



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

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MEMBERS Jan. 11, 2013

Alaska State
Chamber of
Commerce

Alaska Wilderness
Recreation & Tourism
Association

Chugach Alaska
Corporation

City of Cordova

City of Homer

City of Kodiak

City of Seldovia

City of Seward

City of Valdez

City of Whittier

Community of
Chenega Bay

Community of
Tahleke

Cordova District
Fishermen United

Kenai Peninsula
Borough

Kodiak Island
Borough

Kodiak Village Mayors
Association

Oil Spill Region
Environmental
Coalition

Prince William Sound
Aquaculture
Corporation

Commander
17th Coast Guard District
PO Box 25517
Juneau, AK 99802-5517

SUBJECT: Recertification Application

Dear Sir:

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, or OPA90.

This application is submitted under the guidelines in the U.S. Coast Guard's Sept. 16, 2002, Federal Register notice, which established a streamlined recertification process for two years 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." The year covered by this application falls under the guidelines for the streamlined process. Substantive changes are summarized below.

Broad Representation Of, And Involvement With, Our Region

Incident Management Training for Stakeholders

If there was an oil spill today, representatives from local governments, local emergency operation centers, and other community resources, such as emergency services, would likely find themselves engaged in the response in some manner. The council is working on a project to train these stakeholders on the basics of the Incident Command System, how to familiarize themselves with the PWS Tanker Contingency plans, and address how local entities would interact with Unified Command. The project will consist of a series of

one-day workshops for these local stakeholders to cover these and other relevant topics. PWSRCAC hopes these workshops will enable community representatives to better understand the process and represent their communities in the aftermath of an oil spill. The project aims to foster communication between stakeholders, local communities, industry and the regulatory bodies by giving them a chance to interact, exchange ideas, and build rapport and understanding before a spill.

A contractor has been selected, and work on this project will begin early this year with the workshops to be conducted in the spring.

Youth Involvement Program

Under this program, we fund educational opportunities for students from our region to study topics related to our mission. This year, the program grew significantly from last year to encompass a total of eight projects:

- King Career Center, for a trip to Valdez to study oil transportation
- Valdez High School, for a science class field trip to Peterson Bay in Kachemak Bay to study coastal ecology issues vital for future protection of these resources and to learn about monitoring for invasive species
- Valdez Elementary School, to study chum salmon incubation and to learn the value of salmon as a resource, as well as learn about the council, the Alyeska tanker terminal, the Exxon Valdez oil spill and clean-up and the Prince William Sound tug escort system
- Alaska Geographic, for the addition of a Valdez extension to its annual expedition to take youth from the Exxon Valdez oil spill region on a trip through the Sound to explore its natural and cultural resources, landscape, communities, subsistence activities, and to study matters related to the Exxon spill
- Kodiak Island Borough School District, for a Marine Stewardship Club after-school program to teach middle and high school students about global climate change, oil spills, oil spill response, and marine debris
- Prince William Sound Science Center, for Ocean Science events in Cordova and Valdez
- Kachemak Bay Research Reserve, for delivery of "Could It Happen Here?" kits on oil spills for students in Kodiak, Nanwalek, Port Graham, and Seldovia
- Katie Gavenus of Homer, for development of a "Children of the Spills" book and website

In addition, the council's Information and Education Committee is developing a "Train the Trainer" program to teach people how to train peer listeners to provide counseling to their friends and neighbors in communities affected by oil spills.

Staff and volunteer public service

In October 2012, Donna Schantz, the council's director of programs, was elected to the Valdez city council, where she serves alongside council President Dorothy Moore, who is the city's mayor pro tem (equivalent to vice mayor).

Committee volunteer Pete Heddell serves on the Whittier city council. And Executive Director Mark Swanson continues his service on the Valdez Ports and Harbors Commission, while Project Manager Alan Sorum remains on the governor's Alaska Boating Safety Advisory Council.

Partnership with Stakeholders and Affiliates

Tanker contingency plans

One of the council's most extensive multi-stakeholder efforts in the past year was working on the renewal of spill prevention and response plans (contingency plans) for oil tankers operating in Prince William Sound.

A major component of this effort was the nearshore workgroup process. The workgroup consisted of the Prince William Sound oil shippers (through the Response Planning Group), the Alaska Department of Environmental Conservation, Alyeska SERVS, and ourselves, with limited participation by the U.S. Coast Guard.

The workgroup, which met from November 2011 through March 2012, focused on a variety of Nearshore response effort topics: what resources were required and how would consumables be re-supplied; what improvements were needed concerning tactics, job aides, and training; operations in compromised visibility and darkness; equipment deployment from the large response barge; and elements related to timing.

After multiple rounds of review and revision, the contingency plans were approved by the Alaska Department of Environmental Conservation in November 2012.

Participation in Cook Inlet Risk Assessment

Since 2011, the council has been a partner in a Cook Inlet risk assessment being conducted under the management of the Cook Inlet Regional Citizens' Advisory Council, with additional participation by the oil industry, and federal and state agencies, including the Coast Guard.

This assessment is examining the risk of oil spills posed by vessels transiting the area, covering the types and sizes of vessels plying the Inlet and dominant accident types, and attempting to identify future oil spill risks based on vessel size, type and frequency. Study results will provide a basis for the identification and initial ranking of risk reduction measures.

While our council's primary focus is Prince William Sound, Cook Inlet is also within our region, and we have several member entities from the Kenai Peninsula. Thus we regard this Cook Inlet risk assessment as another opportunity for engagement with our region, as well as for understanding and reducing spill risks within it.

Our chief contribution to the assessment has been support of the Consequence Analysis Workshop, which was conducted in October 2012. Its goal was to bring together subject matter experts in the field of oceanography, geology, biology, subsistence use, socioeconomics, fisheries and resource management to discuss impacts to resources in the region from oil spills based on six scenarios selected for the purpose. (The report from this workshop was not yet available as this application was being submitted.)

Oil Spill Prevention

Best available technology for Prince William Sound escort tugs

In 2011, the council retained Robert Allan Limited of Vancouver, British Columbia, a firm of internationally respected naval architects that is expert in the field of escort tugboat design and operation, to study the towing systems on the tanker escort tugs used in the Sound, and analyze how those systems compare to what is considered Best Available Technology in use by escort tugs internationally.

The Allan study concluded that, while the Prince William Sound towing equipment is of high quality and well maintained, some of it has not kept up with technical innovation since the tugs entered service in the Sound more than a decade ago. Consequently, it no longer represents the best technology available for its purpose.

The study identified two winch deficiencies found in both types of Prince William Sound tugs.

One deficiency had to do with the fact that the winches lack the type of spooling gear needed to bring line onto the winch in such a way that it is not susceptible to "diving" when later placed under heavy load. The other deficiency had to do with the fact that the winches now on the tugs lack full-load render-recover capability, relying instead principally on winch brakes to secure their towlines. This effectively eliminates render-recover capability under heavy load.

The study concluded the winches should be upgraded, after further study to determine the forces involved and the appropriate specifications for the upgrade. The council has transmitted the study and its findings to Alyeska, the Alaska Department of Environmental Conservation, and the US Coast Guard and urged that the needed upgrades be pursued.

Corrosion issues at the Valdez Marine Terminal

The council retained corrosion expert Dr. Robert Heidersbach to study corrosion issues at the Valdez tanker terminal. Dr. Heidersbach came to mixed conclusions: The terminal is relatively corrosion-free and under good corrosion-management practices in some areas, but suffers from corrosion problems in other areas. However, he did make one overarching recommendation: That all piping at the terminal be made inspectable as soon as possible. At present, much of the terminal piping cannot readily be inspected because it is either buried underground or covered by insulation. Dr. Heidersbach's report was scheduled for board review and approval at the council's meeting in late January.

Review of Prevention Commitments at Valdez Marine Terminal

Early in 2012, our contractor Harvey and Associates completed a review of Alyeska's adherence to commitments it had made regarding oil-spill prevention measures at the Valdez Marine Terminal.

This review resulted in several findings and recommendations. One of the issues of most concern has to do with the status of the impermeable secondary containment systems required to be in place around the terminal's crude oil storage tanks.

Based on the Harvey analysis, the council has come to question the integrity of secondary containment and is considering whether to challenge the associated 60 percent prevention credit when the contingency plan for the terminal expires in May of this year.

Sharing information on our work

The council was invited to address the Inter-Agency Coordinating Committee On Oil Pollution Research Committee (ICCOPR) in Washington, DC, in 2012. This committee, chaired by the Coast Guard, was born out of the Oil Pollution Act of 1990, as was the citizens' council. Board member John French, along with Roy Jones—the council's representative in Washington—presented on the council's behalf. Their topics included the council's formation, structure, committees, key projects, goals, and past research initiatives. French also spoke of the council's work on dispersants.

In Conclusion

We have kept this application brief in accordance with this year's streamlined recertification process. This required the omission of many other worthwhile endeavors by our council in our ongoing efforts to maximize the safety of

terminal and tanker operations in Prince William Sound. We stand ready to furnish information on those as needed. Also, we would be happy to provide additional detail on any of the undertakings described above.

Sincerely,

A handwritten signature in black ink, appearing to read 'mswanson', with a long horizontal flourish extending to the right.

Mark A. Swanson
Executive Director

cc: Barry Roberts, Liaison, Alyeska Pipeline Service Co.