Alaska Regional Response Team
September 22, 2022, Business Meeting (Anchorage & Virtual Meeting)
Meeting Summary

Meeting Documentation
• Agenda • Meeting Presentations • Meeting Attendees (attached)
ARRT Documents, Plans and Guidance (New/Updated since last meeting)
None currently

Introductions, Tri-Chairs Report and Review of Actions Since Last Meeting

Ms. Mary Goolie, EPA ARRT Coordinator conducted a roll call of the ARRT Members and the On-scene Coordinators. Ms. Tiffany Larson, ADEC Tri-Chair, Ms. Beth Sheldrake, EPA Tri-Chair, and CAPT Phil Prather, USCG Alternate Tri-Chair offered opening remarks.

Ms. Beth Sheldrake, EPA Tri-Chair, presented an overview of the actions of the ARRT since the February 2022 meeting, (See Slide 8). Major events and milestones include the following:

- RSC Job Aid Task Force kicked-off
- Updated ARRT member and agency contact list
- National Response Team/ Regional Response Teams Co-Chairs Meeting week of February 12, 2023

ARRT Committee Reports

Dr. Lisa Fox, U.S. Department of the Interior, reported on the recent activities of the Wildlife Protection Committee and Cultural Resources Committee, and Ms. Victoria Colles, ADEC, reported on the Statewide Planning Committee. In lieu of a report on Science and Technology Committee, Mr. Scott Pegau, Oil Spill Response Institute, presented on recent Oil Spill Recovery Institute's research activities. The table below provides a summary of the major activities of these committees and associated presentation slide numbers.

ARRT Committee	Major Activities	Presentation
Science and Technology Committee	• No report from committee, Oil Spill Recovery Institute provided an overview of their recent research projects, summarized in the presentation.	Slides 11-19
Cultural Resources Committee	• ARRT CRC Charter – completed and submitted to ARRT Tri-Chairs for approval • Next meeting – November 2022 • Future work planned: • Review and revise the *Alaska Implementation Guidelines*	Slide 21

	• Collaborate with Culturally Important Places Work Group and potentially develop new response tools	
Wildlife Protection Committee	Working on a ~~C~~carcass collection and documentation training video • Future work • Review and administrative update of the Wildlife Protection Guidelines for Oil Spill Response in Alaska (WPG) Pribilof Islands Working Group: • Revising the Pribilof Islands Wildlife Protection Guidelines (PI WPG) • Revised PI WPG will supplement the WPG • Expect to finalize by 2023	Slides 22-23
Statewide Planning Committee	• Monthly SPC Meetings • Upcoming ACP Reviews: AWA ACP • FAQs & Outreach: Plan Review Process and quarterly newsletter • Recommending & coordinating Website Updates on ADEC and ARRT	Slides 26-32

Area Committee Reports

Each of the four Area Committees provided updates on their activities ~~of the Area Committees~~ and recent major events in the areas. The ~~a~~Area ~~c~~ ommittees are working on annual reviews and modifications as necessary to each of the four Area Contingency Plans, as well as other projects, exercises, and trainings to support response readiness in their areas. The tables below are a summary of the requests for support from the Area Committees to the ARRT and of the upcoming activities and work in the Area Committees (Slides 35-64).

Area Committee Requests for Support	
Alaska Inland	Support/ideas/resources for oil spill prevention Village Compliance Assessment
Alaska Inland	Continue conversation on logistic support from ARRT member agencies – follow-up on ARRT Tabletop Exercise conducted on 9/21/2022
Arctic and Western Alaska	Development of statewide risk assessment methodology
Arctic and Western Alaska	GIS support and improved technology for planning (trajectory and GRS validation software)
Southeast Alaska	Support for exploration of GRS documents to GIS format and improve technology to conduct validations with modeling software

Area Committee	Next Meeting	Status of ACP	Major Upcoming Exercises/ Trainings, and Projects
Alaska Inland	• TBD, Winter 2023	• V2020.1, signed in March 2021 • On-going work to ISB OSC Decision-making Checklist • Initiating admin subcommittee for 2023 review and modifications	• October 4-6 Hilcorp Alaska exercises • Proposing Capacity Building Outreach and Training- Coordinated by EPA, ADEC, ANTHC (Spring 2023)
Arctic and Western Alaska	• November 1, 2022	• V2020.1 Signed December 2021 • V2020.2: Out for Public Review; Expected by end of year. Revisions include detailed ESA consultation language, and new content on intentional wellhead ignition and unmanned aerial systems.	• On-going work on salvage & marine firefighting and GRS validation
Prince William Sound	• October 13, 2022	• Working to complete 2020.2 modifications following public comment Summer 2022. • Future Considerations: updates to UAS protocol and continue to streamline formatting	• PWS VMT Exercise: Oct 12th (Valdez) • CG/VPD/SERVS Natural Disaster Exercise: Nov 30th (Various) • PWS Tanker Exercise May 16-18 (Valdez/Anchorage)
Southeast Alaska	• TBD	• V2020.1, signed in March 2021 • Admin Subcommittee – Workgroup approved UAS protocols (AWA ACP) for next SEAK ACP update	• PREP Full Scale Exercise April 2023, Ketchikan

The afternoon session consisted of three special topics presentations. A thorough summary of the presentations is not included in this meeting summary due the complexity and detail, interested parties should review the presentation slides.

Report on the Bering Sea/ Typhoon Merbok response

CAPT Leanne Lusk, USCG FOSC Sector Anchorage, gave a report on response to the Typhoon Merbok in Western Alaska. At present, the largest discharge reported/discovered is 1,000 gallons of gasoline, used oil and various hazardous substances in small containers scattered along one mile of river near Chevak, Alaska. Several overflights have been conducted in the region. The Pacific Strike Team and University of Alaska Fairbanks is using unmanned aerial systems (UAS) to further identify damaged or

missing tanks. USCG is coordinating closely with the State Emergency Operations Center and with pollution response partners at EPA and ADEC. (No presentation available)

Report on Summer 2022 Joint USCG EPA Inspections in Western Alaska

Ms. Torri Huelskoetter, EPA FOSC, gave a report on this summer's joint agency facility inspections. These inspections are presented as an opportunity to connect with the facility operations and community leaders and residents to develop strong relations and to cooperatively assess and improve fuel facilities in Arctic and Western Alaska. Many of these facilities are out of compliance in terms of operations, maintenance, and spill preparedness – but the solutions to fix these are complicated by the remote location and limited resources – both personnel and materials (Slides 68-83).

In a following discussion, Dr. Kimberley Maher, ADEC SOSC, added that EPA, ADEC, Alaska Energy Association (AEA), US Fish and Wildlife Service (USFWS) and the school district in Beaver, AK (Yukon Flats region) are working collaborative to address concerns regarding the old school tank farm. AEA wants to decommission the school tanks, but the school district would be required to also provide funds. AEA reached out to EPA and ADEC to collaborate with the school district to help them understand that preventative actions are cheaper than responding to a spill. The school district has identified grant funds to allow this project to move forward. USFWS is also working to procure funding to clean up the contaminated soil at the decommissioned tanks, which is located on Yukon Flats National Wildlife Refuge land.

Update on the Clean Water Act, proposed Hazardous Substance Rule

Ms. Sheldrake presented on the proposed new regulations under for the Clean Water Act, Hazardous Substances (CWA HS) for worst-case discharge planning under 311(j)(5). Public comment on the proposed regulations closed this summer, with final action expected no later than September 2024. Analysis of EPA, State, and other federal programs shows that no existing program covers the entirety of required CWA 311(j)(5) program elements for every CWA HS. There are overlaps with Clean Water Act federal ~~facility~~ oil facility response plan and Clean Air Act risk management plans, Resource Conservation and Recovery Act (RCRA) hazardous waste regulations~~;~~, Toxic Substances Control Act (TSCA) and state programs and regulations. The new regulations will extend requirements for a response plan to facilities that meet or exceed a capacity threshold quantity of 10,000 times the reporting quantity of CWA HS if the site is located within 0.5 miles of a navigable water or conveyance and is a threat to the fish, wildlife and the environment, public health or public water systems, or at the discretion of the regional administrator. Slides 85-98 provide a detailed background and summary of the proposed regulations. Ms. Sheldrake also provided an overview of the requirements of a facility response plan (Slides 84-105).

Status Report on the National Contingency Plan, Subpart J Update

Ms. Sheldrake reported that the final rule on "Authorization of Use" and "Testing and Listing" is expected in May 2023, with an effective date of August 2023 (dates subject to change). The proposed revisions are meant to inform the use of dispersants and other chemical or biological agents and ensure OSCs, RRTs and Area Committees have relevant information to support response decision-making. The revisions have a three-pronged approach for decision-making: 1) Testing and Listing, 2) Authorization, and 3) Atypical Dispersant Monitoring (Slides 106-108).

EPA Office of Research and Development: Unmanned Aerial Systems & In Situ Burning Plume Modelling Project

Dr. Maher, SOSC, and Ms. Liza Sanden presented on a research project at the Poker Flats Research Range to improve the forecasting and modeling of in situ burning smoke plumes. This project included four days of ISB of small quantities of crude oil to obtain aerial samples and air monitoring via the use of UAS, visual and infra-red monitoring of the plume, and ground-based air monitoring stations. EPA Office of Research and Development led this research project with support from several federal agencies and the University of Alaska. EPA Region 10 and the Pacific Strike Team established multiple ground-based monitoring stations, connected via telemetry to obtain real-time remote data sharing. The USCG and EPA were able to successfully assess the interoperability of our instruments and telemetry technology (Slides 109-113).

Marine Spill Response Corporation: Capabilities for the Aerial Application of Dispersants

Mr. Tracy Sedlack presented on the capabilities of Marine Spill Response Corporation (MSRC) to apply dispersants in Alaska. MSRC has Tier 1-3 Dispersant Classification for Prince William Sound, Cook Inlet and Southeast Alaska with a dedicated aircraft. While MSRC will be able to cover much of Western Alaska with the new aircraft, they are not applying for OSRO Classification. Mr. Sedlack's presentation included an overview of MSRCs dispersant program assets, and activation of the program for application of dispersants and response operations (Slides 115-133).

Meeting Close-out

There were no public comments made at this meeting.

Closing Remarks:

The tri-chairs offered closing remarks and thanked all presenters and attendees for their participation.

Upcoming Dates

- ARRT Meeting: *The dates of the Winter 2023 meeting are subject to change and will be posted on the ARRT website.*

Participant Summary:

Seventy-five individuals attended the meeting, representing twelve member agencies and additional other tribal governments, federal, and state agencies, industry, and other non-governmental organizations

Member Agencies in Attendance		
Member Agency	**Present**	**Not Present**
Alaska Department of Environmental Conservation	●	
Department of Agriculture	●	
Department of Commerce	●	
Department of Defense	●	
Department of Energy	●	
Department of Health and Human Services	●	
Department of the Interior	●	
Department of Justice		●
Department of Labor	●	
Department of State		●
Department of Transportation	●	
Environmental Protection Agency	●	
Federal Emergency Management Agency		●
General Services Agency	●	
U.S. Coast Guard	●	
U.S. Nuclear Regulatory Commission		●

Non-member Organizations in Attendance
Federal Agencies
U.S. Department of the Interior, Bureau of Safety and Environmental Enforcement
U.S. Department of the Interior, Fish & Wildlife Service
U.S. Department of Transportation, Pipelines and Hazardous Material Safety Administration
Federally Recognized Tribes & Consortia
Bristol Bay Native Association
Industry
ConocoPhillips Alaska, Inc.
Hilcorp Alaska
Response and Environmental Services
Alaska Clean Seas
Marine Spill Response Corporation

Nuka Research and Planning, Ltd.
Pearson Consulting
Non-Governmental Organizations
International Bird Rescue
Ocean Conservancy
Oil Spill Recovery Institute (OSRI)

ALASKA REGIONAL RESPONSE TEAM

September 22, 2022

Meeting Purpose and "Rules"

- *This is a business meeting of the **ARRT***
  - *Questions and discussion is for ARRT Members and OSCs*

- *Items discussed that are the responsibility or content of the Area Committees will be **referred to appropriate Area Committee** and not includ in dthe meeting discussion, except for how the ARRT can provide support, if requested/needed*

- *While open to the public, it is not a public meeting*
  - *As time allows, questions may be taken from the public. Please type questions in the Chat box. Non-ARRT members are invited to sign up for Public Comment.*

Tips: Using Zoom

- Change your name to,
FULL NAME and **AGENCY**

Please mute your microphone
&
turn off video,
except when speaking

Dial-In Options:

669-254-5252 669-216-1590
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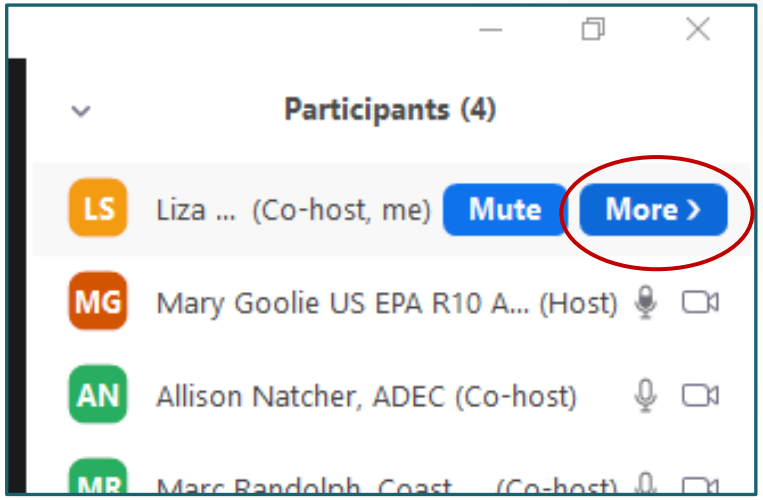
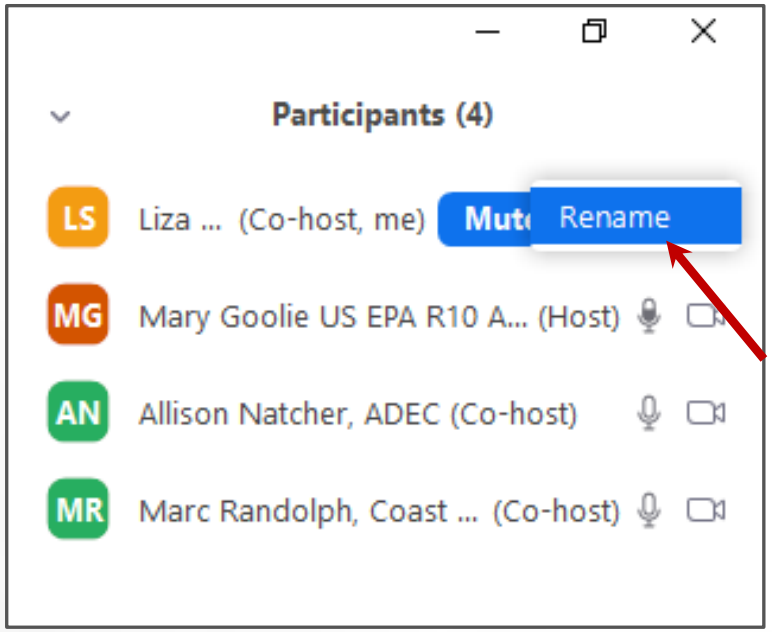
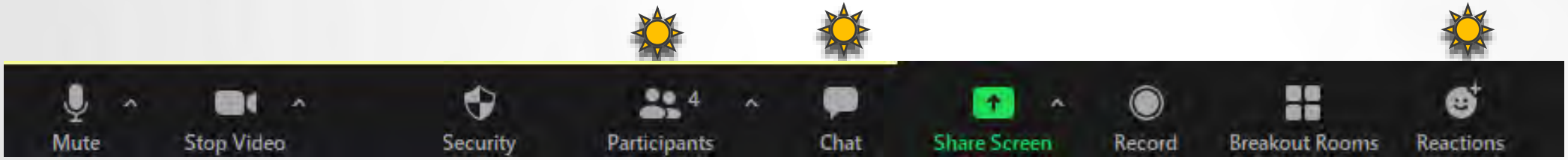
Meeting ID: 161 6961 3152
Passcode: 9073124310





ZOOM TIPS: **RAISE HAND AND CHAT**



ARRT Members & Representatives, raise your hand to speak or enter question/ comment in chat.

Chat

Find “Raise Hand” Under Reactions

Please use “Everyone” Chat when asking or responding to questions or making general comments requests during this meeting.

Non-ARRT members, sign up for Public Comment by entering your request in Chat.

ALASKA REGIONAL RESPONSE TEAM

INTRODUCTIONS &
REPORT FROM TRI-CHAIRS

Supporting Federal and State On-scene Coordinators

Alaska RRT

INTRODUCTIONS

ARRT Coordinators will facilitate ARRT member and FOSC/SOSC roll call.

For other attendees and members of the public, the attendee list will be based on Participant Names in Zoom.

lew Members, OSCs, Area Planners

- Lisa Fox, DOI
- Suzanne Archuleta, DOS
- Paul Valley, FEMA
- Bernie Nowicki, SOSC
- LT Shelby Frasca, PWS Area Secretary

Since Last Meeting (17 FEB 2022- Virtual)

Alaska Regional Response Team

- RSC Job Aid Task Force kicked-off
- Clean Pacific (Seattle) 23-25 August
- Updated member/agency contact list

Relevant Agreements

- Russia-US JCP Ex 2023 Initial Planning has begun (minus Russia)
- Arctic Council EPPR re-prioritizing/re-starting some projects

National Response Team

- NRT monthly member meetings
- Issued 4 new QRGs
- NRT/RRT Co-Chairs Meeting w/b week of 12 FEB 2023
- Support to several international spills (Bahamas, Cuba)
- New USCG Vice Chair – CAPT Trey Wirth

ALASKA REGIONAL RESPONSE TEAM COMMITTEES

Science and Technology Committee

Cultural Resources Committee
Wildlife Protection Committee
Pribilof Islands Working Group

Cultural Resources Committee (CRC)

- Last meeting – January 2022
- ARRT CRC Charter – completed revision and submitted to ARRT tri-chairs for approval
- Future work
  - Review and revise the *Alaska Implementation Guidelines*
  - Collaborate with Culturally Important Places Work Group and potentially develop new response tools
- Next meeting – November 2022

Photo credit: ADNR Office of History & Archaeology

Wildlife Protection Committee (WPC)

- Carcass collection and documentation training video
- Future work
  - Review and administrative update of the *Wildlife Protection Guidelines for Oil Spill Response in Alaska* (WPG)
  - Begin to update content

Photo credit: Alaska Department of Fish & Game

Pribilof Islands Working Group

- Subcommittee of WPC
- Met on monthly/bi-monthly basis in 2022
- Revising the *Pribilof Islands Wildlife Protection Guidelines* (PI WPG)
  - Revised PI WPG will supplement the WPG – used to be an Aleutian Islands SCP annex
  - Reformatted to match ACP structure
  - Updated content and added info from WPG
  - Developed new sections and content – marine debris, drone pilot list, wildlife observation locations, etc.
  - Expect to finalize by 2023
- Next meeting – October or November 2022

QUESTIONS?

Contact us:

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SHPO: judy.bittner@alaska.gov

NMFS: sadie.wright@noaa.gov

FWS: angela_matz@fws.gov

ADFG: jeanette.alas@alaska.gov

ADEC: mike.donnellan@alaska.gov

ALASKA REGIONAL RESPONSE TEAM
STATEWIDE PLANNING COMMITTEE

Statewide Planning Committee members

ARRT Coordinators

- **EPA:** Mary Goolie
- **USCG D17:** vacant
- **ADEC:** Allison Natcher

USCG Area Secretaries and ADEC/EPA Area Planners

- **USCG PWS:** LT Shelby Frasca
- **USCG SEAK:** Kathy Hamblett and LT Joe Zarlengo
- **USCG AWA:** LCDR Matt Richards
- **ADEC:** Victoria Colles
- **EPA:** Mary Goolie

Statewide Planning Committee Activity

- Monthly SPC Meetings
- Upcoming ACP Reviews: AWA ACP
- FAQs & Outreach: Plan Review Process, quarterly newsletter
- Recommending & coordinating Website Updates on ADEC and ARRT

Overall: Interagency coordination of planning efforts

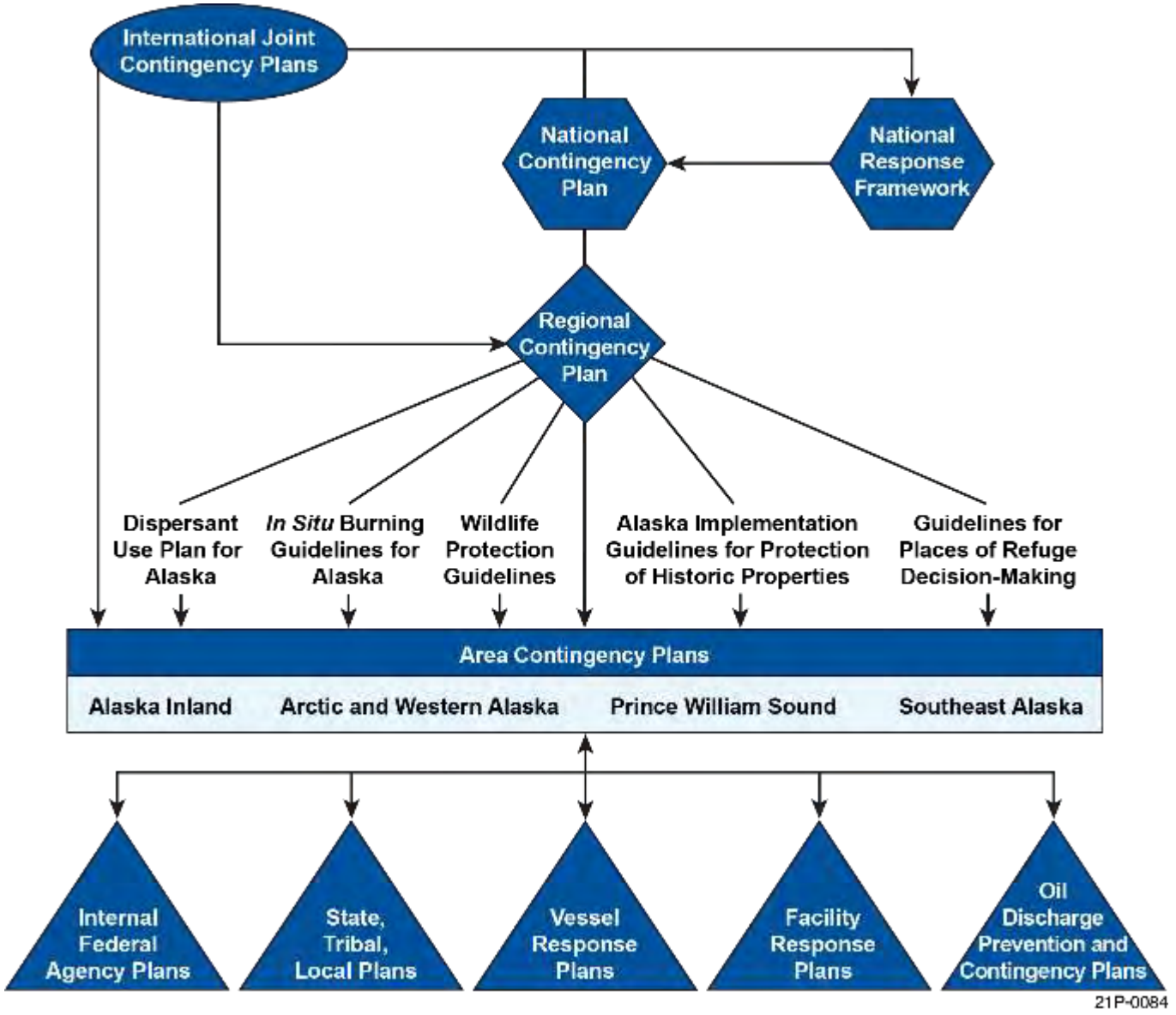
ADEC Website Updates

https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/regional-area-planning

- **Regional and Area Planning FAQ** (also on Reference and Tools page under "Overview documents".)
- **Annual Review Guidance**

New “Meetings and Events Calendar” at https://www.alaskarrt.org

Plan Relationships



Regional Contingency Plan

- Planner Centric
- Region-wide policy issues
- Updates: ARRT

Area Contingency Plan

- Responder Centric
- Area resources and procedures
- Updates: Area Committee

Questions?

Supporting Federal and State On-scene Coordinators

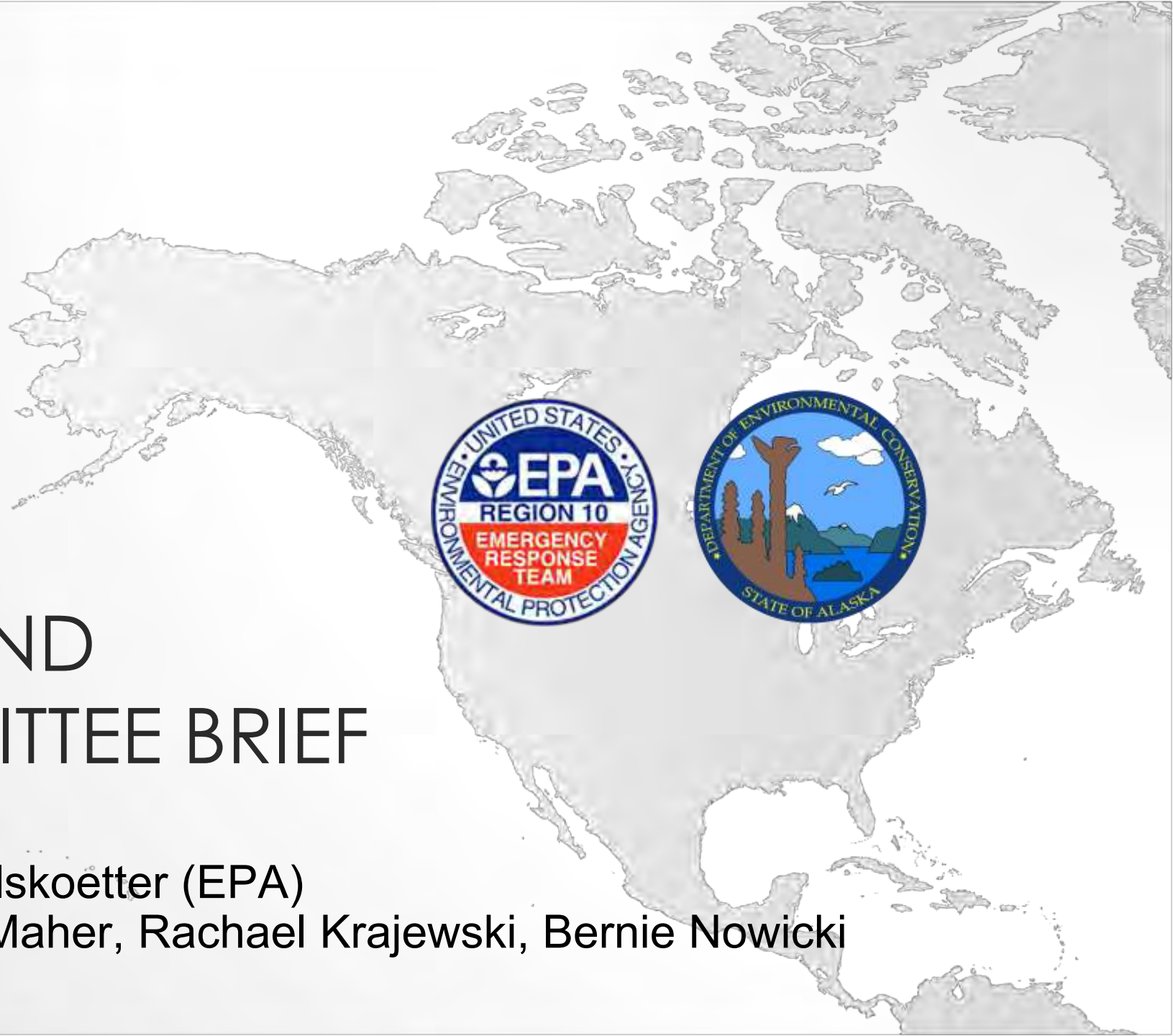
Alaska RRT

BREAK

ALASKA REGIONAL RESPONSE TEAM

AREA COMMITTEE REPORTS

September 22, 2022



ALASKA INLAND AREA COMMITTEE BRIEF

Bob Whittier & Torri Huelskoetter (EPA)
Anna Carey, Kimberley Maher, Rachael Krajewski, Bernie Nowicki (ADEC)

Alaska Inland Area Committee update

Last Meeting September 20, 2022

Working Groups Sponsored by AK Inland Area Committee

- **In Situ Burning:** Task - Develop ISB Decision-Making Checklist in ACPs *(not an update to ISB Guidelines)* for references in AK Inland ACP.
  - Testing at upcoming industry-led exercises October 2022
- **Hazardous Substance Response**: Task Update ACP Chapter 7000 & HazSub Job Aid. *On Hold*
- **Response Logistics:** Task Update Chapter 5000 Logistics & Logistics Job Aid. *On Hold*

Area contingency plan update

Version 2020.1 approved March 2021

2023 Tasks: Annual Review *(example - update new OSC contacts).*

Future Public Review Update (Planned for 2024+):

- Incorporate products of HazSub, Logistics & ISB Working Groups
- Review & Revise Job Aids for Health & Safety, Radiation, Waste Management & Disposal

Contact Victoria Colles with proposed plan modifications or to be on the AK Inland Admin Subcommittee

Case/ Exercise Summary
Poker Flats: ISB Air Monitoring Exercise:

Test & Demonstration of EPA Air Monitoring Capabilities Exercise including a test of instrument telemetry and data publication/sharing

Special Announcements:

- Hilcorp North Slope IMT Exercises October 2022

- Proposing Capacity Building Outreach and Training- Coordinated by EPA, ADEC, ANTHC (Spring 2023)

Needs Requiring ARRT Support

- Support/ideas/resources for Village Compliance Assessment
- Continue conversation on logistic support from ARRT member agencies – follow-up on ARRT Tabletop Exercise 9/21/2022

ADEC Area Planning website:

http://alaska.gov/go/7EKN

Contact us:

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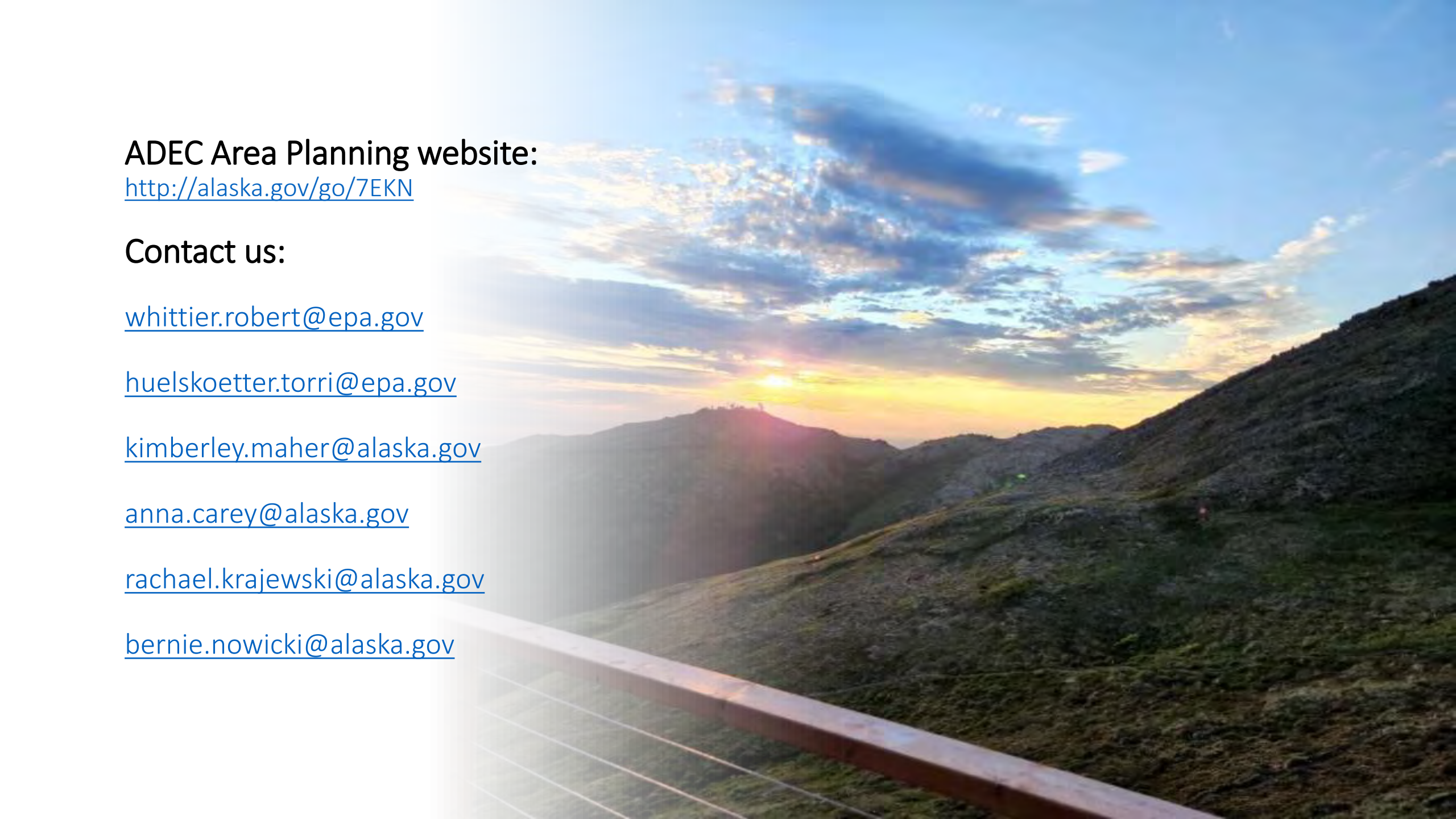


ARCTIC & WESTERN ALASKA

Report to Alaska Regional Response Team: September 22, 2022

LCDR Matt Richards Matt.Richards@uscg.mil

Area Committee Update

- GIS system
- Oilmap software
- Active GRS Validation
- Continued UAS work
- Contracted Risk Assessment support
- Next AC Meeting: November 1, 2022

Area Contingency Plan Update

- Version 2020.2 public comment period anticipated to close mid/late October
- Several updates from 2020.1 addressed
- Grammar corrections and writing clarity
- Detailed ESA consultation language
- Intentional Wellhead Ignition added
- UAS language expanded/clarified

M/V MAUNALEI

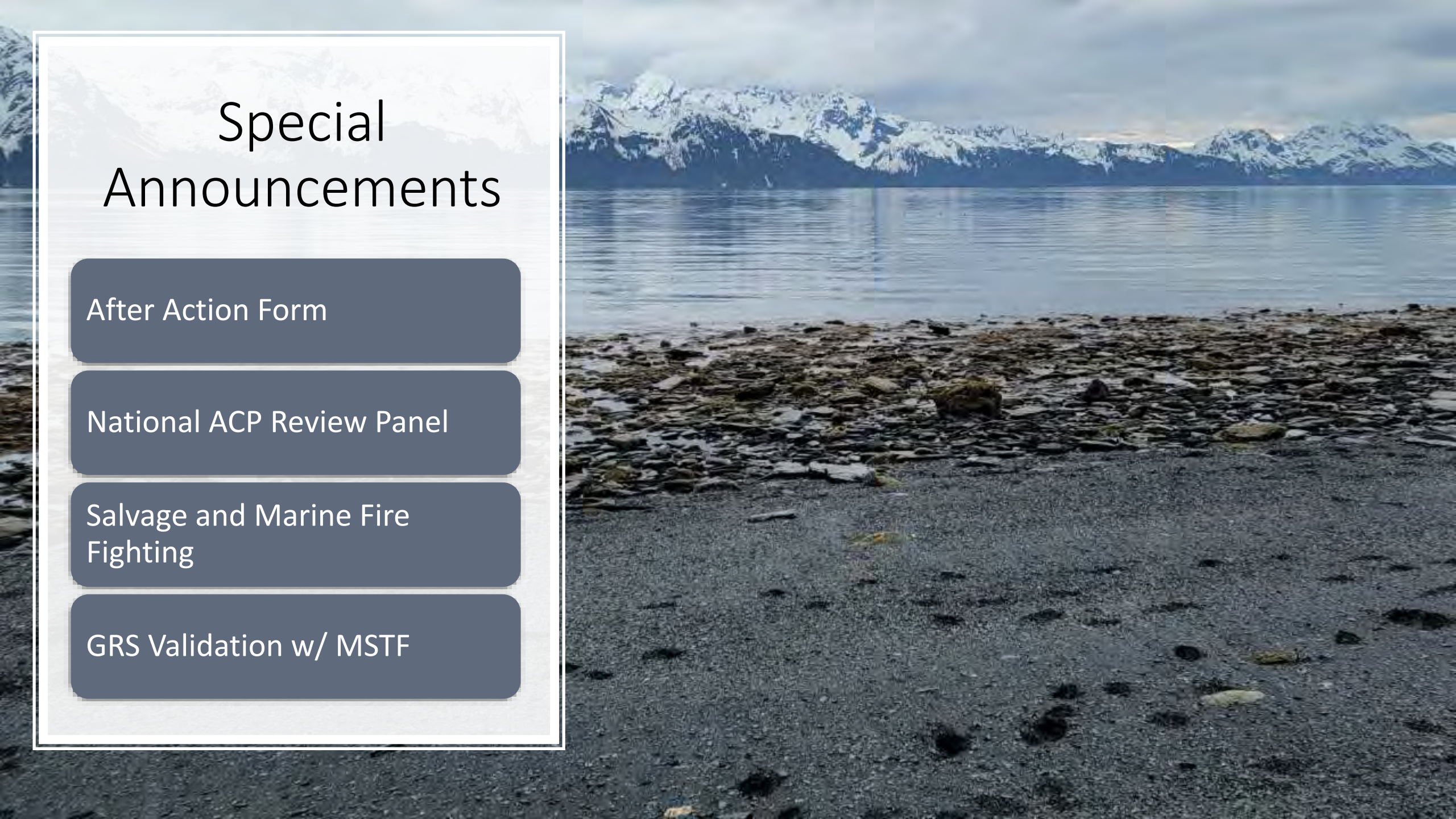
- CPP seal failed
- Discharged 6 gal/hour during transit from Seattle to ANC
- Prohibiting entry would result in supply chain disruptions

F/V PACIFIC SOUNDER

- 17JUN22: grounded west end of Unimak Island, max potential 21,000 gal
- Salvage not possible until 2023 due to weather
- Vessel likely pushed onshore and torn apart over the winter

Special Announcements

- After Action Form
- National ACP Review Panel
- Salvage and Marine Fire Fighting
- GRS Validation w/ MSTF



Area Committee Needs for Alaska RRT support

- Development of statewide risk assessment methodology
- GIS support and improved technology for planning (trajectory and GRS validation software)
- Continued area committee support and coordination

Area Committee Contacts

ADEC Area Planning website:

- http://alaska.gov/go/7EKN

Contact us:

- AWA-AC@uscg.mil
- decsparplanning@alaska.gov

PRINCE WILLIAM SOUND AREA COMMITTEE

September 22, 2022

Area Committee update

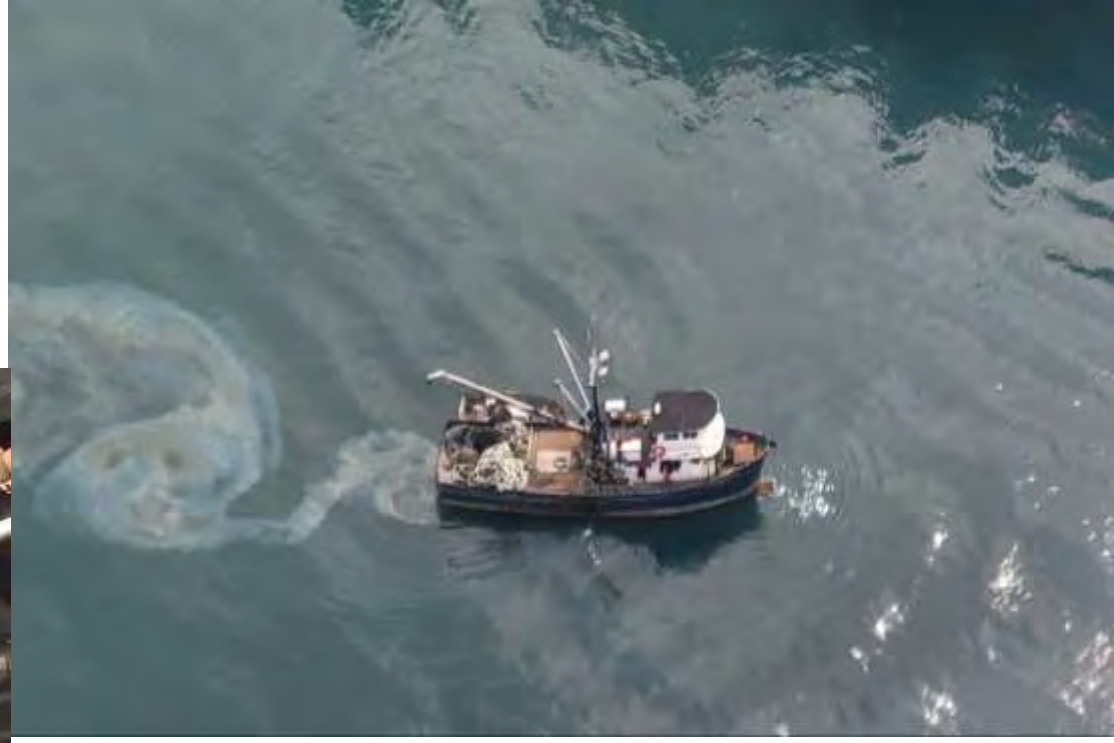
Notable initiatives within the PWS Area Committee:

- Public comment concluded, actively finalizing plan
- Area Committee Meeting in April (Cordova), Tabletop Exercise was completed at the same time
- Steering Committee Meeting Aug 17th
- Keeping ADEC PWS Area Page up to date

Area Contingency Plan update

- Current Version (2020.2)
- Plan updates:
  - Working on finalization of plan. Public comment closed.
  - Added several ‘Reference and Tools’ boxes directing readers to updated information.
- Future considerations:
  - Updates to UAS protocol
  - Continue to streamline formatting.

Case Summary/ Enforcement



- Vessel dumping overflight Tank
- Truck Fire at Valdez Refinery

Special Announcements

- PWS VMT Exercise: Oct 12th (Valdez)
- Area Committee Meeting Oct 13th (Valdez)
- CG/VPD/SERVS Natural Disaster Exercise: Nov 30th (Various)
- PWS Tanker Exercise May 16-18 (Valdez/Anchorage)

Area Committee Needs for Alaska RRT Support

- None at this time

Area Committee Contacts

PWS Area Planning website:

- Prince William Sound Area (alaska.gov)

Contact us:

- Patrick.A.Drayer@uscg.mil
- Anna.Carey@alaska.gov
- Shelby.E.Frasca@uscg.mil
- decsparplanning@alaska.gov

SOUTHEAST ALASKA AREA COMMITTEE

Report to Alaska Regional Response Team
22 September 2022

Darwin Jensen, CAPT (USCG)
Rachael Krajewski (ADEC)

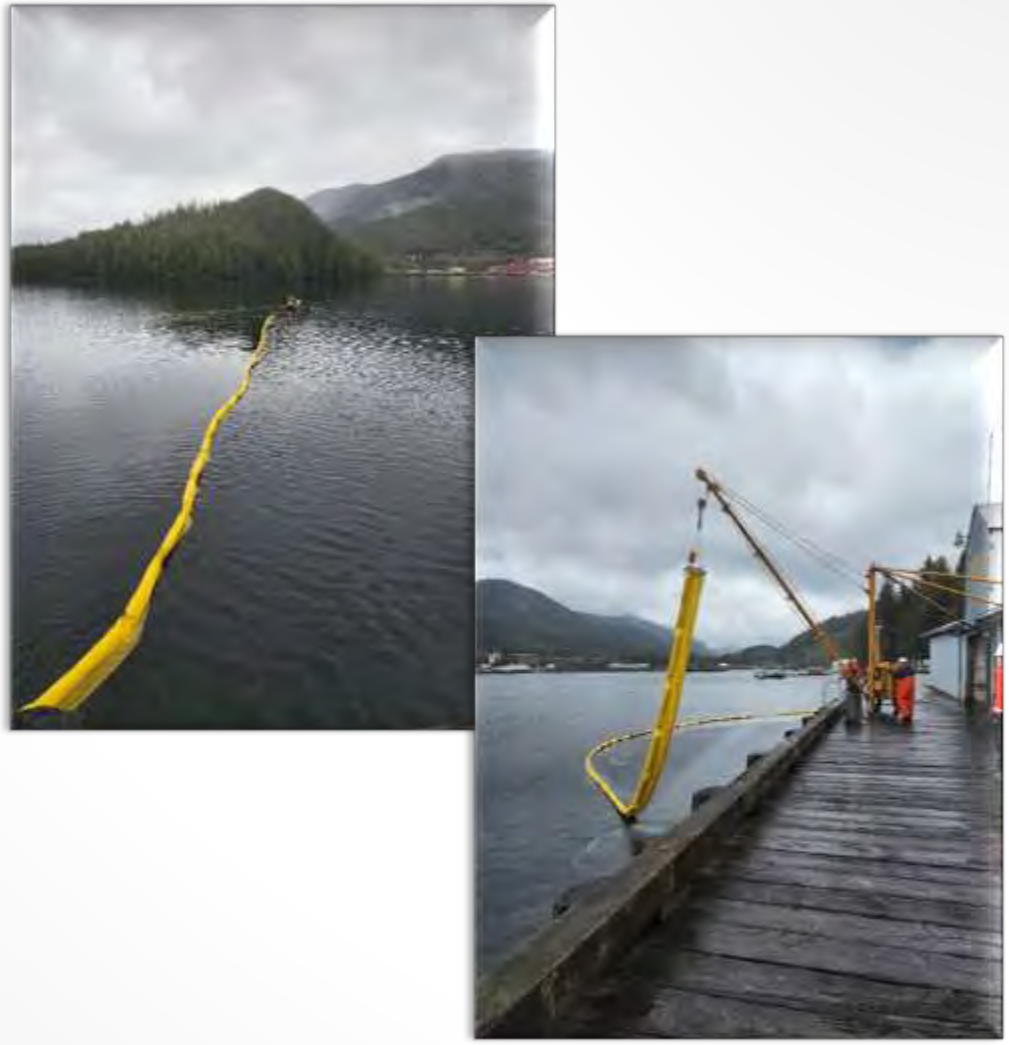
AREA COMMITTEE UPDATE

Notable initiatives/events within the SEAK Area Committee:

- IMT Training in Juneau, April 2022
- Tactics Exercise in Ketchikan, May 2022
- Environmental Expo Series in Juneau, May 2022
- Southeast Environmental Conference in Juneau, August 2022
- Planning for PREP EX, April 2023
  - Concept & Objectives Meeting, June 2022
  - Initial Planning Meeting, September 2022

KETCHIKAN TACTICS EXERCISE

- Conducted May 2022 in Ketchikan
- Executed "Planning P" of ICS for one operational period
- Simulated worst-case discharge scenario near Metlakatla (approx. 10 mi SE of Ketchikan)
  - Tug pulling fully-loaded barge; line parted in heavy weather and barge collided with AMHS ferry
  - Approx. 500,000 gal of mixed fuels (diesel, aviation, gasoline) discharged
- Practiced deployment of boom



NEVA STRAIT OIL SPILL
MARCH 2022

- 83-ft tug WESTERN MARINER was towing 286-ft container barge CHICAGOF PROVIDER through Neva Strait (approx. 20 mi NW of Sitka)
- Tug lost steering and barge collided with it, running it hard aground
- Unified Command of ADEC, USCG, and Western Towboat Co. formed to respond
- Tug was repaired, removed from shore and spill contained and recovered

43,500 gallons	onboard at grounding
33,040 gallons	clean diesel offloaded
4,453 gallons	diesel from oil/water mixture pumped from vessel & on-water recovery
700 gallons	diesel from skimming operations
	20 cubic yards of saturated adsorbents
5,307 gallons	spilled and not recovered

PREP EXERCISE

- Full scale exercise to be conducted near Ketchikan in April 2023
- Commence second operational period following scenario from Tactics Exercise in May 2022
- Establish fully-staffed ICP in Ketchikan and equipment deployment at incident location near Metlakatla
- Test GRS concurrently with exercise

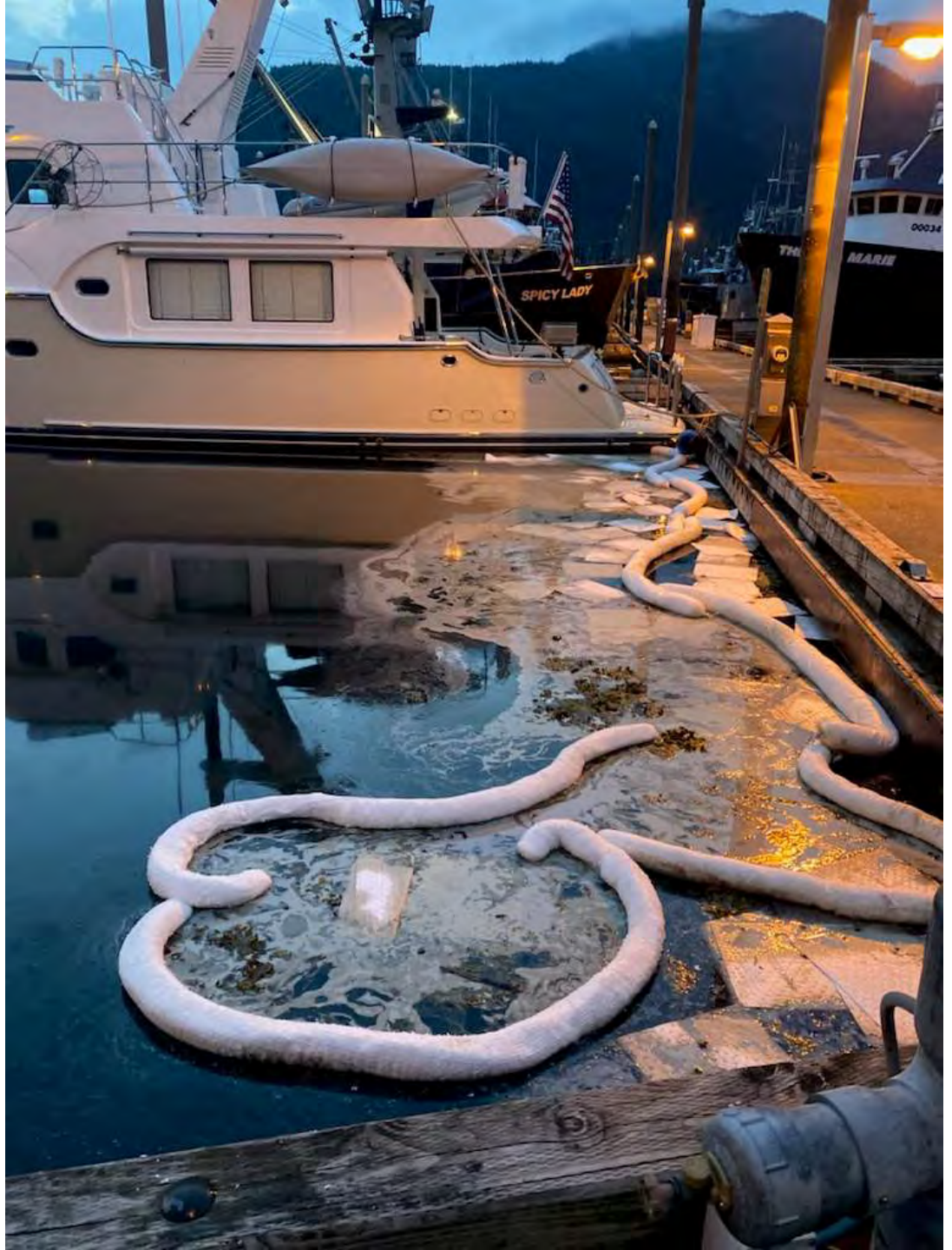
AREA COMMITTEE NEEDS FOR ALASKA RRT SUPPORT

- Support for exploration of GRS documents to GIS format and improve technology to conduct validations with modeling software

QUESTIONS?

ADEC Area Planning website:

http://alaska.gov/go/7EKN



Supporting Federal and State On-scene Coordinators

Alaska RRT

LUNCH

Meeting will restart at
1:00 PM (Alaska Time)

If you want to offer a public comment,
sign up in "Chat"
or email Mary Goolie
goolie.mary@epa.gov
By the end of this lunch break.

ALASKA REGIONAL RESPONSE TEAM

September 22, 2022

Afternoon Session

Afternoon Agenda

- **Report on Summer 2022 Joint USCG-EPA-ADEC Inspections,** Torri Huelskoetter (EPA)
- **Update on Clean Water Act, Hazardous Substance Proposed Rule and Reminder on Subpart J Updates**, Beth Sheldrake (EPA)
- **EPA Office of Research and Development: Unmanned Aerial Systems & In Situ Burning Plume Dispersion Modelling Project**, Bob Whittier (EPA)
- **Marine Spill Response Corporation: Capabilities for the Aerial Application of Dispersants**, Tracy Sedlack (MSRC)
- **Public Comment**
- **Meeting Close-out**

Report on Summer 2022 Joint USCG-EPA Inspections

Rural Alaska FRP/SPCC Inspection Coordination EPA & USCG 2022

EPA Inspection History

- There are at least 400 FRP facilities spread throughout Alaska, and perhaps thousands of SPCC facilities as well
- Late 1990's there was extensive funding available through the "Denali Commission" to install and upgrade bulk fuel facilities in rural Alaska
- Funding for EPA inspections over the last decade was minimal with only enough to conduct dozen or so inspections each year primarily at facilities on the road system or easy to reach via commercial air.

USCG Arctic Shield Marine Safety Task Force (MSTF)

- MSTF initiative is focused on marine safety and environmental protection missions
- USCG launched the MSTF initiative in spring of 2019
- Approximately $800K to manage MSTF (logistics and personnel support)
- Inspections occur between May and September
- Teams deploy to a hub for 10-14 days
- Supported by Civil Air Patrol and Alaska Army National Guard for transportation around western Alaska and the Arctic from Hub communities.

USCG MSTF 2019 & 2020 Inspections

- 2019 inspections of approximately 60% (236) of the facilities within USCG jurisdiction identified 556 facility deficiencies
- In 2020 USCG conducted 172 Facility inspections
- MSTFs have made note of several facility issues inside the tank farms, <u>within EPA jurisdiction</u>
- Dilapidated and deteriorated facilities pose a potential risk to the community and the environment
- Decrepit BIA tanks with extensive history of discharges into the community






Village Implications

- Repairs are expensive but failure of these facilities have serious consequences to entire villages;
  - Potentially leaving them unable to heat their homes, schools, and clinics
  - Unable to fuel transportation necessary for subsistence lifestyle
  - Very few resources available for an expensive cleanup or repairs which would drain village funds
  - Lack of resources has historically resulted in incomplete cleanups leaving contamination that continues to pose a risk to human health and the environment

2022 BIL Update: An unintended consequence of the Bipartisan Infrastructure Law (BIL) is the cost of repair and replacement work in the villages has increased almost 300% due to supply chain issues and contractors being tied up with other BIL projects and much of the BIL focus is on cleaner energy

The USCG reached out to Alaska OSCs for assistance in working with these facilities and brining them into compliance, helping to mitigate preventable spills that result in undue stress and hardship in these communities.

EPA & MSTF 2022 Kotzebue Hub Inspections

Ball & Huelskoetter

Kotzebue Hub, July 6-13th

5 USCG, 2 EPA

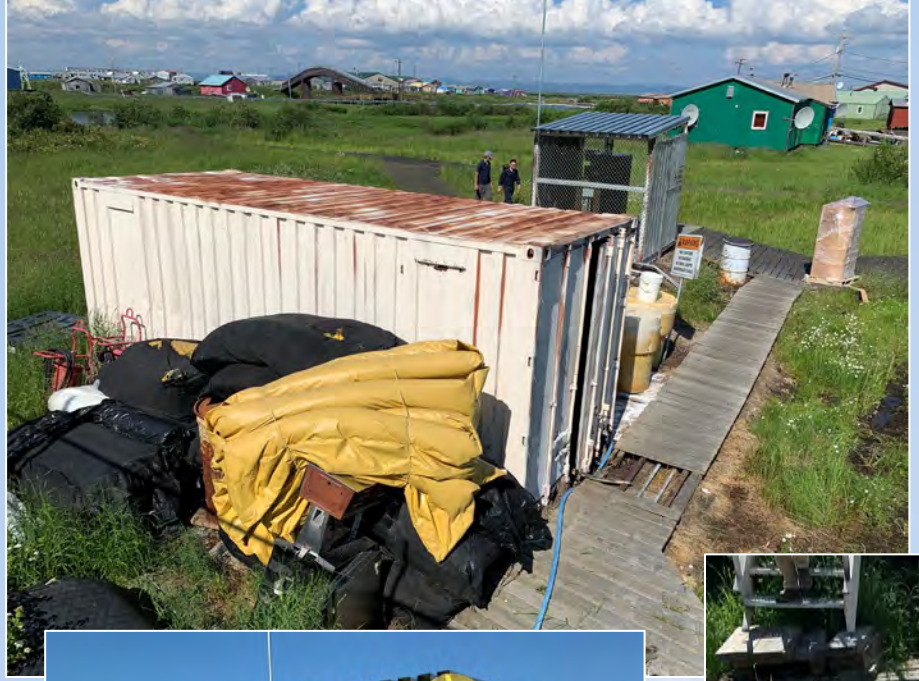
- **Selawik**
- **AmblerRed Dog Mine**
- **Kivalina**
- **Kotzebue**
- **Shungnak**
- **Kiana**
- **Buckland**
- **Noorvik**

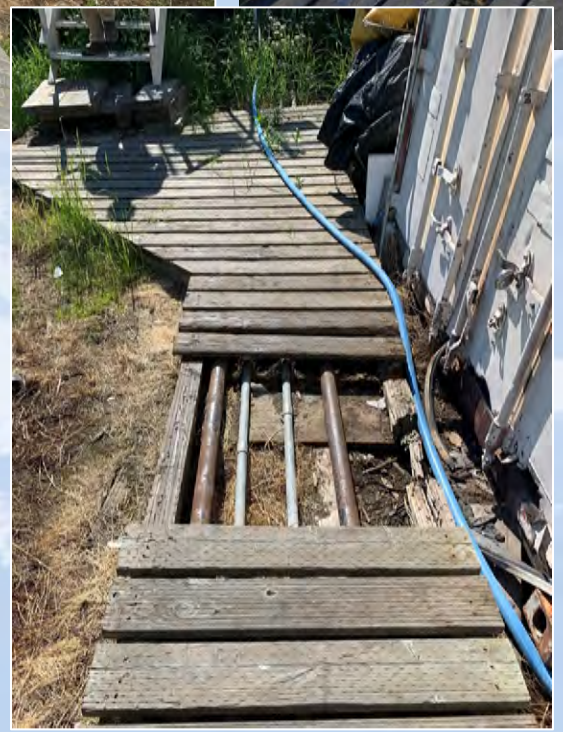
Shungnak

Shungnak

Selawik

Selawik





EPA & MSTF 2022 Bethel Hub Inspections

Franklin & Whittier

Bethel Hub, August 23-30th

8 USCG, 2 EPA

- Akiachak
- Chefornak
- Chevak
- Eek
- Goodnews Bay
- Kasigluk
- Kongiganak
- Kwethluk
- Kwigillingok
- Kipnuk
- Kasigluk
- Napaskiak
- Sleetmute
- Bethel
- Newtok
- Nunapitchuk
- Platinum
- Quinhagek
- Toksook Bay

Bethel

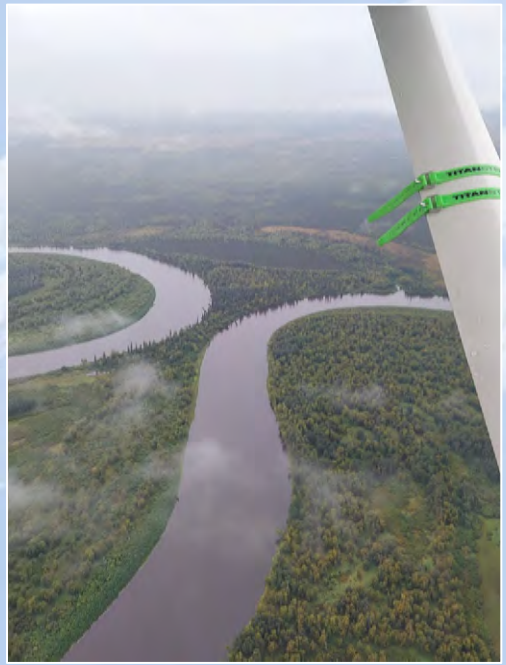

U.S.
COAST
GUARD


EXIT
THINK
SAFETY FIRST
WEAR
PERSONAL
PROTECTIVE
EQUIPMENT

Chevak

Toksook Bay

Sleetmute



2022 Recap

- 7 villages
- 22 facilities
- 22 SPCC inspections
- 14 FRP inspections
- 2 GIUEs

This is an opportunity to connect with the leaders and residents of these communities and develop strong relationships that will help us all achieve our goals in the safest manner possible. It is also a chance to work with other federal, state, tribal and local agencies to cooperatively assess and improve the fuel facilities that are key to sustaining remote communities in Arctic and Western Alaska while best utilizing limited resources.

Next Steps

- Cross Training, USCG shadowing EPA inspections during Oil Team inspections in Fairbanks
- USCG/EPA combined inspection checklist
- Compliance assessment and assistance
- Information sharing; What info, format, contacts, which agencies, shareholders, etc.
- Outreach, grants, assistance, courses/training available
- Cases for demonstration of prevention costs for cleanup costs
- Who are the Village Champions-Contacts
- Coordinate EPA Region 10 Oil Team and Headquarters for awareness
- How to implement coordination efforts so they are long term
- Planning for more inspections next year

Update on Clean Water Act, Hazardous Substance Proposed Rule & Reminder on Subpart J updates

CLEAN WATER ACT HAZARDOUS SUBSTANCE WORST CASE DISCHARGE PLANNING REGULATIONS

US EPA
Office of Emergency Management
May 2022

STATUTORY AND REGULATORY BACKGROUND

Under Section 311(j)(5) of the Clean Water Act (CWA), the President:

> *"shall issue regulations which require an owner or operator of a . . . facility . . . to prepare and submit to the President a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge, of oil or a hazardous substance."*

Oil requirements promulgated in 1994: Facility Response Plans (FRP) under Subpart D of 40 CFR 112.

EPA has never proposed worst-case discharge planning regulations for CWA hazardous substances (HS) under 311(j)(5).

CONSENT DECREE

CWA 311(J)(5)(C)(IV) ONSHORE FACILITY DEFINITION

An onshore facility that, because of its location, could reasonably be expected to cause **substantial harm** to the environment by discharging into or on the navigable waters, adjoining shorelines, or the exclusive economic zone.

OTHER AGENCY RESPONSIBILITIES

United States Coast Guard

- Marine Transportation-Related Facilities
- Tank Vessels

Department of Transportation, Pipeline & Hazardous Materials Safety Administration

- “In Transportation”

Department of Interior

- Seaward of the coastline

CWA 311(J)(5)(D) RESPONSE PLAN REQUIREMENTS

A response plan required under this part shall-

i. Be consistent with the National Contingency Plan (NCP) and Area Contingency Plans (ACP);

ii. Identify the qualified individual having full authority to implement removal actions, and require immediate communications between that individual and the appropriate Federal official and the persons providing personnel and equipment pursuant to clause (iii):

iii. Identify, and ensure by contract or other means . . . the availability of, private personnel and equipment necessary to remove to the maximum extent practicable a worst case discharge (including a discharge resulting from fire or explosion), and to mitigate or prevent a substantial threat of such a discharge;

iv. Describe the training, equipment testing, periodic unannounced drills, and response actions of persons . . . at the facility, to be carried out under the plan to ensure the safety of the . . . facility and to mitigate or prevent the discharge, or the substantial threat of a discharge;

v. Be updated periodically; and,

vi. Be resubmitted for approval of each significant change.

CWA 311(J)(5)(E)
SUMMARY OF EPA RESPONSIBILITIES FOR SUBMITTED PLANS

1

Promptly review such response plan;

2

Require amendments if the plans do not meet . . . requirements of this paragraph;

3

Approve plans that meet the requirements of this paragraph; and,

4

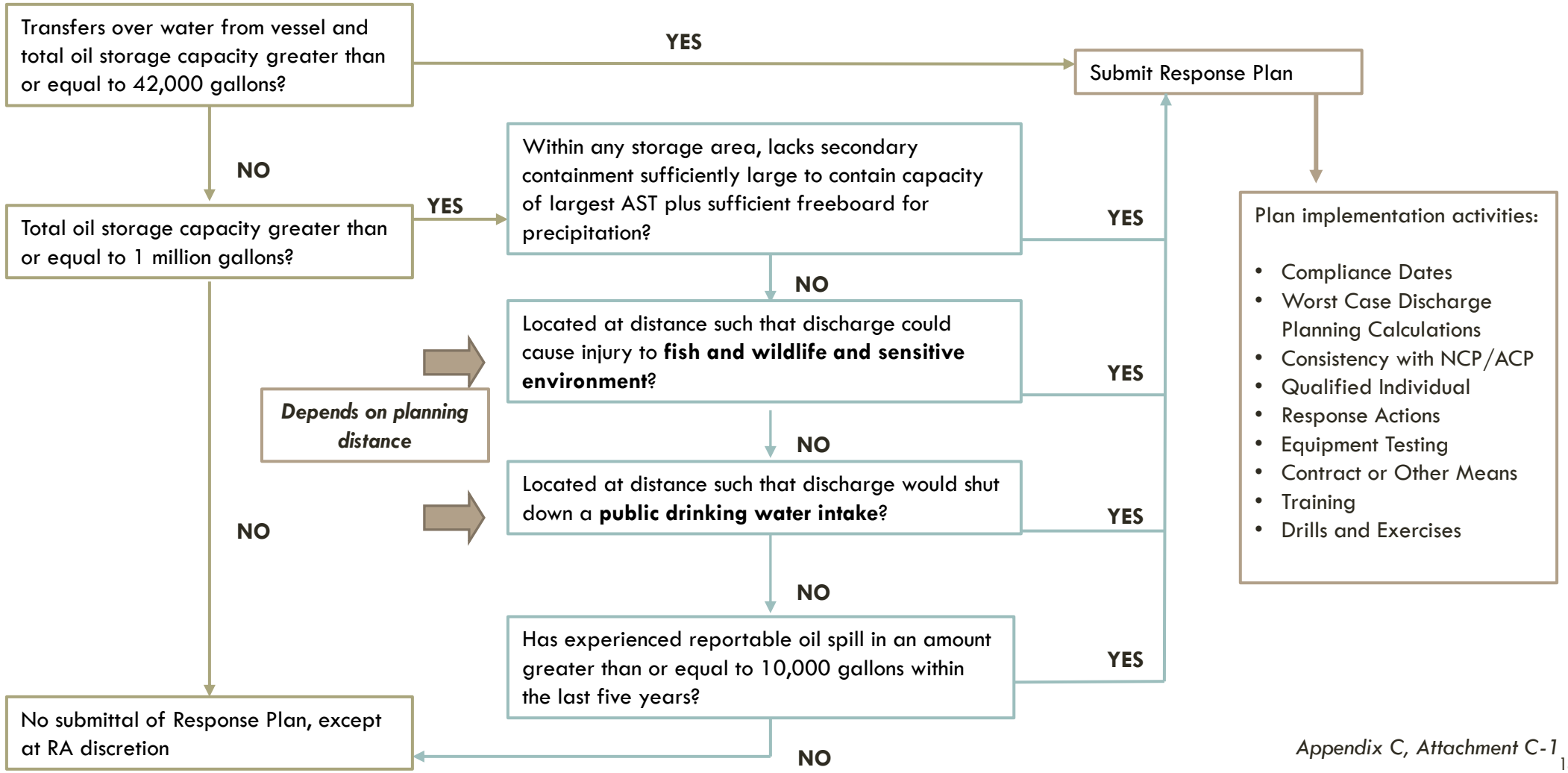
Review each plan periodically thereafter

DEFINING THE PROBLEM: EXISTING PROGRAMS

Analysis of EPA, State, and other federal programs shows that no existing program covers all the required CWA 311(j)(5) program elements for all CWA HS

- Facility oil FRPs and RMPs may have overlap with some of the required program elements
- RCRA Generators and TSDF Regulations are comprehensive *for hazardous wastes only*
- PCBs account for majority of CWA HS spills in NRC database (55%) from 2010-2019 and are regulated under TSCA
- State programs do not provide uniform coverage and are a patchwork

APPLICABILITY CRITERIA: OIL FRP (40 CFR 112.20)

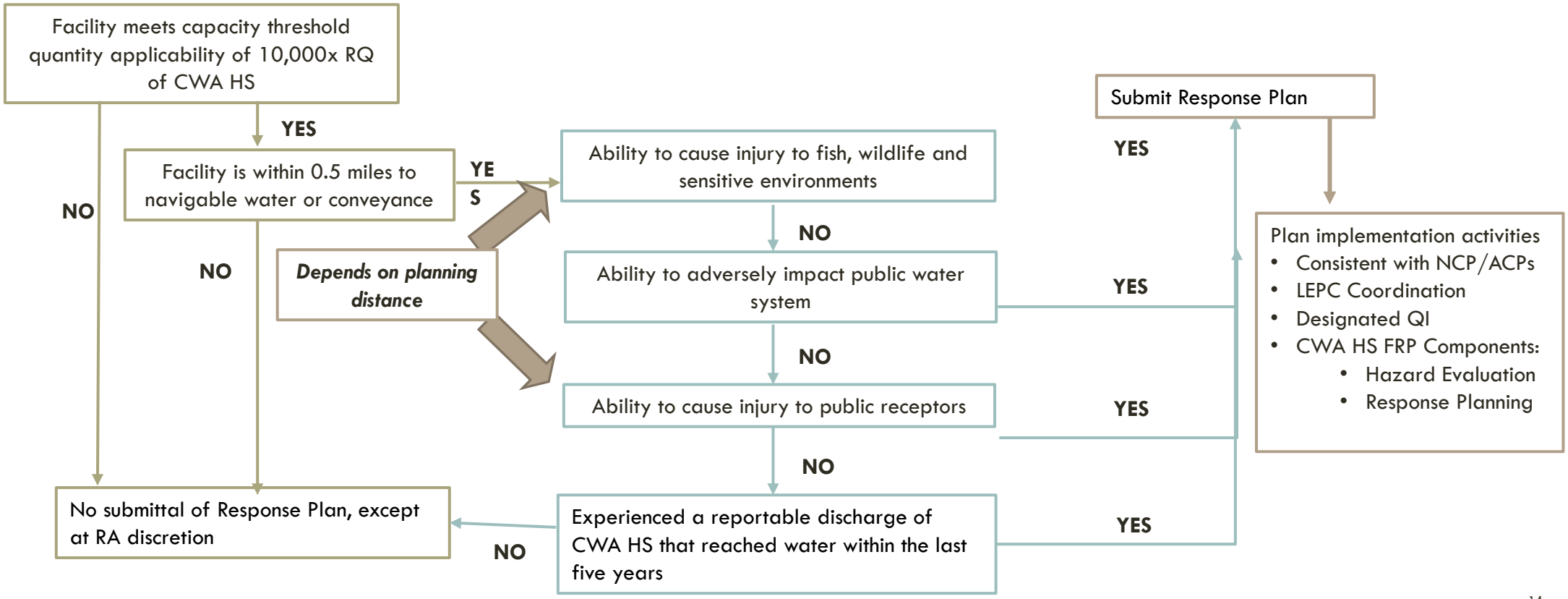


Appendix C, Attachment C-1

PROPOSED APPLICABILITY CRITERIA: HAZARDOUS SUBSTANCES

Differences in applicability criteria with the Oil FRP program:

- Adequate secondary containment not a substantial harm criteria.
- Facility within 0.5 miles of WOTUS part of applicability (rather than just planning distance).
- Public receptors as a substantial harm criterion.



APPLICABILITY: SUBSTANTIAL HARM CRITERIA OTHER ITEMS

Not proposing lack of adequate secondary containment as a substantial harm criterion

- Specific secondary containment provisions are not feasible due to wide variability in CWA HS and difficulty in evaluating existing structures and engineering without a consolidated prevention program.
- Allowing passive mitigation in distance planning may provide for more accuracy in real world conditions.
- Passive mitigation may be difficult to implement and enforce.

Overwater transfers

- EPA has no information about facilities performing overwater transfers of CWA hazardous substances; soliciting comment/data on a potential lower threshold for these facilities.

APPLICABILITY: REGIONAL ADMINISTRATOR (RA) DETERMINATION OF SUBSTANTIAL HARM

- Type of transfer operation
- CWA hazardous substance quantity and category stored onsite
- Proximity to fish and wildlife and sensitive environments and other areas determined by the Regional Administrator to possess ecological value
- Ability to adversely impact to public water systems
- Location in a source water protection area
- Ability to cause substantial harm to public receptors due to a worst case discharge to navigable waters
- Lack of passive mitigation measures, including measures that enhance resilience to climate change
- Potential for a worst case discharge to adversely impact communities with environmental justice concerns
- Potential vulnerability to climate change
- Reportable discharge history
- Other site-specific characteristics and environmental factors that the Regional Administrator determines to be relevant to protecting the public or environment from harm by discharges of CWA hazardous substances into or on navigable waters

APPLICABILITY: REGIONAL ADMINISTRATION (RA)
DETERMINATION OF SIGNIFICANT AND SUBSTANTIAL HARM

Proposed: *EPA RA significant and substantial harm criteria:*

- Frequency of past reportable discharges
- Proximity to navigable waters or adjoining shorelines
- Age of equipment
- Potential for hazards such as flooding, hurricanes, earthquakes, or other disasters that could result in a worst case discharge
- Other facility-specific and Region-specific information, including local impacts on public health

EPA must review and approve significant and substantial harm FRPs

FRP GENERAL REQUIREMENTS:

- Consistent with NCP and ACPs - Review annually and revise
- ID Qualified Individual (trained to Incident Commander) – Duties:
  - Activate internal alarms and hazard communication systems
  - Notify all response personnel
  - Identify the character, exact source, amount, and extent of the discharge
  - Notify and provide necessary information to the appropriate Federal, State, and local authorities (NRC, SERC/TERC, LEPC/TEPC
  - Notify and provide necessary information to public water systems
  - Assess the possible hazards to human health and the environment
  - Assess the interaction of the discharged CWA hazardous substance with water, solutes in water, water treatment chemicals, and/or other substances, notify response personnel
  - Implement prompt response actions
  - Coordinate rescue and response action
  - Use authority to immediately access company funding to initiate cleanup activities
  - Direct cleanup activities until properly relieved

FRP GENERAL REQUIREMENTS, CONT.

- ID and ensure by contract or other means private personnel and equipment
- Describe the training, equipment testing, periodic unannounced drills, and response actions
- Update facility response plan periodically and resubmit to the Regional Administrator for approval of each significant change

EMERGENCY RESPONSE INFORMATION

Facility Information

Owner/Operator Information

Reportable discharge history: to water, 5 years

Response personnel and equipment: private personnel and equipment necessary to respond to the maximum extent practicable to WCD or threat of WCD

Hazard Evaluation

- Chemical-specific information, including response considerations, health and fire hazards, chemical reactivity, hazard classifications, and physical and chemical properties
- Potential effects on public water system; injury to FWSE; and public receptors; impacts to communities with environmental justice concerns; and impacts of climate change
- Risk Based Decision Support System with risk ID, risk characterization, risk control, risk communication.

EMERGENCY RESPONSE INFORMATION, CONT.

Notification requirements:

- Fed/local/State, contractor, NRC, QI, OSC/RRC, local responders, public water systems, local media, hospitals, local receptors/interested parties

Discharge information

- Event details, substance/quantities/hazards, receptors, water/conveyances

Personnel Roles and Responsibilities

- Description + response times/qualifications

Evacuation Plans (+diagrams)

Discharge Detection Systems

- For discharges and related air releases (monitoring)

Response Actions

- Immediate, PPE, responsibilities by job title, facility actions, sampling

Disposal Plans

Containment Measures

EMERGENCY RESPONSE INFORMATION, CONT. 2

Training Procedures

- Follow OSHA, keep logs for 5 years

Exercise Procedures

- PREP is sufficient

Self-Inspection

- Written, retained for 5 years

LEPC/TEPC Coordination

Coordinate with local emergency plan (EPCRA 303)

Provide copy of FRP to SERC/TERC or LEPC/TEPC upon request

- Annual coordination
- Includes providing plan, contact information
- Coordinate on drill/exercise schedule
- Document activities

CLIMATE CHANGE

A worst case discharge: the largest foreseeable discharge in adverse weather conditions, which is inclusive of conditions due to climate change.

Regional Administrators have discretion to require FRPs due to climate change risks.

Facilities must examine climate change impacts in their FRP hazard evaluation.

Soliciting comment on additional approaches to considering climate change in applicability criteria and FRP components.

FACILITY DENSITY

- EPA recognizes the increased risk of worst case discharges in areas with a high density of CWA hazardous substance facilities
- Considered additional requirements for facilities in areas with high facility density, as well as including co-location of facilities with less than the threshold quantity of CWA hazardous onsite but proximate to other facilities which, in the aggregate, meet the CWA hazardous substance threshold quantity as an applicability criterion
- Soliciting comment on these approaches as well as the appropriate proximity metrics, quantities, and methods for determining shared risk amongst facilities

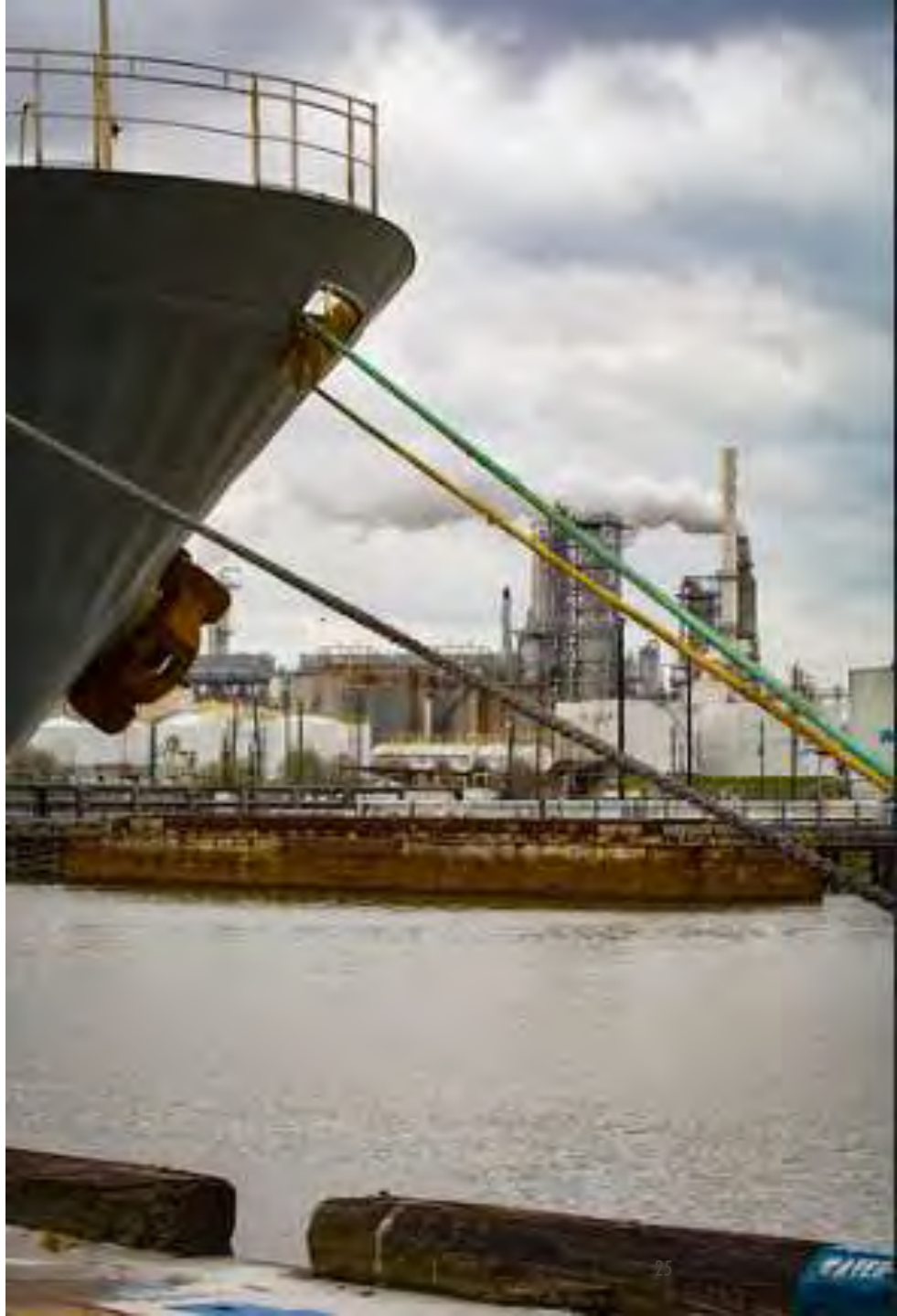
NEXT STEPS

March 28, 2022: Federal Register publication

July 26, 2022: Comment period closes (https://www.regulations.gov/docket/EPA-HQ-OLEM-2021-0585/comments)

Final Rule: by 30 months after proposal publication (September 28, 2024)

https://www.epa.gov/hazardous-substance-spills-planning-regulations/proposed-rulemaking-clean-water-act-hazardous



NCP Subpart J Update

Sept 2022

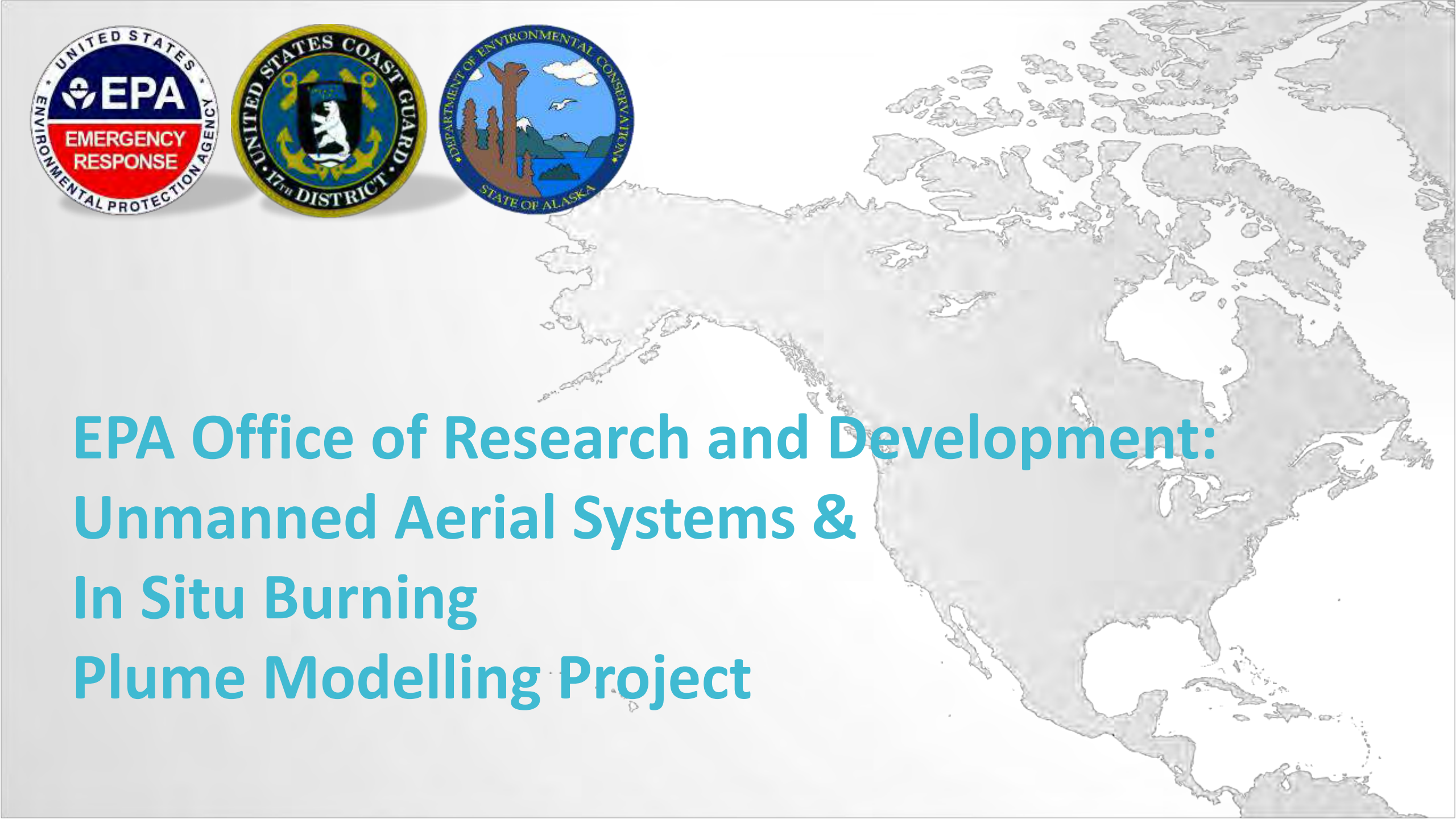
Background

- Subpart J of the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP) governs the use of dispersants and any other chemical or biological agent to respond to oil discharges
  - Last major revisions in 1994 (post OPA 90)
  - April 2010 Deepwater Horizon oil spill prompted changes
- January 2015 EPA proposed Subpart J revisions received over 81,000 total comments
- Proposed revisions are meant to inform the use of dispersants and other chemical or biological agents and ensure OSCs, RRTs and Area Committees have relevant information to support response decision-making
  - Three-pronged approach: 1) Testing and Listing, 2) Authorization, and 3) Atypical Dispersant Monitoring.
- EPA sued in January 2020 for failing to finalize the rule
- August 2021 federal court rules that EPA must produce a final rule on all three-prongs by May 2023

Status of Final Rulemakings

- **July 2021** – EPA issues final rule on Dispersant Monitoring Requirements (effective Jan 2022)
  - Work ongoing to updated SMART protocols

- ***Planned*** **May 2023** – Final rule on "Authorization of Use" and "Testing and Listing" (effective date Aug 2023)



EPA Office of Research and Development: Unmanned Aerial Systems & In Situ Burning Plume Modelling Project

MULTI-AGENCY EFFORT

U.S. Environmental Protection Agency
– Office of Research and Development
– Region 10 Emergency Response

U.S. Geological Survey

Bureau of Safety and Environmental Enforcement

National Oceanic and Atmospheric Administration

U.S. Coast Guard, Pacific Strike Team

University of Alaska Fairbanks

Poker Flats Research Center

PROJECT PURPOSE

WHAT: Conduct sampling of a burning oil plume in Alaska to provide NOAA with data for near-source dispersion model calibration.

> First-of-its-kind effort: probing a near-source plume using an unmanned/uncrewed aircraft system (UAS, or drone) for spatial and temporal plume concentrations to feed into a dispersion model.

WHY: The resulting calibrations (improvements) of the model will further the ability of On-Scene Coordinators (OSCs) to predict worker and downwind populace exposure and improve dispersion modeling science.

Use of UAS for emission measurement is in its infancy and this is the first of its kind access to aerial emission data for plume dispersion model testing.

ISB Air Monitoring

UAV-mounted Air Monitoring & Air Sampling

Ground-based Air Monitoring & Air Sampling

SUCCESSFUL DEPLOYMENT & INTEGRATION OF EPA & USCG AIR MONITORING INSTRUMENTS

Including use of telemetry Equipment (VIPER and Guardian) for single-source remote viewing of air quality data

Marine Spill Response Corporation: Capabilities for the Aerial Application of Dispersants

MSRC – Aerial Dispersant Program

ARRT - Anchorage
September 2022

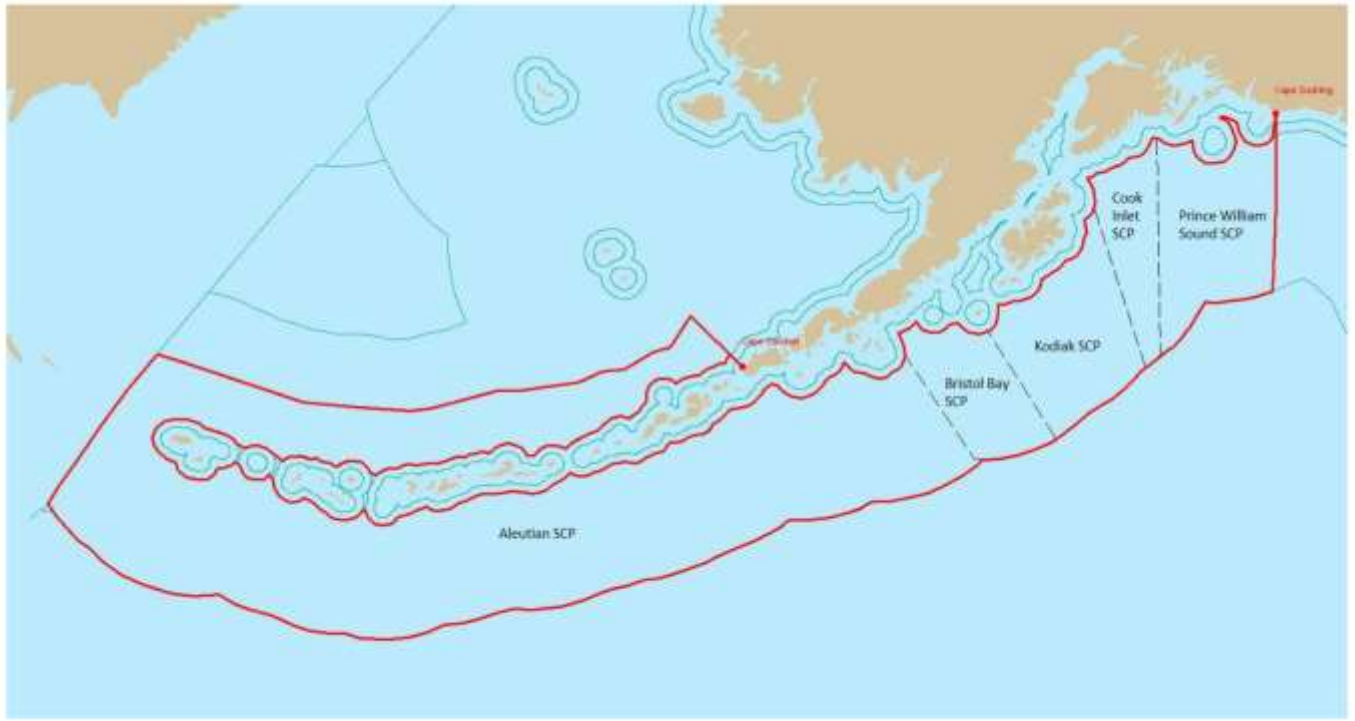
MSRC

Marine Spill Response Corporation®

MSRC DISPERSANT OSRO CLASSIFICATION FOR PWS AND COOK INLET

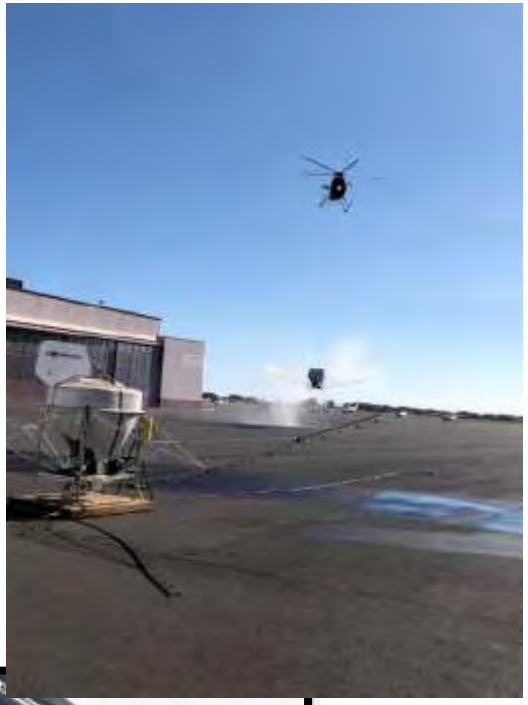
MSRC has Tier 1-3 Dispersant Classification for PWS, Cook Inlet and Juneau.
While MSRC will be able to cover much of Western Alaska with the new platform, we are not applying for OSRO Classification.

- MSRC is a registered Oil Spill Primary Action Contractor (PRAC)
- MSRC provides dedicated aircraft for dispersant application through a third-party aircraft provider that covers Juneau, PWS and Cook Inlet as well as MSRC's other operating areas
- Shippers must cite MSRC directly in their VRPs as MSRC Customers/MPA members
- Alyeska members cite MSRC directly in their C-Plans
- USCG or MSRC Customers may activate MSRC for dispersant capability



MSRC DISPERSANT PROGRAM OVERVIEW

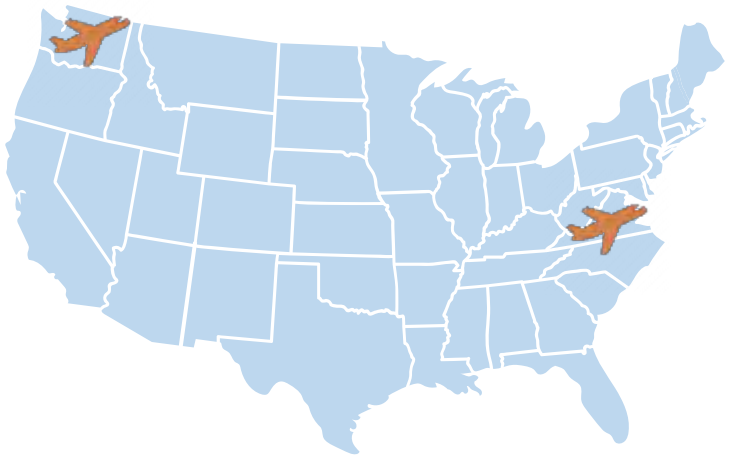
- Aircraft Fleet
- Dispersant Stockpiles
- Misc. Dispersant Systems
- Dispersant Response Tools
- MSRC Aerial Dispersant Program Activation
- MSRC Strike Team and Support Capabilities



737 DISPERSANT SPRAY AIRCRAFT

Aircraft Specifications

- Speed: 430 knots
- Fuel Consumption: 850 gph
- Range Fully Loaded: 2,685 nm
- Max Dispersant Payload: 4,125 gals
- 4-person crew (Chief Pilot, Co-Pilot, Flight Engineer and Spray system Operator)
- Mobilization time: 2.0 hours



Base Locations

- Moses Lake, Washington
- Shenandoah Valley, Virginia
- 3rd 737 will be based in VA and used for backfill during maintenance of either active plane.

737 RANGE FROM HOME BASE IN 7 HRS

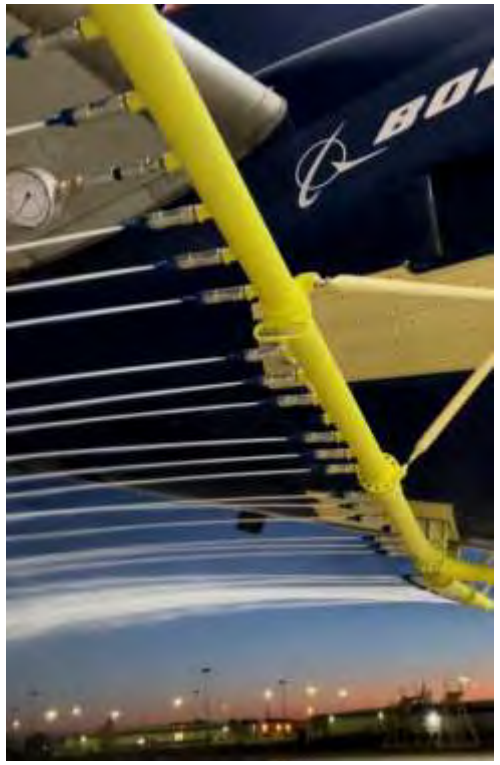
Radius of Coverage
Shenandoah Valley, VA and Moses Lake, WA
2.0-hour mobilization time
2,150 nm range

*These distances are based on planning standard mobilization times and aircraft speed. They do not reflect EDSP calculator assumptions.

AIRCRAFT CUSTOM SPRAY SYSTEM CAPABILITY

Spray System Development

- Card test successful at 150 -300 ft altitude at 155-195 knots speed, 300–500-micron VMD
- Application for Alternate speed and addition to the BSEE EDSP Calculator has been submitted to the USCG NSFCC
- Work ongoing with BSEE and AMOG to develop a drift calculator for these aircraft



MSRC'S AIRCRAFT OF OPPORTUNITY (AOO)

- MSRC has contracted with fixed-wing and rotary aircraft providers throughout the Lower 48, Caribbean, Hawaii and Alaska to provide spotter aircraft for dispersant operations.
- The AOO providers can assist with aerial observation, spotters for the dispersant spray aircraft, transporting MSRC or other observers and perform other tasks as needed.
- MSRC audits each of these providers on 18-month intervals to ensure their operations, safety, maintenance programs and training are in alignment with MSRC and industry standards
- In Alaska and the Caribbean, the AOO pilots are required to pass the NOAA "Observing Oil from Planes and Helicopters" course. This allows MSRC to have trained observers readily available in locations with limited MSRC employee availability.

MSRC'S DISPERSANT STOCKPILE

The majority of MSRC's dispersant stockpile is containerized in 330-gallon poly totes or 5,000-gallon ISO tanks on trailer chassis. . This allows for our stockpile to be easily cascaded to the staging airport via road or via air cargo. MSRC's stockpile is strategically located throughout the U.S. to ensure we can meet the regulatory requirements of 33 CFR 154 and 155.

MSRC owns 129,006 gallons of COREXIT dispersant:

- COREXIT 9500A – 117,633 gallons
- COREXIT 9527A – 10,673 gallons

*MSRC also has access to member and partner OSRO stockpiles throughout the U.S.

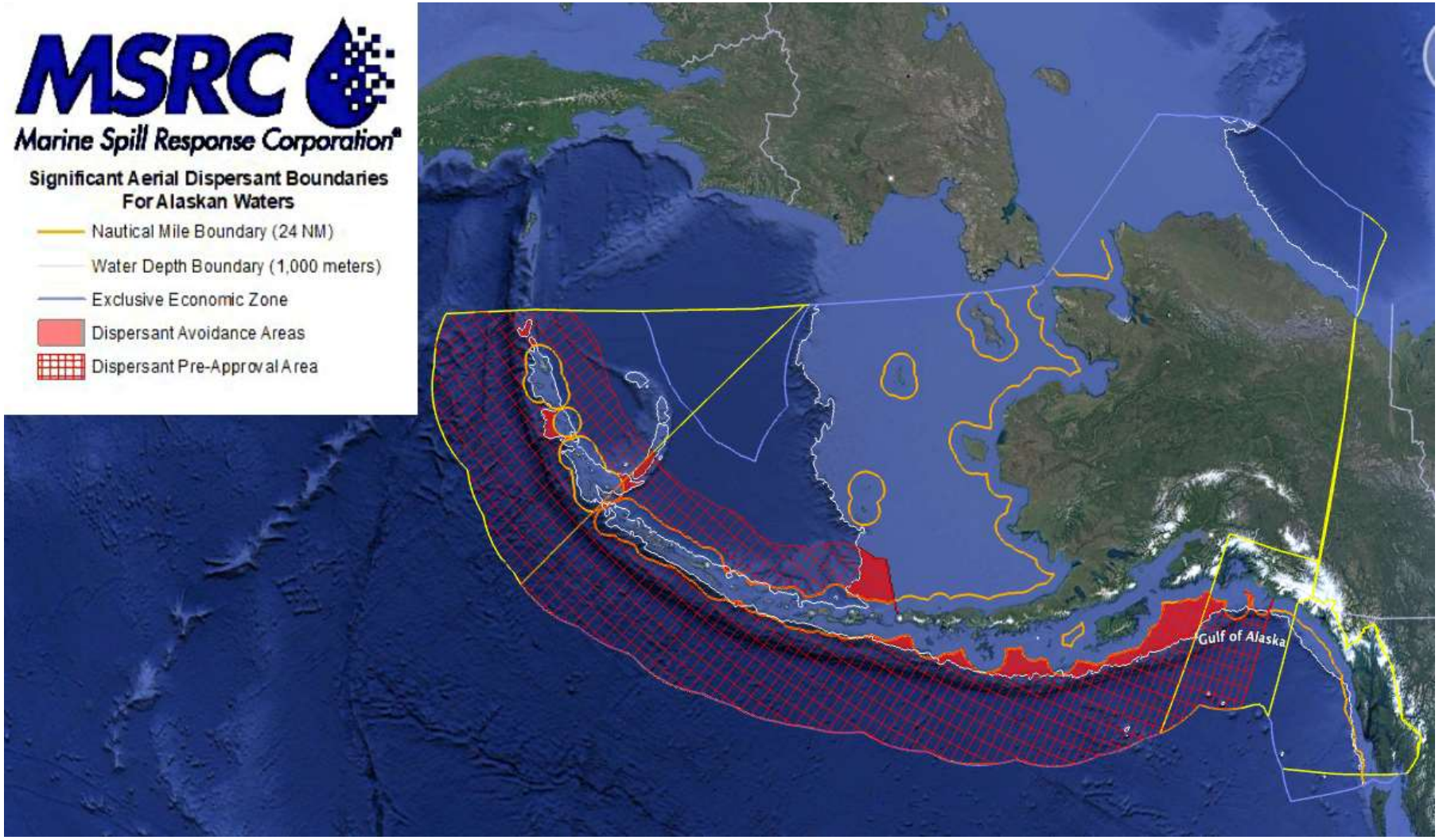
*MSRC is in the process of acquiring an additional 268,000 gallons of 9500A from one of our member companies.

DISPERSANT FLY-AWAY KITS

Each dispersant spray aircraft contains a fly-away kit so they can immediately commence operations as soon as they land. Each kit contains

- A loading pump
- 8′ x 8′ containment berm
- 4 loading hoses with spare shutoff valves
- 2 Decon hoses
- A spill clean up kit
- Misc. assorted fittings and clamps for the loading of dispersants

DISPERSANT RESPONSE TOOLS – GOOGLE EARTH



MSRC relies on several computer programs to assist with response operations.

Google Earth – To locate COTP Zone boundaries, pre-approved dispersant areas, staging airports, Marine Sanctuaries, and avoidance areas.

DISPERSANT RESPONSE TOOLS – SKYROUTER

SkyRouter is a computer-based Flight Data Monitoring (FDM) System that allows MSRC to track and monitor the data from the dispersant spray aircraft.

SkyRouter provides real time tracking of the aircraft, records the aircraft flight path, provides text and phone communications with the aircraft, and weather overlays of the response area.

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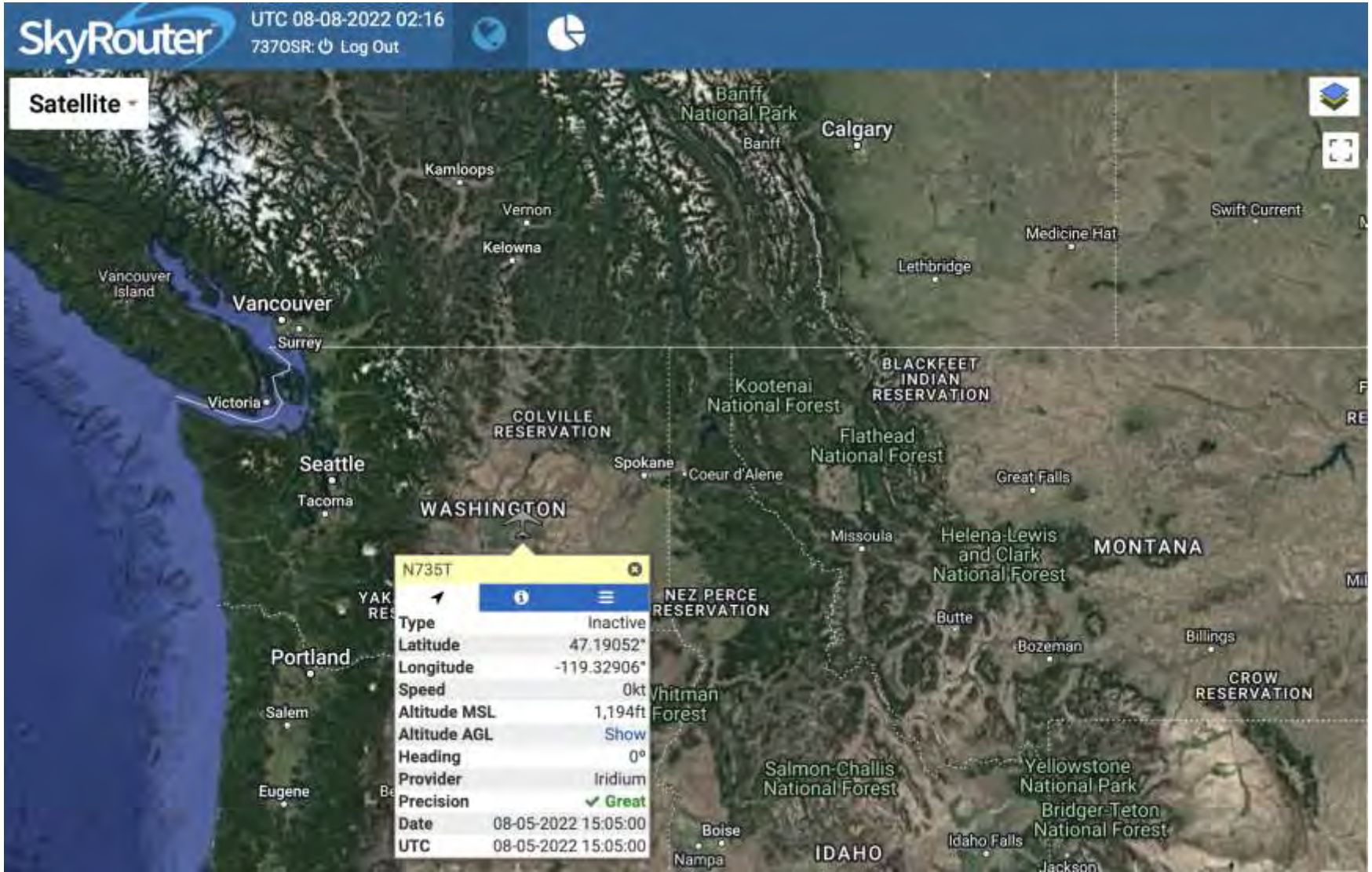
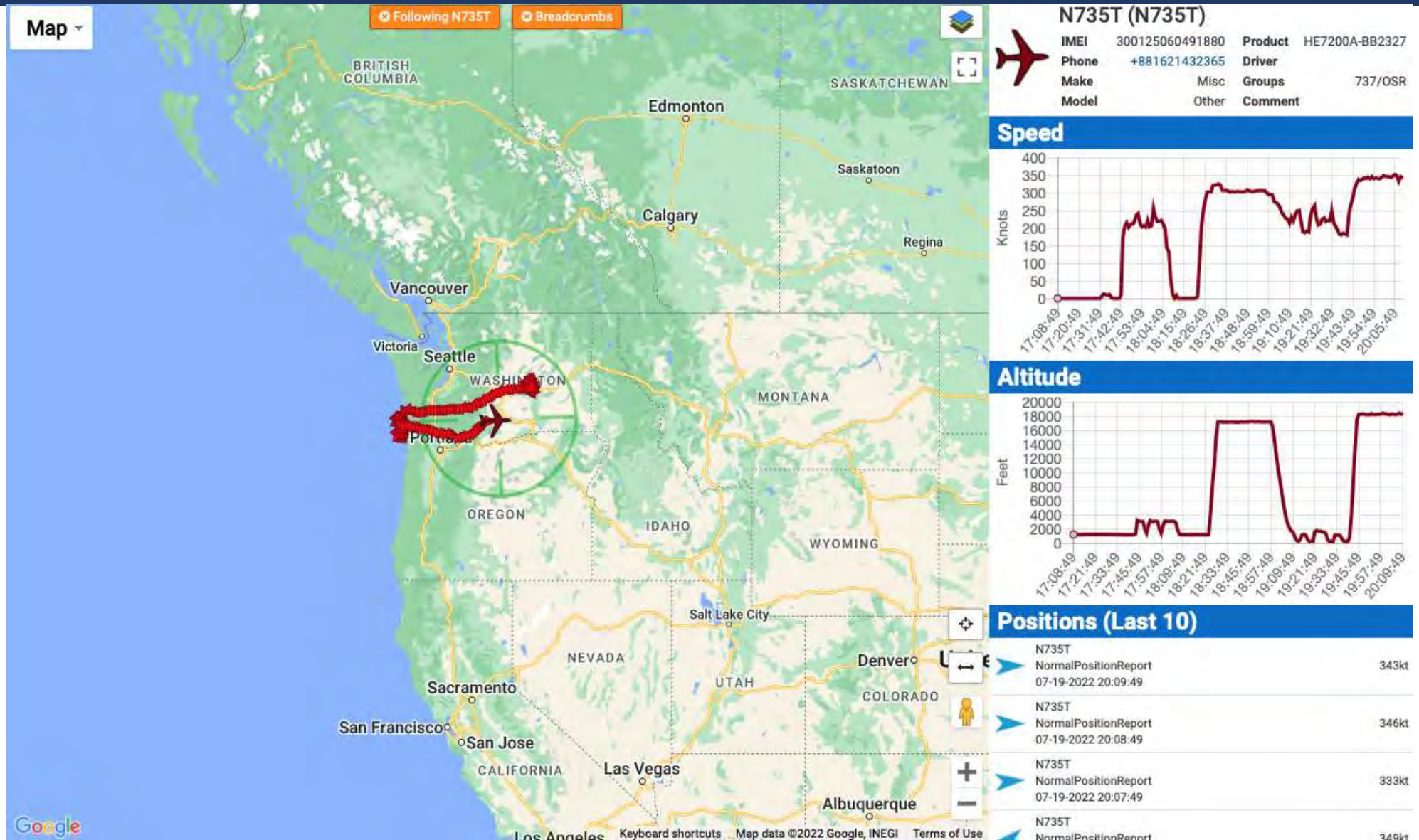


DISPERSANT RESPONSE TOOLS – SKYROUTER



A replay of a training flight on 7/19/22.

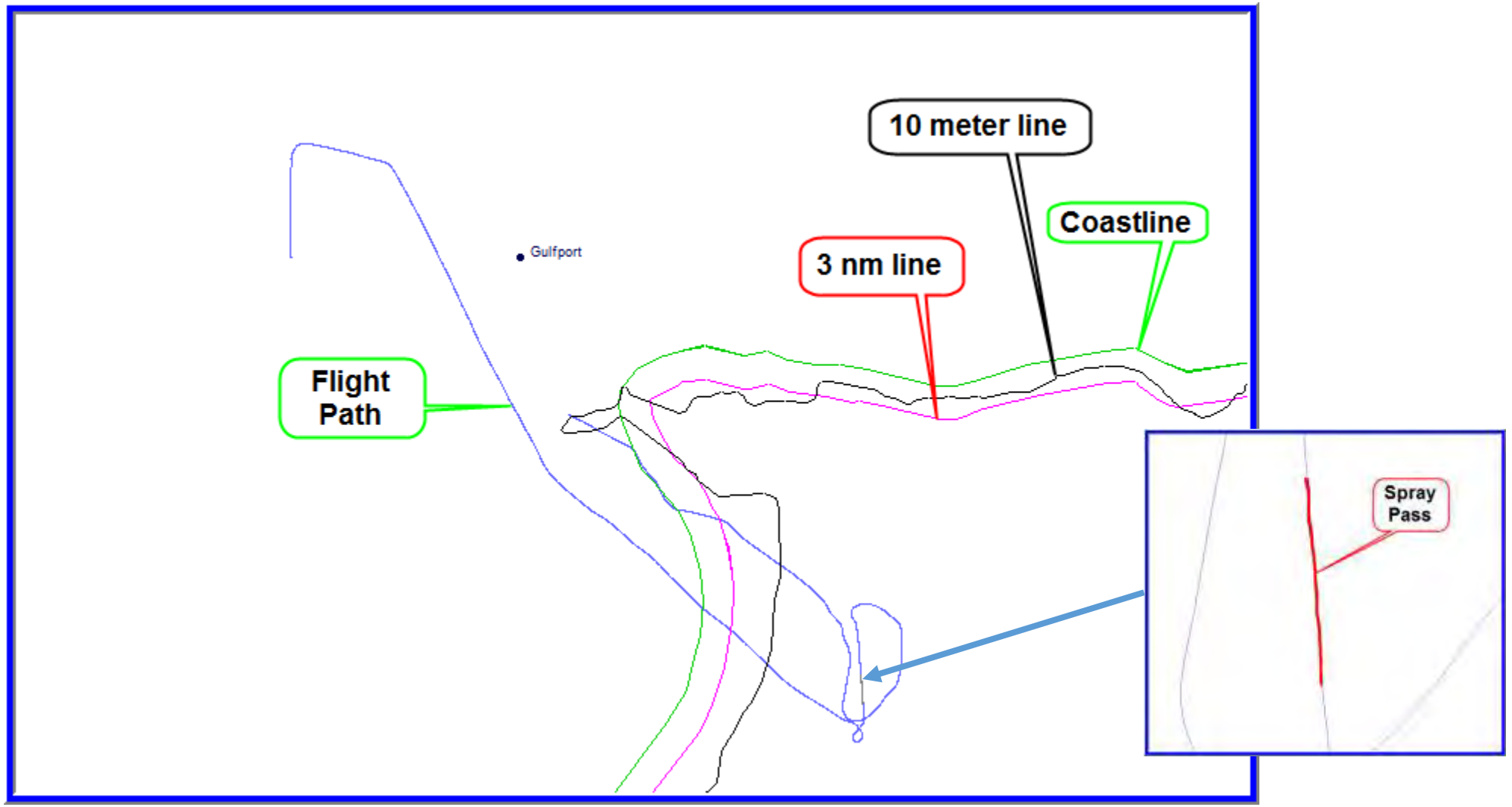
DISPERSANT RESPONSE TOOLS - SATLOC

Each of the spray aircraft and the spray systems are monitored by the Satloc system. Satloc records the following:

- Location of the aircraft every second
- Spray start and stop times
- Latitude and longitude location
- Amount of dispersant sprayed (gallons sprayed)
- Dosage of dispersant sprayed (gallons per acre)
- Spray application speed

The maps associated with the Satloc system show flight paths, pre-approved spray areas, marine sanctuaries, state and USCG COTP boundaries, bathymetric approval zones, and coastlines.

DISPERSANT RESPONSE TOOLS – SATLOC



Staging Airport Selection

Several factors go into selecting the correct staging airport for dispersant operations

- Proximity to the incident location
- Runway length
- Runway weight load capability
- Fixed Base Operations (FBO) logistics (can they support fueling a 737, office spaces, area for stockpile trailers and other equipment)
- Low volume of flights in and out
- Ease of access if it is a TSA facility

KHSA – Stennis International Airport Kiln, MS

MSRC AERIAL DISPERSANT ACTIVATION

MSRC's Dispersant Program is activated in relatively the same manner as MSRC's mechanical response equipment.

- The customer calls MSRC at 1-800-OIL-SPILL (1-800-645-7745)
- Customer provides incident information to the duty phone officer for the perspective region
- Duty phone officer notifies the Response Manager for the area of the incident
- Response Manager calls the customer to confirm incident location, amounts, and equipment requested and other information necessary for the response. If dispersants are considered during this initial conversation, the Response Manager will call the Dispersant Operations Manager
- The Dispersant Operations Manger will call the customer to confirm the potential activation of aerial dispersants
  (* The Dispersant Operations Manager will advise the customer on the use of aerial dispersants and the process to gain USCG approval for the specific area if it is in a pre-approved area)
- Dispersant Operations Manager will notify:
  - *Dispersant Program Manager*
  - *Dispersant Strike Team*
  - *Dispersant Aircraft Provider*
  - *Dispersant Consultant*

* No personnel, equipment, aircraft, or stockpiled dispersants will be activated at this time.

REGULATORY REQUIREMENTS FOR AERIAL DISPERSANT PROGRAMS

To maintain a USCG OSRO Dispersant Classification, MSRC must meet several regulatory requirements. Some of these requirements are:

- Commence initial dispersant application within 7 hours of notification.
- Apply 4,125 gallons of dispersant within the first 12 hours in all Captain of the Port Zones, except those in the Gulf of Mexico which requires 8,250 gallons in the first 12 hours.
- Cascade dispersant stockpiles to the staging airport
  - 4,125 gallons (8,250 Gulf) within 7 hours
  - 11,687 gallons within 24 hours
  - 11,688 gallons within 30 hours
  - 23,375 gallons within 48 hours
- Provide spotter/observer aircraft and personnel
- Provide trained pilots and personnel to support dispersant operations (loading of planes, transportation of stockpiles, and operations management)
- Comply with ASTM Standard F1413 "Standard Guide for Oil Spill Dispersant Application Equipment"

REGULATORY REQUIREMENTS FOR AERIAL DISPERSANT PROGRAMS

MSRC's dispersant program is designed to meet regulatory requirements of 33 CFR 154 and 155 for Tier's 1, 2, and 3 dispersant response throughout the U.S., including Hawaii, Caribbean, and Alaska (Juneau, Prince William Sound and Cook Inlet only in Western Alaska)

Effective Daily Application Capacity (EDAC)*

	Gulf of Mexico	-	*All Other US*
• Tier 1 (first 12 hours)	= 8,250 g	-	4,125 g
• Tier 2 (first 36 hours)	= 23,375 g	-	23,375 g
• Tier 3 (first 60 hours)	= 23,375 g	-	23,375 g
• Total Gallons	= 55,000 g	-	50,875 g

* There are numerous set criteria for calculating EDAC such as operating hours per day, spray pass length, mobilization times, spill distance from staging airport, etc.

THANK YOU!

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MSRC
Marine Spill Response Corporation®

Supporting Federal and State On-scene Coordinators

Alaska RRT

PUBLIC COMMENT

_REVIEW OF PARKING LOT ISSUES
_PLANNING FOR NEXT MEETING
_CLOSING REMARKS

Save the dates

Area Committee Meetings:

ARRT 2023 Winter Meeting: February 7-9, 2023