

Table 1.0: Request for Additional Information on Petro 49, Inc. Sitka Bilk Plant- South Plant and North Plant ODPCP (24-CP-1017)

#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
1.	xx	Table of Contents	-	-	Adjusted page number for Section 2.6
2.	1-11, 1-43, 3-57, 3-58, 4-11	1.2.2 Table 1.2-6, 1.6.12.1, 3.11, 4.4 Table 4.4-1	18AAC75.449(a)(6)(M)	USFWS: Recommend updating all references to the Wildlife Protection Guidelines for Oil Spill Response in Alaska to the most current version (2020.2).	Updated references and bibliography to most current version (2020.2)
3.	1-6	1.2 Table 1.2-4	18AAC75.449(a)(2)	ADNR: Please change the phone number for ADNR-OHA from 907-269-8721 to 907-269-8700.	Swapped phone number
4.	1-6	1.2 Table 1.2-4	18AAC75.449(a)(2)	ADNR: in footnote 8, eliminate the word historic. Current wording implies permits are required for historic archaeological sites, but they are required for both historic and prehistoric sites.	Removed the word historic
5.	1-11	1.2.2	18AAC75.449(a)(6)(M)	USFWS: Table 1.2-6, Changes were made to this table in WPG v.2020.2. Recommend updating with Table 4.1 from WPG v2020.2	Updated to match table 4.1 from WPG v2020.2
6.	Appendix B pg. 233, pg. 254-257	Appendix B	18AAC75.449(a)(3)	Plan states “The Incident Safety Plan form is located in Appendix B of this plan.” Appendix B includes Safety Officer Checklist, but not an Incident Safety Plan form. Safety officer checklist in appendix B also states “develop the general safety plan for response operations (see section 1.3.7).” Plan does not contain section 1.3.7. Please clarify/amend.	Added safety plan form to Appendix B and revised reference on checklist to state section 1.3
7.	1-16, 1-72, and 1-75	1.5.1; 1.8	18AAC75.449(a)(5)(A)	“Local spill response resources locations are depicted on a site map in Figure 1.8-2 and are listed in Section 3.6 of this plan.” The figures in 1.8-2 are vague, don’t specifically specify storage for response equipment. The listed regulation states the facility diagram must include locations of response equipment ... clearly marked.” Facility diagrams do not clearly mark locations of response equipment. Please add.	Added locations of spill response equipment in Figure 1.8-2 (South Plant) and Figure 1.8-5 (North Plant). Included Figure 1.8-5 in reference to spill response location reference.

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8.	1-22, 3-43 & 3-45 Appendix D	1.6.4, 3.9.3, App D	18AAC75.449(a)(6)(F); 18AAC75.451(k)(2)(C)	“GRS Maps, located in Appendix D of this plan, for the Indian River, Middle Island, and Starrigavan Bay <i>display some</i> of the sensitive areas near the Sitka Bulk Plant.” Looking at figure 3.9-1 on pg 3-45, Sandy Cove, Pirate Cove, and Silver Bay extend into the planning area, and Starrigavan Bay is not depicted in the figure. Section 3.9 also states only Indian River, Middle Island, and Starrigavan Bay are within the 5-mile planning area for the ODPCP. Please amend to include Pirate Cove, Silver Bay, and Sandy Cove in all relevant areas of the plan. Southeast Alaska Geographic Response Strategies: Zone Five	Included additional GRSs in all relevant areas of the plan, updated Figure 3.9-1 and Appendix D to include additional GRSs in the 5-mile radius of the facility.
9.	1-22	1.6.4	Administrative	At the end of the paragraph on fisheries, processors, and hatcheries, what does “TF-5” refer to?	Deleted “TF-5.”
10.	1-24	1.6.5	Administrative	Second paragraph on section 1.6.5 under “On Water” containment, the plan includes an incomplete sentence: “The slick can then be captured by pulling the boom up to the slick and closing around it as shown in.” Please clarify.	Removed “as shown in” from paragraph
11.	1-26	1.6.7	18AAC75.449(a)(6)(I)	The plan states “alternate storage devices outside of the tank farm are listed in Section 1.6.12.1.2.” That section is titled “Spill response if Winds are from the Northwest.” Please amend to reflect the correct cross reference.	Amended to correct cross reference (1.6.12.1)
12.	1-27	1.6.8	18AAC75.449(a)(6)(L), 18AAC75.451(f)- Administrative update	Page. 1-27 states “the Petro Mariner barge ... will arrive in Sitka within 26 hours” and page 3-26 states the barge will arrive in 27 hours. Please amend for consistency.	Corrected barge arrival time to 27 hours.
13.	1-28	1.6.9	18AAC75.449(a)(6)(K): Procedures and locations for temporary storage	Reg states “procedures and locations for temporary storage and ultimate disposal of oil-contaminated material...” Section on temporary storage states a temporary storage site can be constructed in approximately 24 hours but no locations are identified. Please include.	Added that storage sites could be constructed in the loading racks at both plants.
14.	1-28	1.6.10	18AAC75.449(a)(6)(M)	“For handling species that are outside of SEAPRO’s contracted ability, SEAPRO has an <i>understanding</i> with IBR that IBR will be responsible for contracting an NMFS approved wildlife responder.” Please amend section to reflect/specify	Deleted erroneous statement about contracting another wildlife

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				contracted capabilities to meet requirements under listed regulations.	responder. SEAPRO has a contract with International Wildlife Research, which is approved for the response and treatment of all marine mammals including sea otters.
15.	1-33	1.6.12 SC	18AAC75.449(a)(6)(A)	Current plan lists out that QI makes notifications per table 1.2-2 for local facilities and seafood processors, recommending they turn off water. Renewal only specifies agency notifications in the spill scenario. Please include/specify notifications to local resources in spill scenario.	Added statement that QI will conduct local notifications to ICS 201
16.	1-35, 1-36, 1-39, 1-41, 1-45, 1-47 to 1-49	1.6.12 SC	18AAC75.449(a)(6); 18AAC75.432	Total amount of containment boom listed in the ICS 204s in the spill scenario for P49 owned material exceeds amount of containment boom listed in table 3.6-1 for P49 response equipment (2000ft between both facilities). Amount of containment boom used in the scenario equals 2050ft. I assume the discrepancy has to do with the 650ft of boom, listed as SEAPRO owned in the ICS 201, which is listed as P49 owned on page 1-41. Please amend. Additionally, ICS 209&215 shows that 2700ft containment boom is used in the response. Per form ICS 201 on pages 1-35 to 1-36 2250ft of containment boom listed as total. Per ICS 204s, 2050ft of boom is used total. Please review and clarify total amount of containment boom available and necessary for response to the RPS volume and spill scenario.	Removed second erroneous listing of 200' of boom for TF-2, combined both 200' booms for TF-3 into one 400' item to increase clarity, reduced amount of P49-owned boom for TF-5, and added SEAPRO-owned boom on ICS 201 and the ICS 204 for TF-5.

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					Corrected total number of boom from 2,700 to 2,400 throughout.
17.	1-41, 1-44	1.6.12 SC	-	-	Minor formatting.
18.	1-46	1.6.12 SC	18AAC75.449(a)(6)(A)	ICS form 232 on anadromous streams: references section 3.9.3 and figure 3.9-3. Streams are listed in table 3.9-2 . Table 3.9-3 shows shoreline types, there is no figure 3.9-3. Please amend.	Corrected reference to state table 3.9-2
19.	Pg 2-9	2.5	18AAC75.450(b)(1)	Pg. 2-9 of plan states that annual inspections are performed and the annual inspection form is located in Appendix A of the plan. Appendix A includes inspection forms for daily and monthly inspections, but no form for the annual inspection. Please add this form to the plan or clarify if a different form is also used for annual inspections.	Removed mentions of annual inspections.
20.	2-11	2.5.3	18AAC75.065(a)(1)&(2);	Table 2.5-3: Are the most recent internal STI-SP001 inspections being considered as both internal and external? Please update the tank inspection schedule to match with the recommended inspection schedules in the most recent STI reports for tanks 1-18 at the North plant.	Updated tank inspection schedule in accordance with most recent inspection reports for North Plant Tanks 5, 11 ,12, 16, and 18. Verified all other inspection dates are accurate.
21.	2-16	2.5.5	18AAC75.075(d):	Regulation 18AAC75.075(d) states “Drainage of water accumulations from [SCAs] that discharge directly to the land or warters of the state must be controlled by locally operated, positive close failsafe valves or other positive means to prevent a discharge. Valves must be kept closed and locked when not in use. The owner or operator shall inspect accumulated water before discharging it from a [SCA].” This section does not provide enough description as required by the associated	Clarified drainage and inspection procedures, and added additional information on how the drainage systems operate.

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				regulation. Please clarify the inspection process for SCA, OWS, and clarify water drainage procedures.	
22.	3-2	3.1.1	18AAC75.451(b)(1)&(2)	Section states that South Plant consists of tanks “constructed between the year of 1923 and 1966.” Tables in section 3.1.1 list tank construction years as between 1914 and 1966. Please review and correct to ensure accuracy and consistency throughout plan.	Updated tank construction timespan to match dates listed in Table 3.1-1.
23.	Section 3	Section 3	18AAC75.451(b)(7): The plan holder must provide ... a piping diagram showing all facility piping, including the location of valves.	Plan does not contain a piping diagram. Please amend to include.	Petro 49 had an API 570 inspection performed this summer at both Sitka Plants and the engineer is preparing piping diagrams as part of the final report. The updated piping diagrams are anticipated to be completed by this fall. The diagrams will be provided to ADEC when they are available. No changes made.
24.	3-3&3-4	3.1	18AAC75.451(b)(1)&(2)	Capacity for all tanks in renewal do not match capacities listed in the most recent 3 rd Party API/STI inspection reports. Please provide information on tank capacity calculations.	Tank capacities were updates to align with the capacities listed in the tank strapping charts. The strapping charts

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					will be submitted to ADEC with this RFAI response. No changes made.
25.	3-19	3.3.3, 3.3.4	18AAC75.451(d): The names and detailed contact information for persons filling positions in the command system must be maintained by the plan holder, and this information may be contained in a separate document ... The document must be submitted with the plan application package.	Per the listed regulation, the plan holder must include description and diagram of the ICS hierarchy that include positions command, financial, operations, planning, logistics, and environmental personnel. Diagram must include key state, federal, local government. Please expand the ICS diagram to include names and contact information for persons filling the positions. This can be submitted on a separate document per the regulation. Additionally, please include a space for the local OSC, at minimum a contact number for City of Sitka like the plan lists for the state and federal OCSs. For positions filled by SEAPRO, at minimum include the contact number for SEAPRO.	A detailed contact list for all individuals filling the ICS roles for the Sitka Bulk Plant is being provided with this RFAI response. This document will be maintained separately from the ODPCP in accordance with 18 AAC 75.451(d). A statement to this effect was added to Section 3.3.4. Figure 3.3-1 was revised to include the LOSC.
26.	3-24	3.5.1	18AAC75.451(f)	The plan states “P49 has identified areas to serve as dedicated areas for equipment staging and temporary waste storage areas ... on the ICS 204 forms in section 1.6.12.1.” The ICS 204 forms in that section do not include information on staging areas for equipment and waste storage. Please amend.	Specified staging areas for equipment storage at both plants.
27.	3-27, 3-28	3.6.1	18AAC75.451(g)(1)&(3)-(7)	Table 3.6-1 South Plant response equipment. Sorbent boom listed as “various.” Please specify quantity.	Specified quantities of

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					boom stored at each plant
28.	3-32	3.7.1	18AAC75.451(i)	Address for SEAPRO only includes street address. Please include city and zip code.	Added city and zip code of SEAPRO headquarters
29.	3-39	3.9.1	18AAC75.451(k)	USFWS: In Table 3.9-1, remove row for Steller's eider. The facilities are not in range of this species.	Removed Steller's eider from table 3.9.1.
30.	3-41	3.9.1	administrative	First sentence in "Birds" section states "Alaska and Canadian breeding grounds." It appears that this sentence was cut off. Please clarify.	Revised broken sentence.
31.	3-39, 3-41, 3-59, 3-60	3.9.1, 3.11	18AAC75.451(k)	USFWS: Birds- Many of the bird colonies included here are far from the facilities. Recommend updating this list with bird colony information from the North Pacific Seabird Database: Third full paragraph: Recommend updating with bird colony data from https://axiom.seabirds.net/maps/js/seabirds.php?app=north_pacific#z=3&ll=55.00000,-170.00000 .	Removed discussion about migration stopover areas that are far from the facility. Updated bird colony data and bibliography with reference.
32.	3-43	3.9.3	administrative	Section for "Aquatic Farms" states "There is one active aquatic harming operation." ADEC assumes this is meant to read "aquatic <i>farming</i> operation." Please consider amending.	Corrected misspelling.
33.	3-43, 3-44, 3-60	3.9.3, 3.11	18AAC75.451(k)(2)(C)	USFWS: Endangered Species and Critical Habitats Page 3-43 The facility is within the range of the short-tailed albatross (listed under the Endangered Species Act (ESA) as endangered) and should be included in this section. Note that critical habitat has not been designated for this species. More information can be found on the USFWS short-tailed albatross page: https://ecos.fws.gov/ecp/species/433 . Page 3-44	Removed northern sea otter and replaced with short-tailed albatross. Updated bibliography with reference.

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				Remove first paragraph. Only the Southwest Alaska stock of northern sea otters is listed as threatened under the ESA; the Southeast Alaska stock of sea otters (the population in the vicinity of the facilities) is protected under the Marine Mammal Protection Act, but is not listed under the ESA. Northern sea otter stock ranges can be found on the USFWS Northern Sea Otter web page: https://ecos.fws.gov/ecp/species/2884 .	
34.	3-43	3.9.3	18AAC75.451(k)(2)(C)	Aquatic Farm: states there is one active one located 4 miles east, but doesn't list the name. Previous plan listed the name as: "Aquatic Farms: The Sawmill Cove – Silver Bay Seafoods aquatic farm is located approximately four miles east of the South Plant. The location is depicted in Figure 3.10-1 of this plan." Please amend to include.	Updated to include the name of the aquatic farm.
35.	Document pg. 210	Appendix A	-	-	Revised monthly inspection form for the Sitka South Plant to no longer include out of service Tank #1
36.	Document pg 225-228	Appendix A		ADNR: The State Cultural Resource Investigation Permit application and Stipulations have been updated for 2024. Suggest that you provide link to OHA webpage for Cultural Resource Permits in section 3 page 3-53, or use updated documents at: https://dnr.alaska.gov/parks/oha/archsurv/permitinvestigate.htm Keep Permit documents up to date, or provide link to these documents in section 3.	Updated SCRIP permit