

Table 1.0: Request for Additional Information on Delta Western Sitka Samson ODPCP (25-CP-5295)

| # | Page | Section | Regulation 18 AAC 75.### | Comment/Recommendation | Plan Holder Response |
|----|-------------------|-----------------------|---------------------------------|--|---|
| 1. | 2-7 | Spill scenario 2.1 | 18AAC75.449(a)(6); 451(g)(1) | <p><u>Original Comment: (RFAI #1 comments 7 & 24):</u> Per 18 AAC 75.451(g)(1) the plan holder must include a list of equipment that details location, inventory, and ownership. The plan only has one table listing equipment, page 2-7 in the response scenario. The scenario does not detail the location of all equipment (equipment that is not physically present at the DW Sitka facility). Please update this table to include all required information per 18 AAC 75.451(g).</p> <p><u>DW Response:</u> The equipment listed on page 2-7 with an “X” indicate DW owned and on-scene. Each task force specifies the equipment owner and staging location. No changes to the text were made.</p> <p><u>DEC comment:</u> 18 AAC 75.451(g)(1) requires the location of all equipment to be included in the plan. For equipment <i>not</i> owned by Delta Western, a location is not included beyond “<i>southeast region.</i>” In order to ensure that all equipment required for a response can be on scene and support the RPS within the regulatory time frames, locations for all equipment must be included in the plan. Please update the response equipment table to detail where specifically contracted equipment will be ordered from.</p> | Additional language has been added to the note on page 2-7 to specify the location of non-DW owned spill response equipment. |
| 2. | Spill scenario | Spill scenario | 18 AAC 75.449(a)(6)(C) | <p><u>Original Comment (#11):</u> The response scenario does not describe or include any detail on how decontamination will be conducted for responders and equipment. Please update the spill scenario to include decon team information.</p> | Additional language has been added to Section 1.3 of the response scenario to describe the implementation of a decontamination plan as part of the incident-specific safety plan. |

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| | | | | <p>DW Response: Decontamination teams / task forces, location of decon sites, and relevant equipment needed for this is not required to be included in the plan by regulation. For consistency with other approved CPLANs, further information has not been added.</p> <p>DEC comment: 18 AAC 75.449(a)(6) requires a spill response scenario to have sufficient detail and “<i>be usable as a general guide for a discharge of any size, must describe the discharge containment, control, recovery, transfer, storage, and cleanup actions to be taken, and must clearly demonstrate the strategies and procedures adopted to conduct and maintain an effective response consistent with ensuring the safety of personnel.</i>” 18 AAC 75.449(a)(6)(C) requires further detail on in-place procedures to stop a discharge at its source and “<i>prevent its further spread.</i>” Without decontamination strategies appropriate to the spill scenario, Delta Western cannot demonstrate their ability to maintain an effective response [AS 46.04.030(e) “...The department may require an applicant or holder of an approved contingency plan to take steps necessary to demonstrate the applicant’s or holder’s ability to carry out the contingency plan,”] that ensures the safety of response personnel and the public. The RPS spill scenario must demonstrate decontamination procedures to ensure personnel safety. Likewise, all resources (number of personnel, decontamination equipment and other resources) needed to implement effective decontamination must be identified in Part 3 of the plan. Finally, training</p> | |

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| | | | | in personnel decontamination and the implementation of decontamination tactics must also be included in Part 3 of the plan. Please note that the requirement to implement the incident command system does not excuse a plan holder from incorporating and describing the structural and operational components of the incident command system as defined in regulation under 18 AAC 75.990 and as needed to implement the Response Planning Standard scenario. The AIMS Guide specifies the Decontamination Unit resides in the Operations Section. The decontamination resources included in the Delta Western ODPCP must reflect the decontamination needs associated with the RPS volume spill response scenario. We therefore request an update to the spill scenario to include details on decontamination operations. | |
| -- | 3-2 | 3.1 Response Scenario | -- | -- | OSHA has been added to the acronym list. |
| -- | 3-3 | 3.3 Response Scenario | -- | -- | The OSHA decontamination web page reference has been added to the bibliography. |
| 3. | 2-22 | 2.1.6.2 | 18AAC75.066; 020 | Original comment (#17): Table 2-6 states that Tank 5 was installed in 2025, and the tank construction standard is “assumed” to be UL 142. Please review the tank construction standards for the new installation and update the plan accordingly. DW Response: The construction standard was not listed or provided on the formal inspection, therefore “assumed” will need to remain until | Tank 5 was pressure tested and underwent other required testing before being put into service. DW is anticipating completing the STI inspection for Tank 5 at the end of January. A copy of the report will be provided to ADEC when available. |

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| | | | | <p>this information can be confirmed. No changes to the text were made.</p> <p><u>RFAI Comment:</u> Is the post installation report available for Tank 5?</p> | |