



"The mission of the Council is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet."

Members

July 21 2022

**Tourism
Organizations**

Regina Kincaid
Industry Preparedness Program
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

**Alaska Native
Groups**

**Environmental
Groups**

SUBJECT: Comments and request for additional information regarding Andeavor Logistics LP, Kenai Refinery Storage Facility and Truck Terminal Oil Discharge Prevention and Contingency Plan, ADEC Plan #:17-CP-2019

**Recreational
Groups**

Dear Ms. Kincaid:

**Aquaculture
Associations**

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on the Andeavor Logistics LP, Kenai Refinery Storage Facility and Truck Terminal Oil Discharge Prevention and Contingency Plan (ODPCP). CIRCAC's mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet.

**Commercial
Fishing
Organizations**

Overall, we find this plan to be thorough and well-written. However, we also believe several areas require correction while other areas require clarification. For example; some figures and tables are misidentified, and, in Section 1.5 we found the use of the word "Company" in reference to Andeavor Logistics while also addressing actions to be taken by CISPRI to be confusing. Using "Company" in reference to Andeavor is perfectly acceptable. However, their use of this term within Sections 1.5.2 and 1.5.3 makes it difficult to understand which company is being referenced. Use of a universal term should be selective and carefully used to avoid confusion. Another area in need of clarification is within Section 3, Incident Command Documentation. Here, mixed terminology is used to describe the Company Spill Management Team while elsewhere in the plan the term Incident Management Team is used.

City of Kodiak

City of Kenai

City of Seldovia

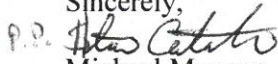
The enclosed comments are intended to support ADEC and the plan holder in ensuring that all content is as clear and current as possible. CIRCAC requests a findings document to be supplied at the end of this plan review.

City of Homer

**Kodiak Island
Borough**

If you have any questions or wish to discuss this further, our Director of Operations may be contacted at (907) 776-5223 or via email at SteveCatalano@circac.org. I may be reached at (907) 283-7222 or via email at MikeMunger@circac.org.

**Kenai Peninsula
Borough**

Sincerely,

Michael Munger
Executive Director

Cc: Graham Wood

**Municipality
of Anchorage**

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Comments and Requests for Additional Information

Regarding

Andeavor Logistics, LP

Cook Inlet

Oil Discharge Prevention and Contingency Plan

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

JULY 21, 2022

Overview

In general, we commend Andeavor for using different font, color, and capitalization to emphasize sections and figures when mentioned within the body of plan. While we were not able to confirm it based on the version of the plan submitted for review, if this formatting choice indicates that this is linked text, this makes the e-version of the plan even more user friendly. The entire plan should be reviewed for spelling, grammar, and punctuation, as some errors exist.

SECTION 1 – RESPONSE ACTION PLAN

1.1 RESPONSE ACTION PLAN

1.1.1 Response Action Alert Notification

Paragraph 1 includes first mention of "Control Operator" but the full title with acronym is included in the third paragraph.

RFAI: Recommend including full title with acronym in first paragraph when first mentioned, then including only the acronym thereafter.

1.3 SAFETY

1.3.1 Initial Response

Page 1-13 of the plan includes a bold section that discusses preparation and availability of Safety Data Sheets (SDS), indicating that they are available electronically via the companies PRISM network and that hard copies are available “*from the Company Safety Department.*” In the event of an emergency, hard copies of the SDS should be readily available to on-site personnel throughout the facility, including the central control room and any other control rooms or primary occupancy spaces. Alternatively, the location where the company safety department is located should be clearly identified. Section 3 also contains similar information regarding location and availability of SDS.

RFAI: Please consider adding language that clearly indicates where personnel can find hard copy SDS and consider making them available in more than one location.

1.3.8 Personal Protective Equipment

The last sentence of the second paragraph indicates, “*The supervisor will notify the Manager of Environmental, Health and Safety of any exposures or equipment deficiencies.*” However, the plan does not indicate who the Manager of Environmental Health and Safety is, nor does it provide any contact information for this person or position.

RFAI: Please clarify who fills this position and provide contact details.

1.5 OIL SPILL STRATEGIES

1.5.2 Company Deployment

The sixth bulleted action item in this section indicates a request for CISPRI to “*alert any contractors that they would normally expect to use.*” Since the very first bulleted action item in this section calls for activation of CISPRI, it makes sense to include the request for CISPRI to alert their contractors in the first bulleted action item. However, this alert appears again in section 1.5.3. Additionally, the instruction to “*Alert any additional contractors that Company may anticipate using for spill response.*” also appears in both bulleted lists. If the plan intends

to identify which actions will be the responsibility of the “Company” (Andeavor) and which actions will be the responsibility of CISPRI, it should be clearer as to who will carry out the action.

RFAI: Please consider deleting the sixth bulleted action item as it creates a redundant and possibly confusing instruction for CISPRI actions. Additionally, consider a more specific term or word in place of the word "Company" to avoid confusion.

1.5.3 CISPRI Deployment

The bulleted action item list in this section seems to more appropriately belong in Section 1.5.2 with only three items directly concerned with CISPRI activities. Additionally, the use of the term “Company” creates a confusion about which “company”, Andeavor or CISPRI, is responsible. Alternatively, since all the actions outlined in both bulleted lists are meant to be undertaken by the Company Incident Commander, and take place nearly simultaneously as indicated in section 1.5.1, it may be more appropriate to combine sections 1.5.2 and 1.5.3 into a general deployment activity section.

RFAI: Please consider combining sections 1.5.2 and 1.5.3 and modifying the bulleted action item list based on a more logical action sequence. Alternatively, consider modifying these sections to include a bulleted list of interim actions and procedures that the operator will perform until the responder identified in the plan initiates a full response, and procedures to notify and mobilize the response action contractor in accordance with 18 AAC 75.425 (e)(1)(E)(ii).

1.6 SPILL RESPONSE STRATEGIES

1.6.3 Response Scenario & Strategies - Scenario 2

In the first paragraph, the plan references Figure 1.6-2 and indicates that it is an ICS organization chart. However, the actual figure in the plan is a map labeled "Scenario Layout - Scenario 2." The ICS chart referenced is actually included as Table 1.6-21 Tactical Objectives - Scenario 2. Day 1 on plan pages 1-51/52. Further, the plan indicates that this table is intended to, "show how the Company Incident Management Team would fill out the Command Post" though it does not appear to actually do this.

RFAI: Recommend updating this section to include the correct figure reference and update the figure to actually show how the Company Incident Management Team would fill out the Command Post as indicated.

1.6.1 Oil Spill Mitigation Procedures

Tables 1.6-1 through 1.6-4 all refer to the “Tank Farm C Operator.” Nowhere in the plan does it indicate that the tank farm is sub-divided into lettered sections, nor does it indicate that there is more than one tank farm operator, so the title used in these tables is confusing. There is only one Tank Farm Control Room and one Tank Farm Control Operator (CO) identified in the plan. Based on the information contained in Section 1.1.1, it appears that the term Tank Farm Control Operator (CO) should be used in these tables.

RFAI: Please clarify the use of the term Tank Farm C Operator or edit these tables accordingly to properly identify the title of the person who should complete the actions within each of these tables.

Table 1.6-5 Terrorist Threat

The third bullet in this table indicates that, “Based on information received, visual inspection will be immediately initiated”, but does not contain specific guidance beyond contacting the appropriate Federal and State authorities and shipping companies.

RFAI: Please consider providing more detail regarding actions to be taken in the event of a terrorist threat.

1.7 NON-MECHANICAL RESPONSE INFORMATION

Section 1.7 (and Section 3. 7) mention the potential for dispersant use, though Section 2.3.1.1 indicates that “Geographical restraints will prevent the product from any of our tanks from reaching Cook Inlet if a major catastrophe causes a breach of the secondary containment dike.” While the “Geographical restraints” that exist around the Andeavor Logistics facilities may be sufficient to prevent oil from migrating to waters of the United States or navigable waters there is not enough discussion or description to allow fair assessment by the reader.

RFAI: Please clarify how Geographical restraints will prevent the product from any tanks from reaching Cook Inlet from these facilities.

SECTION 2 – PREVENTION PLAN

2.1 PREVENTION PROGRAMS

2.1.1 Prevention Training Programs

2.1.1.1 Kenai Refinery Storage Facility and Truck Terminal

While this information may be documented elsewhere, section 2 does not contain a description of the means for achieving training objectives, nor does it include a comprehensive training schedule, including the frequency with which training will be held.

RFAI: Please outline training schedules and frequency as required by 18 AAC 75.020 and 75.425 (e)(2)(A).

SECTION 3 – SUPPLEMENTAL INFORMATION

3.1 FACILITY DESCRIPTION

3.1.1 Kenai Refinery Storage Facility

Paragraph 2 indicates that plot plans which show the lay-out of the refinery are provided in Appendix C. However, Appendix C consists of Acronyms & Definitions. Appendix B does contain plot plans.

RFAI: Please update this section to reference the appropriate appendix.

3.3 INCIDENT COMMAND SYSTEM

3.3.6 Documentation

The first sentence in this section identifies the “Company Spill Management Team” and uses the term four more times throughout section 3 but does not use the term elsewhere in the plan nor does the plan indicate who comprises the Spill Management Team. The plan does identify

the Company's Incident Management Team (IMT) and outlines their duties and responsibilities.

RFAI: Please clarify if the Company maintains a Spill Management Team or if this term should be replaced with IMT.

3.6 RESPONSE EQUIPMENT

This section indicates that oil spill response equipment available in the CISPRI inventory is provided in both the CISPRI Technical Manual and in Appendix A of the plan. Appendix A contains CISPRI and US Ecology Emergency Response Services Contracts but does not contain a list of available response equipment.

RFAI: Please review this sections language and update it accordingly based on where the referenced information is actually located.

3.6.1 Kenai Refinery Storage Facility Spill Control Equipment

The table in this section lists the availability of "Kitty Pools" instead of Kiddie Pools.

RFAI: Please correct this malapropism.

3.7 NON-MECHANICAL RESPONSE INFORMATION

The last sentence of the first paragraph indicates that, "It is The Company's intent to pursue any non-mechanical option as laid out in the Unified Plan Guidance."

RFAI: Suggest updating reference to the Unified Plan and identify/specify the relevant guidance. i.e. Regional and Area Plan

3.9 SPILL RESPONSE TRAINING and DRILLS

3.9.1 Training Programs

This section (page 3-18) categorizes company field response personnel (using HAZWOPER titles/terms) and describes training requirements for field response personnel. Four field response personnel categories are described including a HazMat Specialist (HMS), yet the training requirements for this category are not described as are those for the other three. The list of responsibilities for each position should be reviewed for relevance, as some of the listed "responsibilities" do not appear to fit in this category (e.g., the fourth responsibility for Hazmat Technician is: "Conditions likely to worsen emergencies and preventative measures.")

RFAI: Please review this section and ensure that field response personnel terminology is consistent, and all duties, responsibilities, and training requirements are clearly outlined. Please also review this section and make grammatical corrections.

3.10.1 Environmental Resource Information

The first sentence indicates that, "Extensive environmental sensitivity maps and information are available from the agencies that can be used by oil spill responders..." but should identify specific maps and references as it did previously. In the proposed plan update, this section only references Section 3.11 Bibliography, but that does not include all of the previously listed materials.

RFAI: Please provide a list of the relevant maps and other resources on environmentally sensitive references, or clarify their source in the bibliography, or otherwise indicate how they can be obtained.