



Regional Citizens' Advisory Council / "Citizens promoting environmentally safe operation of the Alyeska terminal and associated tankers."

In Anchorage: 3709 Spenard Road / Anchorage, Alaska 99503 / (907) 277-7222 / FAX (907) 277-4523

In Valdez: P.O. Box 3089 / 339 Hazelet Avenue / Valdez, Alaska 99686 / (907) 835-5957 / FAX (907) 835-5926

January 19, 2004

**MEMBERS**

Commander, 17th Coast Guard District (M)  
PO Box 25517  
Juneau, AK 99802

Alaska State  
Chamber of  
Commerce

**SUBJECT: Recertification Application**

Alaska Wilderness  
Recreation & Tourism  
Association

Dear Sir:

Chugach Alaska  
Corporation

The Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) hereby applies for recertification as the alternative voluntary advisory group for Prince William Sound, per Sec. 5002 (o) of the Oil Pollution Act of 1990.

City of Cordova

City of Homer

This application is submitted under the guidelines in the Coast Guard's Sept. 16, 2002, Federal Register notice, which established a streamlined process for two years (including the year covered by this application) out of every three. The notice stated that a streamlined application need only "describe any substantive changes to the information provided at the last triennial recertification." Substantive changes at PWSRCAC are summarized below.

City of Kodiak

City of Seldovia

City of Seward

Ice detection radar

City of Valdez

In July 2003, the council's work in setting up an iceberg-detection radar system on Reef Island in Prince William Sound resulted in our receiving the Legacy Award bestowed annually by the Pacific States/British Columbia Oil Spill Task Force. Legacy Award winners, said Jean Cameron, executive coordinator of the task force, are "models for others in industry, government, and the public to emulate." The council was nominated by the Coast Guard Marine Safety Office in Valdez and by Alaska Tanker Co., which carries oil for BP. This was our second Legacy Award. The first, in 2000, was for developing a guidebook to aid communities facing manmade disasters such as oil spills.

City of Whittier

Community of  
Chenega Bay

Community of  
Tatitlek

Cordova District  
Fishermen United

The radar system demonstrated its value in March 2003, when it detected "wall-to-wall" ice in the tanker lanes on a dark, foggy night, leading to an eight-hour shutdown of tanker traffic until the ice had cleared out. Though the system was still in test mode at the time, it provided detailed information on ice drifting between Point Fremantle and Reef Island, where the system is installed.

Kenai Peninsula  
Borough

Kodiak Island  
Borough

Kodiak Village Mayors  
Association

The past year also saw the installation and activation of a second radar array unit on Reef Island. The newest system utilizes a larger antenna, resulting in a higher-quality signal. The system has performed so well that users have decided that further field verification is not necessary and the system is now considered fully operational.

Oil Spill Region  
Environmental  
Coalition

Prince William Sound  
Aquaculture  
Corporation

Best Available Technology

The council has long promoted the use of Best Available Technology in oil-spill prevention and response. In 2002, we were instrumental in securing

140.105.040119.USCGRecrLtr.doc

passage of a bill in the Alaska Legislature to require the use of Best Available Technology by Alaska's oil industry. This year, we are assisting the state in implementing the law by inviting manufacturers and vendors of crude oil spill prevention and response equipment to submit information for an electronic database of best available technology. The database will be made available to organizations such as Alyeska Pipeline Service Co., tanker companies and oil-spill response cooperatives for use in performing best available technology reviews. Alaska law requires these reviews whenever an oil spill contingency plan is filed or renewed.

#### Hazardous air pollution from Valdez Marine Terminal

Since its earliest days, the council has been involved in efforts to reduce hazardous air pollution from the Alyeska tanker terminal in Valdez. A major development in this area occurred in August 2003, when, after years of deliberation, EPA announced its National Emissions Standards for Hazardous Air Pollutants/Organic Liquids Distribution. While NESHAP/OLD regulations have not yet been made effective by publication in the Federal Register, the version announced in August indicates that the council won a major victory. EPA, reversing the position it had taken in draft versions, decided the regulations should apply to such sources as oil storage tanks and leaking pumps, valves and other connections.

On another point, however, EPA rejected the council's advice, opting not to regulate emissions from the terminal's Ballast Water Treatment Facility. As the regulations have not yet been put into effect by publication in the Federal Register, we continue to work with EPA in an effort to secure coverage of the ballast water facility in the final version.

#### Marine Firefighting Symposium

In October 2003, the council sponsored its third Symposium on Marine Firefighting for Land-based Firefighters. The curriculum, which resulted in college credit, included live exercises with hands-on training for fighting fires on small vessels, at tank farms, and on oil tankers. Instructors for the symposium were experienced firefighters from West Coast fire departments. As is our practice, we involved several partners in this project, including the Alaska Division of Emergency Services; Tatitlek Chenega Chugach, LLC; Prince William Sound Community College; City of Valdez; Alaska Tanker Company; SeaRiver Maritime; Polar Tankers; Crowley Marine; Alyeska Pipeline Service Co.; and the South West Alaska Pilots Association.

#### Expanded web site

Over the past year, we have expanded our web site, [www.pwsrca.org](http://www.pwsrca.org), to vastly increase the amount of information available on our mission, history, studies, projects, and outreach efforts. Work is under way on a comprehensive database of the council's studies and reports, a database of comments submitted by the council to regulators and industry, and a newsroom page posting media releases. In addition, as noted above, the web site will host the Best Available Technology database.

Our efforts in this area were recognized in November 2003 when the Public Relations Society of Alaska bestowed an Aurora Award on the council's web site.

#### Document management system

The council staff has spent many hours creating an internal electronic document management system covering all correspondence originated or received by the council, plus minutes, agendas, meeting notes and contractor reports.

Components include a searchable computer database of all documents in the system, plus electronic and paper copies of each document. The system now includes almost 4,500 documents and the staff is very close to completing entry of all historical information from our 15 years of operation. When complete, this system will constitute a major searchable archive of information on improvements in oil transportation safety since the Exxon Valdez spill of 1989 and on the formation and operation of a citizens' advisory council under the Oil Pollution Act of 1990.


#### Outreach

Over the past few years, the council has devoted increasing resources to its two main outreach publications, the Observer newsletter and the annual report. Both publications received Aurora Awards from the Public Relations Society of Alaska in 2003. In addition, the council received an Aurora Award for its successful guest opinion program, in which opinion pieces on oil transportation issues -- usually under the executive director's byline -- are sent to Alaska newspapers for publication on their op-ed pages.

We have kept this application as brief as possible, limiting ourselves to truly substantive developments as contemplated in the Federal Register notice. This required the omission of many other worthwhile developments and projects at RCAC over the past year, so we stand ready to furnish any additional information you may require.

Additionally, we note that the recertification guidelines call for a description of "any substantive changes to the information provided at the last triennial recertification" (emphasis ours). In theory that would require this letter to repeat everything in last year's recertification application letter in order to capture all substantive changes since the last triennial recertification, which was in 2002. In the interest of brevity, however, we will merely incorporate last year's letter by reference. Naturally, we can furnish a copy of it, should you require one.

Sincerely,

  
John S. Devens, Ph.D.  
Executive Director

Cc: Richard Ranger, Liaison  
Alyeska Pipeline Service Co.