# DELTA WESTERN, LLC
# Juneau Bulk Facility

# OIL DISCHARGE PREVENTION AND CONTINGENCY PLAN (CPLAN)

required by:
18 AAC 75


Owned and Operated by:
Delta Western, LLC

Plan Date: January~~September~~ 202~~5~~5
Last Revised: Not Applicable (Original Issuance, 5-Year Renewal)

# Table of Contents

The table of contents provides a structured guide for navigating this document. Certain tables, figures, forms, and other embedded elements are assigned page numbers. While in most cases these page numbers appear on the pages, some do not.

# Table 1-1: Designated QI Names & Phone Numbers

| Primary | Cell Phone Number | ~~Office Phone Number~~ |
|---|---|---|
| Christina Bentz | 907-331-8075 | ~~907-265-3836~~ |
| ~~Wyatt Morgan~~ | ~~907-280-8038~~ | ~~907-265-3825~~ |
| Garret Lyons | 907-841-5348 | ~~907-265-3838~~ |
| Dominic Masinelli | 907-351-5862 | |
| Samantha Hinze | 907-231-3533 | |
| Ben Collins | 907-341-7516 | |

# Table 1-2B: Government Agency Phone Numbers

| Type | Entity Name | Phone # | Phone # Notes |
|---|---|---|---|
| Emergency Planning | Local Emergency Planning Committee (LEPC) | 907-586-0419 | |
| Emergency Planning | State Emergency Response Committee (SERC) | 907-428-7019 | |
| Federal Agency | CG Sector Juneau | 907-463-2000 | |
| Federal Agency | EPA Anchorage | 907-271-5083 | |
| Federal Agency | EPA Region 10 | 206-553-1263 | |
| Federal Agency | US Fish & Wildlife Service (USF&W) 907-957-8147 | ~~907-786-3598~~ | 907-366-9150 |
| Federal Agency | US National Marine Fisheries (NMFS) | 907-586-7630 | or 907-586-7285 |
| State Agency | ADEC After Hours | 1-800-478-9300 | |
| State Agency | ADEC Southeast Region Oil Spill Reporting | 907-465-5340 | |
| State Agency | Alaska Department of Natural Resources (ADNR) Office of History and Archeology | 907-269-8728 | or 907-269-8718 |
| State Agency | Alaska Department of Natural Resources (ADNR) Office of History and Archeology | 907-269-8721 | OHA Desk |
| State Agency | ADNR – Statewide Abatement of Impaired Land Section dnr.sero.spill@alaska.gov 907-465-3513 | ~~907-465-3513~~ | ~~or 907-269-8528~~ |
| State Agency | Alaska Department of Fish and Game (ADF&G) Juneau 907-465-4105 | ~~907-465-4290~~ | or 907-465-6384 |
| State Agency | ADNR | 907-269-8548 | |
| State Agency | Alaska (AK) Division of Homeland Security/Emergency Management | 907-428-7000 | |
| State Agency | Alaska (AK) Department of the Interior (Anchorage) | 907-271-5011 | |

## 1.3 Safety Plan

**18 AAC 75.449(a)(3)**

Safety of personnel, responders, and the public are prioritized in the event of a spill. In the event of a spill for which a full incident management team (IMT)/spill management team (SMT) activation is needed, an incident-specific safety plan may be developed by the assigned Safety Officer (SO) or designee. DW anticipates utilizing the Incident Command System (ICS) Form 208, if needed[5].

In developing the incident specific safety plan, the following listed information should be considered:

- Identification of SO including contact information
- Objectives of the Operations (Example Objectives Listed Below)
  - Spill Containment/Cleanup
  - Controlled Entry
  - First aid/Rescue
  - Fire Suppression
- Hazard Identification and Evaluation
  - Chemical Hazards (Listing Levels of the Chemical and Level Related to Flammability, Corrosive, Toxicity etc.)
  - Physical Agents (Including, Hypothermia, Noise, Slips/Trips Falls etc.)
  - Other Hazards (Biological, Confined Space, etc.)
- Site Access and Control Information
  - Site Map
  - Command Post Location
  - Medical Service (for Responders) Location
- Weather and Environmental Conditions (such as: Temperature, Sea State, Wind Speed and Direction etc.)
- Emergency Contacts for Local Response Support (Fire, Hospital/Clinic)
- Routes, Exposure, and Information for (Substance) Found on Safety Data Sheet (SDS)
- Air Monitoring/Respiratory Protection Information including limits in parts per million (ppm) for exposure and monitoring intervals
- Safety/Personal Protective Equipment (Hard Hat, Work Gloves, Tyvek Suit) for different Work Areas (Exclusion/Hot Zone, Decontamination Zone)
- A written description or diagram for Decontamination of Responders Leaving the Exclusion/Hot Zone

[5] Any written incident-specific safety plan will be written to meet the requirements of the Hazardous Waste Operations and Emergency Response regulation (29 CFR 1910.120).

## 1.6 Response Scenario

**18 AAC 75.449(a)(6)**

DW has prepared a written description of a hypothetical spill and response that demonstrates DW's ability, using the resources described in the plan, to respond to a discharge of each applicable RPS volume within the required time frames under 18 AAC 75.430 – 18 AAC 75.442 and under environmental conditions that might reasonably be expected to occur. The response scenario is written to be useable as a general guide for a discharge of any size, and describes the discharge containment, control, recovery, transfer, storage, and cleanup actions that may be taken, and clearly demonstrates the strategies and procedures that may be used to conduct and maintain an effective response, consistent with ensuring the safety of personnel. As allowed by 18 AAC 75.449(a)(6), DW has prepared the response scenario as a separate document, which is incorporated by reference here:

20265_0108_JNU – Bulk Facility CPLAN Response Scenario_REV 0

In an actual spill response, it is important to note landownership in the areas in which response activities are occurring. As noted by Alaska Department of Natural Resources (ADNR):

> *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.*

DW acknowledges the need for notification, consultation, and coordination with ADNR for spills impacting lands owned/managed by ADNR. A fact sheet denoting typical "Generally Allowed Uses" can be used as reference; a copy of this fact sheet is provided in Section 6.2.

# Table 2-4: FCAST Summary

| Sub Location | Tank Identifier | Tank (Construction Standard) | Tank (Year Installed) | Tank (Upgraded/Reconstructed) | Tank (Base/Foundation Type) | Tank Bottom (Construction) | Tank Wall (Type & Construction) | Tank Roof (Type) | Tank (Cathodic Protection) | Tank (Shell Height/Length) | Tank (Diameter) | Tank (Total Capacity - gal) | Product (Generic) | Tank Status |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Bulk Facility | 1 | API 650 Edition 9, Appendix A | 1994 | N/A | Concrete Pad | Cone up. Lap welded floor plates with no annular ring. Internal epoxy liner. | Single Walled Butt Welded | Column supported fixed cone | N/A | 40' | 47' | 517,417 | Diesel | In Service - Filled |
| Bulk Facility | 2 | API 650 Edition 9, Appendix A | 1994 | IFR in 2019 | Concrete Pad | Cone up. Lap welded floor plates with no annular ring. Uncoated. | Single Walled Butt Welded | IFR | N/A | 40' | 47' | 493,557 | Gasoline | In Service - Filled |
| Bulk Facility | 3 | API 650 Edition 9, Appendix A | 1994 | IFR in 2019 | Concrete Pad | Cone up. Lap welded floor plates with no annular ring. Uncoated. | Single Walled Butt Welded | IFR | N/A | 40' | 47' | 492,008 | Gasoline | In Service - Filled |
| Bulk Facility | 4 | API 650 | 1994 | N/A | Concrete Pad | Cone up. Lap welded floor plates with no annular ring. Internal epoxy liner. | Single Walled Butt Welded | Column supported fixed cone | N/A | 40' | 36' | 303,665 | Diesel | In Service - Filled |
| Bulk Facility | 5 | API 650 Edition 9, Appendix A | 1994 | N/A | Concrete Pad | Cone up. Lap welded floor plates with no annular ring. Internal epoxy liner. | Single Walled Butt Welded | Column supported fixed cone | N/A | 40' | 47' | 517,307 | Diesel | In Service - Filled |
| Bulk Facility | 6 | API 650 Edition 9, Appendix A | 1994 | N/A | Concrete Pad | Cone up. Lap welded floor plates with no annular ring. Uncoated. | Single Walled Butt Welded | Column supported fixed cone | N/A | 40' | 47' | 517,678 | Diesel | In Service - Filled |
| Bulk Facility | 7 | API 650 Appendix A | 1994 | N/A | Concrete Pad | Cone up. Lap welded floor plates with no annular ring. Internal epoxy liner. | Single Walled Butt Welded | Column supported fixed cone - center column and rafter arrangement | N/A | 40' | 47' | 516,869 | Diesel | In Service - Filled |
| Bulk Facility | 8 | API 650 Appendix A | 1994 | IFR in 2019 | Concrete Pad | Cone up. Lap welded floor plates with no annual ring. Uncoated. | Single Walled Butt Welded | IFR | N/A | 40' | 36' | 289,858 | Gasoline | In Service - Filled |

*FCASTs Equipped with Internal Linings*

**18 AAC 75.065(g)**

Tanks 1, 4, 5 and 7 are equipped with an internal lining system that was installed in accordance with API 652 (Fifth Edition, 2020).

*FCAST Discharge Prevention*

**18 AAC 75.065(j), 18 AAC 75.065(k), 18 AAC 75.065(l)**

There are a total of eight (8) in-service FCAST Tanks located at the Juneau Bulk Facility. FCAST construction standards, known, or estimated, are presented in Table 2-4. Tanks 1 thru 8 are not riveted nor bolted and cathodic protection and corrosion protection are not required.

Leak detection is provided by the foundations of Tanks 1 thru 8. Each tank is constructed on a rRaised concrete pads which areis crowned at the center and drain to the perimeter allowing an observer to detect leaks from the outside of the tank. Any discharge from the tank bottom would be detected visually during routine visual inspections.

Additionally, each FCAST tank is equipped with one or more means of preventing discharges. The types of devices utilized on the FCAST tanks at the Juneau Bulk Facility include:

| | |
|---|---|
| High liquid level alarms | Tanks 1 thru 8 are equipped with Pnuemecator MLS-020-TF Liquid Level Switch |
| Means of immediately determining the liquid level in each bulk storage tank | Tanks 1 thru 8 are equipped with Shand and Jurs automatic tape level gauges. Pnuemecator MLS-020-TF Liquid Level Switch |

High liquid level alarms are tested monthly by pushing the test button which activates the system. Alternatively, high liquid level alarms can be manually activated by physically adjusting the liquid level rod that activates the alarm system when in contact with product[17].lifting the switch.

[17] Manual testing of the high liquid level alarms is conducted prior to tank filling operations or monthly, whichever is more often.

*Secondary Containment for Aboveground Storage Tanks*

**18 AAC 75.075(a), 18 AAC 75.075(c), 18 AAC 75.075(d), 18 AAC 75.075(e), 18 AAC 75.075(h)**

The Juneau Bulk Facility is equipped with aboveground storage tanks that require secondary containment. The facility also has tanks that do not require secondary containment. As allowed under 18 AAC 75.075(h), DW is not required to, but may, provide a formal secondary containment structure for tanks that are vaulted, self-diked, and/or double-walled.

Unless exempted as stated above, DW maintains aboveground oil storage tanks within a secondary containment area that has the capacity to hold the volume of the largest tank within the containment area plus enough capacity to account for local precipitation. All secondary containment areas for aboveground storage tanks are constructed to meet the following minimum requirements:

- have berms, dikes, and/or retaining walls to prevent the release of oil from the containment area
- with the exception of under the aboveground oil storage tanks, is constructed and/or lined with materials that are:
    - adequately resistant to damage by the products stored
    - resistant to damage from weather
    - sufficiently impermeable
    - resistant to damage caused by operations
- drains and other penetrations through the secondary containment are minimized consistent with facility operational requirements

The Juneau Bulk Facility has a shared impermeable secondary containment with a capacity of 633,936 gallons. The secondary containment structure dimensions and volumetric calculations are provided in Section 6.2 of this Plan. Additionally, the Juneau Bulk secondary containment has steel dike walls, which are constructed to prevent the release of spilled oil from within the containment area; the interior side of these walls are coated with a spray in urethane coating and the exterior side is coated with a corrosion inhibitive layer. An impermeable XR-5 liner, installed 1994, underlies the entire SCA including concrete tank foundation pads. The liner material is resistant to damage by products stored and weather. Operations in the containment area are restricted to prevent damage to the liner.

As required by 18 AAC 75.075(c), DW maintains secondary containment systems such that they do not have excessive amounts of:

- debris
- vegetation
- accumulated water
- other materials or conditions that might interfere with the effectiveness of the system

## 3.5 Response Equipment

**18 AAC 75.451(g)**

As demonstrated in the response scenario required by 18 AAC 75.449(a)(6), DW has ready access to enough equipment to meet the applicable RPS using mechanical methods of control, containment, and cleanup. This equipment is considered to reflect the best available technology (BAT) at the time this plan was renewed. The complete list of contracted[30] or other response equipment to meet the applicable RPS, to protect and recover wildlife, and to protect environmentally sensitive areas (ESAs) and areas of public concern that may be reasonably expected to be impacted by a spill of the RPS volume before oil reaches them is contained on the ICS-201 Page 4 form provided in the Response Scenario[31].

In addition to the response equipment listed in the response scenario (described above), DW maintains a supply of personal protective equipment, hand tools, and other consumable supplies that can be used in the event of a spill.

DW owned equipment is stored at the Juneau 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 to ensure supplies are present, accessible, undamaged, and ready to be deployed. Facility personnel also deploy a subset of their spill response equipment twice a year to periodically test it and ensure proper operation. The deployment exercise consists of the containment and recovery of a theoretical spill where boom, skimmers, and/or pumps may be utilized. If any of the spill response equipment cited in this CPLAN is non-operational, ADEC is to be notified of non-readiness, and the equipment is to undergo maintenance or be replaced.

[30] DW's OSRO would provide contracted equipment and personnel through a memorandum of understanding. These resources are staged throughout Southeast Alaska. In the event of a spill event that requires additional contracted services, DW would utilize the nearest and most readily available service.

[31] As allowed by 18 AAC 75.449(a)(6), DW has prepared the response scenario as a separate document, which is incorporated by reference in Section 1.6 of this plan; in the Response Scenario refer to Section 2.1(ICS-201 Page 4) on page 2-7.

## 3.6 Response Equipment Specifications

**18 AAC 75.451(h)**

The response equipment identified in this plan was chosen to meet the requirements of 18 AAC 75.451(h)[32]; demonstration of this can be seen in the response scenario[33].

[32] Information regarding calculations for recovery capacity is included in Section 1.9 of the Response Scenario.
[33] As allowed by 18 AAC 75.449(a)(6), DW has prepared the response scenario as a separate document, which is incorporated by reference in Section 1.6 of this plan; in the Response Scenario refer to specific scenario in Section 2.1.

## 3.7 Primary Response Action Contractor

**18 AAC 75.451(i)**

DW proposes to utilize the services of a PRAC/OSRO to meet the requirements of AS 46.04.030 or 18 AAC 75.432 – 18 AAC 75.442. The information required to be provided is shown below.

| | |
|---|---|
| Name | Southeast Alaska Petroleum Response Organization (SEAPRO) |
| Address | 540 Water Street, Suite 201<br>Ketchikan, Alaska 99901 |
| Telephone Number | 907-225-7002 |
| Affiliation by Company | Same as name above |
| Description of Response Equipment and Services Provided | PRAC/OSRO<br>https://seapro.org/ |

A Statement of Contractual Terms between DW and the above-referenced PRAC/OSRO is provided on the following page.

*Certificate 3-1: Statement of Contractual Terms between DW and PRAC/OSRO*

## 3.8 Training for Discharge Response Personnel

**18 AAC 75.451(j)**

DW's training program for discharge response personnel is described in Section 2.1.1 of this plan.

## 3.9 Environmentally Sensitive Areas and Areas of Public Concern

**18 AAC 75.451(k)**

The Juneau Bulk Facility is located within the Southeast Alaska Area Contingency Plan (SEAK ACP) which serves as guidance for a coordinated and cooperative pollution response within the Southeast Alaska Captain of the Port Zone. The United States Coast Guard (CG) and ADEC provide references and tools throughout the SEAK ACP with information used to support a response to a discharge that can supplement the information below.

ESAs and areas of public concern that might be impacted by a RPS discharge were evaluated based on modeled spill trajectory predictions of movement and spreading as developed and presented in the response scenario[34] and through the following cited resources.

- ADEC Alaska Sensitive Areas Compendium
- ADEC Geographic Response Strategies – SEAK
- National Oceanic and Atmospheric Administration (NOAA)
    - Environmental Sensitivity Index - Maps and Sensitive Biological Resources
- Alaska Department of Fish and Game (ADF&G)
    - Anadromous Water Maps
- NOAA Environmental Response Management Application
    - (ERMA) Arctic Mapping

In the case of the Juneau Bulk Facility, there are no GRSs within five (5) miles of the facility.

Immediate shoreline habitats, known wildlife critical habitats, and endangered species that overlap with the potential trajectories of a RPS spill are presented in Table 3-4 (Page 3-18). Additional potential sites, based on concern level, that should be considered by an on-scene coordinator during a response are also identified in the table.

[34]As allowed by 18 AAC 75.449(a)(6), DW has prepared the response scenario as a separate document, which is incorporated by reference in Section 1.6 of this plan; in the Response Scenario refer to Section 1.5, and the Aerial Surveillance ICS-204a form in Section 2.1 (TF-4, page 2-12) for information and depiction of modeled trajectories.

Additional anadromous streams that should be evaluated for response activities based on potential spill trajectories are identified in Table 3-5 (Page 3-19) and a copy of the anadromous water atlas map for Juneau is provided on Page 3-20.

Products that can potentially be stored at the Juneau Bulk Facility and their toxicity category defined by 18 AAC 75.640, .650, and .660 are identified in Table 3-6 (Page 3-21). In general, the products at the Juneau Bulk Facility that could result in an RPS release are moderately persistent in the environment as lighter end oils.

Seasonal conditions of resources specific to biological sensitivity and human-use in the Juneau geographic area are presented as a subset from the Environmental Sensitivity Index on Page 3-22. This resource can be utilized quickly to determine resource concerns as it relates to the time of year. The Environmental Sensitivity Index map is provided on Page 3-23.

For response strategies that require agency permitting, the Alaska Regional Response Team Wildlife Protection Guidelines for Oil Spill Response in Alaska is readily available to response personnel; a link is also provided in Section 3.12 of this CPLAN. This document contains full explanations of agency permit requirements.

The response scenarios describe the specific actions taken to protect probable immediate points of contact with ESAs and areas of public concern utilizing the resources from this section[35].

[35]As allowed by 18 AAC 75.449(a)(6), DW has prepared the response scenario as a separate document, which is incorporated by reference in Section 1.6 of this plan; in the Response Scenario refer to Section 1.6, the ICS-204a forms for TF-2 (ESA Protective Booming) in Section 2.1 (page 2-10), and the ICS-232 form in Section 2.1 (page 2-16).

# Table 3-4: Potential Areas of Concern

| Immediate Shoreline Habitat(s) | Critical Habitat Area(s) | Threatened and Endangered Species | Areas of Major Concern | Areas of Moderate Concern | Areas of Lesser Concern | Areas of Local Concern |
|---|---|---|---|---|---|---|
| 6A - Gravel Beaches | None | Blue Whale | Historic properties | Recreational sites and facilities | Sport fishing and hunting | None |
| 6B - Riprap | | Fin Whale | Subsistence and personal use harvests | Public use cabins | | |
| 7 - Exposed Tidal Flats | | Gray Whale | Commercial fishing | | | |
| 8B - Sheltered Rocky Shores (permeable) | | Humpback Whale | Fish processing | | | |
| 10A - Salt & Brackish-water Marsh | | Killer Whale | Marinas | | | |
| | | North Pacific Right Whale | Commercial tourism | | | |
| | | Northern Sea Otter | | | | |
| | | Sei Whale | | | | |
| | | Short-Tailed Albatross | | | | |
| | | Sperm Whale | | | | |
| | | Stellar Sea Lion | | | | |

# Table 4-5: BAT Analysis - Tank Leak Detection

| Primary | Description | Type | (3)(A) - Available for use by DW? | (3)(A) - Best in use in other similar situations? | (3)(B) - Offers other environmental benefits? | (3)(B) - Provides increased spill protection? | (3)(C) - Cost to achieve BAT? | (3)(D) - Age? | (3)(E) - Practical feasibility? | (3)(D) - Condition? | BAT |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Crowned Pads | Crowned pads | Existing Method 1 | Yes - DW owns and/or uses technology | Yes - Technology is readily available and widely used in the industry | Yes | Yes - Expected to increase spill prevention effectiveness | N/A - Owned by DW; Replacement, Operations, and Maintenance accounted for | Mature - Established, >20 years in operation | Yes | Excellent - Fully operational, well-maintained, meets industry standards | ☑ |
| Sub-tank pipe | 2" ABS pipe under tanks | Alternate Method 1 | No - Technology is not used or unavailable | Maybe - Would need substantial infrastructure upgrades | No - Not Available to DW | No - Not Available to DW | Very High - Cost of initial installation | N/A | No - Cost prohibitive | N/A | ☐ |
| Double Bottom Tank | Double bottom with leak detection ports | Alternate Method 2 | No - Technology is not used or unavailable | Yes | Yes | No - Effectiveness is outweighed by constraints | Very High - Cost of initial installation | Well established - updates to technology are incorporated as needed | No - Cost prohibitive | N/A | ☐ |

## 4.6 BAT Analysis - Determining Liquid Levels

There are several means to achieve BAT with respect to determining liquid level within bulk storage tanks. DW is currently capable of utilizing twoone of these methods. Other methods, while good technology, are not feasible at the Juneau Bulk Facility.

The full BAT analysis, following the layout described in Section 4, is provided in Table 4-6 on the following page.

# Table 4-6: BAT Analysis - Determining Liquid Level

| Primary | Description | Type | (3)(A) - Best in use in other similar situations? | (3)(A) - Available for use by DW? | (3)(B) - Provides increased spill protection? | (3)(B) - Offers other environmental benefits? | (3)(C) - Cost to achieve BAT? | (3)(D) - Age? | (3)(D) - Condition? | (3)(E) - Practical feasibility? | BAT |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Mechanical Float Type Level Gauges | Automatic Shand and Jurs level gauges w/ audible high-level alarm | Existing Method 1 | Yes - Technology is readily available and widely used in the industry | Yes - DW owns and/or uses technology | Yes - Expected to increase spill prevention effectiveness | Yes | N/A | Mature - Established, >20 years in operation | Excellent - Fully operational, well-maintained, meets industry standards | Yes | ☑ |
| Mechanical Level Gauges (FCAST) | Pneumercator MLS-020-TF Liquid Level Switch | Existing Method 2 | Yes - Technology is readily available and widely used in the industry | Yes - DW owns and/or uses technology | Yes - Expected to increase spill prevention effectiveness | Yes | N/A | 5-10 years | Excellent - Fully operational, well-maintained, meets industry standards | Yes | ☑ |
| Digital/Radar Level Gauges | Digital/Radar Liquid Level Gauges | Alternate Method 1 | Yes - Technology is available | No - Technology is not used or unavailable | No - Effectiveness is outweighed by constraints | No | High - Cost of installation & maintenance | N/A | N/A | No - Cost prohibitive | ☐ |

## 4.7 BAT Analysis - Protective Coating

There are several means to achieve BAT with respect to protective coatings. DW is currently capable of utilizing one of these methods. Other methods, while good technology, are not feasible at the Juneau Bulk Facility.

The full BAT analysis, following the layout described in Section 4, is provided in Table 4-7 on the following page.

# Table 4-7: BAT Analysis - Protective Coating

| Primary | Description | Type | (3)(A) - Best in use in other similar situations? | (3)(A) - Available for use by DW? | (3)(B) - Provides increased spill protection? | (3)(B) - Offers other environmental benefits? | (3)(C) - Cost to achieve BAT? | (3)(D) - Age? | (3)(D) - Condition? | (3)(E) - Practical feasibility? | BAT |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Corrosion Control Program - Quinquennial Inspection | API 570 Piping Inspection | Existing Method 1 | Yes - Technology is readily available and widely used in the industry | Yes - DW owns and/or uses technology | Yes - Expected to increase spill prevention effectiveness | No | N/A | N/A | Excellent - Fully operational, well-maintained, meets industry standards | Yes | ☑ |
| Impressed Current CP | Impressed Current Cathodic Protection System with anode | Alternate Method 1 | Yes - Technology is available | No - Technology is not used or unavailable | No - Effectiveness is outweighed by constraints | No | High - Cost of installation & maintenance | 5-10 years | N/A | No - Due to facility layout | ☐ |

Table 5-1: Response Planning Standard (Diesel)

**Response Planning Standards - Alaska**

**Oil Terminal Facilities 18 AAC 75.432**

| **Volume of Largest Tank** (gallons) |
|---|
| **517,678** |

| **Prevention Measure** | **Possible Reduction** | **Realized Reduction** | **Discussion/Reference** | **Volume Reduction** (gallons) | **Adjusted Volume** (gallons) | |
|---|---|---|---|---|---|---|
| Alcohol and drug testing of key personnel | 5% | 5% | 18 AAC 75.432(d)(1) | 25,884 | 491,794 | |
| Operations training program with a professional organization or federal certification or licensing of program participants | 5% | 0% | 18 AAC 75.432(d)(2) | - | 491,794 | |
| On-line leak detection systems that automatically alarm at a facility control room that is continuously monitored, for tanks and piping | 5% | 0% | 18 AAC 75.432(d)(3) | - | 491,794 | |
| A sufficiently impermeable secondary containment area with a dike capable of holding the contents of the largest tank, or all potentially affected tanks in the case of increased risk, and precipitation | 60% | 60% | 18 AAC 75.432(d)(4) | 295,076 | 196,718 | |
| Cathodic protection for aboveground oil storage tanks and belowground facility piping within secondary containment | 10% | 0% | 18 AAC 75.432(d)(5)(A) | - | 196,718 | |
| Fail-safe valves on piping systems | 15% | 0% | 18 AAC 75.432(d)(5)(B) | - | 196,718 | |
| Impervious containment area extending under the full area of each storage tank ~~or double bottoms with leak detection~~ | 25% | 25% | 18 AAC 75.432(d)(5)(C) | 49,179 | 147,538 | |
| Containment outside the secondary containment area | 10% | 0% | 18 AAC 75.432(d)(6) | - | 147,538 | |
| | | | **Total Adjusted RPS Volume** (gallons) | | **147,539** | **3,513** bbls |

| **Estimated of RPS to Remain On Land** |
|---|
| **70%** |

| | | |
|---|---|---|
| **Total Adjusted RPS to Remain on Land** (gallons) | **103,277** | **2,459** bbls |
| **Total Adjusted RPS to Reach Water** (gallons) | **44,262** | **1,054** bbls |

## 6.3 Revision Log

The table below is used to document amendments to this CPLAN.

| Revision Number | Month-Year | Affected Pages | Changes Made | Type of Update[38] |
|---|---|---|---|---|
| 0 | JanuarySeptember 20265 | All | Plan Renewal | Plan Renewal |

[38] Refers to DW's interpretation of the type of update. The types of updates are as follows: Plan Renewal, Routine Plan Update, Minor Amendment, or Major Amendment.