

Regional Citizens' Advisory Council / 750 W. 2nd Ave., Suite 100 / Anchorage, Alaska 99501-2168 / (907) 277-7222 / FAX (907) 277-4523 "Citizens promoting environmentally safe operation of the Alyeska terminal and associated tankers."

April 24, 1995

RADM James C. Card Chief, Office of Marine Safety Security and Environmental Protection (G-M), U.S. Coast Guard Headquarters 2100 Second Street SW Washington, DC 20593-0001

Dear Sir:

Please find enclosed the Prince William Sound Regional Citizens' Advisory Council's application for recertification as the alternative voluntary advisory group for Prince William Sound, per Sec. 5002 (o) of the Oil Pollution Act of 1990.

The application consists of the following documents:

- Narrative covering sections (a) through (e) of the guidelines (Attachment: Drill Monitoring Contract Annual Report 1994)
- Addendum on RCAC's efforts to promote partnership with industry and government

(Attachment: Accompanying correspondence)

- Financial & planning information:
  - "Integrated LRP & Budget for 1995" (how budget and plan were developed)
  - Chart of projects for 1995-96
  - 10-year visions
  - "Issue/Project Goals and Targets (includes 1-year, 3-year, 5-year)
  - Final budget 1995-96 (work plans are incorporated into it)
- RCAC's 1994 year in review
- Draft protocol between RCAC and Alyeska Pipeline Service Co. This document has been formally approved by RCAC and we anticipate approval by Alyeska.

#### In addition, enclosed find:

- RCAC Bylaws
- Copy of newspaper ad and press release on availability of application for public review
- Updated list of groups you may wish to contact regarding the application

We are enclosing a current copy of the bylaws because significant changes have been made the past several years. Since April 1994, the bylaws amendments have been amended to: allow appointment of an addition member-at-large on the Executive Committee; establish three members as a quorum for the Executive Committee; and clarify when and how RCAC may purchase goods and services from a business in which a director has a financial interest.

Per your instruction, we are not including copies of our 1990 contract with Alyeska and the addendum to the contract, since you have those from last year and they have not changed. Later this year we will begin working with Alyeska to negotiate our funding level for the three years beginning 1996.

The news release and public notice regarding our recertification application are being distributed to all newspapers in our region and the Anchorage Daily News.

Our financial audit for 1994 is now in progress. A final report will be forwarded to you as soon as it is available, in late May or early June.

If you need any additional information please don't hesitate to call me or Patty Ginsburg in our office.

Sincerely,

CC:

Meg Sudduth, Community Civic Liaison

Alyeska Pipeline Service Co.

#### 1995 Recertification Application

#### (a) Membership Information

#### (1) Selection and appointment process

The membership of the Prince William Sound Regional Citizens' Advisory Council is stipulated in its bylaws. Members consist of communities impacted by the Exxon Valdez oil spill and groups representing specific people or interests with a stake in the region. Member organizations appoint individuals to represent them on the RCAC Board of Directors.

Directors serve at the pleasure of the organization they represent. The bylaws require each representative be a resident of the State of Alaska with the intent of remaining a permanent resident.

Directors serve staggered two-year terms. There is no limit to the number of consecutive terms a director may serve. When a director's term expires, the member organization submits in writing the name of the person it wishes to be seated on the board. Directors are formally seated by a vote of the directors at the annual meeting in March. When a director leaves mid-term, the member organization may appoint a new replacement to fill the unexpired term. The replacement must be formally approved by the Board of Directors.

If a member organization resigns from RCAC (as occurred in 1993 with the resignation of the National Wildlife Federation), applications from other organizations representing the same constituency are solicited through advertisements in all newspapers in the spill impacted region.

#### (2) Board of Directors

Charles Christiansen (Larson Bay), Kodiak Village Mayors Association

Wayne Coleman (Kodiak), Kodiak Island Borough

Tom Copeland (Cordova), Prince William Sound Aquaculture Corp.

Louis "Tex" Edwards (Homer), City of Homer

Larry Evanoff (Chenega), Community of Chenega

Mike Gallagher (Anchorage), City of Valdez

Keith Gordaoff (Anchorage), Chugach Alaska Corp.

Blake Johnson (Nikiski), Kenai Peninsula Borough

Margy Johnson (Cordova), City of Cordova

Gary Kompkoff (Tatitlek), Community of Tatitlek

Dennis Lodge (Seward), City of Seward

Michelle Hahn O'Leary (Cordova), Cordova District Fishermen United

Kristin Stahl-Johnson (Kodiak), City of Kodiak

Stan Stephens (Valdez), Alaska Wilderness Recreation and Tourism Association

Carol Till (Whittier), City of Whittier

Tim Volstad (Seldovia), City of Seldovia

William M. Walker (Anchorage), City of Valdez

Charles K. Weaverling (Cordova), Oil Spill Region Environmental Coalition

George Wuerch (Anchorage), Alaska State Chamber of Commerce

#### (3) Technical committee members and residence

(\* denotes RCAC director) (as of 4/15/95)

Port Operations and Vessel Traffic Systems Committee

Bill Conley (Valdez)

Vince Kelly (Valdez)

Linda Lee (Valdez)

Tom McAlister (Valdez)

Neil Schultz (Cordova)

Tex Edwards\* (Homer)

John Klepper (Valdez)

Dennis Lodge\* (Seward)

Vincent B. Mitchell (Valdez)

Peter Kompkoff (Chenega Bay)

#### Oil Spill Prevention and Response Committee

Wayne Coleman (Kodiak)\* Gail Evanoff (Chenega Bay)
Tom Copeland (Everson, WA)\* Floyd Heimbuch (Anchorage)
Dean Rand (Cordova) Gordon Scott (Girdwood)
Kristin Stahl-Johnson (Kodiak)\* Carol Till (Whittier)\*
Lou Weaver (Valdez)

#### Scientific Advisory Committee

Bill D'Atri (Anchorage)
Ivan Frohne (Wasilla)
Dr. A.J. Paul (Seward)
Gig Currier (Cordova)
David Hite (Anchorage)
Kristin Stahl-Johnson (Kodiak)\*

James Steward (Anchorage) Thea Thomas (Cordova)

Richard Tremaine (Anchorage)

#### Terminal Operations and Environmental Monitoring Committee

Bob Benda (Valdez)

Michael Frank (Anchorage)

Susie Kendrick (Soldotna)

Paul McCullom (Homer)

David Connor (Valdez)

Julie Howe (Eagle River)

E.A. Jim Levine (Anchorage)

George Skladal (Anchorage)

Stan Stephens (Valdez)\*

#### (b) Meetings publicized and accessible to communities

Quarterly board meetings of the RCAC are publicized through press releases and advertisements in local newspapers in the region. All meetings are open to the public, with the exception of executive sessions. Committee meetings and board teleconferences are not usually publicized but they are open to the public. The public is always provided opportunity to comment.

#### (c) Interest groups represented

Commercial fishing interests are represented on the RCAC by Cordova District Fishermen United. Aquaculture interests are represented by the Prince William Sound Aquaculture Corporation.

Alaska Natives are represented by Chugach Alaska Corporation. In addition, the predominantly-Native communities of Chenega Bay and Tatitlek each has a seat on RCAC and six villages on Kodiak Island are represented by the Kodiak Village Mayors' Association. Native environmental interests are also represented through the Chugachmiut Environmental Consortium, one of six environmental groups that make up the Oil Spill Region Environmental Coalition.

Tourism in the region is represented by the Alaska Chamber of Commerce, and recreation interests are represented by Alaska Wilderness Recreation and Tourism Association.

The Oil Spill Region Environmental Coalition represents environmental interests. The coalition consists of the Prince William Sound Conservation Alliance, Alaska Marine Conservation Council, Alaska Center for the Environment, Kodiak Conservation Network, Kodiak Audubon Society and Chugachmiut Environmental Protection Consortium. The latter is a coalition of the villages of Tatitlek, Chenega Bay, Port Graham and Nanwalek.

#### d) Activities

## (1) RCAC has reviewed the operations and maintenance of terminal and tankers through the following activities:

#### Disabled tanker towing study

RCAC spearheaded and co-sponsored a study of disabled tanker towing in Prince William Sound. The study evaluated the capability of existing emergency towing equipment and practices to tow a disabled tanker and examined alternatives that would enhance escort and assist capabilities. The study has been used by industry and regulators to evaluate and improve escort procedures in Prince William Sound. The study was co-sponsored by the Prince William Sound Tanker Association. The U.S. Coast Guard, Alaska Department of Environmental Conservation, and Alyeska Pipeline Service Co. also participated as members of the study group.

#### Federal escort requirements

RCAC reviewed the federal escort requirements for Prince William Sound, and submitted formal written comments at several stages of the rulemaking process. RCAC also consulted with USCG MSO Valdez on its interpretation and application of the new escort rule.

#### Additional tanker escort simulations

In the second quarter of 1995, RCAC conducted additional computer simulations of tanker escort scenarios in Prince William Sound. This work was designed to answer questions raised in the Disabled Tanker Towing Study regarding the effectiveness of different types of escort vessels at assisting disabled tankers under extreme conditions in Valdez Narrows, Valdez Arm and Hinchinbrook Entrance.

#### Prince William Sound Shipping Risk Assessment Project

In March 1995, RCAC began working with major TAPS trade shippers, the U.S. Coast Guard and the Alaska Department of Environmental Conservation on a risk assessment of tankers and tanker escorts. The study is expected to examine the comparative risks of the entire system, including changes in escort procedures made in late 1994. RCAC is a member of the steering committee for this industry-sponsored study. The study is being conducted by Det Norske Veritas Technica.

#### Human factors issues in shipping and spill prevention requirements analysis

This project was a first step toward reducing the incidence of marine accidents in Prince William Sound and Cook Inlet caused by human factors. It resulted in recommendations for further research. The project, a joint effort of the Prince William Sound and Cook Inlet RCACs, was a preliminary analysis and prioritization of human factors issues in shipping and spill prevention in Alaska. The study identified the specific human factors and outlined how further research should be designed. The information was obtained through interviews and focus groups with a broad cross-section of the maritime community, including shipping companies, pilots, working seamen and regulators.

The project was completed in September 1994 and is being used by the State of Alaska Hazardous Substance Spill Technology Review Council to solicit and evaluate research proposals.

#### Vapor controls at terminal

RCAC submitted comments to the U.S. Environmental Protection Agency (EPA) on the proposed federal rule on marine vessel loading vapors. RCAC also monitored progress on Alyeska's plans for installing vapor controls. RCAC concluded that a new "tracer study," to track the path of hydrocarbon vapors released during tanker loading, would not be necessary because of Alyeska's commitment to install vapor controls and the impending federal rule.

RCAC initially recommended that vapor controls be installed at three berths at the Valdez Marine Terminal, to ensure that vapor emissions at the terminal are reduced in compliance with draft EPA standards. After numerous discussions and meetings with Alyeska, RCAC moderated its position and supported subcategorization for Alyeska and installation of vapor controls at two berths, instead of three.

#### Port Valdez Environmental Monitoring

RCAC has been working on several fronts with Alyeska, the Alaska Department of Environmental Conservation and the Environmental Protection Agency regarding programs to detect impact of ballast water effluent on the environment of Port Valdez.

- Ballast Water Treatment Working Group RCAC is in a working group with the Alaska Department of Environmental Conservation, EPA and Alyeska to discuss issues related to Alyeska's ballast water treatment plant (BWTP) at the Valdez Marine Terminal.
- Science Meeting Scientists representing Alyeska, ADEC, EPA and RCAC have met several times to identify points of consensus and formulate recommendations regarding testing and monitoring for environmental impacts from the ballast water treatment plant on marine life in Port Valdez. These meetings may lead to changes in Alyeska's environmental monitoring program. The meetings were initiated by RCAC.
- Federal discharge permit RCAC participated in preliminary discussions with EPA and Alyeska regarding the process for renewal of Alyeska's National Pollution Discharge Elimination System (NPDES) permit. An approved permit is required for the ballast water treatment plant.

#### Ballast water treatment influent monitoring

RCAC and the Alaska Department of Environmental Conservation are sampling and analyzing ballast water off-loaded from tankers calling at the Valdez Marine Terminal. Preliminary samples were taken over the summer and actual monitoring began in October 1994. The program will continue until funds run out, probably in spring or early summer 1995.

The purpose of the program is to detect any incoming materials that might not be treatable by the ballast water treatment plant, materials inappropriate for discharge at the plant, or higher than expected levels of materials approved for discharge. Influent samples are collected without prior notification, usually on a weekly basis, and tested for volatile, semi-volatile and chlorinated organics and metals. The program is funded from moneys remaining from a 1991 legislative appropriation to RCAC. All data collected are forwarded to Alyeska, which usually conducts parallel sampling on behalf of the tanker operators.

#### Corrosion inhibitors

RCAC is monitoring use of a corrosion inhibitor in the Alyeska pipeline. At RCAC's urging, Alyeska agreed to conduct a toxicity testing program to determine whether the highly toxic corrosion inhibitor is impacting marine life in Port Valdez. RCAC, with the assistance of a consulting scientist, is monitoring both the toxicity testing and the continued usage of the corrosion inhibitor.

#### (2) Review of oil spill prevention and response plans

#### State oil spill contingency plans

RCAC reviewed the Prince William Sound Tanker Oil Spill Prevention and Response Plan (the "Core Plan"), 21 individual tanker plans, and Alyeska's Terminal Oil Spill Plan. RCAC's comments were provided to the shippers and Alyeska, as well as the Alaska Department of Environmental Conservation, which is responsible for ensuring that the plans meet state laws and regulations.

#### Federal oil spill contingency plans

Alternative Compliance Plan for the Gulf of Alaska - RCAC reviewed and commented on the TAPS vessel owners and operators OPA 90 Alternative Compliance Plan for the Gulf of Alaska.

#### Prince William Sound Area Plan

RCAC reviewed and commented on the Prince William Sound Area/Regional Coastal Zone Contingency Plan (Volume II). RCAC also participated in work sessions on the plan as an exofficio member of the Prince William Area Committee. RCAC also met with the USCG to discuss its submitted comments in detail. Further discussions resulted in formalization of RCAC involvement in the Incident Command System.

Prince William Sound Tanker Spill Prevention and Response Plan Steering Committee
RCAC continues to participate in the steering committee established by the Alaska
Department of Environmental Conservation (ADEC) to work on modifications to the Prince
William Sound Tanker Spill Prevention and Response Plan. The steering committee includes
industry and regulatory representatives.

The steering committee's work is accomplished primarily through technical working groups. Working group activity in 1994 focused on coastal resources, mechanical training and coordination of the "core" plan with the individual tanker plans prepared by oil shippers. In 1994, the steering committee also began a review of its internal procedures and adopted new terms of reference to help guide the steering committee RCAC was an active participant in the ad hoc work group which revamped these internal procedures.

For the first quarter of 1995, working group activity focused on coastal resources, and the Steering Committee itself put meetings on hold due to the official state review process for the tanker plans.

#### (3) Work done to monitor drills and cleanup of actual discharges

#### **Drill Monitoring**

RCAC retains a long-term contractor in Valdez who works full-time to monitor most of the drills and exercises conducted in Prince William Sound. The drill monitor occasionally monitors drills outside of Prince William Sound in places such as Cook Inlet. (See Drill Monitoring Annual Report attached.)

For major spill drills, RCAC fields a response team, just as it would in an actual spill. Its job is to observe the spill and response efforts, independently verify information disseminated by official sources, inform citizens in the impacted region and advise incident command. RCAC submits written comments, observations and critiques after each drill monitored. At the ARCO Nearshore Drill in September 1994, RCAC fielded a response team and "contributed" personnel to work in a joint information center and on the evaluation team. RCAC representatives also attended a joint SERVS/U.S. Coast Guard drill in Kodiak in April.

#### Spill Monitoring

• Eastern Lion Oil Spill - RCAC monitored all aspects of the Eastern Lion oil spill, May 21, in Port Valdez. An RCAC response team was fielded consistent with RCAC's response plan.

RCAC monitored the spill and spill response, issued situation reports, and monitored disposal of the recovered oil-and-water. After the incident, RCAC worked with industry and regulators on "lessons learned" sessions regarding the causes of the spill and the response to it.

- Sodium hydroxide spill RCAC closely monitored a 7,000 gallon spill of sodium hydroxide, a caustic chemical, at the Valdez Marine Terminal's power house in June. RCAC monitored the environmental impacts of the spill and issued periodic reports to its directors and member entities.
- RCAC also routinely monitored reports of small spills and non-discharge incidents, such as loss of power, port closures such as that due to high wind conditions in November, iceberg damage to the *Overseas Ohio*, and a loading arm failure during loading of the SeaRiver *Long Beach*.
- (4) Review or coordinate scientific studies with recognized expert (see Section (11) for technical and scientific experts used on this projects)

#### Disabled tanker towing study

This study used computer modeling to evaluate the escort and assist capabilities of various escort vessels, procedures and configurations under a variety of scenarios and conditions. Field trials were conducted to test the validity of the computer models. The two-year study was conducted jointly by RCAC, the Prince William Sound Tanker Association, Alyeska Pipeline Service Co., the U.S. Coast Guard and the Alaska Department of Environmental Conservation.

#### Long term environmental monitoring program

This on-going program is establishing baseline data on the presence of hydrocarbons in the water column and sediments. The water-column baseline is established by testing indigenous mussels for poly-aromatic hydrocarbons (PAHs); sediments are tested for PAHs, aliphatic hydrocarbons, total organic carbon and particle grain size. The monitoring program is in its third year.

#### Ballast water treatment influent monitoring

In cooperation with the Alaska Department of Environmental Conservation, RCAC is monitoring tanker ballast effluent before it is discharged into the ballast water treatment facility at the Valdez Marine Terminal. Influent samples are collected without prior notification, usually on a weekly basis, and tested for volatile, semi-volatile and chlorinated organics and metals.. The purpose of the program is to detect any incoming materials that might not be treatable by the ballast water treatment plant, materials inappropriate for discharge at the plant, or higher than expected levels of materials approved for discharge.

#### Alveska studies monitored by RCAC

In consultation with scientific consultants, RCAC reviews studies conducted by Alyeska Pipeline Service Co. These include Alyeska's monitoring of ballast water treatment influent, ballast water effluent and ballast water toxicity. RCAC is also monitoring Alyeska's toxicity testing of a pipeline corrosion inhibitor. RCAC is also working with Alyeska and regulatory agencies on potential enhancements in Alyeska's environmental monitoring program in Port Valdez.

Human factors issues in shipping and spill prevention requirements analysis RCAC, in partnership with Cook Inlet RCAC, conducted preliminary analysis and research to prioritize human factors issues in Prince William Sound and Cook Inlet. The study identified the specific human factors and outlined how further research should be designed. The information was obtained through interviews and focus groups with a broad cross-section of the maritime community, including shipping companies, pilots, working seamen and regulators.

## (5) Activities to review developments in spill prevention and clean-up technology

- Alaska Clean Seas test of in-situ burn RCAC co-sponsored and monitored an experiment in burning emulsified oil. The test burn was conducted Sept. 8-11, 1994, at Prudhoe Bay, by Alaska Clean Seas. The primary goal of the test burn was to develop burning as a response tool for highly weathered and emulsified crude oils.
- At the International Oil Spill Conference (Feb. 27-March 2,95), RCAC representatives reviewed exhibits and attended panels and sessions.
- RCAC's drill monitor evaluated equipment and monitored response strategies. Examples include new nearshore mini-barges, use of fishing vessels in nearshore response, tethering of tugs to outbound tankers and changes to the Graham Rec skimmer to improve performance and achieve regulatory approval. (See Drill Monitoring Contractor Annual Report 1994, attached)
- Nearshore demonstration RCAC monitored the first sea trials of the State of Alaska's Nearshore Gulf of Alaska Demonstration Project, April 14-16, 1994, in Seldovia. The demonstration featured a specially-built recovery barge and four fishing vessels equipped and trained for nearshore response. The fishing vessels performed specific towing, skimming and barge assist functions.
- Marine Spill Response Corporation Research (MSRC) and Development Committee meeting - RCAC representatives traveled to the Washington DC area in August 1994 to participate in the MSRC R&D Committee meeting. Technology reviewed included an oily water separator, chemical treatments, in-situ burning, and remote sensing capabilities. Other participants included MSRC staff, Minerals Management Service staff, and United States Coast Guard staff.
- Oil Spill Technology Committee In October 1994, RCAC began participating in the Joint Pipeline Office Oil Spill New Technology Committee meetings with industry and regulators. The meetings provide a forum to discuss and review new oil spill technology.
- 17th Arctic and Marine Oil Spill Program Technical Seminar In June 1994, an RCAC representative traveled to this seminar in Vancouver, British Columbia. The seminar covered many developments in the oil spill industry.
- Tanker escorts RCAC conducted computer simulations to assess the capabilities of different tug types in assisting disabled tankers. The simulations done in 1995 included testing of the new 7600 HP Towliner stern Z-drive, as well as a 21,000 HP salvage tug and a 7600 HP VSP tractor tug.
- ASTM Tug Escort Task Group RCAC is a member of the American Society for Testing and Materials (ASTM) Tug Escort Task Group, which was organized by the U.S. Coast Guard to develop an ASTM standard for tug selection criteria and the methodology which would be followed to make the tug selection decision. In addition to RCAC, the task group includes representatives of the oil and maritime industries, regulatory agencies and environmental organizations.
- (6) Review of port operations, organizations, safety systems and incidents, and recommendations made to promote safer transportation of oil

#### **Port**

• Several years ago, RCAC began raising awareness of the need for additional weather reporting stations in Prince William Sound to provide more accurate information about wind and sea conditions. RCAC's recommendation – echoed by industry, local regulators and local communities – ultimately resulted in a federal appropriation for the needed equipment.

- RCAC urged cruise ships to voluntarily install the automated dependent surveillance system (ADSS) on their ships operating in Prince William Sound. ADSS on cruise ships would contribute to better management of ship traffic.
- RCAC, through its Valdez office, monitored incidents in the port and at the terminal. Non-discharge incidents included the *Overseas Ohio* iceberg collision, and a series of class 1 structural failures on TAPS trade tankers.
- RCAC monitored and participated in a tabletop fire drill, March 17, 1995, in Valdez. The drill simulated a fire on tanker at berth.

#### Prince William Sound Shipping Risk Assessment Project

In March 1995, RCAC began working with major TAPS trade shippers, the U.S. Coast Guard and the Alaska Department of Environmental Conservation on a risk assessment of tankers and tanker escorts. The study is expected to examine the comparative risks of the entire system, including changes in escort procedures made in late 1994. RCAC is a member of the steering committee for this industry-sponsored study. The study is being conducted by Det Norske Veritas Technica.

#### Tanker escort issues

Based on a thorough review of the Disabled Tanker Towing Study, RCAC made the following recommendations to improve tanker safety:

- \* Adoption of Coast Guard regulation for escort vessels for certain tankers, with the crash stop requirement to be suspended.
- \* Extension of one-way zone in Port Valdez to the 146 35 W meridian to prevent close quarters meeting situations at the northern entrance to the Narrows. (Endorsement of proposal by the Prince William Sound Tanker Association (PWSTA)
- \* All laden tankers leaving the terminal be escorted by a tethered 7600 BHP VSP tractor tug through Valdez Narrows.
- \* Decisions about tanker escorts and speed through the Valdez Narrows take into account potential problems with maneuverability at 5 knots, the need to accelerate in higher wind conditions, and realistic reaction and response times.
- \* A licensed engineer be stationed in the steering flat for the duration of the transit through the Valdez Narrows to take immediate action, if necessary, in the case of a steering failure.
- \* Tanker pilots, tanker masters, and escort masters be briefed on the capabilities of the braking maneuver, a rudder tug, and a European style tether.
- \* Relocate the pilot station in Valdez Arm two miles south of the present location and establish a precautionary zone. (Endorsement of PWSTA proposal)
- \* Maintain continuous escort of tankers through Prince William Sound.
- \* Establish closure conditions of 40 knot winds or 11 foot seas in central Prince William Sound
- \* Remove the dog leg in the traffic lanes east-northeast of Smith Island.
- \* Revise closure conditions for outbound laden tankers at Hinchinbrook Entrance to 40 knots of wind or 11 foot seas.
- \* Escort tugs be able to perform a rescue preventing a grounding in the event of a tanker casualty in Hinchinbrook Entrance and in the proposed 17 mile extended traffic lanes.
- \* Manage vessel traffic so that outbound laden tankers have maximum sea room at Hinchinbrook Entrance.
- \* Have a tug stand by at Cape Hinchinbrook until tankers have proceeded to a position 17 miles past Seal Rocks. (Endorsement of PWSTA proposal).
- \* Extend the Traffic Separation Scheme beyond Hinchinbrook Entrance 17 miles to create an orderly and separated traffic flow. (Endorsement of PWSTA proposal).
- \* Escorts in the approaches to Seal Rocks include a 22,000 hp or larger ocean going salvage tug, because wind speed prediction is uncertain and the DTTS demonstrates that larger salvage tugs can provide a much greater margin of safety.
- \* Two escorts be required for all laden tankers over 5,000 GT, not just single hull tankers.

\* Require that escort plans be approved by the Captain of the Port prior to escort.

\* Performance standard be developed in lieu of the suspended crash stop requirement for tanker escorts in Prince William Sound.

#### Terminal

 RCAC recommended that Alyeska and RCAC jointly conduct environmental investigations, beyond those required by regulation, to answer outstanding questions about effects of effluent from the ballast water treatment facility on the Port Valdez environment.

- RCAC recommended Alyeska conduct toxicity testing to determine the downstream effects of substances used to inhibit pipeline corrosion.
- RCAC initially recommended that vapor controls be installed at three berths at the Valdez Marine Terminal, to ensure that vapor emissions at the terminal are reduced in compliance with draft EPA standards. After numerous discussions and meetings with Alyeska, RCAC moderated its position and supported subcategorization for Alyeska and installation of vapor controls at two berths, instead of three.

#### Oil spill contingency plans

Upon review of oil spill contingency plans, RCAC recommended additional steps to ensure that the Valdez Marine Terminal and the tankers employ the best available technology as required by state law. In addition, RCAC recommended that to address the state's realistic maximum response operating limitations (RMROLs) requirements, the plan holders should identify thresholds for all pertinent environmental conditions and propose implementation of compensating measures. The compensating measures should include outfitting each of the vessels in the escort fleet for particular conditions.

#### Spill drills

The RCAC drill monitor observes and prepares reports on more than 30 exercises per year. Most of these contain comments and recommendations for improvement in the aspects of spill prevention and response addressed in the specific exercise.

#### (7) Implementation of environmental monitoring strategy

RCAC does not have an overall environmental monitoring strategy of its own, because to do so would duplicate Alyeska's environmental monitoring program. However, RCAC reviews and monitors Alyeska's monitoring strategy and periodically recommends enhancements. RCAC does conducts its own environmental monitoring program to establish baseline hydrocarbon levels in the water column and sediments.

#### (8) Environmental projects undertaken

#### Long Term Environmental Monitoring Program

The Long-Term Environmental Monitoring Program (LTEMP) is establishing a baseline of hydrocarbons in the water column and sediments, both deep and shallow. In the event of another catastrophic spill, this historical and spatial record will likely assist in damage assessment. The water column baseline is being established by testing indigenous mussels for poly-aromatic hydrocarbons (PAHs); sediments are being tested for PAHs, aliphatic hydrocarbons (AHCs), total organic carbon and particle grain size. The monitoring program is now in its third year.

#### Ballast Water Treatment Plant Influent Monitoring

In cooperation with the Alaska Department of Environmental Conservation, RCAC is monitoring tanker ballast effluent before it is discharged into the ballast water treatment facility at the Valdez Marine Terminal. Influent samples are collected without prior notification, usually on a weekly basis, and tested for volatile, semi-volatile and chlorinated organics and metals.. The purpose of the program is to detect any incoming materials that might not be treatable by the ballast water treatment plant, materials inappropriate for discharge at the plant, or higher than expected levels of materials approved for discharge.

#### Port Valdez Environmental Monitoring

RCAC has been working on several fronts with Alyeska, the Alaska Department of Environmental Conservation and the Environmental Protection Agency regarding programs to detect impact of ballast water effluent on the environment of Port Valdez. These activities may lead to enhancements to Alyeska's existing environmental programs.

#### Corrosion Inhibitors

RCAC is monitoring use of a corrosion inhibitor in the Alyeska pipeline. At RCAC's urging, Alyeska agreed to conduct a toxicity testing program to determine whether the highly toxic corrosion inhibitor is impacting marine life in Port Valdez. RCAC, with the assistance of a consulting scientist, is monitoring both the toxicity testing and the continued usage of the corrosion inhibitor.

#### (9) Environmental conditions and locations monitored

#### Long Term Environmental Monitoring Program

This program can potentially detect hydrocarbon contamination in the sediment and water column at Alyeska Marine Terminal and the anchorage at Knowles Head. This monitoring program, by establishing a baseline, should also facilitate damage assessment after a future spill. Locations at which hydrocarbons are monitored under LTEMP are Alyeska Marine Terminal, Gold Creek, Sheep Bay, Sleepy Bay, Knowles Head, Disk Island, Aialik Bay, Windy Bay, and Shuyak Harbor.

In addition to the routine monitoring, five days after the May 21 Eastern Lion oil spill, mussels samples were taken at Saw Island, adjacent to the spill site, to measure hydrocarbon levels. It was the first time that data collected under the program were used as a benchmark for comparison after an oil spill.

#### Ballast Water Treatment Plant Influent Monitoring

In cooperation with the Alaska Department of Environmental Conservation, RCAC is monitoring tanker ballast effluent before it is discharged into the ballast water treatment facility at the Valdez Marine Terminal. Influent samples are collected without prior notification, usually on a weekly basis, and tested for volatile, semi-volatile and chlorinated organics and metals.. The purpose of the program is to detect any incoming materials that might not be treatable by the ballast water treatment plant, materials inappropriate for discharge at the plant, or higher than expected levels of materials approved for discharge.

#### (10) Environmental impacts assessed

<u>Eastern Lion</u> - Following the <u>Eastern Lion</u> spill, RCAC took mussel samples at Saw Island, close to where the oil spill occurred. Analyses showed an elevated level of hydrocarbons, as was expected.

<u>Mussels & sediments</u>: The impacts on mussel tissue and sediments from actual oil spills and routine terminal and tanker operations are assessed through the long term environmental monitoring program. The program monitors for the presence of hydrocarbons, and types, if any.

<u>Human impacts</u>: A project begun in early 1995 is identifying the mental health impacts on humans in communities hard hit by a major oil spill. The project is developing measures that communities can use to mitigate those impacts.

<u>Port Valdez marine life</u>: RCAC and Alyeska are engaged in on-going discussions about detection and prevention of environmental impacts of effluent from the ballast water treatment plant on marine life in Port Valdez. It is anticipated that these discussions will lead to enhancements in Alyeska's monitoring programs.

#### (11) Scientific experts, universities and scientific institutions consulted

#### Long Term Environmental Monitoring Program

The monitoring is conducted by Kinnetic Laboratories, Inc. The laboratory work is conducted by Texas A&M's Geochemical and Environmental Research Group (GERG). Scientific reviewers of the LTEMP Annual Report have been Jeffrey Bromaghin, Ph.D. Statistics (Regional Biometrician at Alaska Department of Fish and Game); Stanley Rice, Ph.D. Comparative Physiology (directs habitat investigations and EVOS damage assessment at NOAA's Auke Bay Lab); Ronald Tjeerdema, Ph.D. Pharmacology & Toxicology, Asst. Professor of Toxicology, U.C. Santa Cruz.

In response to review comments from Drs. Rice and Jeff Short at NOAA's Auke Bay lab, LTEMP sampling has been changed. Deep sediment sampling has been cut back to once a year, rather than twice. Shallow sediments are now being sampled; samples will be collected twice a year at six stations. This change in sampling is expected to allow LTEMP to detect more immediate spill effects.

#### Community Impacts Planning - Mental Health

A new project, titled "Community Impacts Planning: Demonstration Project for Mental Health and Coping Strategies (see abstract in Section III for description)," will be conducted by Dr. J. Stephen Picou, Professor and Head of the Sociology and Anthropology Department at the University of South Alabama.

He has assembled a team to review the work and assist with refining it. That team will consist of the following experts:

- Dr. Catalina Mandoki Arata, Asst. Professor, Department of Psychology, University of South Alabama; specialties of women's issues, sexual abuse, adolescent treatment, and community consultation.
- Dr. Larry B. Christensen, Chair, Department of Psychology, University of South Alabama.
- Dr. Maurie J. Cohen, Asst. Professor of Urban and Environmental Planning, School of Public and Environmental Affairs, Indiana University; specialties of economic impacts of technological accidents and catastrophic events.
- Dr. Arthur G. Cosby, Director, Social Science Research Center, Mississippi State University.
- Dr. Stephen R. Couch, Professor, Department of Sociology, Pennsylvania State University; specialties of technological hazards and disasters and of science, technology and society.
- Dr. Duane A. Gill, Assoc. Professor, Department of Sociology, Anthropology, and Social Work, Mississippi State University; specialties of environmental sociology, community, social impact assessment, human ecology and social change, sociology of disasters.
- Dr. G. David Johnson, Assoc. Professor, Department of Sociology & Anthropology, University of South Alabama.
- Dr. Dean G. Kilpatrick, Professor, Department of Psychiatry and Behavioral Sciences, Medical University of South Carolina; specialties of traumatic stress, victimization, and rape.
- Dr. J. Stephen Kroll-Smith, Professor, Department of Sociology, University of New Orleans; specialty of social and cultural effects of technological hazards and disasters.
- Dr. Arvind K. Shah, Professor of Statistics, Department of Mathematics and Statistics, University of South Alabama, specialty of statistical analysis of data.

#### Hydrocarbon emissions at the Valdez Marine Terminal

- Yoram Cohen, Ph.D., Multimedia Envirosoft, Los Angeles, CA, and Assoc Prof., UCLA
- Arthur M. Winer, Ph.D., Horizon Research, Riverside, CA;
- Gary Pascoe, Ph.D., Environmental Toxicology International Inc., Seattle WA;
- Charles E. Schmidt, Ph.D., Environmental Consultant, Red Bluff, CA;
- Lyle R. Chinkin, Sonoma Technology Incorporated, Santa Rosa, CA;
- Gerald E. Anderson, Systems Applications International, San Rafael, CA.

#### Disabled tanker towing study

The study was conducted by The Glosten Associates. RCAC retained William I. Milwee, Jr., B.S. in Marine Engineering, M.S. in Naval Architecture; and George Randall, B.S. in Naval Architecture, M. Sc. in Ocean Engineering to assist in reviewing elements of the study.

<u>Human factors issues in shipping and spill prevention requirements analysis</u>
This research project was conducted by Battelle Human Affairs Research Center, with Dr. Martha Grabowski and Capt. Mitchell Stoller.

Dr. Grabowski has a B.Sc. in Nautical Science, Marine Transportation, from the U. S. Merchant Marine Academy, Kings Point, NY, and a Ph.D. in Management Information Systems/Expert Systems, Renssalaer Polytechnic Institute, Troy, NY. She has done extensive research in human and organizational error in large scale systems, real time knowledge-based control systems, development methods for advanced technology systems, and the organizational impacts of information technology.

Capt. Stoller is President and founder of Marex, a marine consultant to the oil shipping industry. He holds a B.Sc. Nautical Science from the California Maritime Academy and is a member of the Navigation Safety Advisory Council, which advises Congress on matters relating to navigational safety and the International and Inland Rules of the Road.

#### Prince William Sound Shipping Risk Assessment Project

RCAC is a member of the steering committee for this industry-sponsored study. RCAC has retained Dr. Martha Grabowski (see above) as a consultant to assist on this project. The study itself is being conducted by Det Norske Veritas Technica.

#### EPA rule-making process for vessel loading emissions

- Jeff Adkins, J.D. and B.S. Chemical Engineering Senior Professional, Sierra Research
- S. Kingsley Macomber, Senior Partner and General Counsel, Sierra Research. .

#### Environmental monitoring in Port Valdez

- Peter M. Chapman, Ph.D. Benthic Ecology. Marine biologist, environmental toxicologist, specialist in marine sediments, widely published. Senior Partner of EVS Environment Consultants.
- Wayne G. Landis, Ph.D. Zoology. Director and Professor, Institute of Environmental Toxicology and Chemistry, Huxley College of Environmental Studies, Western Washington University, Bellingham, Washington.
- Robin A. Matthews, Ph.D. Botany-Aquatic Ecology. Associate Professor, Huxley College of Environmental Studies, Western Washington University, Bellingham, Washington.
- Mary H. Murdoch, M.Sc. Environmental Scientist, EVS Environment Consultants.
- Janice Wiegers, Ph.D. Huxley College of Environmental Studies, Western Washington University, Bellingham, Washington.
- Kim Magruder, Environmental Scientist, EVS Environment Consultants. (Also consults on review of tanker ballast influent monitoring data).

#### Water quality issues

- Daryl Hockley, M.S. Engineering. Senior Engineer, Steffen Robertson and Kirsten, Inc.
- Ihor Lysyi, M.Sc. Chemistry, Consulting Environmental Scientist.

#### Technical Advisory Group (TAG):

This group is appointed by the Alaska Department of Environmental Conservation in consultation with the U.S. Environmental Protection Agency to provide technical advice to the agencies regarding the operations of the Alyeska Ballast Water Treatment Facility and environmental monitoring requirements of the Alyeska Pipeline Service Company NPDES permit. The RCAC's Terminal Operations and Environmental Monitoring (TOEM) Committee consulted frequently with the TAG on water quality issues. Members of the TAG in 1994-95:

- Riki Ott, M.Sc. Oil Pollution, Ph.D. Sediment Pollution
- Don Weston, University of California, Berkeley, Environmental Engineering and Health Sciences Laboratory
- John Karinen, National Oceanic and Atmospheric Administration, National Marine Fisheries Service Auke Bay Laboratory

#### Ballast Water Treatment Facility Working Group

RCAC's Terminal Operations and Environmental Monitoring (TOEM) Committee participates in the BWTF Working Group. This group, chaired by the ADEC, provides a forum to present and discuss information on new and re-occurring issues, to develop a balanced information base on a particular issue related to monitoring activities at the Alyeska BWTF. The group works to build an understanding of issues and to arrive at recommendations for the US EPA and the ADEC. In addition to RCAC and ADEC, the working group includes representatives of EPA, Alyeska Pipeline, the Technical Advisory Group and the Prince William Sound Tanker Association.

#### Effects of ballast water effluent

In its work on the effects of ballast water treatment effluent, RCAC and its consultants also consulted with scientists representing Alyeska, the National Marine Fisheries Service and the National Ocean Atmosphere Administration. This group includes, for Alyeska: Jack Anderson, Columbia Analytical; Howard Feder, University of Alaska, Fairbanks; David Shaw, University of Alaska; Gene Dickason and Carl Rutz. Also consulted were Tracy Collier, NMFS/NOAA, and Michael Salazar, NOAA.

# (e) Abstracts of ongoing reports and studies related to minimizing impacts of operations of terminal facilities and crude oil tankers.

#### Ballast water treatment influent monitoring

RCAC and the Alaska Department of Environmental Conservation are sampling and analyzing ballast water off-loaded from tankers calling at the Valdez Marine Terminal. Preliminary samples were taken over the summer and actual monitoring began in October 1994. The program will continue until funds run out, probably in spring or early summer 1995.

The purpose of the program is to detect any incoming materials that might not be treatable by the ballast water treatment plant, materials inappropriate for discharge at the plant, or higher than expected levels of materials approved for discharge. It tests for volatile, semi-volatile and chlorinated organics and metals in the ballast water influent. The program is funded from money remaining from a 1991 legislative appropriation to RCAC. All data collected are forwarded to Alyeska, which usually conducts parallel sampling on behalf of the tanker operators.

#### Port Valdez Environmental Monitoring

RCAC has been working on several fronts with Alyeska, the Alaska Department of Environmental Conservation and the Environmental Protection Agency regarding programs to detect impact of ballast water effluent on the environment of Port Valdez. It includes review and comment on Alyeska's application for renewal of its National Pollution Discharge Elimination System (NPDES) permit, RCAC participation in a state-sponsored working group on ballast water treatment issues, and meetings initiated by RCAC that bring together scientists representing industry, regulatory agencies and RCAC.

#### Corrosion inhibitors

RCAC is monitoring use of a corrosion inhibitor in the Alyeska pipeline. With the assistance of a consultant, RCAC continues to work with Alyeska on a toxicity testing program to measure any impacts on marine life. This project is intended to mitigate the environmental impacts of terminal operations by determining whether a new process will be harmful to marine life.

#### Long term environmental monitoring program

This is an ongoing program designed to provide baseline data on hydrocarbon concentrations at specific sites in Prince William Sound and the Gulf of Alaska. The study provides baseline measurements of polyaromatic hydrocarbons and aliphatic hydrocarbons present in shallow and deep sub-tidal sediments and intertidal mussels. Field surveys were conducted twice a year in 1994. In 1995, the program was modified slightly. Monitoring for aliphatic hydrocarbons in mussels was dropped, and deep sediments are now sampled only once a year instead of twice a year. The monitoring program also identifies the source of any hydrocarbons found in the samples.

Community Impacts Planning - Demonstration Project for mental health and coping strategies This project is developing strategies for reducing the mental health impacts of technological disasters such as the *Exxon Valdez* oil spill . The two-year program will build on research conducted since the 1989 oil spill to develop tools usable in communities hit by an oil spill or other technological disaster. Major elements of the project include: identifying mental health problems associated with the 1989 oil spill; identifying and developing effective strategies for dealing with those problems; a demonstration project in Cordova; and publication of a guidebook to enable other communities to apply the strategies.

The project is designed to address problems that arose after the 1989 spill, such as social disruption, social dislocation, work disruption, psychological stress, family disruption, subsistence disruption, economic loss, depression and psychological impairment. This project continues work begun under the earlier Socioeconomic Project.

#### Community impacts planning - technical

This project will provide tools to help communities respond to an oil spill, with emphasis on community response planning and communications during an oil spill. This project continues work begun under the earlier Socioeconomic Project. The objective – to lessen the impacts of oil spills on humans and their communities – remains the same, but the technical impacts are being addressed under a separate project.

#### Tanker integrity

RCAC will compile and maintain information on all vessels in the TAPS trade, including casualty data from the past 10 to 15 years. Information sources will include Arthur McKenzie's "Guide for the Selection of Tankers," the U.S. Coast Guard's Port Information Exchange System (PSIX), and Lloyd's Register. The purpose of the project is to develop and maintain a central source of information and to identify trends that could lead to casualty prevention measures.

#### Fire fighting capability

This project will promote adequate regulatory requirements for fire response plans; ensure contingency plans contain adequate fire fighting capability; and examine, research and promote best available technology fire fighting capabilities on escort vessels and at the terminal.

#### Human factors

RCAC hopes to participate on a regulator basis in the National Research Council Human Factors Forum scheduled for 1995-96. RCAC will closely monitor research and development projects conducted by the State of Alaska and the U.S. Coast Guard. In consultation with industry and regulators, RCAC may also develop a Request for Proposals into further research and development in human factors.

#### Escort vessels

RCAC is working with industry, the U.S. Coast Guard, ADEC and Alyeska to look at various requirements necessary on escort vessels to ensure the best available protection for the environment. Specific areas of attention include ice scouting technology, fire suppression equipment, and the structural integrity and assist capabilities of various classes of escort vessels.

#### Prince William Sound Shipping Risk Assessment Project

In March 1995, RCAC began working with major TAPS trade shippers, the U.S. Coast Guard and the Alaska Department of Environmental Conservation on a risk assessment of tankers and tanker escorts. The study is expected to examine the comparative risks of the entire system, including changes in escort procedures made in late 1994. RCAC is a member of the steering committee for this industry-sponsored study. The study is being conducted by Det Norske Veritas Technica.

#### **Depots and Corps Manual**

This project is to develop a manual to assist communities in acquiring and setting up their own nearshore response depots. The manual would be a joint effort of the Prince William Sound and Cook Inlet RCACs. A potential contractor has been identified. The project is on hold pending completion of the state's public hearings on tanker oil spill plans.

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## Drill Monitoring Contractor Annual Report 1994

Prepared for the

Prince William Sound
Regional Citizens' Advisory Council

Oil Spill Prevention and Response Committee

Contractor: Tim Jones Contract No. 2060 221

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## DRILL REPORTS INDEX AND REVIEW

The drill monitoring program produced reports on 31 exercises during 1994 plus several other reports on equipment, training and the Eastern Lion Oil Spill in May. Of the 31 drill reports, 28 involved the Ship Escort Response Vessel System. One of the three non-SERVS reports covered emulsion burn tests, partially funded by RCAC, and conducted by Alaska Clean Seas at Prudhoe Bay. The second reported on a drill sponsored by Tesoro at CISPRI headquarters in Kenai. RCAC participated at the invitation of Tesoro and since Tesoro also is a plan holder in Prince William Sound the observation proved valuable to the PWS RCAC effort. Drill monitor also observed the state's Nearshore Demonstration Project deployment of the 650-barrel collection barge at Seldovia.

In 1994 OSPRC staff, drill monitor and SERVS team leader Jim McHale worked out a system in which Mr. McHale could view the monitor reports before they were sent to the committee. This was offered to allow SERVS input to the reports and to correct any inaccuracies that might have been in them. Disagreements were to be resolved by putting both versions of items in dispute into the reports. Of comments received on 22 of the reports SERVS marked 16 of them as "reviewed and noted." Six reports received comments or clarifications and these differences were resolved through teleconference or minor changes in the reports. At times this process slowed the distribution of reports to the committee and other interested parties, however, it did serve to make the reports accurate and offer industry the opportunity to comment at the time of the distribution.

Drills over the year could be placed into four major categories in response to pending issues or those that arose during the year. In the first part of the year, SERVS tested equipment in response to the Anvil Study scenarios. In particular these involved the Valdez Star skimmer and the barge Allison Creek. The second category was raised by the Eastern Lion spill in May that generated a number of "lessons-learned" issues and stimulated several exercises to test various response strategies. The third category is the year long build up of near shore equipment and subsequent training, particularly with fishing vessels. This also involved preparation for the major Arco drill in September which involved near shore response. The fourth came as a result of new escort rules issued in the fall. With the requirement for tethering tugs to outbound tankers came a series of exercises not only to train captains but to match tugs with ships.

The total number of drill reports was exactly the same as 1993, the first full year of the RCAC drill monitoring project. What follows is a listing of drill reports. These are available through the Anchorage OSPRC office along with any videotapes made.

1994 DRILL REPORTS INDEX

Index number corresponds to the last two digits in the number on the individual reports

DATE SERVS	ľ	NUMBER TYPE		
			COMMENT	OSPRC
1/19/94	01	Surprise drill fishing vessel debriefing		Yes
2/2/94	02	Jan. 19 Surprise Drill followup	5/31	7/6
2/4/94	03	NOFI Boom Deployment	5/31	Yes
3/1/94	04	Graham-rec meeting	5/31	7/6
3/24/94	05	Valdez Star/Allison Creek exercise	6/21	7/6
4/12/94	06	Transrec task force demonstration	Yes	Yes
4/14/94	07	Nearshore demonstration project	NA	Yes
4/23/94	08	Barge 460 Transrec exercise	5/31	Yes
4/30/94	09	Heritage Service Sea Skimmer deployme	nt 5/31	Yes
5/3,4/94	10	Whittier FV Training	5/31	Yes
5/9/94	11	Valdez Star/ Allison Creek 2		Yes
5/20/94	12	Freedom Service Sea Skimmer exercise	6/9	Yes
6/11/94	13	450-8 Transrec Exercise	6/13	7/8
6/22/94	14	Mini Barge Training	Yes	7/21
6/23/94	15	Shoreline Cleanup Exercise	8/4	8/12
7/11/94	16	Dr Jack Spill Spray exercise	7/18	7/21
7/14,16/94	17	Mini barge Training	7/19	7/27
7/19-22/84	18	SCAT Training	8/5	8/10
7/29/94	19	Nearshore Training	8/2	8/10
7/31/94	20	Berth 4 Transrec Exercise	8/2	8/10
8/14/94	21	Sea Skimmer Exercise	8/18	8/25
8/18-19	22	Shoreline Protection Training	8/24	8/31
8/25-27	23	Shoreline Protection Training	9/6	9/16
8/2529-9/1	24	SupSalv/SERVS Nearshore	10/31	1/7/95
9/8-11	25	ACS Emulsion Burn	10/25	9/16
9/19-21	26	ARCO Nearshore Drill		10/5
10/6/94	27	Berth 3 Transrec	10/25	11/4
10/19/94	28	Tesoro ICS	NA	1/7/95
10-25-29/94	29	Cordova Fishing vessel training	1/26/95	1/31/95
11/6/94	30	Tanker Tethering Exercise	11/8	12/20
11/8/94	31	Tanker Tethering and control Exercise	1/26/95	1/31/95

DRILL MONITOR	ANNUAL REPORT	PAGE 5
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	OTHER REPORTS:	
5/21/94	Eastern Lion spill	5/31
6/21/94	Terminal booming/skimming meeting	7/11
7/18/94	Barge Responder report	7/21
11/7/94	TAPS II Audit meeting and followup	11/8
12/13/94	Near Shore Action Items Undate	

# A SYNOPSIS OF 1994 DRILL ACTIVITIES AND REPORTS

The 1994 drill year began with an attempt to resolve a couple of issues. One was an Anvil Study scenario that had the dynamic skimmer Valdez Star skimming while towing the 12,000 barrel barge Allison Creek on the hip to give it more storage. The Star has a relatively high volume skimming rate, however its storage is limited and it can fill in as little as 45 minutes. With turn arounds taking as much as four hours for it to unload, this limited the use of the Star. By attaching it to the Allison Creek the skimming time was extended to almost ten hours if the Star were to skim continuously for that long. Early in the year two exercises demonstrated this could be done but took the aid of a small line tug.

The second issue was the viability of the Graham Rec skimmer. Tests in late 1993 had produced less than desirable results and in early 1994 a project was undertaken to improve the skimmer. This took the rest of the year and a new version with decidedly improved floating characteristics and weir positioning was demonstrated in January 1995.

SERVS equipment changes also addressed storage. The 77,000 barrel UT-10 was released and the 135,000-barrel 450-3 and 128,000-barrel Tidemar 460 were added to the fleet. Lightering equipment was moved to the JI 344 which has a capacity of 73,800 barrels. This gave a total capacity to the Transrec barges of 508,700 barrels and capacity in the larger barges within the SERVS system of 727,500 barrels.

The most significant change in response capabilities for the year came in the area of near shore operations. At mid year, SERVS took delivery of a 145,000-barrel barge called the Responder. This is the main near shore operations and storage barge. Along with boom and skimmers for near shore work, the barge was to carry as many as 24 of the new mini barges that also were delivered in 1994. The 249-barrel barges were to be used for collection work in near shore strike teams and for transporting recovered liquids back to the Responder. SERVS received 48 of the barges before the end of the year. Much of the summer was taken up with exercises and training of fishing vessel operators in the use of the mini barges, near shore skimmers which also are operated from a fishing vessel, and shoreline protection and cleaning exercises.

Just prior to the receipt of the near shore equipment, the spill of an industry-estimated 200 barrels of crude from the tanker Eastern Lion created a real time exercise for SERVS management, operators and equipment. RCAC submitted an extensive list of comments after the spill and response and these were included in a list of action items that generated more exercises and work during the last half of the year. Of particular concern expressed was slow reaction to protect the Valdez Duck Flats and the Solomon Gulch Hatchery. In response to the action items SERVS examined the plans and equipment for

the two areas and instituted several new items. Among these were permanent shoreside attachment points for boom and pullout areas for equipment at the hatchery and stationing equipment at the Valdez Container Terminal for duck flats protection. SERVS also purchased two shallow-water boats for inshore protection work and two four wheelers for intertidal operations. While this buildup was under way, ARCO held a major drill in September and though protection of the two areas had been an action item, deployment of protection equipment took longer than it did during the Eastern Lion spill. SERVS planned exercises to test the new equipment and strategies in January 1995

One of the principal action items suggested by RCAC and included in the Alyeska list, concerned management of a spill. RCAC had raised the issue of management taking a proactive rather than reactive approach to spill response. Over the first 10 hours of the spill, industry underestimated the size of the spill and placed equipment only where oil was immediately spreading. As a result, oil did get into the net pens at the Solomon Gulch Hatchery and the duck flats. RCAC's suggestion was that industry get ahead of a spill rather than react to what already had occurred. This was an item addressed by Bill Newbold, terminal business unit manager, who outlined a series of alert levels and management responses. While others among the action items can be evaluated through observation of equipment buildups and training exercises, this one will only be demonstrated in a real spill.

ARCO sponsored a major response drill in September. The scenario was to begin on the third day of a spill after transition from the initial responder and focused on near shore collection and protection equipment and strategies. Again, the drill raised a management issue when ARCO attempted to use a structure that proved for the most part incompatible with the Incident Command System. Some parts of the ARCO system worked well, particularly having a mini IC on the water at the operations level and including agencies in some sections of the command structure. However tasks did not always coincide between the two systems and created a confusion in the command at the field level. RCAC suggested ARCO either give up its system or makes its transition under ICS and than gradually change to its own Command, Communications, Control operation.

Later in the fall, the Coast Guard published new escort guidelines. These included lowering the wind limits at Hinchinbrook Entrance and Valdez Narrows. A new requirement for tethering tugs to ships led to a series of exercises at the end of the year. Under the guidelines, an escort tug was to be tethered to the stern of a ship before it entered Valdez Narrows and remain tethered as far as Buoy 9 toward the south end of Valdez Arm. Exercises began with tugs pulling to the stern to see how they matched up with various classes of ships. Then they began making the attachments and in the process observed

some difficulties that led to equipment and procedure changes. When actual tethered escorts began in mid December tugs had been matched with ships and schedules were arranged to place the proper tug with the outgoing ship.

In addition to the highlighted subjects, SERVS continued fishing vessel training and continued exercising personnel and equipment in standard procedures. Among continuing training were Sea Skimmer 50 drills on the ERVs and Transrec task force drills.

### FOR THE UPCOMING YEAR

In 1995, new contingency plans are expected to be implemented, both the core Prince William Sound plan and individual tanker plans. Early indications are these most likely will call for some new techniques and strategies, all of which will require training and exercise. The drill monitoring program should follow these changes and confirm their implementation.

The new plans include lists of equipment that needs to be identified, located and compared with planning standards. Any new equipment and strategy exercises will be identified and monitored.

Action items remain from the Eastern Lion list. Monitoring program will keep track of these and report on them. The first of these planned are exercises scheduled January 20-24 testing equipment and techniques designed to improve protection of Solomon Gulch Hatchery and the Valdez Duck Flats.

The project called the Mayor's handbook has been held up waiting illustrative pictures. These are in hand for the most part and a completed draft will be available by the spring annual meeting.

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#### 1994 DRILL MONITOR BUDGET

MONTH	PROFESSIONAL SERV	VICES EXPENSES
JANUARY	\$3,446.66	\$34.11
FEBRUARY	\$3,446.66	\$24.72
MARCH	\$3,446.66	\$233.93
APRIL	\$3,446.66	\$368.70
MAY	\$3,446.66	\$324.65
JUNE	\$3,446.66	\$31.88
JULY	\$3,446.66	\$74.75
AUGUST	\$3,446.66	\$27.78
SEPTEMBER	\$3,446.66	\$2,798.93
OCTOBER	\$3,446.66	\$613.23
NOVEMBER	\$3,446.66	\$245.91
DECEMBER	<u>\$3,466.74</u>	<u>\$308.53</u>
TOTA	ALS \$41,380.00	\$5,087.12
REMAIN	DER 0	\$2,712.88*

## **EQUIPMENT ADDITIONS**

To improve drill monitoring efforts, the following pieces of equipment were added to the project during 1994:

Global Flow Meter: This is used to test flow rates in streams and since boom towing speeds are crucial to a response effort, the flow meter was used to give an accurate measure of towing speeds.

Dual play VCR and TV monitor: The VCR plays 8mm and VHS to aid in editing drill monitoring tapes and prevent undue wear and tear on the monitoring video camera. It also will be transprorted to RCAC headquarters in the event of a major spill to use for briefings when tape becomes available.

<sup>\*</sup> The remainder amount was unusually large. This was because there was no major drill scheduled for the spring of 1994. The Eastern Lion spill occurred in Port Valdez, greatly reducing the cost of monitoring.

# Addendum to RCAC Recertification Application RCAC's efforts to promote partnerships with industry and government

## • RCAC has built and maintained open communications, and conducts frequent formal and informal discussions with industry and government

#### **RCAC-Alyeska Protocol**

In 1992 and again in 1993, the relationship between Alyeska and RCAC reached all-time lows over the two groups' inability to agree on communications protocols. Alyeska, understandably, wanted the opportunity to resolve conflicts and disagreements away from the glare of press attention. RCAC sympathized and agreed in concept but would not and could not conduct closed meetings. In January 1994, Alyeska and RCAC began a new series of discussions with the goal of developing a protocol that would meet the needs of both. It appears that the goal has been attained. RCAC has approved the protocol and since March 1995, has been operating according to its provisions. Alyeska has yet to formally ratify the protocol, but Alyeska representatives are confident it will be and urged RCAC to operate under that assumption.

Consensus on this protocol represents a tremendous leap forward in the relationship between Alyeska and RCAC.

#### Vapor Controls

An issue that has been contentious in the past has evolved into one in which RCAC and Alyeska are working together in a positive and productive manner. In the spring of 1994, Alyeska and RCAC respectfully disagreed about some aspects of vapor controls, which are expected to be required under final federal regulations due this summer. RCAC modified its earlier position after a series of talks between RCAC, Alyeska, the U.S. Environmental Protection Agency and the Alaska Department of Environmental Conservation (ADEC).

These talks have led to consensus among all four entities about the time frame for installing vapor controls and the number of berths to be covered. RCAC and Alyeska have maintained close communication throughout these developments and Alyeska has kept RCAC apprised of progress on the design phases of the vapor control program.

#### Port Valdez marine environment

RCAC and Alyeska have altered their approach on issues related to the effects of ballast water effluent on the Port Valdez marine environment. This change has resulted in a much more cooperative and productive working relationship with Alyeska. RCAC is working with Alyeska – our scientists with their scientists – to resolve outstanding questions and develop possible enhancements to Alyeska's monitoring programs. The U.S. Environmental Protection Agency and the Alaska Department of Environmental Conservation are also involved in these discussions.

#### Relations with shippers

Over the past year, RCAC has aggressively promoted partnerships with the major shippers of North Slope crude. Shipping representatives were invited to meet with RCAC executives Oct. 17, 1994. Roger Gale of BP Shipping, Jerry Aspland of ARCO Marine, and Paul Revere of Sea River Maritime attended the meeting and there was a frank exchange of views and a commitment to meet on a regular basis. Additional contacts were made with shippers by phone and in early February, RCAC Executive Director Stan Stanley met with Roger Gale and his staff at BP in Cleveland.

Shippers' representatives receive their own advance copies of RCAC meeting notebooks and are invited to sit at the table during RCAC board meetings. RCAC routinely solicits comments, opinions and perspectives of shippers' representatives.

In March 1995, major shippers invited RCAC, as well as the U.S. Coast Guard and ADEC, to participate in a risk assessment of tankers and tanker escorts. RCAC noted its concern that the study would delay anticipated enhancements in escort systems, but is strongly supporting the concept and plans to be an active participant. The study is expected to examine the comparative risks of the entire system, including changes in escort procedures made in late 1994.

Community Impacts Planning (technical) - An RCAC subgroup is working with Alyeska to define how industry can assist with community oil spill response. Draft of the Community Information Plan has been developed and is under review. RCAC will host an event to encourage pooling efforts with ARCO and BP, which have initiated their own efforts in local contingency planning.

#### Consultation and notification

RCAC now routinely consults with industry and agency representatives before releasing documents to ensure accuracy and fairness. For example, RCAC's drill monitor now provides his draft reports to the team leader of SERVS (Alyeska's escort and response arm) before distributing them to RCAC's Oil Spill Prevention and Response Committee. This system allows Alyeska to present its understanding or perspective early in the process, resulting in fewer misunderstandings.

In the same way, articles for the RCAC newsletter "The Observer," are discussed with and copied to appropriate industry and agency personnel to ensure accuracy and fairness. All of their suggestions are considered.

RCAC continued to provide draft official documents to government and Industry representatives for review and comment before finalization and general distribution. Agendas for the committee meetings are widely distributed to, among others, numerous government and industry representatives. Government and industry representatives are encouraged to participate in the committee meetings. Open discussions occur with government and Industry in informal settings as well such as telephone conversations.

In its review of oil spill contingency plans, RCAC also strove to provide all draft comments to industry prior to their approval and offered the opportunity for input during committee discussions. This gave industry the opportunity to review them and offer their comments in advance of general distribution.

#### Assistance Provided

RCAC staff assisted Kate Wedermeyer, a biologist on loan from the U.S. Biological Survey to a new federal program entitled Ecosystem Management Initiative, with her efforts to compile a bibliographical database. RCAC supplied copies of a bibliography of bibliographies pertaining to hydrocarbon interactions and/or pollution relative to environmental monitoring in high latitude, cold climate conditions; and a current research profile on projects underway in the region affected by the Exxon Valdez oil spill.

#### Scientific Coordination & Cooperation

Following the Eastern Lion oil spill, RCAC staff coordinated with British Petroleum representatives on analyzing a sample of the oil spilled, called the reference oil. After splitting the sample, half was analyzed by RCAC's lab, Texas A&M's Geochemical and Environmental Research Group (GERG), and the other half was analyzed by BP's lab, Battelle. When the lab results were completed, RCAC and BP exchanged them. GERG analyzes samples collected under the Long-Term Environmental Monitoring Program (LTEMP).

At the suggestion of GERG, which conducts sampling for the National Oceanic and Atmospheric Administration's National Status & Trends (NS&T) program, and with agreement from NOAA and RCAC, samples for the NS&T program were collected concurrently with LTEMP samples during the 1995 winter sampling survey. Of nine LTEMP stations, NOAA

selected six to be sampled under NS&T testing in Alaska--Sheep Bay, Knowles Head, Disk Island, Aialik Bay, Windy Bay, and Shuyak Harbor.

#### Team building

RCAC is a regular participant in the SERVS Breakthrough Program which brings together representatives of industry, regulators and RCAC to promote a better understanding within the oil spill prevention and response community.

#### ASTM Tug Escort Task Group

RCAC is a member of the American Society for Testing and Materials (ASTM) Tug Escort Task Group, which was organized by the U.S. Coast Guard to develop an ASTM standard for tug selection criteria and the methodology which would be followed to make the tug selection decision. In addition to RCAC, the task group includes representatives of the oil and maritime industries, regulatory agencies and environmental organizations.

• RCAC is working toward developing and fostering a relationship with the Area Committee through consultation and recommendations.

RCAC continues to be an active non-voting member of the Prince William Sound Area Committee. Throughout 1994, RCAC worked closely with other Area Committee members to review and comment on the Prince William Sound Area Sub-Area/Regional Plan. RCAC also met separately with the USCG to go over the RCAC comments in detail. From these discussions, it is anticipated that RCAC involvement in the Incident Command System will be formalized. In addition, RCAC participated in meetings of the Prince William Sound Area Committee Sensitive Areas Working Group which is identifying and prioritizing sensitive resources. RCAC gathered local input and priorities from knowledgeable local experts and brought this information to the work group process.

• RCAC is working to build cooperation rather than confrontation with industry and government by working with them to develop contingency plans and coordinate projects and recommendations, and keeping them informed.

RCAC reviewed and submitted extensive comments on the Valdez Marine Terminal Plan, the Prince William Sound Tanker Oil Spill Prevention and Response Plan, and 21 individual tanker plans. In addition to reviewing the plans, RCAC participated in numerous discussions and work sessions, as detailed below.

#### Valdez Marine Terminal Plan

RCAC participated in a working group with industry and ADEC to review comments submitted by RCAC on the Valdez Marine Terminal Plan. Through this working group, the participants were able to resolve many issues in a face to face manner. This process helps to diminish misunderstandings and misconceptions since the participants are able to meet face to face and bring concerns to the table. RCAC's draft comments on the plan were provided to industry prior to RCAC approval.

Prince William Sound Tanker Oil Spill Prevention and Response Plan (the "Core Plan") and 21 individual tanker plans

RCAC participated in the Steering Committee which helped to develop these plans (see below). Just as with the Valdez Marine Terminal Plan comments, all draft comments on the Core Plan and the tanker plans were provided to industry prior to approval. Industry representatives were welcomed and considered at all times. RCAC was most concerned about a particular tanker plan and invited the owner company to review it with RCAC in detail, in person. The owner company agreed and the meeting was very productive in addressing many of RCAC's concerns.

RCAC also participated in meetings organized by ADEC to discuss the plans and the process.

#### Prince William Sound Area Plan

RCAC participated in Area Committee meetings with government and industry to help develop this plan. RCAC also met with the USCG to discuss RCAC comments in detail.

#### Drill monitoring material shared

Materials prepared by the RCAC drill monitor are readily available to interested parties. In particular, SERVS receives videotapes of most observed exercises. Informational spreadsheets generated by the drill monitor have been put to use in the SERVS operation.

#### Information sharing & Coordination

As indicated throughout this recertification application, RCAC routinely keeps industry and government agencies informed of its work and plans. RCAC now reviews its legislative agenda with Alyeska and shippers before the legislative session begins. Draft work plans and budgets are provided.

As indicated in the main body of this application ("Activities" section (d)), RCAC is working closely with industry and government on several important projects, including a ship escort risk assessment. This study should provide valuable new information about the comparative risks of various escort procedures and equipment, but it also means a delay in obtaining enhanced tug escorts for Prince William Sound. RCAC quietly registered its concerns to the shippers about the delay in enhanced tugs. RCAC plans to be active and positive contributor as a participant in this project.

Attachment: Log of sample documents reflecting RCAC's efforts to promote partnerships with industry and government

## Documentation of promoting partnership

Document	Date	Significance
Letter from Stan Stephens to Jerry Aspland, ARCO Marine	8/16/94	Reflects RCAC's efforts to improve communications with shippers.
Letter from RCAC to Maurice Croce, Prince William Sound Tanker Association	9/2/94	Invite shippers to Oct. 17 meeting to establish better communications.
Letter from Scott Loll, ARCO, to RCAC staff	9/29/94	Reflects success of working together on ARCO drill
Memo from Stan Stanley to Board of Directors and staff regarding RCAC's role in spills and drills	10/9/94	Signals change in direction for RCAC, to more actively contribute toward successful response.
RCAC letters to shippers representatives	10/20/94	Reflects RCAC interest in shippers' perspectives and participation.
Letter to Alyeska on review of NPDES renewal application	10/21/94	Example of keeping Alyeska informed and cooperative spirit toward review process.
Letter from RCAC staff to ARCO staff	10/31/94	Reflects cooperative spirit of positive critiquing of spill drill.
SeaRiver letter to RCAC regarding drill schedule	1/16/95	Reflects growing cooperation and consultation between shippers and RCAC.
RCAC letter to Capt. Rome, USCG	1/18/95	Overview of improvements in relations with industry and agencies.
FAX from RCAC to Roger Gale, BP	1/20/95	Reflects improved relations and increased dialogue with BP
Letters from RCAC and ADEC regarding new working group on "best available technology"	1/12/95 and 1/20/95	Example of how RCAC routinely works with regulatory agencies and industries on technical working groups.
Letters to BP and Keystone regarding meeting about tanker contingency plans	1/20/95	Reflects efforts to resolve differences wherever possible.
Letter from MSO Valdez to Cmdr., 17th Coast Guard District regarding RCAC	1/27/95	Cites RCAC's efforts and successes in promoting cooperation and partnerships that contribute to safer oil transportation.

RCAC letter to Alyeska	2/3/95	Example of how RCAC routinely keeps Alyeska informed of meetings, issues and plans.
ADEC letter to Capt. Rome, 17th District, USCG	2/8/95	Cites RCAC's efforts to promote positive, productive working relationships.
Letter from Alyeska regarding productive meeting organized by RCAC on environmental monitoring in Port Valdez	2/9/95	Reflects cooperative approach to problem solving.
RCAC letter to Roger Gale, BP, regarding visit.	2/24/95	Reflects improved relations and increased dialogue with BP
RCAC resolution 94-23	December 1994	Reflects RCAC's desire to call attention to things done right.
Letter from Roger Gale, BP, to Capt. D.D. Rome, USCG 17th District	3/20/95	Cites improved relations over the past year between RCAC and BP.

Regional Citizens' Advisory Council - Royal Center, 310 Egan St., Rm. 210 - Box 3470 Valdez, Alaska 99686 (907) 835-5957 : FAX (907) 835-5926

August 16, 1994

Mr. Jerry Aspland, President ARCO Marine, Inc. 300 Oceangate Long Beach, CA 90802-4341

Dear Mr. Aspland:

For the past several years, RCAC's long range plan has included a vision of improved communications with shippers of North Slope crude. We believe that a combination of circumstances and events makes the time especially ripe to pursue this goal.

Accordingly, our Executive Director, Stan Stanley, and I would like to meet with you in October to initiate what we hope will become a more positive, cooperative and productive relationship between ARCO Marine and RCAC. We would be happy to travel to Long Beach for this meeting, if that is most convenient for you.

There has been tension in some areas between RCAC and ARCO Marine, but I am convinced that any disagreements or misunderstandings can be resolved. My optimism stems in part from our success this year in improving relations with Alveska and, in part, from your demonstrated commitment to safe oil transportation. Furthermore, recent discussions with Kim Estes and others planning the nearshore response drill prove that we can turn an adversarial situation into a positive one.

Our shared goals can be furthered if we develop a better working relationship. We very much look forward to hearing your ideas and perspectives on how to do that.

A meeting in the second or fourth week of October would be best for us. Michelle Meckstroth in our office (907 264-6235) can work with your people to arrange it. Thank you for your attention and consideration. We hope to hear from you soon.

Sincerely

Stan Stephens, President

Prince William Sound Regional Citizens' Advisory Council



Regional Citizens' Advisory Council / 750 W. 2nd Ave., Suite 100 / Anchorage, Alaska 99501-2168 / (907) 277-7222 / FAX (907) 277-4523

2 September 1994

Capt. Maurice Croce Prince William Sound Tanker Assoc. c/o Chevron Shipping 555 Market St., Rm 1917 San Francisco, CA 94105

Dear Capt. Croce:

The executive committee of the Prince William Sound Regional Citizens' Advisory Council would like to meet with representatives of the Prince William Sound Tanker Association on the afternoon of October 17.

We would like to establish lines of communication with your organization that hopefully will increase dialogue in the future on issues of concern to both of us. Our main purpose is to work in good faith to establish the relationship envisioned by OPA 90 and to seek your input on how best to accomplish this.

During this meeting we hope to identify any concerns you might have about RCAC, and to clear up any misperceptions about our organization, as well as articulate some of the concerns that we have. We hope to begin building a foundation that will bring about an understanding of each organization's concerns and develop methods to remove the impediments they pose to a better relationship.

If such a meeting is agreeable, Michelle Meckstroth in our office (907/264-6235) can work with your people to arrange it. Thank you for your attention and consideration. We hope to hear from you soon.

Sincerely,

Stan Stephens, President

Prince William Sound Regional Citizens' Advisory Council

CC:

Capt. Roger Gale, BP RCAC Board of Directors



Public Affairs 515 South Flower Street Mailing Address: Box 2679 - T.A. Los Angeles, California 90051 Telephone 213 486 3384

Scott B. Loll
Director
Media & Public Relations
September 29, 1994

Marilyn Leland, Deputy Director Patti Ginsberg, Director - Public Relations Regional Citizens' Advisory Council 750 W. 2nd Ave, Suite 100 Anchorage, Alaska 99501-2168

OCT 6 1994

Dear Marilyn and Patti:

Just a quick note to thank you for your outstanding contribution to the overall success of the external affairs segment of ARCO Marine's oil spill response exercise last week in Valdez.

Your efforts to help make the joint information center a truly viable resource to all participants in the drill, as well as the communities of Prince William Sound, proved to be the key element in the success we enjoyed in communicating accurate and timely information throughout the exercise. The JIC, when functioning as it did in Valdez last week thanks in part to efforts by RCAC, can provide the catalyst for accurate information gathering and dissemination in any spill response.

RCAC's willingness to participate in the JIC brought the process full circle and enabled the external affairs group to focus on truly important issues rather than the finger pointing and "watch dogging" distractions that have hampered previous responses. The response was absolutely a unified effort. While I realize this was only a drill, I believe a precedent has been set and an industry standard of cooperation clearly established that we can all aspire to in future responses, either real or for training purposes.

I firmly believe we have RCAC, specifically you two, to thank for helping us complete the unification of the information resource process. You were terrific to work with and fun to be around, which ironically makes a significant difference in crisis response.

While we don't look forward to ever having to implement a JTC, we welcome your participation should events require such action. Thanks again for your contribution to our exercise and your sincere efforts to make the process work. In closing, we would really appreciate hearing your comments and review of the exercise and learning how you think we could refine the process.

Sincerely

Scott Loll moany



October 20, 1994

Bill Deppe SeaRiver Maritime Inc. P.O. Box 3249 Valdez, AK 99686

#### Dear Bill:

The Prince William Sound Regional Citizens' Advisory Council would like to thank you for your consistent attendance at our quarterly meetings. The Council appreciates the chance to understand the shippers' viewpoint on matters that are brought before the Board. We value your insight and look forward to your continued input at these meetings.

In order to facilitate your participation at our meeings, we have added you to the distribution list for meeting notebooks. You will now be receiving this information two weeks prior to our quarterly meetings.

Again thanks for your participation at the quarterly meetings and we look forward to seeing you in December.

Sincerely,

H.E. Stanley, Executive Director

Prince William Sound Regional Citizens' Advisory Council

CC:

**Board of Directors** 

Staff

From the desk of

# Stan Stanley

To: All Staff

Copy to: Board of Directors

Subject: Spill Response

- 1. Recently I have had conversations with several of you concerning the role of RCAC in a spill. Please note the emphasis on "spills". We practice for only one reason, to be prepared to respond to a future spill. We are not doing it because we have to have so many drills a year, or because it looks good on paper.
- 2. The impetus for these discussions has been the upcoming ARCO drill. To some, it may appear that I have been sending mixed messages. You may consider it an oxymoron to say we are going to perform our usual duties, but we aren't going to operate in the manner we have in the past. Despite many years of federal service, which is equivalent to postgraduate training in obfuscation, it is not my intention to confuse you. I will try to articulate my views in this memo. Hopefully it will not contribute to any further befuddlement, although that is always a danger when one sets out to clarify a previously misunderstood position.
- 3. RCAC's activities during a spill response should be totally focused on contributing to the response effort. Industry and the regulators have long realized that spill response requires a team approach, hence their commitment to a unified command. In the past, RCAC has operated as an independent body external to the response team. We have expressed concerns and made recommendations to the unified commanders and others on the response team, but as outsiders, not as an integral part of the response effort. It was apparent following the Eastern Lion spill that RCAC was not perceived as a valuable asset to the response organization. It is immaterial whether that perception is justified or not. The fact that such a perception exists at all serves to reduce our effectiveness on behalf of the citizens we represent. Outsider views are not accorded the same level of merit as the views of those who are working cooperatively as a part of a team pursuing a common goal. We must, therefore, take a hard look at ourselves to see if we contribute deliberately, or unwittingly, to that perception.
- 4. RCAC has accorded "independence" a sacred place in our corporate philosophy. It is clear to me that the framers of our contract with Alyeska, those who contributed to the drafting of OPA 90 on behalf of this council, and those who drafted our By laws intended that this organization <u>not</u> be just a rubber stamp and mouthpiece for industry views. In my opinion, they used the term independence to denote that we <u>must</u> be able to consider all sides of an issue, to objectively weigh the pros and cons, and to be assertive regarding the positions we adopt, whether or not they coincide with the views of industry. We must be free to attempt to persuade industry to adopt changes we perceive as needed to

enhance the safe transportation of North Slope Crude to market. We must be free to criticize regulators when they fail to enforce the regulations already in place, and we must be free to comment on proposed regulations that will impact TAPS terminal and tanker operations. In short, we must be an independent voice for those citizens we represent.

- 5. Unfortunately, in the past, we often treated independence as the end goal we were striving to achieve, rather than merely as a tool to facilitate our activities. In some meetings with industry it has been stressed with such fervor that it stifled any meaningful dialogue between the parties involved. In the spill response arena we have clung to the view that we could not possibly be a part of the formal spill response organization without sacrificing our independence, our credibility, and our responsibility to the citizens we represent. This view is flawed. It would only be true if our representatives lacked either the courage, the devotion to the cause of the citizens, or the motivation to stand up for their interests. I do not believe that to be the case. We have dedicated, highly motivated individuals throughout this organization who will stand and be counted to protect the interests of their fellow citizens. Their effectiveness will be severely hampered if we persist in viewing ourselves as separate from the spill response organization.
- 6. I strongly urge this organization to adopt a positive attitude toward spill response, not the negative approach based on assumptions and distrust. My sense is that some are of the opinion that our role is to keep industry honest by focusing our efforts on seeking out imperfections in the spill response, and by relaying that information to our member entities without delay, as if this somehow makes the spill response more effective. It implies that industry will not conscientiously attack the spill unless they fear repercussions from informed citizens. Nothing could be further from the truth. During all of the spills and drills I have been associated with I have found industry personnel and regulators to be extremely conscientious. They focus on the spill response and their role in it, not on what someone else may think about their performance. They are highly motivated to get the spill contained and cleaned up. They make errors in judgment, just as we do. (This memo is probably my latest one.) But it would be a gross error in judgment to conclude that they are not dedicated to their mission, a mission that we should share: To mitigate the spill impacts by conducting the most efficient, effective spill response possible. We should totally focus on contributing to that response effort, by assisting in any way we can to reinforce and enhance that which is working well, and by ensuring that those in a position to take corrective action are promptly notified of any problem areas we observe. In addition, we must provide our member entities and directors frequent, factual, objective assessments of the progress of the spill response to ensure that local concerns are considered, and to ensure that local resources are available when needed to augment the response effort.
- 7. Earlier in this memo I stated that some of you may consider it an oxymoron to say we are going to perform our usual duties in the ARCO drill, but that we aren't

going to operate in the manner we have in the past. What I envision for the ARCO drill is consistent with what we have done in the past, with three exceptions. First, our team will be physically located with the other response personnel in the joint information center (JIC) and will be considered a part of the response organization. Secondly, the information being sent to our member entities and directors will be shared with the other members of the JIC before it is sent out to ensure that there are no errors or omissions of fact. We will attempt to resolve any disagreements about the facts by further investigation prior to sending the information out. (This assumes there is not an urgent need to disseminate the information.) Thirdly, our team will focus on how we can enhance the spill response by contributing a useful service to the response organization. Other than these three differences in the approach to our involvement, we will function as we always do. We will be given full access to the command center, will have our own on water observer(s), and we will have the necessary communications links to enable us to keep our member entities and directors informed of the spill response progress, just as we always have.

8. I am firmly convinced that we can, and should, become a valuable asset for any future spill response by assuming a partnership role within the spill response structure. I encourage all of you to approach the ARCO drill with a positive attitude and a willingness to become a valuable member of the spill response team. Those who have threadbare baggage carried forward from the <a href="Exxon Valdez">Exxon Valdez</a> spill and other past associations with industry and the regulators need to stow it away. It probably has no direct bearing on today's issues. There is a new cast of characters, a better spill response capability, and a strong desire to make the system work. We need to join forces with that effort.

Stan

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October 20, 1994

Simon Lisiecki BP Oil 339 Hazelet Ave. P.O. Box 1609 Valdez, AK 99686

#### Dear Simon:

The Prince William Sound Regional Citizens' Advisory Council would like to thank you for your consistent attendance at our quarterly meetings. The Council appreciates the chance to understand the shippers' viewpoint on matters that are brought before the Board. We value your insight and look forward to your continued input at these meetings.

In order to facilitate your participation at our meeings, we have added you to the distribution list for meeting notebooks. You will now be receiving this information two weeks prior to our quarterly meetings.

Again thanks for your participation at the quarterly meetings and we look forward to seeing you in December.

Sincerely,

H.E. Stanley, Executive Director

Prince William Sound Regional Citizens' Advisory Council

CC:

**Board of Directors** 

Staff



October 20, 1994

Bob Levine ARCO Marine Transportation P.O. Box 100360 Anchorage, AK 99510-0360

### Dear Bob:

The Prince William Sound Regional Citizens' Advisory Council would like to thank you for your past attendance at our quarterly meetings. The Council appreciates the chance to understand the shippers' viewpoint on matters that are brought before the Board. We value your insight and look forward to your continued input at these meetings.

In order to facilitate your participation at our meeings, we have added you to the distribution list for meeting notebooks. You will now be receiving this information two weeks prior to our quarterly meetings.

Again thanks for your participation at the quarterly meetings and we hope to see you in December.

Sincerely,

H.E. Stanley, Executive Director

Prince William Sound Regional Citizens' Advisory Council

CC:

**Board of Directors** 

Staff



October 21, 1994

Mr. Jim Sweeney Alyeska Pipeline Service Company 1835 South Bragaw Street Anchorage, AK 99512

## Dear Mr. Sweeney:

The Prince William Sound Regional Citizens' Advisory Council (RCAC) looks forward to constructively participating in the coming discussions about the renewal of the National Pollutant Discharge Elimination System Permit for the Valdez Marine Terminal. We believe this will be an opportunity to help assure that environmental monitoring programs required in the renewed permit are well advised and well designed.

We have asked our consultants to review the data generated by existing monitoring programs in Port Valdez and at the Ballast Water Treatment Plant in the interest of making recommendations to Alyeska and the regulators regarding what studies should be called for in the next permit. We look forward to bringing our consultants into discussions with Alyeska representatives.

In March company representatives said Alyeska is willing to discuss the possibility of investigating jointly with the RCAC certain issues related to the BWTP's environmental effects. We appreciate that offer and would like to discuss with you whether such investigations may be needed prior to the regulators final decisions about the language of the next NPDES permit.

As you may know, representatives from the US Environmental Protection Agency plan to visit Valdez on November 14-15 and will seek the RCAC's recommendation regarding the next permit. The meeting is slated for 1:00 pm on Tuesday, November 15th at the RCAC office in Valdez. In accepting the EPA's offer to meet with them we expressed our wish that Alyeska also be represented at the meeting, and we hope that you and your colleagues can be there. In preparing for the November 15th meeting we hope to have discussions with

Alyeska representatives to hear ideas about how the coming dialog can be undertaken in a positive, constructive fashion.

Thank you for your attention. We look forward to discussing these topics with you further.

Sincerely,

Stan Stephene, President

Prince William Sound Regional Citizens' Advisory Council

CC:

Stan Stanley, RCAC Executive Director RCAC board of directors TOEM Committee Gary Bader, Alyeska Gene Dickason, Alyeska



Oct. 31, 1994

Ronnie Chapple, Public Affairs ARCO Alaska, Inc.

Re: Joint Information Center

Thanks for inviting my thoughts on your memo about the Joint Information Center. I'm enclosing a copy of my own comments (RCAC's formal comments on the drill include a much briefer version) and my suggestions for standard JIC protocols.

As I mentioned to you several weeks ago, I think your memo is complete and certainly consistent with my perceptions. Initially I was concerned about the distinction you make (Page 3) between reports from RCAC field observers versus citizen-reported observations. However, that's not a problem because RCAC also makes that distinction based on the source of observations. My understanding is that RCAC would confirm a citizen report before putting it in the "verified" category.

I'd very much like a copy of your final memo to distribute at RCAC if that's appropriate. As I've said before, this is a wonderful opportunity for us to work together in a cooperative, productive effort that serves our common goals.

Let's keep in touch.

Sincerely,

Patty Ginsburg

Communications Information Specialist

CC:

Marilyn Leland Stan Stanley Memo 10/28/94

To: Ronnie Chappel, ARCO From: Patty Ginsburg, RCAC

Re: Suggested Protocols for Joint Information Center

1. All parties (industry, state, fed, local) participating in the JIC have equal standing.

- 2. JIC director or supervisor is selected by the group on the basis of experience and skills, irrespective of employer.
- 3. Information bulletins contain facts about the incident and response efforts.
- 4. Each party is free to distribute information as it pleases. However, each party commits to use the JIC process to confirm the factual information in all documents distributed.
- 5. In the process of approving information bulletins, disagreement by a reviewer will result in deletion of the disputed fact from the bulletin. Rewriting of the bulletin is to be avoided because it would require resubmission to the other reviewers. In certain limited instances where there is not consensus, the item may be included in a bulletin, with attribution. Example: Coast Guard estimate of size of spill.
- 6. Standard for reviewers It is unrealistic to assume that each reviewer can verify with absolute certainty all of the facts contained in a bulletin. Rather, approval of a bulletin means that to the best of their knowledge, these facts accurately represent the situation.

To: Joe Banta From: Patty Ginsburg

Re: Comments on Joint Information Center, Arco Nearshore Drill

Date: 10/5/94

#### What worked

• The Joint Information Center issued 18 updates in 3 days. It functioned as a central, integrated source of factual information about the response effort.

• The approval and consensus process allowed discrepancies to be resolved before information was released.

• Participants from all parties - Arco, RCAC, Coast Guard and ADEC - worked together very well. Cooperation was excellent.

• This process makes information gathering and dissemination more efficient and more reliable. Checks and balances within the JIC kept guesswork out of the updates.

#### Problem areas

- Approval process The approval process requires that each "agency" (spiller, state, feds and locals) approve bulletins before release. In effect, they are independently verifying the information. ADEC and the Coast Guard delegated this approval authority to their representatives in the JIC. This put those individuals in an impossible position because they couldn't be JIC members and part of their respective agencies' internal operations, at the same time. The underlying problem here appeared to be lack of understanding or failure to buyin to the JIC system.
- Education All participants need to be better informed about the purpose of the Joint Information Center and the role of the liaisons. Arco did an excellent job of educating RCAC about the JIC, but their own people within the JIC did not seem to clearly understand the concepts.
- Type of information The JIC struggled with the level of detail to include in the updates and how to meet the broadest needs of a varied audience. This will likely always be a challenge.
- Verification/approvals There probably needs to be a caveat in the approvals, in that when Stan Stanley (or the Coast Guard, or the state) signs off on an update, that does not mean they have personally verified the information. What it really means is, "to the best of our knowledge at this point . . ."



WHEREAS, the Prince William Sound Regional Citizens' Advisory Council fully supports the United States Coast Guard regulation regarding escort vessels for tankers in Prince William Sound which was released in August of 1994; and

WHEREAS, the Prince William Sound Regional Citizens' Advisory Council believes the new escort vessel regulations constitute a significant leap forward in oil spill prevention; and

WHEREAS, imposition of this regulation had the potential to create bitterness and friction between the regulators, the shippers, and the citizens of the region; and

WHEREAS, CDR Gregory T. Jones, while working to enforce the escort rule fairly, rationally and in the spirit of Oil Pollution Act of 1990, fostered an environment in which industry, regulators, and the RCAC could work cooperatively to resolve differences; and

WHEREAS, through this cooperative effort, a vessel escort plan was agreed to by shippers and the Marine Safety Office in Valdez which significantly improved the safety of shipping in Prince William Sound; and

WHEREAS, the Marine Safety Office in Valdez evaluated data from the Disabled Tanker Towing Study, and modified tanker movement restrictions based on that analysis; and

WHEREAS, CDR Gregory T. Jones worked diligently to effect the maximum increase in tanker safety currently practicable.

THEREFORE, BE IT RESOLVED that the Prince William Sound Regional Citizens' Advisory Council commends the United States Coast Guard and CDR Gregory T. Jones for the direction they have taken in interpreting and applying the federal rule on escort vessels in Prince William Sound.

# **CERTIFICATION**

This resolution was duly adopted by the Board of Directors at a meeting held December 8-9, 1994 by the following vote:

Ayes 15 Nays 0 Abstain 0.

Stan Stephens, President

ATTEST:

Secretary

Please prepare response for my signature. There is a conflict with one wanterly mercing on the 28th Chick of Marilyn. I televe there may be a fishing DEC 23 1994

DEC 23 1994

CC: Mailyn.

Secriver

To: Stan Stanley, Executive Director RCAC Steve Provant, ADEC Cdr. Gregory Jones, USCG COTP Valdez Gary Richardson, VP Alyeska Capt. Tim Plummer, Alyeska Michelle O'Leary, CDFU

SeaRiver Maritime Inc. is in the process of scheduling an oil spill response drill in Prince William Sound for a 3 or 4 day period in mid September 1995. Prior to finalizing the dates of this drill we would like to solicit your input in regard to the timing of this event. If you have any advice about the timing of the drill or are aware of major conflicts please let me know. The three time periods under consideration are:

September 11 thru 142 Significant Salman fish of September 18 thru 213
September 25 thru 283 & Care

It may not be possible to resolve all conflicts but we will appreciate any input you may have. We hope to have the dates of the drill finalized by mid January. If you have any comment please let me know by January 16, 1995. Thank you for your help.

William J. Deppe PO Box 3249 Valdez, AK 99686 907-835-4583 907-835 3701 Fax

Bell Vepre

c. H. Yates

C. Rassinier

D. Koops

No. C. A.



January 16, 1995

William J. Deppe SeaRiver P.O. Box 3249 Valdez, AK 99686

Dear Mr. Deppe:

Thank you for the opportunity to comment on the scheduling of the upcoming drill. The time periods you suggested all have conflicts of varying degrees:

September 11 thru 14 (impacts a silver salmon fishery)

September 18 thru 21 (impacts a silver salmon fishery)

September 25 thru 28 (RCAC will be holding its quarterly meeting in Cordova)

Although the later in the season it gets the more weather is a factor we would suggest, if at all possible, the first week in October might be a possible alternate date. Within the suggested dates the September 11 - 14, 1995 time frame would work best for RCAC participation. Again thanks for the opportunity to comment and we look forward to participating in the upcoming drill if at all possible.

Sincerely,

H.E. Stanley, Executive Director

Prince William Sound Regional Citizens' Advisory Council

# STATE PIPELINE COORDINATOR'S OFFICE

- Department of Environmental Conservation
- □ Department of Natural Resources
- ☐ Department of Fish and Game

411 WEST 4th AVENUE, SUITE 2C ANCHORAGE, ALASKA 99501 PHONE: (907) 278-8594 (907) 278-8595 FAX: (907) 272-0690

January 12, 1995

JAN 1 6 1995

Stan Stanley, Executive Director Regional Citizens' Advisory Council 750 West Second Avenue, Suite 100 Anchorage, Alaska 99501

Dear Mr. Stanley:

On behalf of the Department of Environmental Conservation, I would like to invite your organization to participate with us in a working group to consider the options to fulfill the requirement to implement the best available technology (BAT) for tanker escort vessels in Prince William Sound. This action is the result of the process agreed upon at the meeting held on October 21, 1994, in which your organization participated.

In order to meet BAT as defined for escort vessels operating in Prince William Sound, the Department plans an initial meeting of a working group in February with subsequent follow-up meetings. The definition of BAT will be determined by the Department and provided to the working group participants prior to this meeting.

Before holding this first meeting, it will be necessary to establish the working group representatives from the following invited organizations: Alyeska/VMT, Prince William Sound Tanker Association, SERVS, Prince William Sound Regional Citizens Advisory Council, Spill Technology Review Council and the U.S. Coast Guard. Only the designated representative will be the full participating member of the working group. Other members of the above listed organizations and the public will be restricted to presenting their views during the designated public comment periods or to individual working group members during scheduled breaks.

Once all of the designated representatives on the working group are identified, a public meeting following State of Alaska protocol will be scheduled in Anchorage or Valdez for mid-February. Currently, we anticipate that the group will meet for four to eight meetings, each a day or so in duration. Meetings will be scheduled approximately every two weeks. Public notice will be given for each meeting and provisions will be made to accommodate all who wish to attend.

Stan Stanley Regional Citizens' Advisory Council

January 12, 1995

Any suggestions or ideas for possible inclusion into the meeting agenda are welcome. To assure that your time is well spent and our objectives achieved, the Department will be developing a project scope and detailed agendas before each meeting. The preliminary agenda with the first meeting announcement and any pertinent background information will be provided in the coming weeks. Formal meeting procedures will be adhered to during the meetings.

The Department would like to have the names in writing of the selected representatives to be on the working group by January 27, 1995. Please provide this information or direct any questions or suggestions to John Kotula at (907) 835-4698. John will be the project manager for this effort.

I want to express in advance, the Department's appreciation for the contribution your organization will make towards resolving this important issue for safe transport of oil.

Sincerely,

Tom Chapple

ADEC Regional Administrator

cc: Tim Plummer/VMT/Valdez

Gary Richardson/SERVS

Morris Croce/Chevron Shipping Co.

Greg Jones/U.S.C.G. Marine Safety Office/Valdez Walt Parker/Technology Review Council/Anchorage





January 16, 1995

William J. Deppe SeaRiver P.O. Box 3249 Valdez, AK 99686

Dear <del>Mr. Deppe</del>:

Thank you for the opportunity to comment on the scheduling of the upcoming drill. The time periods you suggested all have conflicts of varying degrees:

September 11 thru 14 (impacts a silver salmon fishery)

September 18 thru 21 (impacts a silver salmon fishery)

September 25 thru 28 (RCAC will be holding its quarterly meeting in Cordova)

Although the later in the season it gets the more weather is a factor we would suggest, if at all possible, the first week in October might be a possible alternate date. Within the suggested dates the September 11 - 14, 1995 time frame would work best for RCAC participation. Again thanks for the opportunity to comment and we look forward to participating in the upcoming drill if at all possible.

Sincerely,

H.E. Stanley, Executive Director

Prince William Sound Regional Citizens' Advisory Council

# Prince William Sound Regional Citizens' Advisory Council

# FAX MESSAGE

From:

To:

Stan Stanley Executive Director (907) 264-6224

Roger Gale, BP

Fax

(907) 277-4523

Pages (including this message):

1

## Message:

- 1. Thank you for the opportunity to visit your headquarters to discuss RCAC and our relationship. I hope to acquire a better understanding of any concerns BP has regarding the activities of this council, and to clarify what we are doing and why.
- 2. I will arrive in Cleveland on USAir flight #449 at 10:24 AM on 1 February 1995 and will depart on USAir flight #866 at 6:20 PM that day. I realize that it is unlikely that it would be productive to visit for that long, but did not want to be locked in to a one or two hour visit if a longer visit were worthwhile. I will remain flexible and catch an earlier flight out if necessary.
- 3. I would appreciate it if someone could let Michelle Meckstroth, my Executive Assistant know where I should go when I arrive in Cleveland. She will be in touch with me via e-mail while I am on the east coast. She can be reached at 907-264-6224.
- 4. I look forward to seeing you in a couple of weeks.

Stan /Stan /

01/20/95 15:10

Page 1

If you have any problems with this transmission please call 907-277-7222.



Jan. 18, 1995

Capt. D.D. Rome 17th Coast Guard District P.O. Box 25517 Juneau, AK 99802-5517

Dear Capt. Rome:

In response to your letter (Jan. 3, 1995) regarding RCAC's efforts to build a long term partnership with industry and government agencies, I am very pleased to report significant strides over the past six to nine months.

RCAC took Admiral Card's comments very seriously. We have re-evaluated our expectations and assumptions, examined our attitudes – both real and perceived – and looked for ways to break down barriers.

As a result, we are communicating with industry groups and government agencies much more frequently, both formally and informally. We find that more frequent communications are leading to better understanding about our respective concerns. I'd like to give you a couple of examples.

We have taken a more proactive approach to reaching out to industry officials, at several different levels. We have met with Gus Elmer, of SeaRiver, Jerry Aspland of ARCO Marine and Roger Gale of BP Oil Shipping, to discuss issues of mutual interest and concern. I have been meeting frequently with Bob Malone of BP, who now chairs the Alyeska Owners' Committee.

RCAC has done more than just talk. We are making sure that industry representatives receive complete packets before our meetings and have the opportunity to sit at our table.

Sensitive and controversial situations are bound to arise and they have. We currently are in the midst of a particularly complex and sensitive issue – state review of oil spill contingency plans for tankers. Consistent with our charge under OPA 90, RCAC has devoted considerable time and resources to reviewing and commenting on these contingency plans.

We understand that RCAC's comments could have far-reaching impacts and we are well aware of the serious concerns within industry about the review process. In an effort to seek understanding and consensus wherever possible, we recently sat down with representatives of one shipping company to iron out misunderstandings and resolve questions. RCAC is committed to working cooperatively with industry and government agencies to help implement

practical, workable and effective response plans that will protect the region in the event of a major tanker spill.

Our relations with Alyeska continue to improve, as well. In late November, we participated in a team-building session together; we consistently keep Alyeska apprised of our activities and projects, and at the very least, solicit their input, if not their outright participation.

Over the past six to nine months, we have also seen significant improvement in our relationships with the U.S. Coast Guard, MSO Valdez, and the Alaska Department of Environmental Conservation. We keep them apprised, they keep us in the loop and we are working together toward common goals. RCAC and ADEC together are jointly conducting a monitoring program of ballast water influent. RCAC and MSO Valdez worked very closely together on tanker escort issues.

There are times it is difficult, no question. When RCAC agreed to hold the findings of the Disabled Tanker Towing Study close to the chest until the report was formally issued, many of our directors had a genuine crisis of conscience. After all, many of us are appointed by public bodies and most of us feel that we are the public. But we had made a commitment and we lived up to it.

We know it's not always easy for industry and government officials, either. There's plenty of teeth-gnashing all around. But we think it's worth it. And we believe that our very sincere efforts to promote positive, productive partnerships are bearing results.

Of course, we will be addressing some of these issues in more detail in our recertification application. But if I can provide you with more information in the meantime, please don't hesitate to call.

Sincerely,

Stan Stephens/President

RCAC Board of Directors MCD



January 20, 1995

Captain Robert C. Baldwin Mr. Glenn R. Kolke BP Oil Company 200 Public Square 6-1617 -P Cleveland, OH 44114-2375

Re: Keystone Shipping Co. Alaska Oil Discharge Prevention and Contingency Plan

Dear Captain Baldwin and Mr. Kolke:

The Prince William Sound Regional Citizens' Advisory Council (RCAC) would like to extend our sincere appreciation to you for coming to Alaska to meet with RCAC members and staff regarding the Keystone Shipping oil discharge prevention and contingency plan ("Keystone Plan"), and other BP chartered tanker plans. As you know, RCAC has conducted an extensive review of the Keystone Plan and plans for other shippers which transit Prince William Sound. We have requested additional information on these plans in order to determine whether RCAC, as a review participant, will make a recommendation to the Alaska Department of Environmental Conservation ("ADEC") that the plans meet the State of Alaska statutes and regulations.

While we have not yet made our final recommendation on the Keystone Plan, nor on other plans for BP chartered tankers, the information you and Keystone presented to us at our meeting demonstrated Keystone's corporate commitment to protection of the environment and to the safety of the vessel crew. We also recognize BP's active involvement in ensuring its shippers meet the ADEC requirements. We commend your suggestion of using the ADEC checklist format to develop uniform contingency plans for BP chartered tankers. In addition we appreciated the follow-up teleconference we had with Keystone on January 17 to clarify the additional information requests. These two sessions were very productive and we look forward to similar meetings, during future plan reviews, as a way of expediting the process, and facilitating understanding.

In the next phase of this review, the "adequacy" phase, we look forward to working cooperatively to address any remaining issues and to further the goal of gaining approval of the Prince William Sound tanker plans, by the ADEC.

Sincerely.

Stan Stephens, President

Prince William Sound Regional Citizens' Advisory Council

2.4 Page 1

CC:

H. E. Stanley, Executive Director Marilyn Leland, Deputy Director Members, RCAC Tom Chapple, ADEC Molly Birnbaum, ADGC Members, OSPR Roger Gale, BP Simon Lisiecki, BP George Clark, Keystone Shipping Gary Bader, APSC Gary Richardson, APSC

2.4 Page 2



- Anderly

Regional Citizens' Advisory Council / 750 W. 2nd Ave., Suite 100 / Anchorage, Alaska 99501-2168 / (907) 277-7222 / FAX (907) 277-4523 "Citizens promoting environmentally safe operation of the Alyeska terminal and associated tankers."

January 20, 1995

Captain G.A. Clark, Vice President Bruce D. Benn, Vice President, Chartering Keystone Shipping Co. 313 Chestnut Street Philadelphia, PA 19106

Re: Keystone Shipping Co. State of Alaska Oil Discharge Prevention and Contingency Plan

Dear Captain Clark and Mr. Benn:

Prince William Sound Regional Citizens' Advisory Council (RCAC) would like to extend our sincere appreciation to you for coming to Alaska to meet with RCAC members and staff regarding the Keystone Shipping oil discharge prevention and contingency plan ("Keystone Plan"). As you know, RCAC has conducted an extensive review of the Keystone Plan, and had requested additional information on the Keystone Plan in order to determine whether RCAC, as a review participant, will make a recommendation to the Alaska Department of Environmental Conservation ("ADEC") that the plan meets the State of Alaska statutes and regulations.

While we have not yet made our final recommendation on the Keystone Plan, the information you presented to us at our meeting demonstrated your corporate commitment to protection of the environment and to the safety of the vessel crew. We were impressed with the information on your efforts to gain ISO 9000 certification.

We also appreciate the time you took to speak with us by telephone on January 17. The additional information you will be sending in response to the issues we discussed should rectify most, if not all, of the outstanding ADEC informational deficiencies which we reviewed as a review participant. We will contact you if we are unable to locate specific information.

In the next phase of this review, the "adequacy" phase, we look forward to working cooperatively to address any remaining issues and to further the goal of gaining approval of the Keystone Plan by the ADEC.

Sincerely,

Stan Stephens, President

Prince William Sound Regional Citizens' Advisory Council

CC:

H. E. Stanley, Executive Director Marilyn Leland, Deputy Director Members, RCAC Tom Chapple, ADEC Molly Birnbaum, ADGC Members, OSPR Roger Gale, BP Bob Baldwin, BP Simon Lisiecki, BP Interocean Management Marine Transport Lines, Inc. Marine Overseas Corp. Gary Bader, APSC Gary Richardson, APSC



January 20, 1995

Tom Chapple
Regional Administrator
Alaska Department of Environmental Conservation
411 West 4th Ave., Suite 2C
Anchorage, AK 99501

Dear Mr. Chapple:

Thank you for the invitation to participate with your organization in a working group to consider the options to fulfill the requirement to implement the best available technology (BAT) for tanker escorts vessels in Prince William Sound.

At its 18 January meeting, the RCAC executive committee appointed Tex Edwards as the RCAC representative to this working group with Tom Sweeney his alternate.

We look forward to working with yourself and John Kotula on this very important topic.

Sincerely,

H.F. Stanley, Executive Director

Prince William Sound Regional Citizens' Advisory Council

cc:

Board of Directors
John Kotula, ADEC
Gary Bader, APSC
Gary Richardson, APSC
CDR. Greg Jones, USCG



February 3, 1995

Mr. Gary Bader Citizens Group Liaison Manager Alyeska Pipeline Service Company 1835 So. Bragaw Street Anchorage, AK 99512

Dear Mr. Bacter:

As I mentioned in my letter to you dated 16 January, 1995, RCAC has been developing its budget for the July 1995- June 1996 time period. The council will conduct an all day budget worksession for Friday, February 10 at the Regal Alaskan Hotel.

I am enclosing an agenda for the meeting as well as the draft budget document which will be submitted to the full council during the worksession. The council welcomes your input and I look forward to seeing you there.

If you have any questions please don't hesitate to call.

Sincerely,

H.E. Stanley, Executive Director

Prince William Sound Regional Citizens' Advisory Board

cc:

**RCAC Board of Directors** 

enclosures



Commanding Officer United States Coast Guard Valdez, Alaska 99686 Marine Safety Office

P.O. Box 486 Phone: 835-4791

> 16000 27 Jan 1995

From: Commanding Officer, USCG Marine Safety Office Valdez

To: Commander, Seventeenth Coast Guard District (m)

PRINCE WILLIAM SOUND REGIONAL CITIZENS' ADVISORY COMMITTEE Subi:

(RCAC) RECERTIFICATION

(a) Commandant (G-M) ltr 16451 dtd 4 Aug 94 Ref:

- The following comments are submitted for consideration in the current evaluation being conducted by Commandant (G-MEP) for recertification of the Prince William Sound Regional Citizens' Advisory Council (RCAC).
- In the past seven months RCAC has made substantial progress towards fostering the desired partnerships as communicated in reference (a). Early in the present cycle, the Council made a commitment to improve their relationships with regulators and the marine industry; their genuine concern was quite evident during the quarterly Council meeting held in Homer, AK last September 94. RCAC's commitment has since evolved into actions where partnerships were not only strengthened but value was clearly added to the process, in turn, enhancing safety and the protection of Prince William Sound.
- They were instrumental in facilitating Congressional budget approval for installation of four new weather stations in Prince William Sound scheduled for Spring/Summer 1995. RCAC also made significant contributions in contingency planning. They actively participated in the Area Response Committee process and provided valuable input to the first edition of the Prince William Sound Subarea/Regional Contingency Plan.
- 4. Perhaps the most dramatic example of the improvements I witnessed this year was their work on the Disabled Tanker Towing Study and their active participation in discussions on how best to implement the new tanker escort regulations. I have received kudos from a number of different parties on the implementation of this high visibility undertaking. I found that RCAC was vitally important in that endeavor by giving me a real sense of public concerns on this subject. They provided valuable technical advice on a highly complex topic and throughout the process negotiated in good faith. I believe the final product is better because of their participation.

OPTIONAL FORM 99 (7-90)

Ce: Marilyns

FAX TRANSMITT	AL Forpages > 2
To Stan Stanley.	For Cdr Grea Jones
Dept/Agency .	Phono ' 835 - 7210
1277 - 4523	Fox #
NSN 7540-01-217-7368 5099-101	GENERAL SERVICES ADMINISTRATION

16000 27 Jan 1995

Subj: PRINCE WILLIAM SOUND REGIONAL CITIZENS' ADVISORY COMMITTEE (RCAC) RECERTIFICATION

- 5. It is important to note that RCAC's conduct in the aforementioned projects was professional, and they fostered a cooperative team approach in their actions. Especially noteworthy is that RCAC has taken great strides to follow their public affairs protocols. In my assessment most of the rank and file are learning to work within the system to accomplish their goals. Many do so with the expected enthusiasm of volunteers, but they are now clearly exercising better discipline at meetings by engaging in open honest debate and tempering their emotions. Finally, as further evidence of their increasing commitment to team play, they are an active and willing participant in ongoing team building training, sponsored by Alyeska, and which also included SERVS, Coast Guard, and the State of Alaska Department of Environmental Conservation.
  - 6. In summary RCAC has made a giant step forward in the quality of relationships with the other players. I believe they meet both the spirit and the letter of an alternative advisory group as envisioned by the Congress in OPA 90.

G. T. Johes

Copy: PWS Regional Citizens Advisory Committee Alaska Department Environmental Conservation Alyeska Pipeline Service, Co.

# STATE OF ALASKA

# **DEPT. OF ENVIRONMENTAL CONSERVATION**

OFFICE OF THE COMMISSIONER 410 Willoughby Avenue, Suite 105 Juneau, AK 99801-1795 Telephone No. (907)465-5050 FAX No. (907)465-5070

February 8, 1995

Captain D. D. Rome 17th Coast Guard District P.O. Box 25517 Juneau, AK 99802-5517

### Dear Captain Rome:

Your December 15 letter requested the Department's opinion with respect to the Coast Guard's recertification of the Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) under the Oil Pollution Act of 1990. It is this Department's observation that the PWSRCAC has taken a number of steps to establish a more collaborative working relationship with industry, the crude oil shipping companies, and state and federal agencies. For example, the following positive improvements were noted:

- 1. The problem solving efforts on the disabled tanker towing study;
- 2. last fall's spill drill was enhanced by the PWSRCAC participation and approach;
- 3. the increased frequency of meeting with Alyeska and the shippers appears to have been characterized by a problem solving vs adversarial approach; and
- 4. the January '95 PWSRCAC sponsored seminar on science related issues associated with the ballast water treatment plant was very helpful to our Department.

It appears that the PWSRCAC has made a concerted effort to improve communications between itself, industry and government agencies. My staff informs me that key members of the PWSRCAC are continuing to actively solicit suggestions for ways to improve and strengthen PWSRCAC as a credible voice for local citizens concerned about safe oil transport in Prince William Sound. It is the Department's opinion that the PWSRCAC is committed to work openly with all parties to ensure the goals and objectives of the Oil Pollution Act of 1990 are achieved.

Thank you for the opportunity to comment on this important matter. We look forward to your recertification of the PWSRCAC this spring.

Sincerely,

Gene Burden by Mily /2/2/2

Commissioner

KF/tdt (G:\SPAR\KF\RCACCERT.LTR)

Roger Gale, BP Oil Shipping cc:

A. Elmer, SeaRiver Maritime Inc. Jerry Asplund, ARCO Marine Inc. Stan Stephens, President RCAC Cmdr G. Jones, USCG, Valdez

Tom Chapple, Regional Administrator, DEC, JPO

Kurt Fredriksson, Director, DEC, SPAR



1898 SOUTH BRAGAW STREET - ANCHORAGE, ALASKA 98512 - TELEPHONE (907) 278-1811, FAX 285-8511, TELEX 285-8409

February 9, 1995

Mr. Stan Stephens President, PWS RCAC Box 1297 Valdez, AK 99686

Dear Mr. Stephens:

I 've recently heard from Gene Dickason and Carl Rutz regarding the Scientific Meeting on Environmental Monitoring of Port Valdez held in Scattle on January 17 - 18, 1995. They indicate that the meeting was professionally conducted with an excellent exchange of ideas regarding the environmental condition of Port Valdez. There was also a productive discussion on what might be considered for future monitoring of the impact of the effluent from the ballast water treatment system on the Port.

I wish to thank you and the RCAC for taking the efforts necessary to get this meeting organized and structured such that meaningful issues could be discussed openly and without confrontation. It is an excellent example of how we can work together in a non adversarial manner to meet our common goal of protecting the environment of Port Valdez. Alyeska looks forward to participating with the RCAC in more meetings like this in the future.

Sincerely,

R. A. Abel Vice President

Quality, Environment and Safety

cc:

Bill Hutmacher, USCG Gary Bader, APSC



24 February 1995

Captain Roger A. Gale Vice President BP Shipping 200 Public Square 22-2556-I Cleveland, OH 44114

Dear Captain Gale: Loger:

Thank you for allowing me to visit your headquarters during my recent visit to the east coast. I know you have a busy schedule, and I appreciated your taking the time to meet with me.

The discussions with you and your staff were very informative, and have helped me to better understand BP's approach to tanker selection and to spill response, and to clarify some of the issues related to oil ownership. I appreciated Captain Bob Baldwin taking the time to show me through your area, Captain Steve Alexander for educating me in your ship vetting program, Ken Grover for his efforts to help me understand the oil ownership question, and to others of your staff who participated in the briefing I received in your "war room."

I particularly appreciated the time that you and I had to talk. You helped me to better understand some of the issues that have been raised in our organization. While I do not profess to have a detailed knowledge of all of those issues, your frank comments helped to define them better for me. I have always believed that open, honest dialogue can eliminate misperceptions that divert energy from the important efforts to enhance spill prevention and response as envisioned in OPA 90. I will continue to encourage such communications at all levels within our organization.

Thank you again for your hospitality in Cleveland.

Sincerely,

**Executive Director** 

Copy to: Board of Directors Staff



BP OIL

R. A. Gale Vice President

BP Oil Shipping Company, USA 200 Public Square, Suite 5-3606-O Cleveland, OH 44114-2375

TEL: 216-586-5525 FAX: 216-586-6742

March 20, 1995

Captain D. D. Rome Chief Marine Safety Division, 17th U.S. Coast Guard District, P.O. Box 25517 Juneau, AK 25517

Dear Captain Rome:

#### Prince William Sound Regional Citizens' Advisory Council

Bob Baldwin has reminded me that last year you wrote to me asking for my opinion on the PWS RCAC's efforts to build the long term partnership described by Admiral Card in his recertification letter to the RCAC. I did not hasten to respond to your letter as it had only been four months since the RCAC's recertification, and I felt that any judgment of their efforts to pay heed to Admiral Card's words would be somewhat premature. However, I recognize now that you were only seeking an interim report, and that there would be an opportunity to comment again when the RCAC applies for recertification on April 28, 1995.

I am pleased to report that in the time since its' recertification the RCAC has, in general, made a conscious effort to improve its relationship with industry, and I believe that industry has responded in kind. It is BP's view, that the RCAC's January 18, 1995, letter to you provides a fair reflection of their effort in the last few months.

You are no doubt aware that the shipping industry recently invited the RCAC (along with the Coast Guard and ADEC) to join it in conducting a Risk Assessment study of tanker transit operations in Prince William Sound, with the intent on focusing on opportunities for improving these operations. The study will

evaluate the interaction of people and the equipment involved in tanker operations, and will be used to identify possible changes to existing operations that will most effectively enhance safety. Clearly this study will require a cooperative contribution by all participants, and will provide an opportunity to build the teamwork environment that is necessary to achieve a genuine partnership. We, at BP, look forward to working with the RCAC and others during this important project.

Yours truly

c.c. W. Walker, RCAC

S. Stanley, RCAC

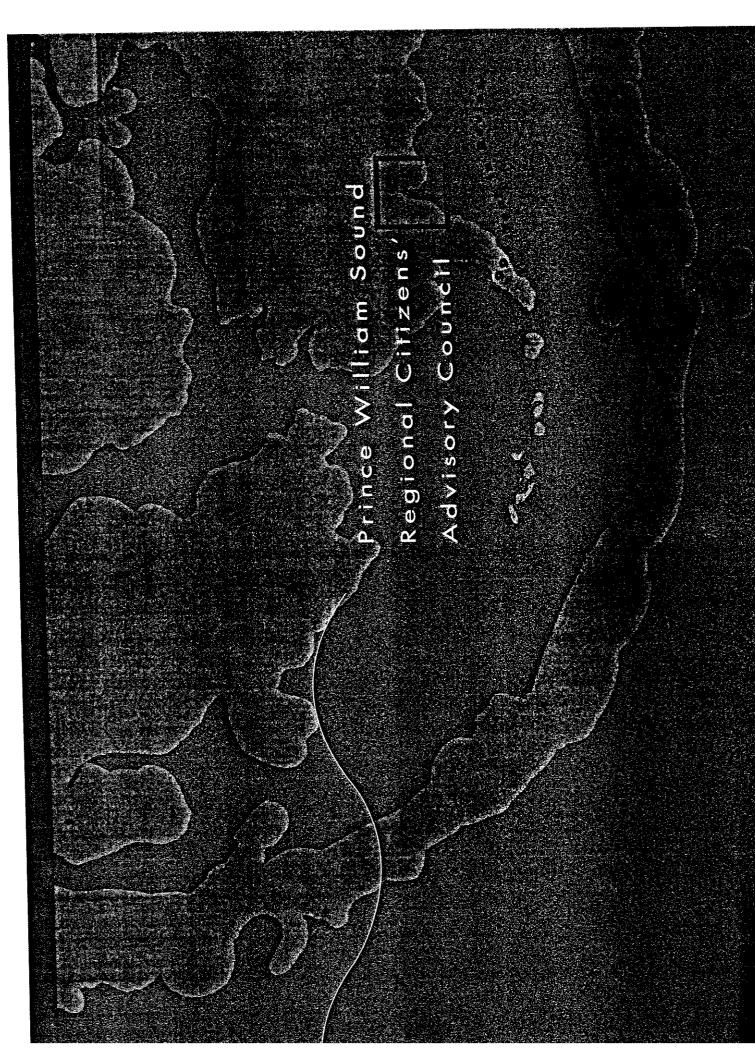
E. Burden, ADEC

D. Pritchard, Alyeska

R. C. Baldwin, BP

R. Malone, BP

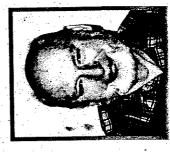
S.P. Lisiecki, BP



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Board of Directors Reports & Studies



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Ston Stephens, President

Son Stanley, Executive Director

working relationships will be the key



industry and regulators. RCAC has a We are pleased to welcome you nership with industry and regulators. Our ability to build and sustain good ber organizations and communities, interests and concerns of our memnificant accomplishment and formi-1994 was to improve relations with while fostering a cooperative partto the 1994 Year in Review. Nineteen ninety-four was a year of sigdable challenge for the Regional RCAC's biggest challenge in unique charge: to represent the Citizens' Advisory Council.

We are pleased to report signifito our long-term success, indeed cant progress in this area. In the perhaps to our very existence.

to handle potentially sensitive issues final stages of the two-year Disabled closely with industry and regulators Tanker Towing Study, we worked in a responsible manner.

communities and Sen. Ted Stevens, Congress approved funding that will A year ago, the prospects were weather reporting in Prince William bleak for federal funds to improve Sound. Thanks to active support from industry, local regulators, make oil transportation safer.

tory, team-player approach to major September, RCAC was part of the assigned to communications and RCAC took a more participaoil spill drills. In a three-day drill conducted by ARCO Marine in response team with personnel

they could benefit from our indepen the drill and shared its observations evaluation. RCAC also monitored with response managers so that dent monitoring.

brought a more cooperative atmos-RCAC continued its aggressive specifics of a vapor control system Valdez Marine Terminal. But 1994 phere as we worked with Alyeska, hydrocarbon emissions at the state and federal regulators to support for controls to reduce search for consensus on the

the U.S. Coast Guard, Marine Safety Alyeska officials, shippers and other also working more closely than ever We talk much more frequently, both formally and informally, with industry representatives. We are Environmental Conservation and with regulators, in particular the Alaska Department of Office, Valdez.

We continue to meet frequently with Alyeska in our on-going efforts relationship that fosters what we all to forge a positive and productive. want: safe oil transportation.

comprehensive overview of RCAC's. year. A few highlights merit particuwork and activities over the past In these pages, you'll find a ar note:

Sound provided new and important information about ways to increase our margin of safety in preventing tanker towing in Prince William oil spills from disabled tankers. A major study of disabled

reporting of weather and sea condiappropriation to pay for improved A coordinated effort by RCAC tions in Prince William Sound. and others resulted in a federal

legislation on the state's oil spill prevention and response activities. The bill as passed could and would have been much worse without the efforts RCAC worked for compromise of RCAC and other concerned

plans for the Valdez Marine Terminal questions, pointing out deficiencies complex, technical documents representing the oil spill contingency and most of the tankers carrying ments to state regulators, raising 1995, RCAC reviewed scores of RCAC submitted extensive com North Slope crude from Valdez. In work that continues into and giving praise where due.

RCAC welcomed a new member Alaska Center for the Environment, The Oil Spill Region Environmental Kodiak Conservation Network and National Wildlife Federation to rep-Consortium, Prince William Sound organization to its ranks in March. resent environmental interests on Coalition (OSREC) replaced the OSREC consists of six separate Conservation Alliance, Alaska Marine Conservation Council, the RCAC Board of Directors. Kodiak Audubon Society. Environmental Protection groups: Chugachmiut

The Prince William Sound Regional Citizens' Advisory Council is guided by its mission: citizens promoting environmentally safe operation of the Alyeska terminal and associated tankers.

Consistent with that mission, RCAC's structure and responsibilities stem from two documents. Under a contract with Alyeska Pipeline Service Company, RCAC receives funding for services provided to Alyeska and the public. The second guiding document, enacted after RCAC was created, is the federal Oil Pollution Act of 1990, which provided for citizen oversight councils for Prince William Sound Cook inlet. The RCAC is certified as the citizen council for Prince William Sound.

### Contract

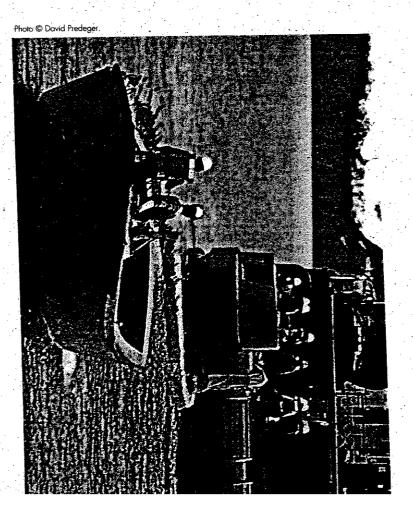
The contract between Alyeska and the Regional Citizens' Advisory Council is explicit about RCAC's independence:

"The independence, and public perception of independence, of the Committee is of overriding importance to the Committee in fulfilling its functions and in meeting public needs. This contract shall be interpreted in such a way as to promote the independence, both actual and

perceived, of the Committee from Alyeska... Alyeska shall have no right...to have any degree of control over the formation or operation of the corporation..."

Under the terms of its contract, the RCAC provides specific services to Alyeska and the public. They include:

- Review, monitor and comment on:
- Alyeska's oil spill response Alyeska's environmental proand prevention plans; Alyeska's prevention and actual and potential environtection capabilities, and and prevention capabilities, Alyeska's oil spill response Increase public awareness of: ronmental impacts of termithe actual and potential envitection capabilities; and response capabilities; mental impacts of terminal Alyeska's environmental pronal and tanker operations; and tanker operations;
- Comment on and participate in monitoring and assessing the environmental, social and economic consequences of oil related accidents;
- Provide input on actual or potential environmental impacts in or near Prince William Sound;



soom is deployed during a drill.

Shurronmental monitoring: Janet Kennedy and Paul Barte Oke a Sediment sample at Knowles Head.



Promoting partnership behings offizens and industry: SERVS Manger offizens of industry: SERVS Manger of industry: SERVS Manger offizens of industry: SERVS Manger officens of industry: S

Comment on the design of measures to mitigate the potential consequences of oil spills and other environmental impacts of terminal and tanker operations;

Participate in development of the spill prevention and response plan; annual plan review; periodic review of operations under the plan including training and conducting exercises;

Comment on and participate in selection of research and development projects.

The contract states that the council may work on other related issues not specifically identified when the contract was written. The RCAC was initially funded at \$2 million per year. The funding level is reviewed every three years.

### Oil Pollution Act of 1990

RCAC's contract with Alyeska pre-dates the Oil Pollution Act of 1990 (OPA 90), but the similarities are not coincidental. Many of the people involved in the establishment of the RCAC also actively promoted citizen involvement provisions in the federal law.

OPA 90 established two demonstration projects in Alaska – one in Prince William Sound, the other in Cook Inlet – designed to promote partnership and cooperation between local citizens, industry and

government; build trust and provide citizen oversight of environmental compliance by oil terminal facilities and tankers.

The law specifically allowed for an alternative, existing organization to meet the requirement for a citizen group and the RCAC is certified as the voluntary alternative advisory council for Prince William Sound. As such, RCAC:

Advises and makes recommen dations on policies, permits, and site-specific regulations relating to the oil terminal and tankers;

Monitors the environmental impacts of the terminal and tankers; Monitors terminal and tanker operations that affect or may affect the environment in the terminal vicinity;

Reviews the adequacy of oil spill prevention and contingency plans for crude oil tankers operating in Prince William Sound;

Advises and makes recommendations on port operations, policies and practices;

Recommends standards and modifications for terminal and tanker operations to minimize the risk of oil spills and other environmental impacts, and enhance prevention and response.



# Oil Spill Prevention

Disabled Tanker Towing Study

providing new and valuable inforescorts and towing was completed. transportation safer. The Disabled mation about ways to make oil and to examine alternatives to capability of existing emergency study was conducted to evaluate the of Environmental Conservation. The Guard and the Alaska Department Pipeline Service Co., the U.S. Coast Sound Tanker Association, Alyeska project of RCAC, the Prince William ties for disabled tankers. enhance escort and assist capabilitowing equipment and practices Tanker Towing Study was a joint A two-year study of tanker

Using computer simulations of various scenarios, the study found that equipment and operating procedures that had been in use could not keep a disabled tanker from grounding in certain extreme situations. The study also revealed ways to improve the effectiveness of towing and assistance capabilities through changes in equipment and operating procedures.

requirements

RCAC submitted comments and recommendations to the U.S. Coast Guard on the final rule on escort requirements for Prince William Sound and Puget Sound. RCAC also

recommended other changes in operating procedures to reduce the risk of a tanker being stranded and enhance the ability of escort vessels to successfully assist tankers in trouble

RCAC's comments were based on the findings of the Disabled Tanker Towing Study. RCAC's comments included recommendations on weather and sea restrictions, tanker speed through the Valdez Narrows, one-way traffic zones and tug type.

Weather reporting

Several years of work culminated in a federal appropriation of \$500,000 for additional weather reporting equipment in Prince William Sound. The new equipment will make oil transportation in Prince William Sound safer by providing more accurate and timely information about weather and sea conditions. Equipment is scheduled for delivery in May 1995. Industry groups, communities, interest groups and regulatory officials actively supported the appropriation.

Plans call for two weather buoys, one at Hinchinbrook Entrance near Seal Rocks and one in the middle of Prince William Sound. Each buoy will have equipment to measure wind speed and



They have divertible search from the Valdez Marine Terminal.



boo Levine (second from right) of ARCO Marine addresses the RCAC Board:

ooking on: Ed Barber, Alaska Department addresses the RCAC Board:

looking Department of Environmental Conservation; and Resources, Tom Chapple, stalk

direction, barometric pressure, wave height and period, air and water temperature. Equipment is also to be installed near Bligh Reef to measure wind speed and direction, barometric pressure and air temperature. In addition, existing monitoring equipment will be upgraded at Potato Point.

Human factors in maritime casualties

Through interviews with 40 mariners Inlet, the study identified nine issues In a cooperative effort with the representatives assisted the review in Prince William Sound and Cook factors that contribute to maritime research on human factors. RCAC ducted a scoping study of human Cook Inlet RCAC, the RCAC confor further research. The findings council in the selection process. Technology Review Council, to were used by a state panel, the solicit and select proposals for casualties in Alaskan waters. Hazardous Substance Spill



Guard Cmdr. Greg Jones, and RCAC Director Tex Edwards
Coost their organizations on the Disabled Tanker Tewning Study Group.

Incident Monitoring RCAC routinely monitored ter-

minal, tanker and port operations, ranging from minor problems on tankers and procedural changes in tanker traffic, to spills and port closures. In 1994, RCAC monitored approximately 20 incidents, including the Eastern Lion oil spill in May, a hazardous substance spill at the terminal in June, and a five-day period of extremely high winds that closed the port in late November.

State programs

RCAC took an active role in the 1994 legislative session on issues affecting oil spill prevention and response. Most of RCAC's lobbying and grassroots organizing efforts focused on SB 215, which reduced the amount of funding available for the state's work in spill prevention and response. Although the bill did become law, efforts by RCAC and others resulted in a compromise measure less damaging than other versions.

## Eastern Lion Oil Spill

RCAC monitored all aspects of the Eastern Lion oil spill, May 21, in Port Valdez. RCAC stationed personnel around the clock for the first 48 hours and filed written situation reports as events unfolded. After the incident, RCAC worked with industry and regulators on "lessons"

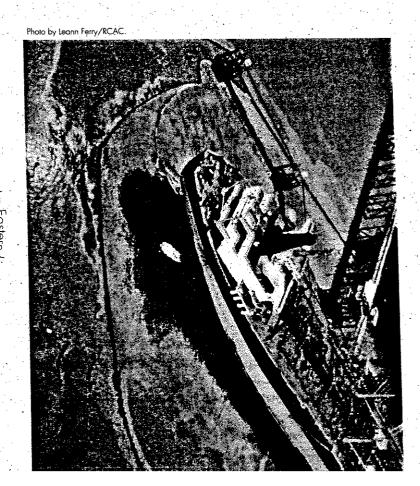
learned" sessions regarding the causes of the spill and the response

Prince William Sound Tanker Spill Prevention & Response Plan

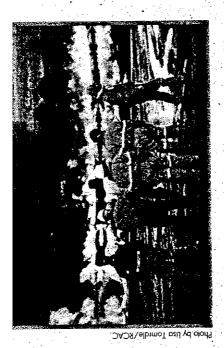
RCAC commissioned a report to analyze the history and issues regarding Alyeska's relationship to the Prince William Sound Tanker Spill Prevention and Response Plan. This plan is called the "core" plan because it is the contingency plan for any tanker spill in the Sound. RCAC formally requested that Alyeska continue to be the planholder for that plan.

the plan was written by Alyeska and referred to as Alyeska's plan. In recent years, Alyeska has adopted the position that it responds to a spill on behalf of tankers and is not itself the "planholder." The Alaska Department of Environmental Conservation concurred with Alyeska's position that although Alyeska is required by state law to respond to a tanker spill, it does so as a response action contractor, not as the planholder.

RCAC continues to be concerned that if Alyeska is not the planholder there will be loss of accountability and degradation of response efforts in the event of another major tanker spill.



escopes the boom surrounding the Eastern Lion.



An outhouser emulsion burns during a test of in-situ burning as a set of in-situ burning as a part of i or whoter emulsion burns during oil. Method of responding to spilled oil.

⋖ Other Advice Comments

RCAC submitted comments to the National Oceanic Atmospheric Coastal Resource Management, on Administration (NOAA), Office of proposed changes to the Alaska Coastal Management Program resulting from state legislation enacted earlier in the year.

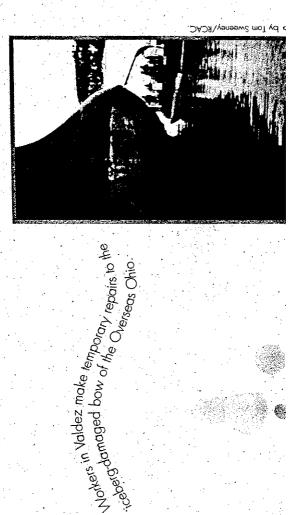
vessels as oil spill response vessels. safety and inspection requirements that could impact the use of fishing RCAC submitted comments to the U.S. Coast Guard regarding

Community impacts planning

divided into two parts, technical and oped for Cordova to mitigate mental and information exchange following A subcommittee was formed to lessen the impacts on communities impacts portion includes communidevelop community response plans. ty response, contingency planning of a major oil spill. The work was an oil spill. RCAC began working demonstration project was develwith industry representatives to health impacts. The technical plan and develop strategies to social. In the social portion, a

Spill response handbook

Response: A guide to oil spill equip-In response to requests, RCAC ment, management and terminolodeveloped a handbook, "Oil Spill



Norkers "maged bow of the Overseas Ohio.

gy." The handbook, to be available in 1995, will be especially valuable to fishermen and community leaders in the event of a spill.

State contingency plans

and reviewed every three years. As plans. The state plans are revised approved oil spill contingency ating in Alaska must have stateand the Alaska Department of spills in Prince William Sound, the review of the core plan for tanker RCAC conducted a comprehensive part of the state's review process, review process continued into 1995. before the plans are approved. The holders address the deficiencies the state's efforts to have the planin some of the plans and monitored plans meet state laws and regulais responsible for ensuring that the Environmental Conservation, which distributed to the shippers, Alyeska tions, RCAC identified deficiencies for tankers. RCAC's comments were terminal plan and individual plans Oil terminals and shippers oper-

Prince William Sound Area Plan

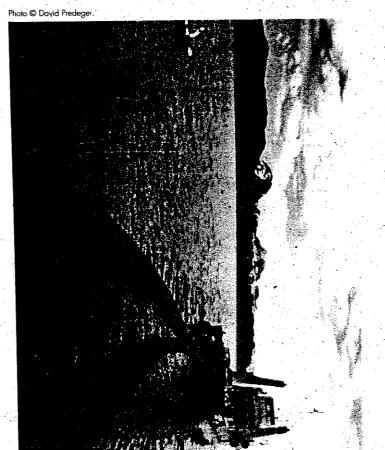
RCAC submitted comments to the U.S. Coast Guard on the Prince William Sound Area/Regional Coastal Zone Contingency Plan (Volume II). This plan is specific to Prince William Sound. It contains policy guidelines for industry

response and describes the response by federal agencies if the federal government manages a spill response in Prince William Sound. RCAC also participated in work sessions on the plan as an ex-officio member of the Prince William Sound Area Committee, which is charged with drafting and reviewing the plan. The area committee is composed of local, state and federal regulatory agencies.

Prince William
Sound Plan
Steering Committee
Nineteen ninety-four was the

Nineteen ninety-four was the fifth year that RCAC has participated in a steering committee established by the state to work on modifications to the Prince William Sound Tanker Spill Prevention and Response Plan. This plan is the blueprint for action in the first three days of a major oil spill from a tanker, when Alyeska manages the spill response. In addition to RCAC, the steering committee consists of industry representatives and regulatory agencies.

The steering committee's work is accomplished primarily through technical working groups. Working group activity in 1994 focused on coastal resources, mechanical training and coordination of the "core" plan with the individual tanker plans prepared by oil shippers. In 1994, the steering committee also began a review of its internal procedures.



pn escont/response ressel trails boom

ACAN (albination bett \( \frac{4}{2} \) documents \( \frac

The F N Tricia Marie tows the bongs Alosson der the nearshore strike team of Mosko Responder during the nearshore strike team of Mosko Responder during the nearshore in Seldovia

Spill drills & exercises

With the assistance of a contract drill monitor in Valdez, RCAC monitors nearly all spill drills and exercises conducted in Prince William Sound and actively participates in major drills.

ed approach to its role in major drills. In the past, RCAC has been an independent observer. At a three-day drill conducted by ARCO Marine in September, RCAC representatives also worked closely with industry and regulators as contributing members of the response effort.

Nearshore Strike Team Demonstration Project RCAC provided input into development of two state-funded demonstration programs in Seldovia and Southeast. The demonstration project, actively supported by RCAC, is designed to demonstrate equipment positioned in coastal communities for use by local volunteers using local vessels of opportunity to contain and recover oil. The demonstration programs are to serve as prototypes for response units elsewhere in the state.

May boom, crews routinely produce, deploying boom,

Long term
environmental
monitoring
program(LTEMP)

of Alaska. The data provide a inter-tidal mussels. The study also and deep sub-tidal sediments and in Prince William Sound and the benchmark for assessing the carbons present. Field surveys are identifies the source of any hydrohydrocarbons present in shallow matic hydrocarbons and aliphatic baseline measurements of polyaro Gulf of Alaska. The study provides bon concentrations at specific sites lecting baseline data on hydrocarwas completed in a program colfuture oil spills. impacts of oil transportation and Prince William Sound and the Gulf conducted twice a year at sites in The second year of monitoring

An extra sampling of mussels was conducted at Saw Island five days after the Eastern Lion oil spill. Saw Island, one of the regular sampling sites, is adjacent to Berth 5 at the Valdez Marine Terminal, where the May 21 oil spill occurred. It was the first time that data collected under the program were used for comparison after an incident.

Ballast water influent monitoring

After a series of delays, RCAC and the Alaska Department of Environmental Conservation began

sampling and analyzing ballast water off-loaded from tankers calling at the Valdez Marine Terminal. Preliminary samples were taken over the summer and actual monitoring began in October.

ent. The program is conducted and metals in the ballast water influ charge. It tests for volatile, semirials inappropriate for discharge at behalf of the tanker operators jointly by RCAC and the Alaska volatile and chlorinated organics levels of materials approved for dis the plant, or higher than expected ballast water treatment plant, mate that might not be treatable by the conducts parallel sampling on Conservation, with funding left over Department of Environmental to detect any incoming materials forwarded to Alyeska, which usually tion to RCAC. All data collected are from a 1991 legislative appropria-The purpose of the program is

Port Valdez environmental monitoring

Discussions between RCAC, Alyeska and state and federal regulators continued through 1994. RCAC is seeking changes in current monitoring programs to provide more useful analysis of ballast water effluent and the aquatic environment in the vicinity of the terminal. RCAC retained consulting scientists to review existing data and reports



Shurionmental monitoring say



Allost water sampling: Judy Kitagawa, Conservation; Leann Ferry, Alaska Department of Environmental Analytical Services

PCAC, and Gregory Tang,

and draft recommendations for modifications and/or improvements to ballast water and environmental monitoring programs in Port Valdez.

Other ballast water treatment issues

Initial work began on review of Alyeska's application for renewal of its National Pollutant Discharge Elimination System (NPDES) permit for the ballast water treatment facility. The NPDES is the federal permit that allows discharge of waste water from the ballast water treatment facility into Port Valdez. The permit expired in June 1994 but it remains in effect until a new permit is issued.

RCAC reviewed the results of a test of the "splitter box" at the ballast water treatment plant. The test

showed no detectable emissions of volatile hydrocarbons. However, the test relied on relatively high detection limits. Alyeska conducted the study as a requirement of its state permit.

PortValdez/Impaired Water Body The Terminal
Operations/Environmental
Monitoring (TOEM) Committee
urged the Alaska Department of
Environmental Conservation to designate Port Valdez as an impaired
water body because of possible violations of state water quality standards near the outfall of the ballast
water treatment facility. The agency
did not do so.

Vapor controls at terminal

RCAC submitted comments to the U.S. Environmental Protection Agency (EPA) on the proposed federal rule on marine vessel loading

vapors and monitored progress on Alyeska's plans for installing vapor controls. RCAC conclud-

"tracer study," to track the path of hydrocarbon vapors released during tanker loading, would not be necessary because of Alyeska's commitment to install vapor controls and the impending federal rule.

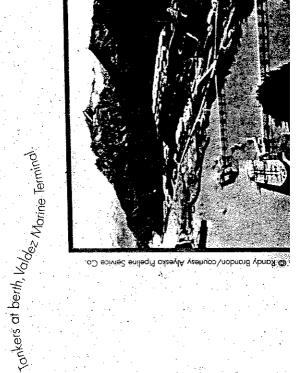
Later in the year, discussions began between RCAC, EPA,
Alyeska and the Alaska Department of Environmental Conservation. The on-going talks sought an accord under which Alyeska would begin installing vapor controls at two berths prior to promulgation of the EPA's final vessel loading rule, now expected in early summer 1995.

Corrosion inhibitors

Alyeska to inject a corrosion inhibitor into the pipeline. In response to RCAC concerns about the potential effects of the corrosion inhibitor on marine life, Alyeska agreed to conduct toxicity testing. RCAC retained a marine toxicologist, in part to assist in monitoring testing of corrosion inhibitors.

Sodium hydroxide

RCAC closely monitored a 7,000 gallon spill of sodium hydroxide, a caustic chemical, at the Valdez Marine Terminal's power house in June. RCAC monitored the environmental impacts of the spill and issued periodic reports to its directors and member entities.



The Observer

through publication of The sent on request to interested citizens office boxes and homes in Prince Observer, a quarterly tabloid taining to crude oil transportation outside the region, as well as regu-William Sound, lower Cook Inlet and newsletter distributed to 33,000 post lators and industry. Kodiak Island. The Observer is also ness on a wide range of issues per-RCAC increased public aware-

column for each issue. In the course about policy and operational issues transportation industry and news and regulatory personnel. Observer, RCAC frequently invites of preparing articles for The Pipeline Service Co. writes its own ered in The Observer, and Alyeska Major oil spill drills are usually covrelated to marine oil transportation. activities, developments in the oil ically includes coverage of RCAC teedback from appropriate industry Each issue of The Observer typ-

Alyeska's assessment of its ered steps taken by the tanker oper-Eastern Lion oil spill. Articles cov-The Observer was devoted to the response to the incident. Another ator, state and federal follow up, and article examined the difficulty of determining tanker ownership. During 1994, one full issue of

gave extensive coverage to escort of single-hull laden tankers, with arti-Another issue of The Observer

> the differences between tractor and conventional tug boats as escort the Disabled Tanker Towing Study cles on the new federal escort rule. vessels and RCAC's recommenda-

### Outreach

discussions. To reach Prince William formal presentations and informal Chenega Bay. These visits included Seward, Kodiak, Homer and each community, staff visited Sound fishermen, RCAC staffed an Working with the directors from information booth at Fish Expo in program of community outreach In 1994, RCAC began a modest

committee volunteers. cultural communications to conduct a seminar for staff, directors and retained a noted consultant in crosstive communications, RCAC In an effort to foster more effec-

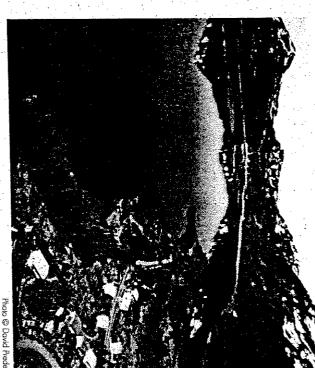
anniversary of the Exxon Valdez oil ence in citizen oversight; and on the and response; on RCAC's experispill: on changes in spill prevention as an important tool in fighting an development of nearshore response a conference marking the five year RCAC presented three papers at

columns to local newspapers. advertisements and submitted guest Topics included state legislation year, RCAC published newspaper Periodically throughout the

> er stations in response, federal funding for weathaffecting oil spill prevention and

William Sound and other issues Prince ln 1994

reports and ing its other docuoped a system for mak the region. throughout citizens libraries and able to ments avail-RCAC devel



The Therenities of RCAC the poet entities of RCAC Box is one of 18



Noting Planning Director L. Noting Planning Director linds Freed, Kodiak Island

done through volunteer committees, are selected through a formal applipolicy is presented to the full counconsisting of council members and provided by the council. All official Public members of the committees field. The committees work for the cil for approval and further action. council, with assistance from staff other citizens with interest, experi-Much of the council's work is ence and background in a given cation process.

RCAC Board Member

& Response Committee response measures, adequate contingency planning and effective regula-Response (OSPR) Committee works through strong spill prevention and to minimize the risks and impacts Oil Spill Prevention associated with oil transportation The Oil Spill Prevention and tions.

Wayne Coleman\* Members:

Dean Rand

Clark Torell

and recommends improvements in Port Operations & tems. The POVTS Committee is

Bill Conley based in Valdez. Chair:

Susie Kendrick, han Widom, A.J. Poul Committee.

or a Kendrick, Ivan Widom, A.J. Poul Committee.
Meeling of the Scientific Advisory

Pete Kompkoff Dennis Lodge\* Vince Mitchell Vince Kelly

Floyd Heimbuch Chair:

Tom Copeland\* Gail Evanoff

Kristin Stahl-Johnson\* Tim Robertson Gordon Scott Carol Till\*

Lou Weaver

Vessel Traffic Systems Traffic Systems (POVTS) Committee in Prince William Sound. It identifies monitors port and tanker operations The Port Operations and Vessel the vessel traffic and navigation sys-

Tex Edwards\* Members: Tom McAlister Neil Schultz

Scientific Advisory Committee

The Scientific Advisory

advice to the other RCAC committees on technical reports, scientific pendent scientific research. It also provides scientific assistance and Committee (SAC) sponsors indemethodology, data interpretation Richard Tremaine and position papers. Chair:

Jocelyn Barker Ivan Frohne Bill D'Atri Members:

A. J. Paul David Hite

Kristin Stahl-Johnson\* James D. Steward David Salmon

Terminal Operations & Environmental

tion. The TOEM Committee is based Committee evaluates operations at Environmental Monitoring (TOEM) The Terminal Operations and ronment and identifies actual and potential sources of chronic pollurespect to their effect on the envithe Valdez Marine Terminal with Monitoring in Valdez.

E.A. Jim Levine Bob Benda Members: Chair:

Michael Frank Julie Howe

Paul McCullom Susie Kendrick

George Skladal Stan Stephens\*



Alaska Wilderness Recreation President & Tourism Association Stan Stephens



Fishermen United Cordova District Vice President



Association Kodiak Village Mayors Charles Christiansen



Ivan Widom City of Seldovia Secretary





Aquaculture Corp. Tom Copeland Prince William Sound

Alaska Chamber of Commerce

(replaced Carl Marrs in

September)

Jim Cloud





Kenai Peninsula Borough Blake Johnson

Chugach Alaska Corp.

Keith Gordaoff



Kodiak Island Borough Member At-Large Wayne Coleman

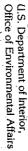


Tex Edwards
City of Homer



City of Cordova Margy Johnson





Doug Mutter

MSO Valdez U.S. Coast Guard

Cmdr. Greg Jones

Atmospheric Admininstration National Oceanic &

John Whitney

Alaska Division of Emergency Services

Alaska Department of Natural Resources

Jerry Brossia/Ed Barber

Alaska Department of Fish and Game

Claudia Slater

Environmental Conservation Alaska Department of (non-voting)

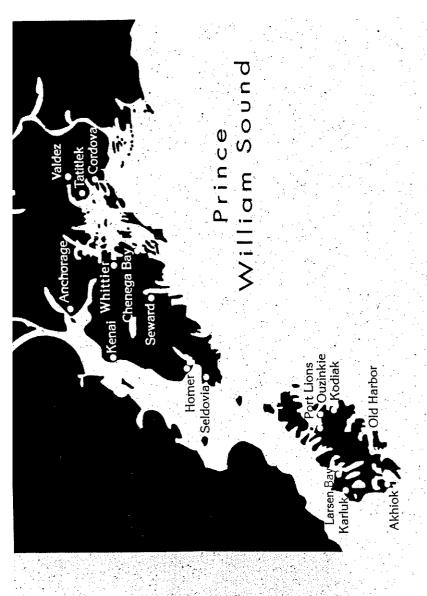
Tom Chapple

Ex-Officio Members

Pete Petram

Carl Lautenberger
U.S. Environmental Protection Agency

U.S. Forest Service Bruce Van Zee





Mike Gallagher City of Valdez

Community of Cherlega Bay

Lairry Evanoff



Dennis Lodge City of Seward

Community of Tatitlek (replaced Darrel Olsen in May)

Gary Kompkoff



Kristin Stahl-Johnson City of Kodiak



Carol Till City of Whittier





Charles K. Weaverling Oil Spill Region Environmental Coalition

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(Ref. A/C #2.2.2528).

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Coordination, request for additional information on the Alyeska
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Prince William Sound Tanker
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Nov. 2, '94

(Ref. #2.2.2538/2.4/2.9.3)

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Dec. 20, '94

(Ref. #A/C 2.2.2542/2.9.1.1/2.4)

## RCAC Staff

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Marilyn Leland

Stan Stanley

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Patty Ginsburg Linda Robinson

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