

Government Hill Community Council JBER ODPCP Renewal 2021

Please find in the following paragraphs, comment on the plan renewal application package for U.S. Airforce Joint Base Elmendorf Richardson's (JBER) Oil Discharge Prevention and Contingency Plan (ODPCP), State Contingency Plan Number 16-CP-2058. Located in Anchorage and adjacent to the Government Hill community, JBER's sprawling facility has a petroleum storage capacity of 13,557,663 gallons (JP-8 jet fuel, diesel, and gasoline). Many of the following comments were compiled with a particular interest in operations adjacent to Government Hill and oil transfers from the Crowley Aboveground Storage Tanks at the Port of Anchorage (POA).

Page 3 Hazardous Waste Contingency Plan

- 18 AAC 75.425 requires an Oil Discharge Prevention and Contingency Plan (ODPCP). This is quite different from a Hazardous Waste Contingency Plan. Please correct the regulatory authority for a Hazardous Waste Contingency Plan.

Page 56 Table 1-8

Please clarify the reportable spill quantity for the SERC and LEPC.

- Neither SERC or the LEPC have mandated spill reporting/notification authority. The LEPC is a planning body and has little to no actual role during a response. Please validate this assumption and update the table as appropriate.

Please update Table 1-8 with the appropriate local public safety authority, establish spill reporting parameters, and assure the current and correct contact information is provided within the table.

- The means and responsibility for notifying the Government Hill residents, as well as other communities adjacent to the base, is not clearly determined by review of the plan. It is my understanding that the responsibility for local public safety is the Municipality of Anchorage. The specific municipal authority that is responsible for public safety, including dissemination of notifications to affected communities, needs to be validated and updated within the plan.

Section 1.6.7 JBER Spill Response Contractor

18 AAC 75.425(e)(1) requires that the response action plan must provide, in sufficient detail to clearly guide responders in an emergency event, all information necessary to guide response to a discharge of any size, up to and including a discharge that is equal to the applicable response planning standard set out at 18 AAC 75.430 - 18 AAC 75.442.

- Please identify and provide documentation or contracts to demonstrate access to the services referenced in 1.6.7. If this is SUPSALV, please clarify in this section. Although Figure 2 is useful in graphic representation of the response personnel, the figure also lists an unspecified JBER contractor. This leaves questions on the ramp up of contracted personnel to address a discharge up to and including a discharge that is equal to the applicable response planning standard.

- Section 3.8 provides information on SUPSALV, which based upon my interpretation, is also dependent upon contracted services. While this is acceptable, it also puts response time for critical containment and response activities further out for mobilization.

Is it possible to dissect the response personnel needed in the RPS scenario to establish the numbers of personnel needed for critical immediate actions such as containment, site control, and mitigation strategies? Clearly defining the numbers of these personnel, where they are sourced from, and their roles should provide expediency to response functions and personnel roles.

Page 74 Second Bullet, Section 3.2.1 Potential Routes of Discharge [75.425(e)(3)(B)(i)], and Figure 13

Please provide a clear map delineating routes of discharge and the location of the Cherry Hill Ditch as it is identified as key point to mitigate spill impact to Cook Inlet waters (See RPS scenario).

There are various watersheds within the JBER facility, e.g., Ship Creek runs 13.3 miles through the JBER facility; Eagle River as well. Understanding the potential routes of discharge from primary storage facilities would be useful to mitigate water impacts. The RPS scenario states that "response personnel would be called upon to identify multiple locations to block fuel flow (e.g., storm sewer/ sanitary sewer catch basins or manholes)." Are there schematics available to readily locate these catch basins or manholes beyond what is presented in the Figures?

At a minimum, the potential routes of discharge to Cook Inlet via storm water and/or culverts from the largest tanks on the facility or the pipeline from the port.

Figure 13 lacks sufficient detail for use during a spill response. Is it possible to increase the scale along transportation corridors (mobile fueler routes) and large storage facilities to assist responders' efforts to contain the spill or to mitigate environmental impacts? This comment is aligned with other comments that note the need for further detail on routes of discharge.

Section 1.7.2 Scenario 2 On-Land Spill from an Aboveground Pipeline

Further detail on scenario 2 which addresses a spill from the pipeline that connects to the Crowley tank at the port. Considering the frequency and volume of fuel transfer via this pipeline, arguably, this may present the most likely source for a medium to large spill.

The location of the breach in the scenario is unclear as information on the line (upon which the pipeline scenario volume and location are based) including the maps/figures or within appendix H [page H-5] are not easily correlated. Additional explanation would be of value during a response if not during a plan review. As I read appendix H, this line appears to go from 12" to 10" to 8". Where do these lines transition in diameter? Where is the section of line that is ruptured relative to other environmental features or waterways? What isolation valves are established to isolate the breached line and can they be remotely activated or must they be manually closed? Potential routes of discharge along this pipeline haven't been clearly provided in the figures. A schematic (or hydraulic profile if available) showing the valve locations along the pipeline from the Crowley tanks at the POA would be useful in a spill response.

Page 221 Incident Responsibilities and Command Structure

Language in this section is unclear regarding the need for establishment of a Unified command.

“18 AAC 75.425(e)(3)(C) command system - a description of the command system to be used in response to a discharge, including the title, address, telephone number, and affiliation by company, agency, or local government of each person, including a person identified in (1)(B) of this subsection, who by law or through employment, contract, or cooperative agreement, is responsible for responding to a discharge, and each person's functional role in the command system; this list must include command, fiscal, operations, planning, and logistics lead personnel; the command system must be compatible with the state's response structure outlined in the state master plan prepared under AS 46.04.200”

To be consistent with state law as well as the Alaska Inland Area Response Plan which serves as the state master plan (<https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/inland-area/>), coordination between the IC and both the federal and state on scene coordinators should be direct unless agreed to by all parties. Although an "IC is responsible to plan, monitor and evaluate all incident response plans and their subsequent implementation" (Section 3.3), ADEC has approval authority for cleanup and waste disposal plans for oil spill response. (18 AAC 75.310(a).

This section, as well as Figure 2, seems to default all communications with the SOSC to occur through the Environmental Office or through a liaison. The SOSC represents state interests, serves to coordinate state resources agencies, and as a regulatory agency has the means to represent state interests (including those adjacent community residents that may be affected by base spill response operations or impacts). For alignment with state law and conventional expectations for Unified Command, this should be corrected throughout the plan, specifically within this section, the requirements reflected in each response scenario, and within Figure 2.

Page 260 Wildlife Capture, Treatment and Release Program

The BAT assessment of JBER's wildlife capture, treatment and release programs is insufficient. The RPS scenario section 1.7.1.10 references the use of Bird Treatment and Learning Center and the Alaska Zoo as treatment support entities. However, BTLC and the Zoo are not under contract to perform these functions?

Thank you and the JBER staff for the opportunity to comment and for consideration of these comments when finalizing this plan renewal.