Table 1.0: RFAI Delta Western Sitka Samson ODPCP (25-CP-5295)

#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
Section 1					
--	ii	Greatest Possible Discharge	--	--	Update facility's total oil storage capacity to include the addition of ISO tanks stored onsite temporarily to meet operational needs.
--	iv - vii	TOC	--	--	Updated TOC to reflect pagination updates due to RFAI responses.
--	1-3	1.2	--	--	Table 1-1 was updated to incorporate new QI updates.
1.	1-5	1.2	18AAC75.449	• **ADF&G:** In Table 1-2B, change ADF&G contact number to 907-465-4105 in Juneau. • **ADNR:** Update contact information for ADNR SAIL to: 907-465-3513 or email at dnr.sero.spill@alaska.gov. • **USFWS:** In Table 1-2B For the NMFS row, change phone numbers to 907-957-8147 (primary) and 323-366-9150 (alternate).	Table 1-2B was updated to include the changes called out here.
2.	1-7	1.3	18AAC75.449(a)(3)	This sections states that Delta Western will utilize the ICS208 form for developing a safety plan. The Form is not included in the appendices or in the response scenario. Please include the form.	The ICS 208 Form has not been included since the most recently updated version is readily available on FEMA's website. Language has been added to Section 1.3 to describe the information to be considered when developing the safety plan.
3.	1-13	1.7	18AAC.75.449(a)(9)& 451(b)(7)	Per the listed regulations, facility diagrams must label facility piping even if the specific piping diagrams are redacted as confidential. Please label facility piping in the diagram.	Facility piping is shown in Figure 1-2. A callout box has been added to clearly point out facility piping.
--	1-2	1.1 response scenario	--	--	The end time for operational period #1 was updated.

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4.	1-3	1.3 response scenario	18AAC75.449(a)(6)(C)	For procedures to stop the discharge, the plan states *"access and implement prompt removal actions to contain and remove the spill substance."* Please add additiona detail on what procedures are being described in this section.	Section 1.1 of the CPLAN provides additional details regarding initial emergency action steps. Language has been added in Section 1.3 of the response scenario to further elaborate stopping the flow at the source as well as containing and removing the spill substance.
5.	1-8	1.10 response scenario	18AAC75.449(a)(6)(K)	Per section 1.10, procedures and locations for temporary storage are found on the corresponding ICS 204 forms. The forms do not detail specific temporary storage/waste staging locations. Please update to include specific locations for temporary storage.	ICS Form 204-a(TF-1) lists 2 rolls of disposal bags and 10 drums that are staged at the Samson Yard. TF-2 and TF-3 also list and provide temporary storage types and staging locations. To further specify the specific locations for temporary storage a footnote has been added on page 1-9.
6.	1-10	1.12 spill Scenario	18AAC75.449(a)(6)(M)	**ADF&G:** The newest version of the Alaska Regional Response Team *Wildlife Protection Guidelines for Oil Spill Response in Alaska* (Version 2020.02, September 2023) should be referenced.	The reference has been updated as suggested here in Section 3.3 and in the bibliography.
7.	2-7	spill scenario 2.1	18AAC75.449(a)(6); 451(g)(1)	Per **18 AAC 75.451(g)(1)** the plan holder must include a list of equipment that details location, inventory, and owernship. 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).**	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.
8.	2-7;	spill	18AAC75.449(a)(6)(J)	• Task Force 1: ICS201 does not provide sufficient detail to	The Resource Summary specifies that the vac truck and driver will not

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	2-18	scenario 1.9&2.1	&451(h)	describe when facility recovery operations start, and the plan does not have enough evidence to support recovery operations for TF1 to be 10 hours. • Task Force 2: Table 2-2 lists operating hours for TF2 to be 11 hours. Per ICS 201 Resource Summary, 1 responder is listed as on scene and 4 responders are scheduled to arrive at 11am. ICS201 lists recovery operations starting at 7:45am. Due to daylight hours from about 6am to 8pm (Sunrise and sunset times in Sitka, April 2026), operating conditions are limited. Per section 3.3 table 3-2, the plan states that response efforts are likely to be halted during the night. • Task Force 3: Table 2-2 lists operating hours for TF3 to be 9 hours total. PER ICS 201 Resource Summary, all responders are listed as arriving at 11am. The plan does not specify if operations are planned to go through the night. Please review the timeframes for arrival on scene and timeframes for operating hours (daylight hours are roughly 6am to 8pm in mid April) and update the response scenario accordingly to reflect the appropriate operating period. Please explicitly state start and stop times for each Task Force so that the scenario may be evaluated against the RPS.	arrive onsite until 1100. This would allow for approximately 9 hours of daylight for operations to occur during operational period #1. Table 2-2 has been updated from 2 trucks operating for 10 hours to 1 truck operating for 9 hours during the first operational period and 7 hours during the second operational period. The ICS 204-a form for TF-1 has also been updated to require only 1 vac truck and 1 vac truck operator. Similar to above, the hours operating have been updated from 11 hours to 9 hours of daylight for operations to occur during operational period #1. An additional operational period has been added for TF-2. No changes have been made to the ICS 201 form start time as this may begin with DW personnel and DW owned equipment by 0745 involving the deployment of containment boom. For TF-3 with an arrival/start time of 1100, the task force would have 9 hours of daylight for recovery operations with a sunset of 2000. No changes to TF-3 have been made. Per the regulations cited, the start and stop times of each task force are not required to be included.

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9.	1-8; 2-7; 2-18	spill scenario 1.9&2.1	18AAC75.449(a)(6)(J) &451(h)	• Per ICS201 resource summary on page 2-7, Task Force 1 is assigned ten 55-gal storage drums and two vac truck (with no specifications on any storage capacity), equaling 550gal of containment available to that team (10x55=550). Per recovery calculations on page 2-18, TF1 is listed with a cumulative recoveryof 23,520gal. Please review and edit to include all relevant storage containers and all storage specifications used for TF1 recovery operations. • Please review the recovery calculations and RFAI comment #8 and amend as needed. Per skimmer recovery rates listed on page 1-8, Task Force Two should be 1,991gal/day x 11hrs = 21,901. Task Force Three should be 1,991 x 9hrs= 19,919. Total storage for the Canflex FCB Storage Bladder should be 10,552. Storage capacity total should be 66,738 for info included in pg. 2-18. Total recovered oil should be 65,340gal. • Pg 2-18 shows only 1 storage tank truck for temporary storage calculations, reducing calculated capacity to 66,738. If including all tank trucks for capacity storage capacity would be 72,338gal. Please update this section to include the total temporary storage capacity as per all resources listed in the ICS201 form.	Storage equipment from other task forces may be used for TF1 recovered product. The storage equipment listed in Table 2-2 provides a cumulative storage capacity that accommodates product recovered from both on-land and on-water recovery operations. No changes to the text have been made. The recovery calculations have been amended regarding RFAI #8. The skimmer calculations in the oil recovery table and the example in Section 1.9 have been updated accordingly. No changes to the temporary storage calculation have been made as the values used are accurate according to our records. The storage tank trucks used in TF-8 have been added to the temporary storage calculations in Table 2-2.
10.	2-5	Spill Scenario 2.1	18AAC75.449(a)(6)(B) &(C)	ICS 201 current actions summary does not provide description of immediate response actions to demonstrate source control and cleanup after discovery of release in alignment with the RPS. Please include steps taken at what time in the ICS 201 actions summary. At 11am, SEAPRO responders and equipment arrive on scene. Per the resource summary, some equipment and responders are listed as arriving at 12pm. Please update to include all arrival times for responders. Please also include additional detail regarding immediate response actions.	The actions summary has been updated to incorporate initial emergency action steps. The ICS 201 resource summary has also been updated to have all SEAPRO equipment arriving by 1100 to align with the actions summary timeline.

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11.	Spill scenario	Spill Scenario 2	18AAC75.449	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 detailed description on decontamination teams/taskforces, location of decon sites, and ensure all response equipment needed is listed.	Language has been added to Section 1.3 of the CPLAN to detail information to be provided in the incident specific safety plan. Decontamination information would be included in the safety plan if deemed necessary by the SO. 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.
12.	2-17	Spill Scenario ICS232	18AAC75.449	**ADNR:** Specify OHA as an agency resource to consult for the potential for sites within a spill area. Under Section 4: Archaeo-cultural and socio-economic issues, update Narrative statement to include: "Consult with the on-scene coordinator and available agency resources, *including the DNR Office of History and Archaeology* for potential sites."	The Narrative statement under Section 4: Archaeo-cultural and socio-economic issues section has been updated to specify OHA as an agency resource.
Section 2					
13.	2-1	2	Article 1, 18AAC75.450	The Article 1 cross reference section lists **18 AAC 75.025**, **.065**, **.066**, **.075**, and **.080** all as being in section 2.1.5 which is not accurate. Please review and correct the cross reference table to ensure the correct plan section is listed.	The Article 1 cross reference section has been updated to reference the correct plan section.
14.	2-7	2.1.2	18AAC75.450;	There is insufficient description on the process for the monthly facility inspections, and what all components are assessed. Additionally, the plan does not include the monthly inspection form. Please update to include additional description for the monthly inspection walkthrough and what items are assessed.	Specific requirements / details for the monthly inspections are not required to be included by regulation. For consistency with other approved CPLANs, the monthly

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					inspection forms are not included as they are not required by regulation. No updates to the text have been made.
15.	2-20	2.1.6.1	18AAC75.065(k)	The plan states that: Tanks 1-3 are equipped with VEGAPULS 6X high level alarms and VEGA VCCS13e gauges for determining liquid level. The plan includes information on how liquid level monitoring devices are tested, but does not include a description on how high level alarms for FCASTs are tested manually to ensure proper operation during an overfill. Please update to include detailed description of manual alarm testing.	Language has been added on page 2-20 to specify manual alarm testing for the high liquid level alarms.
16.	2-20, 4-12	2.1.6.1	18AAC75.065(j)(4)	There are differing descriptions on leak detection for FCAST. Page 2-20 states tanks are set on raised concrete pads with a leak detection sump. Page 4-12 and Table 4-5 state that the tanks have a double bottom and leak diversion to SCA. Please provide DEC with a design drawing for the leak detection system. Please also see comment #29 for Section 5 on claimed RPS reduction credits.	Language has been updated on page 2-20 and 4-12 to correctly indicate that the tanks are set on concrete ringwalls with infill slabs and a 2" ABS pipe under the tanks that allow for visual observation of a leak.
--	2-23	2.1.6.2	--	--	A footnote has been added on page 2-22 to discuss the addition of ISO tanks stored onsite temporarily to meet operational needs.
17.	2-22	2.1.6.2	18AAC75.066; 020	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.	The construction standard was not listed or provided on the formal inspection, therefore "assumed" will need to remain until this information can be confirmed. No changes to the text were made.
18.	2-25	2.1.6.2	18AAC75.066(h)	Plan states that high level alarms are tested monthly by pushing a button. Please include detailed description on how the alarm mechanisms are mechanically tested.	Language has been added to section 2.1.6.2 to specify how the alarm mechanisms are mechanically tested.

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19.	2-29	2.1.6.3	18AAC75.075; 450	The ODPCP does not provide a description of the specific construction of the TTLR SCA or its capacity. Please update this section to include sufficient detail to demonstrate the plan meets the listed regulations.	The Tank Truck Loading Rack (TTLR) Lane Containment Area Calculation is provided in Section 6.2 starting on page 6-7. No changes to the text were made.
20.	2-32	2.1.6.4	18AAC75.080(b)	Please provide DEC with a copy of the written corrosion control plan.	The API 570 report with piping diagrams redacted will be provided to DEC with the submittal of DW's responses to this RFAI.
				Section 3	
21.	3-24	3.1	18AAC75.451	**ADF&G:** In Sensitive biological resources, please update the fish table to include pink salmon and the amended table information listed below:  Species / J F M A M J J A S O N D / Spawning / Eggs / larvae / Juveniles / Ad Chinook salmon X X X X X X X X X X X X / June-August / September-May / / April-July chum salmon X X X X X X X X / July-September / September-May / / April-July pink salmon X X X X X X X X / July-September / September-May / / April-July coho salmon X X X X X X X X / August-November / September-May / / April-July sockeye salmon X X X X X X X X / July-September / September-May / / April-July pacific herring X X X / March-May / / May-June / June-August	The information presented on page 3-24 is a document pulled directly from NOAA's ESI Maps and Data website and should not be modified. A footnote has been added on page 3-15 to note that pink salmon are also present in the area.
22.	general	3.1	18AAC75.451	**ADF&G:** ADFG recommends including a table listing agency permit requirements for various response strategies. Of note, A Fish Habitat Permit from the Department of Fish and Game Habitat Section is required for placing boom anchors in or across anadromous streams and also for active hazing of avian and terrestrial wildlife. See the Alaska Regional Response Team *Wildlife Protection Guidelines for Oil Spill Response in Alaska* document for full explanation of agency permit requirements.	For consistency with other approved CPLANs, a table has not been incorporated with this information. Language has been added in Section 3.9 to reference this guidance document.
23.	3-1	3	18AAC75.451	All sections except Section 3 include a cross reference table at the beginning of the section with regulatory references. Please update to include a cross reference table for consistency.	Sections that focus on a single regulation include their own dedicated cross-reference table. In contrast, other sections (such as Section 3) incorporate cited regulations that are less sequential; these are consolidated with the main plan cross reference table

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					rather than having a separate section specific table. No changes to the text were made.
24.	3-11(79)	3.5, response scenario	18AAC75.451(g):	The plan states "DW owned equipment is stored at the Sitka Samson Bulk Facility and maintained in "ready" status in secured and marked locations. Routine maintenance is performed, as required by the manufacturer, where applicable. Spill response equipment is inventoried and inspected twice a year. Facility personnel also deploy a subset of their spill response equipment twice a year to periodically test it and ensure proper operation." **18 AAC 75.451(g)** states that the plan must have ready access to enough equipment, must include a complete list of contracted equipment and related response equipment, including vessels, to meet the applicable response planning standards to: **(g)(1)** include location, inventory and ownership; **(g)(2)** time frame for delivery and startup of response equipment and trained personnel located outside of the facility's primary region of operation; **(g)(4)** each vessel designated for recovery operations must be of proper operational capacity to support response; **(g)(8)** and procedures for storage, maintenance, and inspection of spill response equipment under the immediate control of the operator when not in use, including procedures for periodic testing and maintenance of response equipment. The plan lacks detail for the following items. Please review the cited regulation and update the plan to include additional detail for the following: • **(g)(1)&(2):** Location for all equipment. The list of response equipment in the response scenario does not include information on where contracted material is physically located or being ordered from. • **(g)(4):** The plan does not include any description of the skiffs listed as available response equipment. Please update to	Language has been added in a footnote on page 3-11 to describe where contracted response equipment is located and who it would be ordered from. Specifications have been added for the vessels cited in the response scenario. Additional language has been added to Section 3.5 to further elaborate spill equipment inspections and deployment.

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				include specifications for vessels listed for response. • **(g)(8):** Procedures, maintenance, and inspection of spill response equipment, including procedures for periodic testing and maintenance of response equipment	
25.	3-11	3.6	18AAC75.451(h)	Footnotes for this section state that information required under this regulation is incorporated into the spill scenario sections 2.1 and 2.2. Information regarding calculations for recovery capacity under **18 AAC 75.451(h)** is also included in section 1.9. Please update to include this cross reference in the footnotes.	As suggested, a footnote has been added in Section 3.6 of the CPLAN to cross-reference Section 1.9 of the Response Scenario.
26.	Pdf 88pg	3.9	18AAC75.451	**USFWS:** Table 3-4 Endangered Species column: • Change heading to "Threatened and Endangered Species." • Remove Steller's eider (facility not in range of the species). • Remove "Waterfowl" (they are present, but not listed as Threatened or Endangered under the Endangered Species Act).	Table 3-4 has been updated to include the changes suggested here.
Section 4					
27.	4-13	4 BAT	18AAC75(a)(2)(A)	Crowned pads and 2" ABS pipe under tanks listed as alternative method 1 and 2, but next column states that DW owns and/or uses. Please clarify if this technology is existing at this facility.	This technology does not exist at the facility and has been removed from Table 4-5: BAT Analysis.
28.	4-15	4 BAT	18AAC75(a)(2)(C)	Mechanical level gauges for FCAST listed as obsolete method 1, not used by DW, n/a for cost to achieve, listed as 5-10yrs old and excellent condition, but not practically feasible as cost prohibitive. It is not clear if this technology is currently in use. Please update the table to clarify.	This technology does not exist and is not in use for the listed FCAST. The age and condition columns for this method have been updated.
Section 5					
29.	5-2	5	18AAC75.432	The plan claims 25% credit reduction per **18 AAC75.432(d)(5)(C)** for "impervious containmne area extending under the full area of each storage tank ***OR*** double bottoms with leak detection." For readability and clarity of facility construction, DEC recommends it be specified wich is claiming the credit for. Please pdate the RPS form in both this section and where it is included in the response scenario.	The RPS table has been updated to only specify credit for impervious containment under the full area of each storage tank.