Table 1.0: Request for Additional Information on Delta Western Ward Cove ODPCP (24-CP-5254)

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1.	N/A	CPLAN Renewal Change Log	408(c)(2)	The CPLAN Renewal Change Log does not sufficiently capture the extensive number of deletions and revisions throughout the plan. • Revise the change log so that it can be used to fully understand where content from the previously approved plan has been moved to. Ensure all additions, revisions, and deletions are clearly noted.	An updated CPLAN Renewal Change Log is provided as part of the RFAI response. The CPLAN Renewal Change Log reflects all changes, including those made as part of this RFAI response.
2.	All	All	448(a)	The contingency plan is difficult to navigate and locate critical information in a timely manner, which reduces its effectiveness as an emergency response tool. Several structural and formatting issues hinder its usability, including: • Frequent redirections to multiple sections and appendices before providing necessary information. • Lack of a logical cross-referencing structure, making it unclear where regulatory requirements are addressed. • Inconsistent and unclear appendix page numbering, further complicating navigation. **<u>To correct this the plan must:</u>** • Improve overall plan navigation to reduce unnecessary redirections and ensure users can quickly locate critical information. • Establish a clear and consistent cross-referencing structure by ensuring all references to appendices, tables, and figures are explicit and include page numbers, and by providing logical page numbering within appendices (e.g., Appendix A-1, A-2). • Consider the integration of tables and figures within the text, instead of separately in appendices, to reduce excessive cross-referencing.	The following changes have been made to improve the navigability of the plan: • Removed section appendices and put content back in line, more similar to the prior version of the plan [improves flow and reduces cross references] • Added tables and figures to the TOC (see also #3) • Moved tables and figures in line to be presented in the section in which they are discussed [reduces cross-referencing] • Replaced full repetition of regulatory text tables with a shorter regulatory references [reduces bulk and put text closer in line with section headers] • Improved cross-references within the plan and to the scenario document (see also #4)

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3.	i	Table of Contents	448(e)	The table of contents (TOC) lacks clear navigation to information in the plan. It relies on the user to manually search the text within sections and appendices to locate information that further directs them to the content they are looking for, often located in another section or appendix of the plan. The amount of effort and difficulty involved in locating crucial information prevents the plan from being a readily usable document. • Revise the main TOC so that it lists all major sections, includes all appendices, and references all tables and figures, even if they are inside appendices (e.g., "Table B-3 Response Times (Appendix B, Page 4)"). • The revised table of contents must provide a **clear and structured overview** of all plan components, ensuring users can quickly locate **sections, appendices, tables, and figures** without unnecessary searching.	The TOC was updated to include all tables, figures, forms, etc. as they appear in line within the text. A note at the top of the TOC was also added indicating that while the majority of pages have page numbers, some pages (namely tables) do not. This was done in both the main document and the scenario document.
4.	ii	Cross-Reference	448(e)	The cross-reference table does not provide enough information for the user to determine where each compliance requirement is addressed in the plan. Specifically: • The table does not provide **clear and specific references** to the exact **sections, appendices, or page numbers** where compliance requirements are addressed. • Users must **manually search** the text within sections and appendices to locate information that further directs them to the content they are looking for, often located in another section or appendix of the plan. To ensure compliance, the plan must: • Ensure the cross-reference table provides clear, specific citations by listing the exact section, appendix, and page number where each regulatory requirement is addressed.	The cross reference table was updated to add additional references, as appropriate. For example, a secondary reference was added if the section refers to another section.

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				Avoid vague or incomplete reference (e.g., "See Appendix" should be expanded to "Appendix B, Page 5") • The revised cross-reference table must allow users to **quickly locate** compliance-related information without unnecessary searching. It must be structured in a way that **facilitates regulatory review and emergency response readiness**.	
5.	All	All	448(a)	The plan has multiple complex topics summarized in tabular format, but at the expense of clearly addressing regulatory requirements. The tables as a stand-alone are not a replacement for the detailed discussion often warranted to guide a responder in an emergency event. • Improve usability by expanding upon these summaries with detailed text in the body of the plan to accompany the tables	Additional information was added to several of the tables to provide additional context and details to aid the reader in being able to more directly tie the language to the corresponding regulatory requirements. Moving the tables in line, additionally provides for better context. In most cases, additional details were added to the tables vs. the text to facilitate plan usability and ease of updating.
6.	1 of 1	1-2B	Administrative	Please update the ADNR Statewide Abatement of Impaired Land Section contact information to: • Email: dnr.sero.spill@alaska.gov • Phone: (907) 465-3400 or 3513	Table 1-2B was updated to include the two phone numbers called out below. Delta Western maintains e-mail addresses electronically. As such, the e-mail address was not added to the text.
18 AAC 75.449 Part 1; ODPCP: Response Action Plan					
7.	All	Response Scenario	448(a)	The Response Scenario is difficult to navigate and reference efficiently because information is fragmented, the appendices	The Response Scenario was retained as a stand-alone

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				lack consistent page numbering, and regulatory requirements appear scattered throughout various ICS forms without clear identification. For additional context, please see RFAI #2.	document, but additional headings were added to aid in navigation. Additionally, in most cases, page numbers were added to ICS forms and summary tables to further aid in navigation. Other improvements, such as updates to the TOC and cross-reference tables, were also implemented (see also #2, 3, and 4).
8.	1-3	1.3	449(a)(3)	The plan states, *"In all other instances, DW will rely on pre-existing policies and procedures to ensure the safety of personnel, responders, and the public"* • Adopt these policies and procedures by reference in this section.	This statement was removed during the RFAI. A footnote was added to clarify DW's response for developing an incident-specific safety plan in the event of an incident requiring full IMT/SMT activation.
9.	1-4, 1-5	1.5	449(a)(5)	The plan references response mobilization but does not provide specifics on vehicle/vessel types used, routes, and contingency planning for adverse weather. It also doesn't include time estimates. Expand to include: • A detailed transportation plan, specifying vehicle/vessel types, routes, and contingency measure for adverse weather. • An overview of how interim response actions (e.g. initial containment with local resources) will bridge gaps until external resources arrive. • Specific examples of resource mobilization times.	Mobilization of local Ketchikan-based resources is immediate. A footnote was added to denote SEAPRO's (OSRO/PRAC) worst case 4-hour mobilization within Ketchikan. This information is also reflected in the ICS 201-4 for resource summaries that are provided in the scenario document.

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					Additional transportation methods of specific vehicles, vessels, and aircraft were also added to the text. Adverse weather is addressed by resources being staged and maintained in "ready status." Interim response actions from Section 1.1 are cross-referenced.
10.	1-6	1.6	449(a)(6)(F)	ADNR Land Use Guidance: *"Excluding those lands conveyed or withdrawn, the State of Alaska Department of Natural Resources (ADNR) manages most tidelands and submerged lands from the line of mean high tide and seaward to a line three nautical miles distant from the mean low tideline. In addition, ADNR manages most shorelands below ordinary high water, and over 100 million acres of uplands spread throughout the state. Spills impacting ADNR land call for notification, consultation, and coordination with ADNR. Certain response activities on state land may require permitting from ADNR. Such activities include those that go beyond uses that are Generally Allowed, e.g., anchoring a response vessel in the same location for more than 14 days or using heavy equipment on state land. To inquire about whether a spill is impacting state land or if response strategies require permitting, please contact ADNR."* • Incorporate ADNR's land-use guidance (above) within Section 1.6. • Clearly state which activities require consultation or permits from ADNR and provide examples (e.g. anchoring response vessels, use of heavy equipment).	The language included here was incorporated into Section 1.6 of the CPLAN and a cross reference in the scenario document back to this section was also added. Instead of providing a hypothetical list, a statement acknowledging the need for notification, consultation, and coordination with ADNR was added to the text in Section 1.6. In addition, a copy of ADNR's fact sheet for "Generally Allowed Uses" was also added to Section 6.2 and cross referenced here.

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				• Include a note to cross-reference this section in the Response Scenario.	
11.	1-6	1.6	449(a)(6)(F)	The ICS 232 form lists at-risk ESAs but does not specify response actions tailored to each site. There is no deployment schedule to ensure adequate response times. The plan references the potential use of GRSs but does not identify which specific GRSs apply to the spill scenario. • Clearly define response strategies for ESAs and areas of public concern, including planned tactics and assigned resources. • Explicitly name and incorporate applicable GRSs into the response scenario. • Provide a deployment timeline that ensures these areas are protected before oil reaches them.	The ICS 232 forms provided in each spill scenario reference the exact GRS site numbers that would be affected by the spill scenario. The ICS 204a for ESA Protective Booming in each scenario (TF-3) describes resources and tactics in the first operational period for these sites as they will be prioritized. No changes to the text were made.
12.	All	Response Scenario	449(a)(6)(I)	The plan does not specify timeframes for starting and completing lightering operations. • Define expected timeframes for assessment, setup, and completion of lightering.	Additional language was added to Section 1.8 of the standalone Response Scenario, including cross references to the appropriate ICS-204a forms. Noting that additional information on the lightering process can also be found in Section 8 of this ICS-204a forms.
13.	All	Response Scenario	449(a)(6)(J)	The plan does not clearly explain how recovered oil is transferred or how recovery volumes are determined. While it references a formula for calculating daily oil recovery capacity, it does not show how these procedures apply to the scenario. Additionally, the plan does not demonstrate how temporary storage capacity aligns with recovery estimates	Additional language was added to Section 1.9 of the standalone Response Scenario to reference operations called out in the ICS-204a forms.

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				• Define transfer procedures from temporary to permanent storage • Provide example calculations for recovered oil and oily water volumes using the formula provided per 451(h)(3). • Demonstrate that temporary storage capacity matches projected recovery volume.	Example calculations were also added Section 1.9 to showcase that the recovery volume exceeds the RPS within a 72-hour timeframe. Further, the oil recovery calculations and temporary storage calculation for each scenario were combined onto a single page and a summary added to demonstrate that sufficient temporary storage capacity is available.
14.	1-8	1.8	449(a)(6)(K)	The plan does not specify disposal procedures, required permits, or transportation logistics for oily waste. • Identify final disposal sites and confirm permitting requirements • Define transportation logistics for moving recovered oil and oily waste. • Show that temporary storage capacity is sufficient until waste can be transported off-site	Additional language was added to Section 1.10 of the standalone Response Scenario to provide additional information as to how Delta Western will identify disposal sites and potential methods of transport. As noted above, both scenarios show that temporary storage capacity is sufficient until waste can be transported offsite. (see also #13).
15.	1-11	1.12	449(a)(6)(M)	The plan states "*The procedures, methods, and equipment that may be utilized can be found on the corresponding ICS-204a form.*" ICS 204 forms lack specific methods or procedures for wildlife response. • Describe procedures, methods, and equipment to be used in wildlife response.	Methods and equipment are described in the ICS 204-a task forces for Wildlife Assessment (TF-7 for gasoline scenario and TF-8 for diesel scenario).

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				• Explicitly reference and commit to using the Alaska Wildlife Protection Guidelines for Oil Spill Response and ensure these procedures are integrated into response scenarios.	Section 1.12 of the Response Scenario references and commits to the AK Wildlife Protection Guidelines and a reference to further tools found on the ADEC website regarding wildlife resources to use as applicable based on findings. Preventative measures are described. No changes to the text were made.
18 AAC 75.450. Part 2 – ODPCP; Prevention					
16.	All	2	448	This section is difficult to navigate due to fragmented information, inconsistent appendix page numbering, and a reliance on cross references. The cross-referenced material frequently contains vague content rather than clear actionable details, making it difficult to verify compliance and reducing the plan's usability as a working document. For additional context, please see RFAI #2. • Summarize key information directly within the section instead of relying on cross-references. • Ensure all ICS form references include specific page numbers, section names, or form fields. • Clarify and expand supporting documentation for facility standards, secondary containment compliance, and drainage procedures.	Section 2 was reworked to remove the Section 2 Appendix and associated addendums. The text now appears in line in a more similar fashion to the previous version of the plan. See also responses to #17 through 25 below for additional changes along with the response to #2.
17.	All	2.1.5, Appendix	450(a), 065	FCAST and SFAST sections are missing supporting information regarding how these standards are applied or how compliance is documented. • Include clear explanations of how standards are applied within the facility.	The FCAST and SFAST sections were compared to the prior version of the CPLAN and it was found some language was inadvertently excluded during the

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					transition to the new format. This language has been added back in.
18.	2-11	2.1.5, Appendix	450(a), 065(k)&(l) & 066(g)&(h)	The monthly testing procedures for high-level alarms are not clearly described • Include a clear description of the monthly testing procedures for tank high-level alarms, including the specific inspection methods and protocols.	Additional language was added to Sections 2.1.6.1 and 2.1.6.2 as to how the high-level alarms are tested.
19.	2-11	2.1.5, Appendix	450(a), 066(d) & (e)	Current description is missing equipment and operational details for draining liquids from dikes and interstitial spaces. • Include specification for pumps, sensors, monitoring systems. • Provide inspection and maintenance schedules.	Information on the specific equipment installed on these tanks has been added to Sections 2.1.6.1 and 2.1.6.2. This includes the frequency of inspection. No language was added about draining liquid from dikes or interstitial spaces as that condition would be indicative of a potential tank failure and would require the tank to be temporarily taken out of service for further assessment. As the operation is not routine practice or conducted on a regular basis, the inclusion of such information is considered inappropriate.
20.	2-11	2.1.5, Appendix	450(a), 075	This subsection must provide adequate data to justify the 60% RPS Reduction for a sufficiently impermeable SCA. Additional information is needed to show that the SCA at the Delta Western Ketchikan facility meets the requirements of 18 AAC 75.075 by demonstrating sufficient volume and impermeability. • Describe the system design, lining (as applicable), and how it meets required impermeability standards.	Additional language was added to Section 2.1.6.3. Additionally, two attachments (Tank T-01 SCA Sufficiently Impermeable Evaluation and Secondary Containment Calculations) were added to Section 6.2 to support

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				• Provide calculations showing the net SCA volume in relation to the capacity of the largest tank.	Delta Western's justification of the 60% RPS reduction and volume calculations.
21.	2-11	2.1.5, Appendix	450(a), 075(d)	SCSA-1: Plan states "*When needed, aboveground oil storage tank secondary containment areas are drained of accumulated water.*" This statement does not include sufficient detail. • Please expand to include description of drainage procedures, equipment used, and location of discharge.	Additional language was added to the end of Section 2.1.6.3 to provide more details with respect to SCA drainage/discharges.
22.	2-11	2.1.5, Appendix	450(a), 075(g)	SCSA-2 does not contain sufficient detail. Please expand to include description of: • ISO Loading area and TTLR SCA capacity. • Construction detailing how they meet department SCA standards under 18 AAC 75.075. • Drainage procedures, equipment used, and location of discharge. • Description of how product released to the SCAs is managed, where product is pumped to, how it is recovered etc.	Secondary containment calculations were added to Section 6.2. See also #20 and 21.
23.	N/A	2, FOP Addendum	450(a), 080(b)	Attach a comprehensive corrosion control program detailing: • Monitoring methods (e.g., cathodic protection, inspections). • Maintenance schedules for high-risk areas like pipelines and marine headers.	This text has been relocated to section 2.1.2. DW's API 570 program for this facility has been adopted by reference in this section.
24.		2, Appendix	450(b)(3)	The "Frequency" values in Table 2-3 are too general to allow for a valid analysis. For instance, a ~1,200-gallon spill occurred in June 2024 during fuel transfer to the AST, yet the table categorizes such events as "very low" frequency. • Clearly define what each frequency value represents (e.g., "very low" = once every 50 years) or use numeric frequency values (e.g., 1 spill per X years).	Updated the table (now Table 2-12) to include a more descriptive frequency. Added additional language to the source column to better differentiate the type of spill covered. This includes updated sources of various types of

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				• Distinguish between spills during fuel transfers and catastrophic tank ruptures in the analysis, as each has different causes and likelihoods. • Populate Table 2-3 with data fields that reflect these distinct spill scenarios.	structural failures as well as fuel transfers (overfills).
25.	2-9, 2-11	2.4, Appendix	450(b)(4)	The plan partially addresses seismic risk but does not provide sufficient analysis of seismic vulnerabilities, current design standards, or mitigation measures. Table 2-4 states that the tank farm was designed and constructed to UBC seismic standards. However, the UBC (1997) has been superseded by the IBC and the seismic zone concept that the UBC used is considered obsolete by the USGS (see https://www.usgs.gov/programs/earthquake-hazards/science/earthquake-hazards-201-technical-qa). • Specify how the original seismic design standards for the tank farm compare to the current IBC standards if the tank farm were built today, specifically whether the tank farm (or components thereof) would or would not meet today's standards; if the tank farm would not meet current standards, please describe the potential mitigation measures that would theoretically be required to bring it up to today's standards (e.g., additional tank bracing, anchoring, etc.) • The plan must demonstrate how the facility will withstand seismic events and prevent oil spills.	The language used for seismic risk was outdated. The language has been updated appropriately to include the relevant codes to which construction and installation were completed. Design and installation standards are based on the time of installation and modifications of existing infrastructure is not generally required. Additionally, the language in the table (now Table 2-12) provides analysis of potential oil discharges and was updated accordingly.
18 AAC 75.450. Part 3 – ODPCP; Supplemental					
26.	All		448(a) 451(a)	This section does not provide enough detail for a complete compliance review. The referenced ICS forms and appendices frequently contain vague references rather than clear, actionable details, making it difficult to verify compliance and is not readily usable as a working plan.	Throughout Section 3, ICS forms are referenced by either form name or task force as it relates to either the gasoline or diesel scenario.

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				• Summarize key response actions directly within the section instead of relying on cross-references. • Ensure all ICS form references include specific page numbers, section names, or form fields to improve usability.	Additionally, the response scenario document cross-reference table was updated to reference specific ICS forms. Each ICS form has a detailed description of the proposed actions for each task force within Section 8 that includes key responsibilities and instructions.
27.	All	3.1.3	451(b)(5) 025(a)	Sections 3.1.3 and its sub-sections lack sufficient detail on the transfer requirements and practices intended to reduce, slow, or prevent discharges. • Revise these sections to clearly describe the transfer procedures and controls used to minimize the risk and severity of spills.	This text has been relocated to Section 2.1.5. The language was also expanded to add detail regarding procedures and controls.
28.	3-3	3.1.3.1	451(b)(5) 025(a)	The plan states "*DW takes all appropriate measures to prevent spills or overfilling during a transfer of oil, including, but not limited to reducing loading rates at the beginning and end of a transfer*." This statement is vague and it is not clear if the appropriate measures referenced here were in place before the ~1200 gallon spill in June 2024. • Clarify how procedures were improved after June 2024 to reduce the chance of that type of spill happening again. • Please consider relocating this content to Section 2 for easier navigability.	This text was relocated to Section 2 as requested. With respect to how the procedures were improved, we increased the sound output volume on the high-level alarm along with reviewing and discussing lessons learned with onsite personnel as to how such an event could be prevented in the future. Table 2-12 was updated to include a column stating "Facility Best Practices" to identify lessons

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					learned from discharge history. Additionally Table 2-11 includes an updated reference to denote the change in volume associated with the high-level alarm.
29.			451(c)	The spill trajectory analysis provided in the plan lacks details on assumptions and variables used. • List trajectory model assumptions (wind speed, velocity). Specify modeling tool used (e.g., GNOME, ADIOS2). Explain how data updates would occur during a response.	Section 1.5 of the Response Scenario incorporates a reference in which WebGNOME is discussed as spill trajectory model that can be updated in real-time during a response using current conditions. Furthermore, a discussion of model development and assumptions used to generate trajectories was added to the Response Scenario Plan Appendix (Section 3.4). The scenario ICS-204a forms for Aerial Surveillance overlays these trajectories to the map.
30.	3-3, 3-4	3.1.3.4	451 025(e)	The current description of emergency shutoff does not adequately demonstrate how the facility meets requirements to stop a discharge in the shortest possible time. Stating that the facility is "equipped with emergency shutoffs" and referencing a map does not provide sufficient detail. • Provide a detailed explanation of how the emergency shutoffs function, including the procedures for activating them and the expected response times.	This text has been relocated to Section 2.1.5.4. Language was added to discuss emergency shutoff activation, functions, and expected response times.
31.	3-6	3.2	451(c) 453(3)	The plan states "*Taking into account the relative location of the tank, soil type, low spots, and level of vegetation, it is estimated that no more than 10% of the adjusted RPS could reach open water*."	Corrected the language in this section to read "…. no more than 90% of the adjusted RPS could reach open water."

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				• The Response Scenario, Table 3-3, and Table 5-1 of this plan, as well as the previous plan (June 2020), state that an estimated 10% of the adjusted RPS will remain on land and 90% would reach open water. **Please correct this typo (i.e., "more" to "less") accordingly.**	Note: due to other text changes, this language can now be found in Section 3.1.
32.	3-11	3.4	451(e)	Regulation requires estimates of the frequency and duration of factors that may limit a response. Table 3-4 states that winds exceed 20 kts with a frequency of 3% annually, with only 11 days per year affected. The 3% estimate was confirmed via comparison with data for Ketchikan International Airport, however the estimate of 11 days affected appears to be a significant underestimate. Three percent of one year is 11 days, so the plan apparently assumes that the windspeeds exceed 20 kts continuously those – and only those - 11 days, which is not accurate. • Refer to archived weather data to determine the number of actual days affected by windspeeds that exceed 20 kts and update the plan.	The table (now Table 3-2) was updated to 38 days or 10% annually. This estimate was derived using a 5-year compilation of the Ketchikan Internation Airport max windspeed records from Weather Underground monthly historical records. The data set was converted from mph to kts and days affected by maximum windspeeds of >20 kts were summed and divided by 5 to reach an annual estimate.
33.		3.10	454(k)(1)	The plan states "ESAs and areas of public concern that might be impacted by a RPS discharge were identified based on predictions of discharge movement, spreading, and probable points of contact." However, the plan does not show or reference the specific predictions (e.g., trajectory maps or modeling data). Without this information, it is not possible to fully evaluate the section because it is not apparent how ESAs and areas of public concern were identified or assessed. • Include the relevant trajectory or spill movement details in the plan. If you rely on a single model run, please note that it will not capture all the possible outcomes under varying weather and tidal conditions. • If a full probabilistic model is not available, you may use the EPA Planning Distance estimate for non-persistent oils in	This section (now Section 3.9) was updated to reference the modeled spill trajectories presented in the standalone response scenario document. The Response Scenario Plan Appendix (Section 3.4) provides a discussion to the spill trajectory model development and background including model settings and inputs.

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				tidal waters to define the area at risk. For more information on EPA's Planning Distance guidelines, see: FRP Rule Attachment C-II. https://19january2021snapshot.epa.gov/oil-spills-prevention-and-preparedness-regulations/facility-response-plan-frp-rule-attachment-c-ii_.html .	Additional details and discussion as to how ESAs are identified through the resources presented were also added into Section 3.9 of the CPLAN document. Specific ESAs addressed by the response scenarios are included in the ICS-232 forms presented in Sections 2.1 and 2.2 of the Response Scenario. Spill trajectories are shown on the ICS 204a forms for Aerial Surveillance. A cross reference has been added to the text in this section. GRS and ESI maps within the 5+ mile are also provided in Section 6.2.
34.	3-13	Section 3.6	451(g)	Page 3-7 states, *"The response equipment required by 18 AAC 75.451(g) is presented in Section 3.6."*. Section 3.6 refers to the Response Scenario 201 for complete list of contracted equipment. The plan directs the user to 3.6 and then redirects to Response Scenario ICS 201. The ICS 201 is missing information and only partially satisfies the requirements of 18 AAC 75.451(g). The equipment information is scattered across multiple pages of the ICS 201 – and the ICS 201 does not contain all the content required by 18 AAC 75.451(g). For example, wildlife hazing kits,	Text in this section was updated to direct the reader to Page 4 of the ICS-201 form for each of the response scenarios (Sections 2.1 and 2.1 of the standalone Response Scenario). The ICS-201 page 4 form is intended to be a comprehensive list of all equipment that would be deployed in a response and

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				SCAT equipment, ISO tanks & storage bladders, tank trucks, and drones are found throughout the ICS 204 forms but not in the ICS 201. • Ensure direct and complete cross references are used to minimize redirections. • **Create a single comprehensive equipment list that fully summarizes the information scattered across multiple forms.** • Clarify ownership for all response resources. Ensure all equipment listed has an estimated deployment time and clarify whether those estimates account for real-world conditions.	includes wildlife hazing kits, temporary storage, drones, etc. The ICS-201 page 4 form notes that "on-scene" equipment and personnel are owned/operated by Delta Western. This equipment links directly to the various ICS-204a Task Force forms for use in a response. A footnote was also added to the bottom of page 4 of the ICS-204a to reiterate the "on-scene" equipment ownership.
18 AAC 75.450. Part 4 – ODPCP; BAT					
35.	All	4	448, 452(b)	The plan must identify all available technologies and provide a written analysis of each technology that fully satisfies the six-step process outlined in 18 AAC 75.452(3). Additionally, the plan must include a clear justification demonstrating that the selected technology is the best available for the Delta Western Ketchikan operation. Currently, the content is too brief and lacks sufficient detail to meet regulatory requirements. Several areas are incomplete, missing analysis using the six-step process, and lacking justification for the BAT selection. <u>Example</u>: Table 4-1 (clip below): under (3)(A) Available for use by DW, the plan states, "yes". This does not fully satisfy the requirements of 18 AAC 75.452(a)(3)(A) which also calls for discussion on whether each technology is the best in use in other similar situations.	Additional language was added to the Section 4 text to provide guidance as to what is meant on the tables and how DW completed the six step process. Additional language was also added to portions of the tables to provide some additional clarifying verbiage where applicable. With respect to specific examples provided, please see the responses below. Table 4-1: Language to address (3)(A) is provided in two columns,

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				Example: Table 4-6 is described in overly vague terms and does not differentiate between technology used to satisfy 18 AAC 75.065(k)(3 & 4) and 18 AAC 75.066(g)(l)(C & D). Example: Throughout the section the requirements of 18 AAC 75.452(3)(D) are not met. It appears that the Tables are describing the general age of the Technology, however the regulations require the age of the technology presently in use at the operation. • Revise this section so that it meets the intent and requirement of 18 AAC 75.452 to include updating each table so that: 1. Includes all available technologies 2. Each identified technology includes written analysis that fully satisfies the requirements of 18 AAC 75.452(3). 3. There is written justification to demonstrate that the technology proposed to be used is the best available for the Delta Western Ketchikan operation If the information does not fit within the table, it may be provided as supporting text within the section.	one that addresses similar situations and has more narrative text and one that is simply stating if the technology is available for use by DW. The new language in Section 4 helps address this point. Table 4-6: The table rows were updated to identify shop built and field erected tanks more clearly. Additionally, the description of technology was updated to include both liquid level determination technology and high level alarming capabilities to satisfy 18 AAC 75.065(k)(3 & 4) and 18 AAC 75.066(g)(1)(C & D). In all tables, the language related to (3)(D) was updated as follows: 'N/A' representing not applicable was used for all alternative methods as they are not in use by DW; 'N/A' was also used for equipment that is not owned by DW and is instead owned by a third-party. For all existing methods, the language was revised to address the age and condition of the specific

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					technology at the DW Ketchikan Bulk Facility.