

# **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 2026

Last Revised: Not Applicable (Original Issuance, 5-Year Renewal)

	Oil Discharge Prevention & Contingency Plan (CPLAN)	
	Document Number	JNU-CPLAN-01; Rev. 0
	Revision Date	January 2026

## Certificate of Approval

	Oil Discharge Prevention & Contingency Plan (CPLAN)	
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## Plan Contents

### 18 AAC 75.448(a)

As required, by 18 Alaska Administrative Code (AAC) 75.448(a), this plan was written to:

- Be usable as a working plan for oil discharge control, containment, cleanup, and disposal;
- Contain enough information, analyses, supporting data, and documentation to demonstrate the ability of Delta Western, LLC (DW) to meet the requirements of Alaska Statute (AS) 46.04.030, AS 46.04.055(c)(2), and 18 AAC 75.400 – 18 AAC 75.495;
- Demonstrate that the personnel, equipment, and other resources identified in the plan are sufficient for meeting each response planning standard (RPS) applicable for each facility in the plan; and
- Take into account realistic maximum operating limitations and their effects on response capability and the deployment of resources.


## Greatest Possible Discharge

### 18 AAC 75.448(b)

DW considers the greatest possible discharge (GPD) that could occur at the facility covered by this plan to be the facility's total oil storage of 3,667,797 gallons<sup>1</sup>. The general procedures to respond to a discharge of this magnitude are described throughout this plan and addressed specifically in Section 1.8.

Field Constructed Aboveground Storage Tank (FCAST) Total	3,648,359	gallons
Shop Fabricated Aboveground Storage Tank (SFAST) Total	12,000	gallons
Piping Total	7,438	gallons
<b>Facility Total / GPD</b>	<b>3,667,797</b>	<b>gallons</b>

<sup>1</sup> The volume presented here assumes the full capacity (100%) of every aboveground storage tank of 1,000 gallons or greater plus the full capacity (100%) of every component of facility oil piping, and assumes the complete and utter failure of all containment capacity. In reality, DW does not fill tanks to full capacity (100%) and the conditions that would result in the catastrophic failure of every aboveground storage tank, all facility oil piping, and all containment structures are few.

 <b>DELTA WESTERN™</b> PETROLEUM	Oil Discharge Prevention & Contingency Plan (CPLAN)	
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## Cover Page

**18 AAC 75.448(d)**

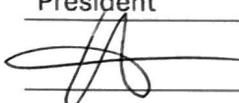
**Official Plan Title** DELTA WESTERN, LLC JUNEAU BULK FACILITY OIL DISCHARGE PREVENTION AND CONTINGENCY PLAN

**Date of Plan** September 2025

I have the appropriate authority under 18 AAC 75.408(b) to commit the oil discharge prevention and response resources necessary to implement this plan.

Name Henry Palmer

Title President

Signature 

Date 8/27/25

## Plan Organization


**18 AAC 75.448(e)**

As required by 18 AAC 75.448(e), this plan was written to:

- Consist of the five parts and contain the information described in 18 AAC 75.449 – 18 AAC 75.453;
- Contain a complete table of contents and lists of tables and/or figures referenced in the table of contents as each section appendix as well as a detailed list at the beginning of each section appendix; and
- Include a cross-reference table that directs the reader to the appropriate information.

These specific requirements can be found as follows:


Five Parts	Sections 1, 2, 3, 4, and 5, respectively
Table of Contents	Begins on page iv
Cross-Reference Table	Begins on page viii

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## Cross-Reference Table

While this plan is presented in the order shown in 18 AAC 75.449 – 18 AAC 75.453, as required by 18 AAC 75.448(e), the following cross reference tables are provided to direct the reader to the appropriate information. Where multiple references appear, the first one is the primary section in which the content is addressed followed by any and all cross references contained within that section. If section specific cross-reference tables are provided, only the primary cross-reference is provided here.


### 18 AAC 75.448

Citation	Description	Plan Section
(a)	Plan contents	Plan Contents
(b)	Greatest possible discharge	Greatest Possible Discharge
(c)	Multiple operations	Not Applicable
(d)	Cover page	Cover Page
(e)	Plan requirements	Plan Organization

### 18 AAC 75.449

Citation	Description	Plan Section
(a)	Response action plan	1
(a)(1)	Emergency action checklist	1.1
(a)(2)	Reporting and notification	1.2
(a)(3)	Safety plan	1.3
(a)(4)	Communications procedures	1.4
(a)(5)	Deployment strategies	1.5, 1.1
(a)(6)	Response scenario	1.6 <sup>2</sup> , Response Scenario, 6.2
(a)(7)	Additional requirements – exploration & production	Not Applicable
(a)(8)	Nonmechanical response options	Not Applicable
(a)(9)	Facility diagrams	1.7
(a)(10)	General procedures for greatest possible discharge	1.8, 5
(b)	Definitions	Not Actionable

<sup>2</sup> 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: 2025\_08\_JNU – Bulk Facility CPLAN Response Scenario\_REV 0


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## 18 AAC 75.450

Citation	Description	Plan Section
(a)	Prevention plan	2
(b)	Prevention plan contents	See Below
(b)(1)	Discharge prevention programs	2.1
(b)(2)	Facility discharge history	2.2
(b)(3)	Potential discharge analysis	2.3
(b)(4)	Specific conditions	2.4
(b)(5)	Discharge detection	2.5
(b)(6)	Waivers	Not Applicable

## 18 AAC 75.451

Citation	Description	Plan Section
(a)	Supplemental information	3
(b)	Facility description and operational overview	2.1.6
(b)(1)	Aboveground storage tanks >10,000 gallons	2.1.6
(b)(2)	Aboveground storage tanks >1,000 and ≤ 10,000 gallons	2.1.6
(b)(3)	Information specific to vessels	Not Applicable
(b)(4)	Information specific to railroads	Not Applicable
(b)(5)	Procedures for loading / transfer	2.1.5
(b)(6)	Information specific to production facilities	Not Applicable
(b)(7)	Piping diagram	1.7
(b)(8)	Information specific to transmission pipelines	Not Applicable
(c)	Receiving environment	3.1, 1.7, 5, Response Scenario
(d)	Command system	3.2, 1.2
(e)	Realistic maximum response operating limitations summary	3.3
(f)	Logistical support	3.4
(g)	Response equipment	3.5, Response Scenario
(h)	Response equipment specifications	3.6, Response Scenario
(i)	Primary response action contractor	3.7
(j)	Training for discharge response personnel	3.8, 2.1.1

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Citation	Description	Plan Section
(k)	Environmentally sensitive areas and areas of public concern	3.9, 6.2, Response Scenario
(l)	List of resources for greatest possible discharge	3.10, 1.8
(m)	Additional information	3.11
(n)	Bibliography	3.12
(o)	Definitions applicable to this section	Not Actionable

18 AAC 75.452

Citation	Description	Plan Section
--	Best available technology review	4

18 AAC 75.453

Citation	Description	Plan Section
--	Response planning standard	5

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# 1 Response Action Plan

## 18 AAC 75.449(a)

The Response Action Plan, which comprises Section 1 of this plan, is designed to clearly guide responders in an emergency event.


## 1.1 Emergency Action Checklist

### 18 AAC 75.449(a)(1)

Below is a short checklist, immediately available to response personnel while on duty, of the immediate response and notification steps to be taken if an oil discharge occurs.

Safety	<ul style="list-style-type: none"> <li>• Warn persons in the immediate area, activate internal alarms</li> <li>• Eliminate sources of ignition, if safe to do so</li> <li>• Determine safety requirements</li> <li>• Identify the character, source, amount, and extent of the release and other pertinent information needed for notification</li> </ul>
Initial Control & Containment	<ul style="list-style-type: none"> <li>• Stop the flow at the source</li> <li>• Transfer product out of damaged tank, vessel, and/or piping</li> <li>• Assess and implement prompt removal actions to contain and remove the spilled substance</li> <li>• Deploy containment boom and response equipment, as needed</li> <li>• Construct a containment berm</li> <li>• Divert discharged oil to a collection area</li> </ul>
Reporting & Notifications	Notify immediate supervisor, Facility Manager, facility response personnel, emergency responders (i.e., 911), Qualified Individual (QI), and agencies as applicable <sup>3</sup>
Transfer of Command	The initial on scene coordinator (IOSC) shall direct cleanup activities until relieved of this responsibility by an incoming Incident Commander (IC)

<sup>3</sup> Notification requirements vary based on each incident, as described throughout this plan.

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## 1.2 Reporting and Notification

### 18 AAC 75.449(a)(2)

All DW personnel have been trained to report spills to their immediate supervisor and the Facility Manager, regardless of hour of day. The individual discovering the spill, the immediate supervisor, or the Facility Manager, is then required by company policy to notify a company-designated QI.

Company-designated QIs typically make all agency notifications<sup>4</sup>. Company-designated QI names and phone numbers are presented in Table 1-1.

In the event a spill meets a regulatory-defined reporting threshold, notification to the appropriate government agency/agencies will be made. The criteria for reporting spills and the telephone numbers for government agency/agencies that may require notification are presented in Tables 1-2A and 1-2B.

Contact information for potentially impacted groups is presented in Table 1-2C.

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<sup>4</sup> Immediate supervisors and Facility Managers are also authorized to make agency notifications in the unlikely event a company-designated QI is unable to be reached within a reasonable amount of time.

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

Primary	Cell Phone Number
Christina Bentz	907-331-8075
Garret Lyons	907-841-5348
Dominic Masinelli	907-351-5862
Samantha Hinze	907-231-3533
Ben Collins	907-341-7516

# Table 1-2A: Regulatory Reporting Thresholds

State	Administrative Agency	Substance Spilled	Spill Location	Reporting Quantity	Links to Regulations	Contact Information
Alaska	<a href="#">Alaska Department of Environmental Conservation's Division of Spill Prevention and Response</a>	Hazardous substances	On Land	Any release must be reported as soon as the person has knowledge.	<a href="#">18 AAC 75.300</a>	DEC Response Team office: 1-800-478-9300 Call International: 1-907-269-0667 Report Online: ReportSpills.alaska.gov
Alaska	<a href="#">Alaska Department of Environmental Conservation's Division of Spill Prevention and Response</a>	Hazardous substances	Into Water	Any release must be reported as soon as the person has knowledge.	<a href="#">18 AAC 75.300</a>	DEC Response Team office: 1-800-478-9300 Call International: 1-907-269-0667 Report Online: ReportSpills.alaska.gov
Alaska	<a href="#">Alaska Department of Environmental Conservation's Division of Spill Prevention and Response</a>	Petroleum/Oil from a facility and not a UST	On Land	Any release of oil in excess of 55 gallons must be reported as soon as the person has knowledge.	<a href="#">18 AAC 75.300</a>	DEC Response Team office: 1-800-478-9300 Call International: 1-907-269-0667 Report Online: ReportSpills.alaska.gov
Alaska	<a href="#">Alaska Department of Environmental Conservation's Division of Spill Prevention and Response</a>	Petroleum/Oil from a facility and not a UST	On Land	Any release of oil in excess of 10 gallons but less than 55 gallons must be reported within 48 hours of discovery.	<a href="#">18 AAC 75.300</a>	DEC Response Team office: 1-800-478-9300 Call International: 1-907-269-0667 Report Online: ReportSpills.alaska.gov
Alaska	<a href="#">Alaska Department of Environmental Conservation's Division of Spill Prevention and Response</a>	Petroleum/Oil from a facility and not a UST	Into Water	Any release of oil must be reported as soon as the person has knowledge of discharge.	<a href="#">18 AAC 75.300</a>	DEC Response Team office: 1-800-478-9300 Call International: 1-907-269-0667 Report Online: ReportSpills.alaska.gov
Alaska	<a href="#">Alaska Department of Environmental Conservation's Division of Spill Prevention and Response</a>	Petroleum/Oil from a facility and not a UST	To Impermeable Secondary Containment Area	Any release of oil in excess of 55 gallons must be reported within 48 hours after the person has knowledge of the discharge .	<a href="#">18 AAC 75.300</a>	DEC Response Team office: 1-800-478-9300 Call International: 1-907-269-0667 Report Online: ReportSpills.alaska.gov
EPA	United States Environmental Protection Agency	Oil	On Water, Adjoining Shorelines	Any discharge in violation of Section 311(b)(3) of the Clean Water Act must be reported immediately.	<a href="https://www.ecfr.gov/current/title-40/section-300.300">https://www.ecfr.gov/current/title-40/section-300.300</a>	National Response Center: 1-800-424-8802
EPA	United States Environmental Protection Agency	Hazardous substance	Any	Any release that equals or exceeds the reportable quantity in 40 CFR 302.4 must be reported immediately.	<a href="https://www.ecfr.gov/current/title-40/section-302.6">https://www.ecfr.gov/current/title-40/section-302.6</a>	National Response Center: 1-800-424-8802
CG	United States Coast Guard	Oil	On Water	Any discharge in violation of Section 311(b)(3) of the Clean Water Act must be reported immediately.	<a href="https://www.ecfr.gov/current/title-33/section-153.203">https://www.ecfr.gov/current/title-33/section-153.203</a>	National Response Center: 1-800-424-8802
CG	United States Coast Guard	Hazardous substance	On Water	Any discharge in violation of Section 311(b)(3) of the Clean Water Act must be reported immediately.	<a href="https://www.ecfr.gov/current/title-33/section-153.203">https://www.ecfr.gov/current/title-33/section-153.203</a>	National Response Center: 1-800-424-8802


# 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	907-366-9150
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	907-465-3513	dnr.sero.spill@alaska.gov
State Agency	Alaska Department of Fish and Game (ADF&G) Juneau	907-465-4105	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	



# Table 1-2C: Potentially Impacted Groups Contacts

Type	Entity Name	Phone #	Phone # Notes
Local Industry	Petro Marine	907-586-4400	
Local Industry	Greens Creek	907-789-8170	
Local Industry	Raptor Center, Juneau	907-790-5424	
Local Industry	Raptor Center, Sitka	907-747-8662	
Local Industry	Cruise Lines	907-723-1215	
Local Industry	Cruise Lines	907-723-1214	
Local Native/Village Corporation	SEALASKA Corp	907-586-1512	
Local Native/Village Corporation	Goldbelt	907-790-4990	
Local Public Safety	Harbors, Port Office	907-586-0292	
Local Public Safety	Harbors, Port Office	907-586-5255	Aurora Harbor
Local Public Safety	Harbors, Port Office	907-789-0819	Statter Harbor
Local Public Safety	Public Safety/Police	907-586-0600	
Local Public Safety	Fire	907-586-5322	
Local Public Safety	EMS	911	
Local Public Safety	Alaska State Troopers, Juneau	907-465-4000	
Local Public Safety	Hospital, Bartlett	907-796-8900	
Local Public Safety	City & Borough of Juneau, Manager	907-586-5240	
Local Public Safety	CBJ contacts:	See Notes	
Local Public Safety	Water Utility	907-780-6888	
Local Public Water Intakes	Taku Smokeries	907-463-3474	
Local Public Water Intakes	Taku Smokeries	1-800-582-5122	
Local Public Water Intakes	DIPAC (Douglas Island Pink and Chum, Inc.)	907-463-4810	
Local Public Water Intakes	DIPAC (Douglas Island Pink and Chum, Inc.)	877-463-2486	
Local Seafood Processors	Alaska Seafood Company	1-800-451-1400	
Local Seafood Processors	Alaska Glacier Seafoods, Inc	907-790-3590	

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## 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<sup>5</sup>.

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

<sup>5</sup> 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).

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## 1.4 Communications Procedures

### 18 AAC 75.449(a)(4)

The IOSC, IC, or designee, will be responsible for establishing field communications procedures. This includes, but is not limited to, establishing radio channels/frequencies and their appropriate usage by response personnel. DW relies primarily on the following means of communication:

- Cellular phones
- Very High Frequency (VHF) radios
- Land lines
- Microsoft Teams


DW communications can be supplemented by Primary Response Action Contractor (PRAC), Oil Spill Response Organization (OSRO), parent company, contractor, and/or IMT/SMT communications equipment. In addition, various state and federal agencies in Alaska maintain communications equipment, which may be available in the event of a spill response.

In the event of a spill for which full IMT/SMT activation is needed, an incident-specific communications list and/or an incident radio communication plan may be developed. DW anticipates utilizing the ICS 205A and/or ICS 205, if needed. In all other instances, DW will rely on existing means of communication.

With respect to VHF radios, channel and frequency guidance information is presented in Table 1-3.

Table 1-3: VHF Radio Channel & Frequency Guide

Type	Description
Marine VHF Channel 10	Will be monitored during response operations
Marine VHF Channels 68, 69, 71, 72, and 78	Non-commercial channels that MAY BE USED during a spill response
Marine VHF Channels 13, 15, 16, 17, 21, 23, 81, and 83	MAY NOT BE USED unless specific permission has been granted by the CG
Additional Marine VHF Frequencies	Will be designated, as appropriate
Frequency 155.295	AK state emergency frequency
Marine Single Sideband (SSB) 4125.00MHz	Designated frequency within AK waters
SSB 4125 and Marine VHF Frequencies	Are utilized by the CG

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## 1.5 Deployment Strategies

### 18 AAC 75.449(a)(5)

In the event of a spill, DW will initially rely on local Juneau-based personnel and resources that can be mobilized immediately. Local Juneau-based personnel and resources may be supplemented, if needed, as described below.

In addition to local Juneau-based personnel and resources, DW may utilize one or more of the following:

- Location-based or regional PRAC/OSRO responders and equipment<sup>6</sup>
- Location-based State of Alaska spill response equipment
- DW regional personnel and equipment
- Parent company personnel and equipment
- Contracted personnel and equipment


The primary means of mobilizing equipment, personnel, and other resources to the site will be dependent on the needs of the incident, availability, and current location. Typical transportation methods that may be utilized include, but are not limited to:

- Motor vehicle
  - Company-owned vehicle(s)
  - Rental vehicle(s)
- Vessel
  - Skiffs
  - Barges
  - OSRO/PRAC response vessel
- Aircraft
  - Helicopter
  - Cargo plane
  - Passenger plane

In the event of adverse weather, equipment, personnel, and other resources will be staged and maintained in “ready” status for mobilization when conditions allow.

The decision to mobilize PRAC/OSRO resources is typically made by the QI in consultation with the IOSC or IC. In the event PRAC/OSRO resources are needed, the actions outlined in the emergency action checklist (refer to Section 1.1) will be carried out to the extent feasible utilizing local personnel and resources available. No interruption of response or cleanup will occur as the result of transition and substitution of equipment and resources between DW and the PRAC/OSRO.

<sup>6</sup> SEAPRO responders and equipment can be made available within 4 hours of notification (SEAPRO, 2025).

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## 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:

2026\_01\_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.

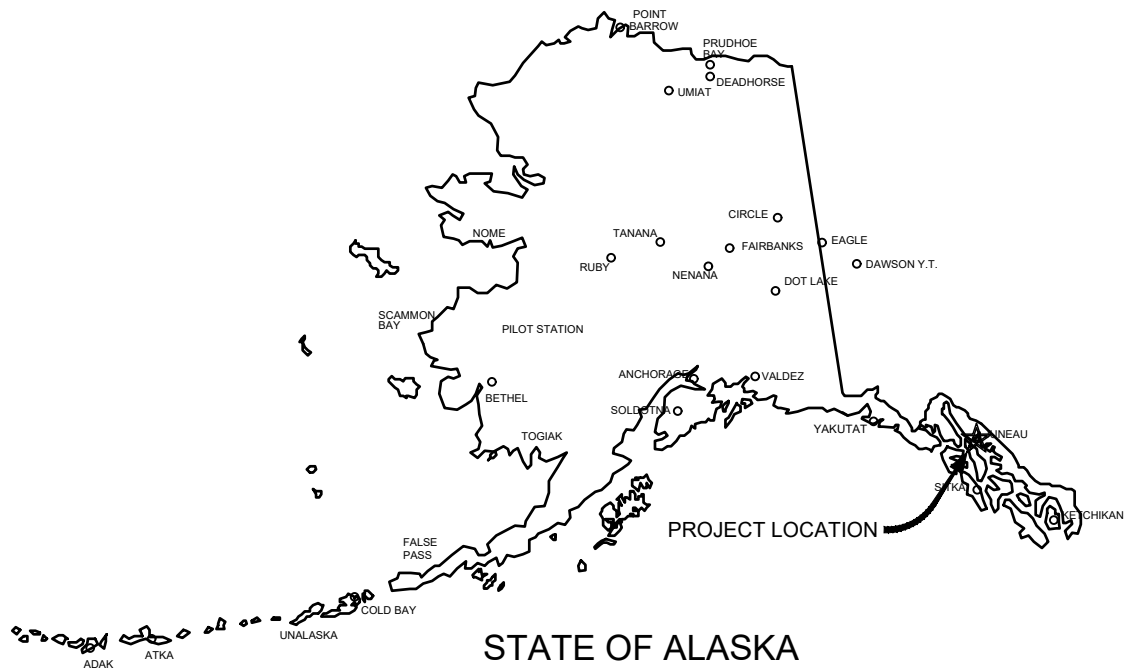
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## 1.7 Facility Diagrams

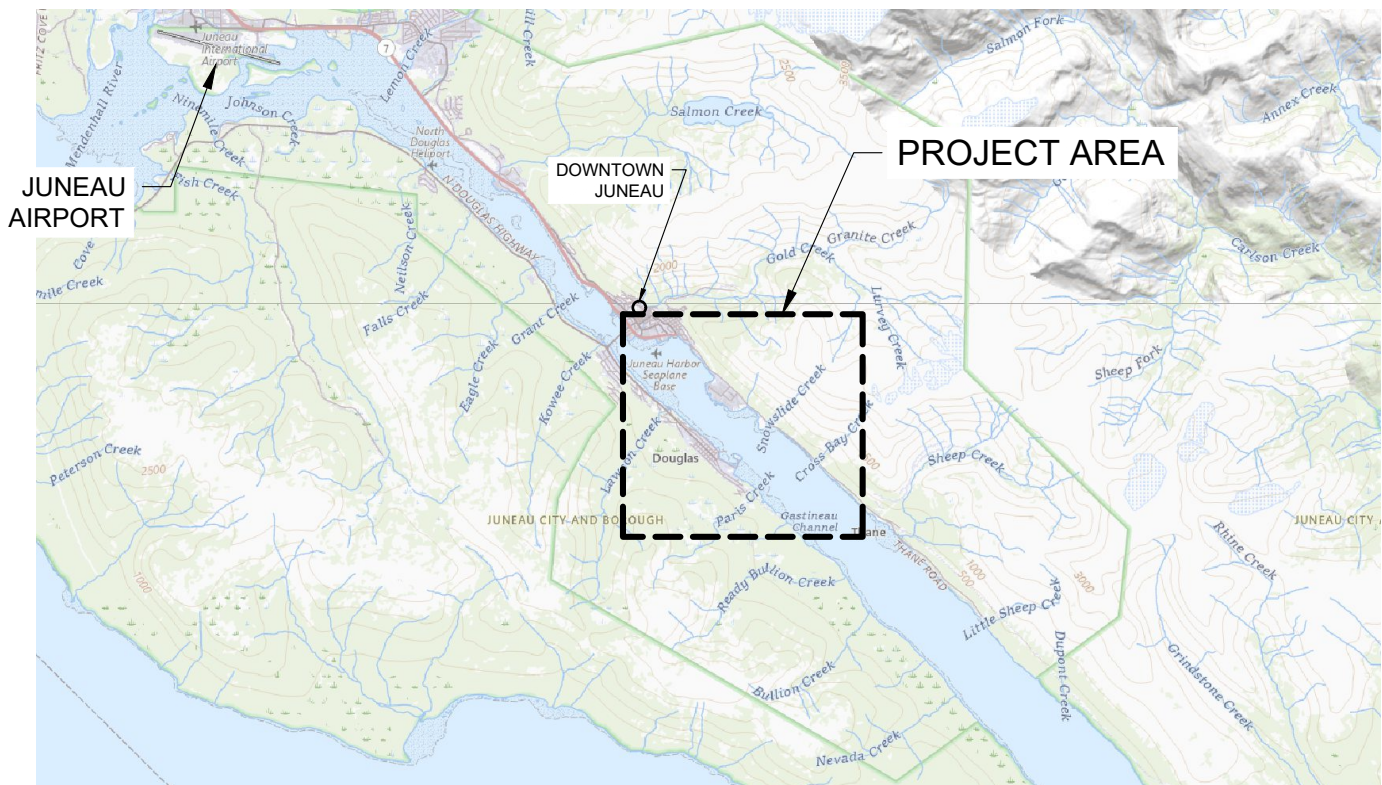
**18 AAC 75.449(a)(9), 18 AAC 75.451(b)(7)**

Facility diagrams are provided on the following pages.

DW has submitted the piping diagram required by 18 AAC 75.451(b)(7) under separate cover. This diagram contains sensitive security information that is not eligible for public disclosure under Federal Regulations.



STATE OF ALASKA

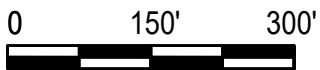
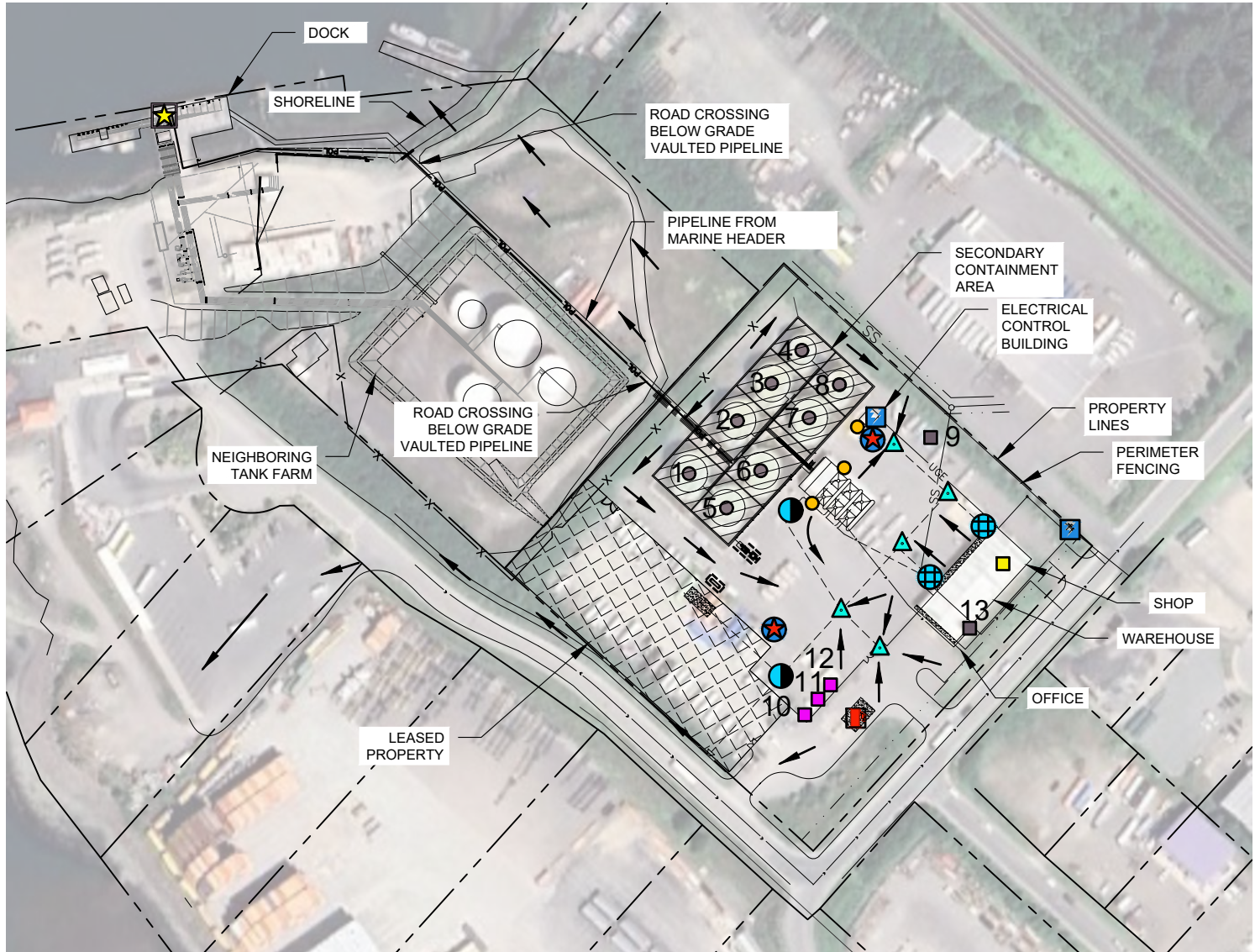


0 1.5 MILES 3 MILES

JUNEAU GENERAL VICINITY MAP





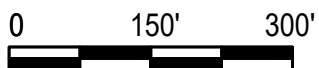
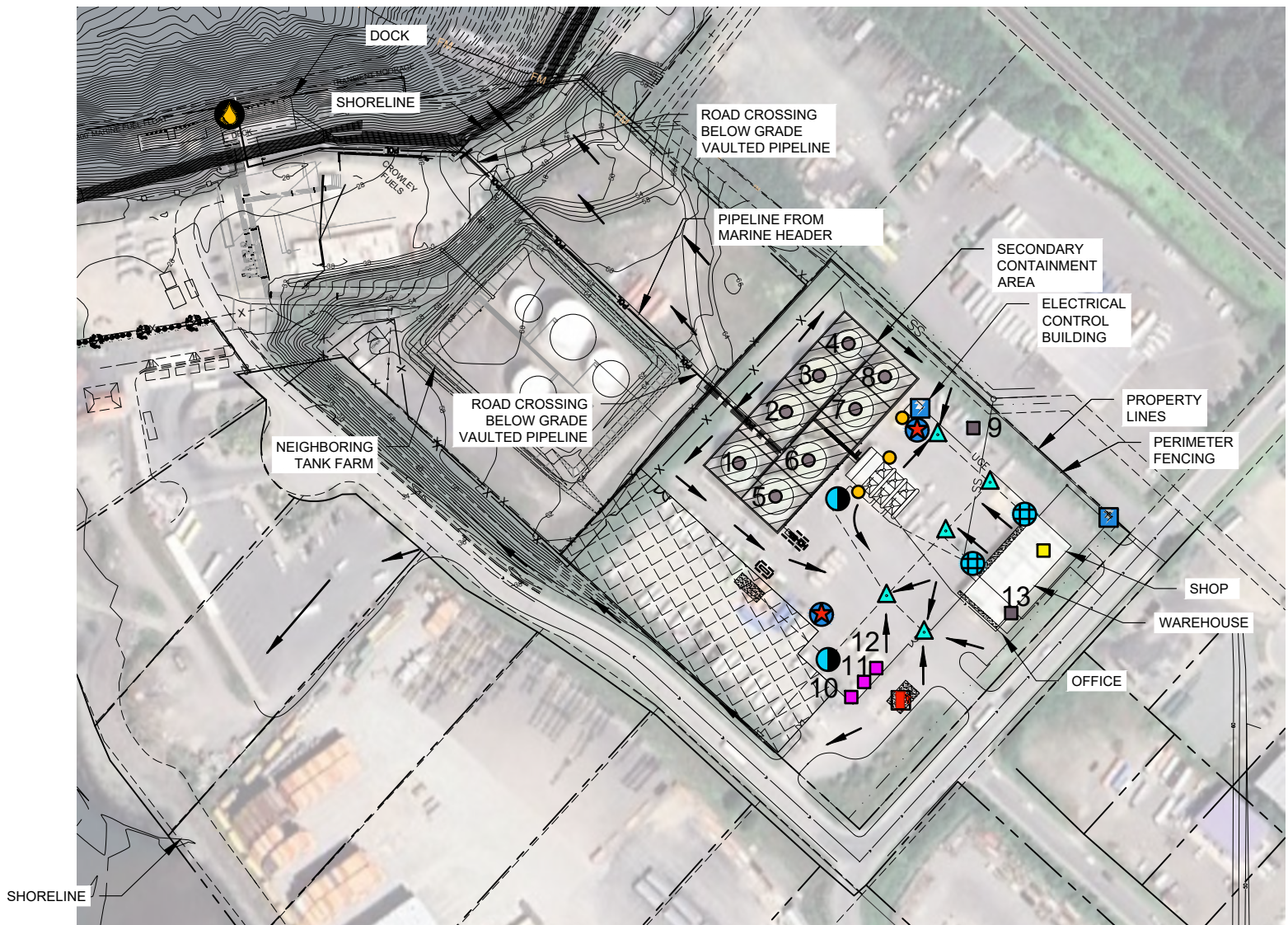


## FACILITY SITE LAYOUT

- |  |                                     |  |                          |
|--|-------------------------------------|--|--------------------------|
|  | EMERGENCY STOP                      |  | SPILL RESPONSE EQUIPMENT |
|  | BULK FUEL STORAGE TANK - VERTICAL   |  | DRUM STORAGE             |
|  | BULK FUEL STORAGE TANK - HORIZONTAL |  | CARDLOCK PUMP            |
|  | ELECTRICAL DISCONNECT               |  | OIL WATER SEPARATOR      |
|  | MARINE HEADER                       |  | DRAIN                    |
|  | SURFACE DRAINAGE DIRECTION          |  | STRIP DRAIN              |
|  | DISPENSING TANK                     |  |                          |





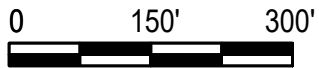
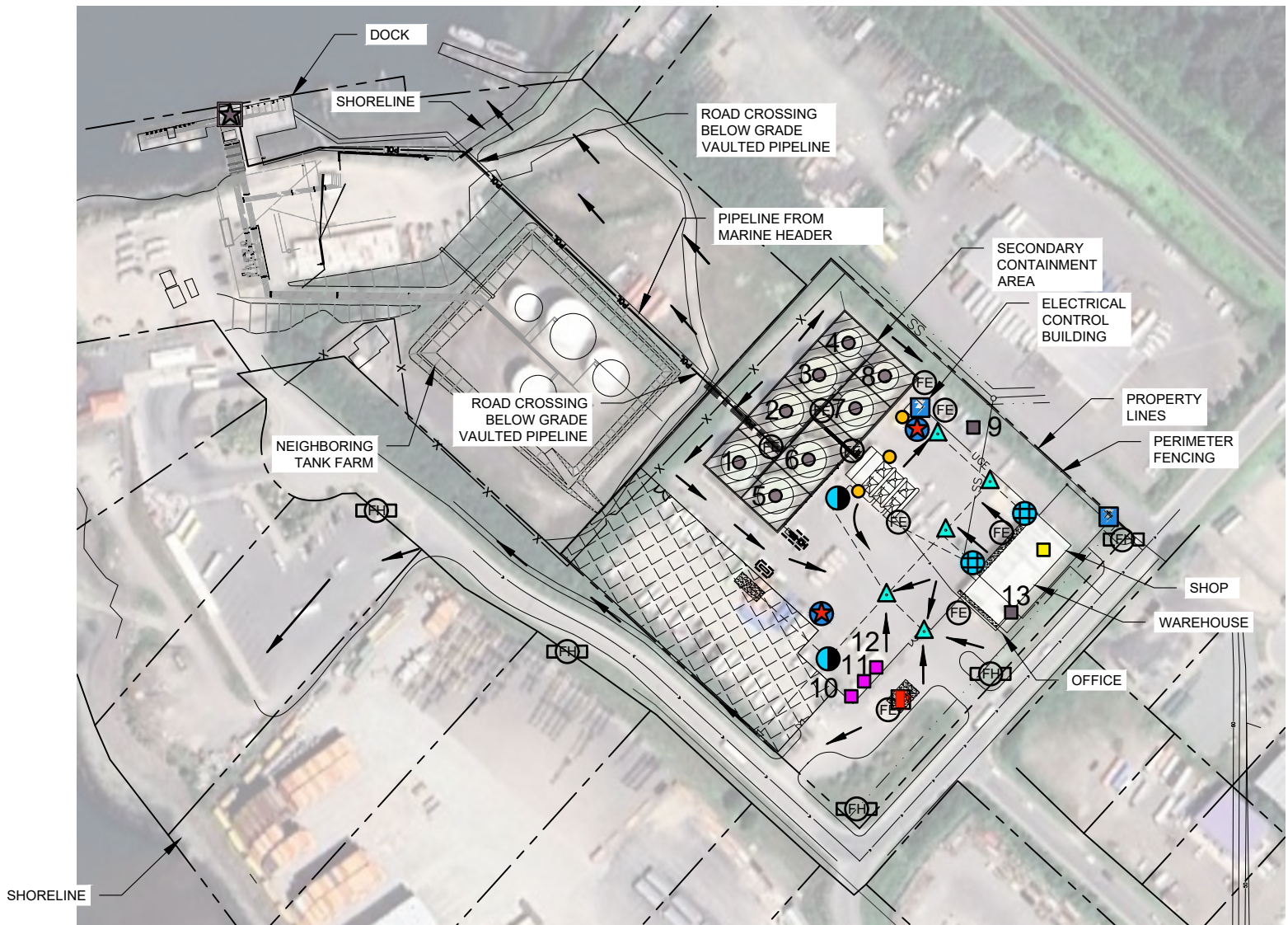


## FACILITY CONTOUR MAP

- |  |                                     |  |                            |
|--|-------------------------------------|--|----------------------------|
|  | EMERGENCY STOP                      |  | SPILL RESPONSE EQUIPMENT   |
|  | BULK FUEL STORAGE TANK - VERTICAL   |  | SURFACE DRAINAGE DIRECTION |
|  | BULK FUEL STORAGE TANK - HORIZONTAL |  | DRUM STORAGE               |
|  | OIL TRANSFER LOCATION               |  | OIL WATER SEPARATOR        |
|  | ELECTRICAL DISCONNECT               |  | DRAIN                      |
|  | DISPENSING TANK                     |  | STRIP DRAIN                |








## FACILITY FIRE CONTROL MAP

- |                                     |                            |
|-------------------------------------|----------------------------|
| EMERGENCY STOP                      | SPILL RESPONSE EQUIPMENT   |
| BULK FUEL STORAGE TANK - VERTICAL   | SURFACE DRAINAGE DIRECTION |
| BULK FUEL STORAGE TANK - HORIZONTAL | CARDLOCK PUMP              |
| MARINE HEADER                       | DRUM STORAGE               |
| ELECTRICAL DISCONNECT               | OIL WATER SEPARATOR        |
| DISPENSING TANK                     | DRAIN                      |
| FIRE EXTINGUISHER                   | STRIP DRAIN                |
| FIRE HYDRANT                        |                            |



### **Juneau Bulk Facility – Piping Diagram**

This document is not available for public distribution.

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## 1.8 General Procedures for Greatest Possible Discharge

### 18 AAC 75.449(a)(10)

The procedures to respond to the GPD at the facility would follow the same steps and be similar in nature to those defined in the response scenario<sup>7</sup>. However, the main difference between a RPS scenario and a GPD scenario is that additional resources may be needed to respond to the GPD. DW anticipates that conditions resulting in a GPD would likely impact other infrastructure within the community and/or region, thus potentially resulting in limitations on resources and additional time to receive outside support. In this case, DW would focus their efforts on:


- Safety
- Initial containment and control
- Mitigation efforts

The GPD is very similar to the unadjusted RPS (shown in Section 5) for this facility as a fact of its unique configuration compared to many tank farms. Additionally, it may be faster to mobilize certain resources from the Lower 48 than from other locations within Alaska due to the facility's southern location within the state.

In addition to contracted resources, DW may employ other resources when responding to a GPD such as:

- Local non-PRAC/OSRO personnel, equipment and resources, such as local fishermen, charter flights, portable tanks, waste vendors, and qualified environmental professionals
- Agency personnel, equipment, and resources, such as those from Alaska Department of Environmental Conservation (ADEC) spill response caches
- PRAC/OSRO personnel, equipment, and resources located outside of the southeast region, including the Lower 48
- Use of DW equipment and personnel not identified in this CPLAN, such as company-owned or operated skimmers, tankage, and barges
- Use of parent and sister company personnel, equipment and resources

<sup>7 7</sup> 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.

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## 2 Prevention Plan

### 18 AAC 75.450(a), 18 AAC 75.450(b), 18 AAC 75.005(a)


The Prevention Plan which comprises Section 2 of this plan is designed to demonstrate that DW meets all applicable requirements of 18 AAC 75.005 through 18 AAC 75.085.

The following cross reference tables are provided to direct the reader to the appropriate information<sup>8</sup>.

### 18 AAC 75 Article 1

Citation	Description	Plan Section
.005	Responsibility	2
.007	General oil pollution prevention requirements	2
.015	Waiver	Not Applicable
.020	Oil discharge prevention training and recordkeeping	2.1.1
.025	Transfer requirements	2.1.5
.027	Requirements for laden tank vessels	Not Applicable
.037	Requirements for laden oil barges	Not Applicable
.045	Operating requirements for exploration and production facilities	Not Applicable
.047	Requirements for flow lines at production facilities	Not Applicable
.055	Leak detection, monitoring, and operating requirements for crude oil transmission pipelines	Not Applicable
.065	Field-constructed aboveground oil storage tank requirements	2.1.5
.066	Shop-fabricated aboveground oil storage tanks	2.1.5
.075	Secondary containment requirements for aboveground oil storage tanks	2.1.5
.080	Requirements for facility oil piping	2.1.5
.085	Requirements for railroad tank cars and operations by rail	Not Applicable

<sup>8</sup> In some cases, the information required by this section to demonstrate that DW meets all the applicable requirements of 18 AAC 75.005 - 18 AAC 75.085 is also required under other CPLAN sections. Information has been placed where it is believed to be most appropriate.

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## 18 AAC 75.005

Citation	Description	Plan Section
(a)	General duty to comply	2
(b)	Non-crude tank vessel/barge with limited capacity	Not Applicable

## 18 AAC 75.007

Citation	Description	Plan Section
(a)	General duty to comply	Not Actionable
(b)	Duty to operate in a manner that prevents oil discharge	2
(c)	Most stringent requirement clause	Not Actionable
(d)	Repealed	Not Applicable
(e)	Duty to ensure employees are fit for duty	2.1.3
(f)	Duty to provide security measures and surveillance	2.1.4
(g)	Repealed	Not Applicable
(h)	Repealed	Not Applicable


As the owner and/or operator of a CPLAN regulated facility, DW understands their general duty to meet the applicable sections of 18 AAC 75 and to prevent the discharge of oil into waters or onto land of the state. This includes the duty to comply with other state and federal laws applicable to the prevention of an oil discharge.

## 2.1 Discharge Prevention Programs

### 18 AAC 75.450(b)(1)

DW's discharge prevention programs that are in place at this facility include the following, which are described in the subsequent sections if further detail:

Oil Discharge Prevention Programs (including Training)	Section 2.1.1, 3.8
Inspection and Maintenance	Section 2.1.2
Substance Abuse and Medical Monitoring	Section 2.1.3
Security and Surveillance	Section 2.1.4
Procedures for Loading / Transfer	Section 2.1.5

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### 2.1.1 Oil Discharge Prevention

#### 18 AAC 75.020(a), 18 AAC 75.020(e)

DW's oil discharge prevention training program was designed to comply with 18 AAC 75.020 and 18 AAC 75.451(j) to ensure that all personnel with job duties that directly involve the inspection, maintenance, or operation of oil storage and transfer equipment regulated under 18 AAC 75.005 – 18 AAC 75.085 are appropriately trained with respect to company and state oil pollution prevention measures applicable to their position.

The applicability of each paragraph of 18 AAC 75.020 is shown below along with where it is addressed in this plan.

#### 18 AAC 75.020

Citation	Description	Plan Section
(a)	Training program required	2.1.1 (above)
(b)	Training program components	2.1.1.1
(c)	Documentation of training	2.1.1.2
(d)	Facility discharge history	2.2
(e)	Recordkeeping	2.1.1 (below)

DW maintains all records related to training, inspections, tests, maintenance, and repairs required under 18 AAC 75.005 – 18 AAC 75.085 in a retrievable form, such that a copy of each required record can be provided to the ADEC upon request. These records are kept for at least five (5) years, as required by 18 AAC 75.020(e).

#### 2.1.1.1 Persons to be Trained

#### 18 AAC 75.020(b)


This section describes DW's personnel training program as it relates to the successful implementation of this plan<sup>9</sup>.

The following positions are identified as it relates to DW's personnel training program for CPLAN regulated facilities:

- IMT/SMT Member
- QI

<sup>9</sup> Where DW relies on contracted personnel to meet the requirements of this plan, their training and training records, are completed and maintained by their employer, not DW.



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- IOSC
- Spill Responder, Non-Tank Truck Operator
- Spill Responder, Tank Truck Operator
- Project Team Member
- Facility Assigned Personnel with Job Duties Directly Involving the Inspection or Operation of Oil Storage and Transfer Equipment

Table 2-1 contains each of these job duties; training appropriate to their role; licensing, certification, or prerequisites; and a listing of the training objectives and means of achieving them, inclusive of the subject, schedule, frequency, and type.

# Table 2-1: Personnel Training Program Matrix

Position	Job Duties	License, Certification, and Pre-Requisites	Training - Subject	Training - Schedule	Training - Frequency	Training - Type	Training - Record
IMT / SMT Member	Fulfill one or more roles on the IMT / SMT	None	Incident Command System	Upon Assignment	One Time	ICS-100, ICS-200	Certificate
IMT / SMT Member	Fulfill one or more roles on the IMT / SMT	None	Incident Command System	Ongoing	Ongoing	Participation in Drills & Exercises	Sign In Sheet
Qualified Individual	On call 24-7 to receive and record information related to potential, discovered, or actual spills	None	Internal Spill Reporting Training for Operating Company	Prior to Designation by Company President	One Time	Internal - within Learning Management System	Certificate
Qualified Individual	Report spills in accordance with applicable regulations, leases, and other governing documents	None	Spill Reporting	Ongoing / Initial Training to be Completed Prior to Designation by Company President	Ongoing	On The Job	Designation by Company President
Qualified Individual	Interface with regulatory agencies as it relates to spills; may include fulfilling the role of Incident Commander if a formal IMT / SMT is note required	None	Incident Command System	Prior to Designation by Company President	One Time	ICS-100, ICS-200	Certificate
Qualified Individual	Interface with regulatory agencies as it relates to spills; may include fulfilling the role of Incident Commander if a formal IMT / SMT is note required	None	Spill Reporting	Ongoing / Initial Training to be Completed Prior to Designation by Company President	Ongoing	On The Job	Designation by Company President
Initial On-Scene Coordinator	Report spill to supervisor, Facility Manager, and QI, as appropriate	None	Internal Spill Reporting Training for Operating Company	Upon Assignment	Recurring, Minimum of Once Every Two (2) Years	Internal - within Learning Management System	Certificate
Initial On-Scene Coordinator	Manage spill response activities until relieved of duties by incoming Incident Commander	None	Incident Command System	Upon Assignment	One Time	ICS-100, ICS-200	Certificate
Initial On-Scene Coordinator	Manage spill response activities until relieved of duties by incoming Incident Commander	None	Incident Command System	Ongoing	Ongoing	Participation in Drills & Exercises	Sign In Sheet
Initial On-Scene Coordinator	Complete initial response actions as defined in facility CPLAN	None	CPLAN	Upon Assignment	Annual	Annual CPLAN Review	Training Roster
Spill Responder, Non-Tank Truck Operator	Understand spill reporting requirements; secondary spills may occur during spill response activities	None	Internal Spill Reporting Training for Operating Company	Upon Assignment	Recurring, Minimum of Once Every Two (2) Years	Internal - within Learning Management System	Certificate
Spill Responder, Non-Tank Truck Operator	Take appropriate response actions as defined in facility CPLAN	24 Hour HAZWOPER	HAZWOPER (includes Hazardous Communications, Safe Materials Handling)	Prior to Acting in a Spill Responder Role	One Time w/Annual Eight (8) Hour Refresher	External - by Appropriate Provider	Certificate
Spill Responder, Non-Tank Truck Operator	Take appropriate response actions as defined in facility CPLAN	None	CPLAN	Upon Assignment	Annual	Annual CPLAN Review	Training Roster
Spill Responder, Non-Tank Truck Operator	Take appropriate response actions as defined in facility CPLAN	None	Spill Response	Ongoing	Ongoing	Participates in Spill Response Activities	None
Spill Responder, Tank Truck Operator	Understand spill reporting requirements; secondary spills may occur during spill response activities	None	Internal Spill Reporting Training for Operating Company	Upon Assignment	Recurring, Minimum of Once Every Two (2) Years	Internal - within Learning Management System	Certificate
Spill Responder, Tank Truck Operator	Drive tank truck in support of response activities (i.e., Waste Management)	Commercial Driver's License (CDL) w/HAZMAT & Tank Endorsement	Driving (clean driving record, current medical card)	Prior to Driving a Tank Truck Transporting Hazardous Materials	Varies	Internal - within Learning Management System	CDL
Spill Responder, Tank Truck Operator	Drive tank truck in support of response activities (i.e., Waste Management)	Commercial Driver's License (CDL) w/HAZMAT & Tank Endorsement	DOT HAZMAT	Prior to Driving a Tank Truck Transporting Hazardous Materials	Every Three (3) Years	Internal - within Learning Management System	Certificate
Spill Responder, Tank Truck Operator	Take appropriate response actions as defined in facility CPLAN	24 Hour HAZWOPER	HAZWOPER (includes Hazardous Communications, Safe Materials Handling)	Prior to Acting in a Spill Responder Role	One Time w/Annual Eight (8) Hour Refresher	External - by Appropriate Provider	Certificate
Spill Responder, Tank Truck Operator	Take appropriate response actions as defined in facility CPLAN	None	CPLAN	Upon Assignment	Annual	Annual CPLAN Review	Training Roster
Spill Responder, Tank Truck Operator	Take appropriate response actions as defined in facility CPLAN	None	Spill Response	Ongoing	Ongoing	Participates in Spill Response Activities	None
Project Team Member	Understand spill reporting requirements; secondary spills may occur during spill response activities	None	Internal Spill Reporting Training for Operating Company	Upon Assignment	Recurring, Minimum of Once Every Two (2) Years	Internal - within Learning Management System	Certificate
Project Team Member	Take appropriate response actions as defined in facility CPLAN	40 Hour HAZWOPER	HAZWOPER (includes Hazardous Communications, Safe Materials Handling)	Prior to Acting in a Spill Responder Role	One Time w/Annual Eight (8) Hour Refresher	External - by Appropriate Provider	Certificate
Project Team Member	Take appropriate response actions as defined in facility CPLAN	None	CPLAN	Upon Assignment	Annual	Annual CPLAN Review	Training Roster
Project Team Member	Take appropriate response actions as defined in facility CPLAN	None	Spill Response	Ongoing	Ongoing	Participates in Spill Response Activities	None
Facility Assigned Personnel w/Job Duties Directly Involving the Inspection, Maintenance, or Operation of Oil Storage and Transfer Equipment	Understand spill reporting requirements; spills may be discovered or occur during maintenance or operation of oil storage and transfer equipment	None	Internal Spill Reporting Training for Operating Company	Upon Assignment	Recurring, Minimum of Once Every Two (2) Years	Internal - within Learning Management System	Certificate
Facility Assigned Personnel w/Job Duties Directly Involving the Inspection, Maintenance, or Operation of Oil Storage and Transfer Equipment	Understand facility inspection and maintenance requirements as defined in facility CPLAN	None	CPLAN	Upon Assignment	Annual	Annual CPLAN Review	Training Roster
Facility Assigned Personnel w/Job Duties Directly Involving the Inspection, Maintenance, or Operation of Oil Storage and Transfer Equipment	Complete inspections of oil storage and transfer equipment	None	Familiarization with Infrastructure and Proper Functionality	Prior to Independently Completing Inspections	Initial; Ongoing as Needed	On The Job	None
Facility Assigned Personnel w/Job Duties Directly Involving the Inspection, Maintenance, or Operation of Oil Storage and Transfer Equipment	Maintenance of oil storage and transfer equipment, not requiring confined space entry, welding, or lock out / tag out	None	Familiarization with Infrastructure and Maintenance Procedures	Prior to Conducting Maintenance on Oil Storage or Transfer Equipment	Ongoing	On The Job	None

Position	Job Duties	License, Certification, and Pre-Requisites	Training - Subject	Training - Schedule	Training - Frequency	Training - Type	Training - Record
Facility Assigned Personnel w/Job Duties Directly Involving the Inspection, Maintenance, or Operation of Oil Storage and Transfer Equipment	Maintenance of oil storage and transfer equipment, specifically work that involves entering aboveground storage tanks	Confined Space Entry	Confined Space Entry & Rescue	Prior to Entering a Confined Space	Recurring; Once Every Two (2) Years	External - by Appropriate Provider	Certificate
Facility Assigned Personnel w/Job Duties Directly Involving the Inspection, Maintenance, or Operation of Oil Storage and Transfer Equipment	Maintenance of oil storage and transfer equipment, specifically work that involves welding	Welding Certification	Proper Welding Techniques	Prior to Conducting Welding on Oil Storage or Transfer Equipment	One Time w/Ongoing Use	External - by Appropriate Provider	Certificate
Facility Assigned Personnel w/Job Duties Directly Involving the Inspection, Maintenance, or Operation of Oil Storage and Transfer Equipment	Maintenance of oil storage and transfer equipment, specifically work that requires equipment lock out / tag out	None	Lock Out / Tag Out	Prior to Conduct Maintenance in Areas or on Equipment where Lock Out / Tag Out is Required	Recurring; Required Every Three (3) Years	Internal - within Learning Management System or External - by Appropriate Provider	Certificate
Facility Assigned Personnel w/Job Duties Directly Involving the Inspection, Maintenance, or Operation of Oil Storage and Transfer Equipment	Operation of oil transfer equipment, not over water	None	Transfer Operations	Prior to Independently Completing Over the Water Transfer Operations	One Time	On The Job	None
Facility Assigned Personnel w/Job Duties Directly Involving the Inspection, Maintenance, or Operation of Oil Storage and Transfer Equipment	Operation of oil transfer equipment, over water	None	Transfer Operations, including Person-In-Charge (PIC) Training	Prior to Independently Completing Over the Water Transfer Operations	One Time	On The Job	PIC Training Documentation Record

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### 2.1.1.2 Documentation of Training

#### 18 AAC 75.020(c)

Training conducted by DW to meet the requirements of this plan will be documented on a form containing the following information:

- a statement listing the course or program content
- signature and date of each participant <sup>10</sup>

### 2.1.2 Inspection and Maintenance

DW conducts the following inspections of all oil storage and transfer equipment regulated under 18 AAC 75.005 – 18 AAC 75.085:

- Overall/general:
  - Monthly facility inspection
- Aboveground storage tanks (ASTs):
  - Monthly AST American Petroleum Institute (API) 653 tank inspection
  - Monthly AST Steel Tank Institute (STI) SP001 tank inspection
  - Formal third-party internal and external inspections as required by API 653 (every ten [10] years for internal and every five [5] years for external <sup>11</sup>)
  - Formal third-party external inspections as required by STI SP001 (frequency varies <sup>12</sup>)
- Facility oil piping<sup>13</sup>:
  - Annual hydrotesting<sup>14</sup>
  - Formal third-party API 570 inspection (every five [5] years)

DW conducts maintenance on oil storage and transfer equipment regulated under 18 AAC 75.005 – 18 AAC 75.085, as needed.


<sup>10</sup> Where certificates are generated by an outside party or learning management system, a certificate is considered to be equivalent to the signature and date of the participant.

<sup>11</sup> Inspection interval is subject to change and may be shortened based on the finding of the previous inspection.

<sup>12</sup> Inspection interval varies by tank characteristics and may be shortened based on the findings of the previous inspection. The most typical inspection interval for STI SP001 regulated tanks is twenty (20) years.

<sup>13</sup> API 570 piping inspection program includes informal inspections and ongoing maintenance including corrosion control mitigation. The program is adopted by reference and will be provided to ADEC upon request.

<sup>14</sup> Limited to facility oil piping that is utilized for the receipt or discharge of oil over water.

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### 2.1.3 Substance Abuse and Medical Monitoring

#### 18 AAC 75.007(e)

DW has a substance abuse program that meets applicable federal Department of Transportation drug and alcohol testing requirements for regulated personnel. Testing includes pre-placement, post-accident, reasonable suspicion, random, return-to-work, and follow up, as required by applicable regulations. Compliance with this program is administered by the Human Resources Department.


With respect to medical monitoring, DW may, at its expense and in its discretion, require personnel to undergo a physical examination by a licensed physician for legitimate work-related reasons. All DW personnel holding a commercial driver's license shall undergo all medical tests and examinations as required by their license.

### 2.1.4 Security and Surveillance

#### 18 AAC 75.007(f)

The following security measures and surveillance are employed at the facility to minimize the risk of vandalism, sabotage, and unauthorized entry.

Security Measures	<ul style="list-style-type: none"> <li>• Facility is equipped with permanent lighting</li> <li>• The tank farm and loading/offloading areas are fenced; gates are closed and locked when the facility is unmanned</li> <li>• Access to start/stop stations at the loading/offloading areas are limited to authorized personnel</li> <li>• Power to the pumps is shut off and valves are closed and secured when facility is unmanned</li> </ul>
Surveillance	<ul style="list-style-type: none"> <li>• Facility is equipped with permanent lighting</li> <li>• Personnel are onsite during normal business hours</li> </ul>

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## 2.1.5 Procedures for Loading / Transfer

### 18 AAC 75.451(b)(5)

DW's procedures for loading or transferring oil to or from a pipeline, facility, oil barge, or storage tank were designed to comply with 18 AAC 75.025. The applicability of each paragraph of 18 AAC 75.025 is shown below along with where it is addressed in this plan.

### 18 AAC 75.025


Citation	Description	Plan Section
(a)	Spill and overfill prevention	2.1.5.1
(b)	Boom requirements for crude oil, persistent products, and oily ballast water	Not Applicable
(c)	Tank cleaning operations prohibited	2.1.5.2
(d)	Personnel communication	2.1.5.3
(e)	Positive means to stop transfer	2.1.5.4, 1.7
(f)	Areas not protected by secondary containment	2.1.5.5
(g)	Tank cars and tank trucks	2.1.5.6
(h)	Shore-to-vessel transfers	2.1.5.7
(i)	Feasibility of boom deployment under (b)	Not Applicable
(j)	Definition of "transfer"	Not Actionable

### 2.1.5.1 Spill and Overfill Prevention

### 18 AAC 75.025(a)

DW takes all appropriate measures to prevent spills or overfilling during a transfer of oil, including, but not limited to:

- Providing adequate training to each person responsible for conducting transfer operations
- Actively manning transfer operations
- Following standard transfer procedures applicable to the type of transfer operation being conducted
- Reducing loading rates at the beginning and end of a transfer
- Installing spill prevention devices, such as high-level alarms, on equipment to be filled where possible
- Routinely testing spill prevention devices

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#### 2.1.5.2 Tank Cleaning Operations Prohibited

##### 18 AAC 75.025(c)

DW does not conduct tank cleaning operations during cargo offloading,

#### 2.1.5.3 Personnel Communication

##### 18 AAC 75.025(d)

DW utilizes multiple means of communication during transfers to ensure that each person involved in a transfer is capable of clearly communicating orders to stop a transfer at any time during the transfer. Company policy enables all employees with “stop work authority”<sup>15</sup>.

The means of communication that may be utilized during transfers include voice, hand signals, VHF radio, and/or cellular phone. In the unlikely event communication is lost, transfer operations will also cease until such time as communication can be restored.

#### 2.1.5.4 Positive Means to Stop Transfer

##### 18 AAC 75.025(e)

DW’s facility is equipped with emergency shut offs, which provide a positive means to stop a transfer in the shortest possible time consistent with the best commercially available technology. Emergency shut offs<sup>16</sup>, are shown on the Tank Farm Fire Control Map (Section 1.7, Figure 1-4) and listed below:


- North of the TTLR
- South of the TTLR
- Electrical Control Building

The emergency shut offs are red push buttons that are activated by pushing the button. These shut offs are designed to stop transfers immediately, although some lag time may occur. Typically, DW anticipates activation of an emergency shut off would effectively stop a transfer in less than 2 minutes.

In the event valve closure is utilized as the means to stop a transfer in lieu of an emergency shut off, the estimated time is anticipated to be five minutes or less as shown below.

<sup>15</sup> DW defines “stop work authority” as any employee having the ability to stop work at any time for any reason.

<sup>16</sup> Note: if the need arises to shut down a transfer while a cargo offload is in progress, DW will first request that the discharging vessel shut down pumping prior to closing the facility valves.

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Dock: Immediately	TTLR: 2 minutes
First valve inside SCA: Immediately or 3 minutes	Tank valves: Immediately or 5 minutes

#### 2.1.5.5 Areas not Protected by Secondary Containment

##### 18 AAC 75.025(f)

Before beginning a transfer to or from an area not protected by secondary containment, DW personnel conduct the following actions:

- Confirm that all valves in the transfer system are in the correct position
- Verify that any header not being utilized during the transfer is blank flanged or capped
- Inspect all piping and hoses that will be used in the transfer are inspected

Additionally, DW personnel inspect all piping and hoses used in the transfer at least once during transfer operations.

#### 2.1.5.6 Tank Cars and Tank Trucks

##### 18 AAC 75.025(g)

Tank cars are not able to be received by this facility.

Prior to, and after, loading any tank truck, DW transfer personnel visually inspect the lowermost drain and all outlets on the tank truck; DW transfer personnel also visually inspect the associated secondary containment structure prior to initiating loading or unloading. Additionally, before any tank truck departs the facility's TTLR, the tank truck manifolds are blank flanged or capped, and valves are secured.


The TTLR at the Juneau Bulk Facility is designed for "bottom loading".

#### 2.1.5.7 Shore-to-Vessel Transfers

##### 18 AAC 75.025(h)

All aboveground transfer piping that is used to transfer oil to/from vessels is visually inspected at least monthly. Additionally, DW completes all transfers of oil to/from vessels with an onboard oil storage capacity of 250 barrels or greater in accordance with CG requirements as required by 33 CFR 154.310(a)(17). All CG-regulated transfers are



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conducted by a designated Person In Charge (PIC), who has been adequately trained in such operations.

### 2.1.6 Facility Description and Operational Overview

**18 AAC 75.451(b), 18 AAC 75.451(b)(1), 18 AAC 75.451(b)(2)**

The Juneau Bulk Facility consists of the following infrastructure:

- ASTs
  - FCAST [18 AAC 75.065]
  - SFASTs [18 AAC 75.066]
- Secondary containment structures [18 AAC 75.070]
- Tank truck loading/offloading rack (TTLR)
- Facility oil piping [18 AAC 75.080]
- Marine header
- Tank trucks

The primary purpose of the facility is the storage and distribution of oil products. Juneau Bulk Facility receives oil in bulk from barges.

With respect to aboveground storage tanks, DW has aboveground storage tanks that fall into both of the following categories as shown on Tables 2-2 and 2-3, respectively.


- ASTs >10,000 gallons
- ASTs >1,000 and ≤10,000 gallons

## Table 2-2: ASTs >10,000 Gallons

Sub Location	Tank Identifier	Tank (Total Capacity - gal)
Bulk Facility	1	517,417
Bulk Facility	2	493,557
Bulk Facility	3	492,008
Bulk Facility	4	303,665
Bulk Facility	5	517,307
Bulk Facility	6	517,678
Bulk Facility	7	516,869
Bulk Facility	8	289,858

## Table 2-3: ASTs >1,000 and ≤10,000 Gallons

Sub Location	Tank Identifier	Tank (Total Capacity - gal)
Bulk Facility	9	6,000
Cardlock	11	3,000
Cardlock	12	3,000

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How DW meets the applicable requirements of 18 AAC 75.065, 18 AAC 75.066, 18 AAC 75.070, and 18 AAC 75.080 is presented in the following subsections.

#### 2.1.6.1 Field-Constructed Aboveground Oil Storage Tanks (FCASTs)

**18 AAC 75.065(h), 18 AAC 75.065(i), 18 AAC 75.065(j), 18 AAC 75.065(p), 18 AAC 75.065(q)**

DW's field-constructed aboveground oil storage tanks (FCASTs) were designed and installed to comply with 18 AAC 75.065. The applicability of each paragraph of 18 AAC 75.065 is shown below.

#### 18 AAC 75.065

The following sections of the 18 AAC 75.065 are applicable to the Juneau Bulk Facility.

Citation	Description
(a)	Maintenance and installation requirements
(b)	Inspection intervals
(d)	Recordkeeping
(e)	Required notifications
(g)	Internal lining systems
(i)	Requirements for installations on or after 5-14-1992 and before 12-30-2008
(j)	Requirements for installations after 12-30-2008 and before 11-18-21
(k)	Overfill prevention
(l)	Duty to test overfill prevention devices
(o)	Out of service tanks
(p)	Riveted or bolted tanks prohibited
(q)	Requirements for installations on or after 5-17-2022


The following sections of the 18 AAC 75.065 are not applicable to the Juneau Bulk Facility.

Citation	Description
(c)	Alternative to internal inspections
(f)	Internal steam heating systems
(h)	Requirements for installations placed in service before 5-14-1992
(m)	Cathodic protection system requirements
(n)	Duty to maintain cathodic protection test lead wire

As much of the applicability of this section is based on the date the tanks were placed into service, a FCAST summary is provided on the following page in Table 2-4.

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 annular ring. Uncoated.	Single Walled    Butt Welded	IFR	N/A	40'	36'	289,858	Gasoline	In Service - Filled

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#### *FCAST Inspection Requirements*

**18 AAC 75.065(a), 18 AAC 75.065(b)**

DW maintains and inspects each FCAST tank in accordance with the requirements of API 653. Table 2-5 presents the FCAST inspection schedule; Table 2-5 can be found on the following page.

#### *FCAST Recordkeeping Requirements*

**18 AAC 75.065(d)**

DW maintains the following records with respect to FCAST tanks:

- Formal third-party API inspections for the life of the tank
- Routine in-service inspections, required by Section 6.3.1 of API 653, for five (5) years
- Monthly high liquid level alarms and gauge test documentation for five (5) years
- An Annex L API 650 Storage Tank Data Sheet for the life of the tank

#### *FCAST Notification Requirements*

**18 AAC 75.065(e)**


DW will notify ADEC as follows:

- As soon as practical before a FCAST undergoes a major repair or major alteration
- Before a FCAST resumes service following a major repair or major alteration

For the purposes of this section, a major repair or major alteration is as defined in Section 3.22 of API 653.

Table 2-5: FCAST Inspection Schedule

Sub Location	Tank Identifier	Internal Inspection (Type)	Internal Inspection (Last Conducted)	Internal Inspection (Next Due - Year)	Internal Inspection (interval in years)	Internal Inspection (Interval Basis)	External Inspection (Type)	External Inspection (Last Conducted)	External Inspection (Next Due - Year)	External Inspection (interval in years)	External Inspection (Interval Basis)
Bulk Facility	1	Formal	07/28/23	2033	10	INSP CALCS	Formal	07/01/23	2028	5	STND
Bulk Facility	2	Formal	07/26/23	2031	8	INSP CALCS	Formal	07/26/23	2028	5	STND
Bulk Facility	3	Formal	08/03/23	2031	10	INSP CALCS	Formal	08/03/23	2028	5	STND
Bulk Facility	4	Formal	08/15/25	2035	10	INSP	Formal	08/15/25	2030	5	STND
Bulk Facility	5	Formal	08/15/25	2035	10	INSP	Formal	08/15/25	2030	5	STND
Bulk Facility	6	Formal	07/23/23	2033	10	INSP	Formal	07/23/23	2028	5	STND
Bulk Facility	7	Formal	09/24/22	2032	10	INSP	Formal	09/24/22	2027	5	STND
Bulk Facility	8	Formal	08/15/25	2035	10	INSP	Formal	08/15/25	2030	5	STND

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#### *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 raised concrete pad which is 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.

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<sup>17</sup>.

<sup>17</sup> Manual testing of the high liquid level alarms is conducted prior to tank filling operations or monthly, whichever is more often.



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### *FCASTs Removed From Service*

#### **18 AAC 75.065(o)**

A FCAST “removed from service”<sup>18</sup> for more than one year must be:

- Free of accumulated oil
- Marked with the words “Out of Service” and the date taken out of service
- Secured in a manner that prevents unauthorized use
- Blank flanged or otherwise disconnected from facility piping

In the event a FCAST is removed from service for more than one year, DW will notify the department. The notification will contain an affirmative statement noting that the above actions have been completed.

### *2.1.6.2 Shop-Fabricated Aboveground Oil Storage Tanks (SFASTs)*

#### **18 AAC 75.066(a), 18 AAC 75.066(b), 18 AAC 75.066(j)**

DW’s shop-fabricated aboveground oil storage tanks (SFASTs) are not regulated by ADEC and while they are included within this plan for the purposes of calculating “facility effective storage capacity” in accordance with OPC 92-6, they are not subject to the SFAST requirements in this CPLAN and thus are not discussed further.

### *2.1.6.3 Secondary Containment Structures*


The Juneau Bulk Facility is equipped with one or more secondary containment structures as required by 18 AAC 75.075; to assist in demonstrating DW’s conformance to these requirements. The applicability of each paragraph of 18 AAC 75.075 is shown below and on the following page.

## **18 AAC 75.075**

The following sections of the 18 AAC 75.075 are applicable to the Juneau Bulk Facility.

<b>Citation</b>	<b>Description</b>
(a)	General secondary containment requirements
(c)	Maintenance

<sup>18</sup> As defined above, for the purposes of this section, “removed from service” means not in regular use for the service intended and not included in a regular maintenance and inspection program in accordance with this section.

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Citation	Description
(d)	Drainage of accumulated water
(e)	Installations placed in service on or after 5-14-1992
(g)	Rail tank car and tank truck loading / unloading areas
(h)	Vaulted, self-diked, and double-walled tanks

The following sections of the 18 AAC 75.075 are not applicable to the Juneau Bulk Facility.

Citation	Description
(b)	Offshore exploration and production facilities
(f)	Department initiated requirements for installations placed in service before 5-14-1992
(i)	Repealed


A facility secondary containment structures summary table (Table 2-6) is provided on the following page <sup>19</sup>.

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<sup>19</sup> Note: Table 2-8 only contains details for facility secondary containment structures that are needed per the regulations contained in 18 AAC 75.075; additional tertiary containment areas, or those not required by 18 AAC 75.075 are excluded from this table.

Table 2-6: Facility SCA Summary

Sub Location	Secondary Containment - ID	Secondary Containment - Construction Type	Secondary Containment - Installation Date	Secondary Containment - Volume (gallons)	Secondary Containment - Lining	Secondary Containment - Additional Details	Associated Assets	Largest Asset Volume (gallons)
Bulk Facility	Shared Containment	Impermeable Concrete	1994	633,936	Under Tank	None	Tanks 1 through 8	517,678
Bulk Facility	Shared Containment	Impermeable Concrete		8,545		None	ISO Totes, TTLR	6,800

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### *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

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All aboveground oil storage tank secondary containment areas are visually inspected at least weekly, unless precluded by safety concerns or weather conditions, for the following:

- debris and vegetation
- proper alignment and operation of drain valves
- visible signs of oil leaks or spills
- defects or failures of the secondary containment structure

These weekly inspections are documented.

When needed, aboveground oil storage tank secondary containment areas are drained of accumulated water; at the Juneau Bulk Facility, this is typically conducted at least monthly but may be as frequently as daily. Discharges are directly to land and/or water and require locally initiated actions (i.e., physical opening of a valve, removal of a cap, activation of a pump, etc.)<sup>20</sup>. All discharges are preceded by a visual inspection of accumulated water prior to discharge to ensure no oil will be released. This inspection is documented.

All documented inspections required by this section are kept for five (5) years.

#### *Secondary Containment for Tank Truck Loading/Unloading Areas*

**18 AAC 75.075(g)**

The Juneau Bulk Facility is equipped with the following areas subject to 18 AAC 75.075(g):

- Tank truck loading<sup>21</sup> rack


The tank truck loading/unloading rack is equipped with secondary containment that is designed to contain the maximum capacity of any single compartment of tank trucks that utilize the facility.

These areas are paved/surfaced with impermeable materials (i.e., concrete). Like other secondary containment areas, these areas are maintained 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

<sup>20</sup> With respect to this facility, all SCA drainage is conducted via pump. The water leaves the SCA through a piping system and discharges just outside of the fence.

<sup>21</sup> Offloading is also conducted at tank truck loading rack.

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DW's internal transfer procedures require the use of tire chocks, which act as a physical barrier, to prevent premature vehicular movement during loading and unloading activities if the area is not equipped with a permanent berm or recession.

As noted in Section 2.1.5.6, DW transfer personnel complete a visual inspection of the above-referenced secondary containment structures prior to initiating loading or unloading.

#### 2.1.6.4 Facility Oil Piping

##### 18 AAC 75.080(a)

DW's facility oil piping was designed and installed to comply with 18 AAC 75.080. The applicability of each paragraph of 18 AAC 75.080 is shown below and on the following page.


#### 18 AAC 75.080

The following sections of the 18 AAC 75.080 are applicable to the Juneau Bulk Facility.

Citation	Description
(a)	Duty to comply with facility oil piping requirements
(b)	Corrosion control program
(i)	Supports for aboveground piping
(j)	Inspection of piping
(m)	Corrosion protection for aboveground piping
(n)	Valve requirements
(o)	Out of service piping

The following sections of the 18 AAC 75.080 are not applicable to the Juneau Bulk Facility.

Citation	Description
(c)	Piping placed in service after 12-30-2008
(d)	Buried piping placed in service between 5-14-1992 and 12-30-2008
(e)	Buried piping placed in service after 12-30-2008
(f)	Cathodic protection for piping placed in service after 12-30-2008
(g)	Exposing buried piping
(h)	Buried piping without cathodic protection
(k)	Operation and maintenance of cathodic protection
(l)	Corrosion protection for aboveground piping not covered by (m)
(p)	Section-specific definitions


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As much of the applicability of this section is based on the type of piping and the date the piping was placed into service, a facility oil piping summary is provided on the following page in Table 2-7.



# Table 2-7: Facility Oil Piping Summary

Associated Facility	Piping Segment	Type of Piping	Date of Installation	Diameter (Inches)	Length (Feet)	Cathodic Protection?
Juneau Bulk Facility	Tank 1 to TTLR	Above Ground	1994	4	336	No
Juneau Bulk Facility	Tank 1 to Marine Header	Above Ground	1994	6	883	No
Juneau Bulk Facility	Tank 2 to Header	Above Ground	1994	6	873	No
Juneau Bulk Facility	Tank 3 to TTLR	Above Ground	1994	4	200	No
Juneau Bulk Facility	Tank 4 to TTLR	Above Ground	1994	4	231	No
Juneau Bulk Facility	Tank 4 to Marine Header	Above Ground	1994	4	983	No
Juneau Bulk Facility	Tank 5 to Marine Header	Above Ground	1994	6	947	No
Juneau Bulk Facility	Tank 6 to TTLR	Above Ground	1994	4	127	No
Juneau Bulk Facility	Tank 7 to Marine Header	Above Ground	1994	6	975	No
Juneau Bulk Facility	Tank 8 to TTLR	Above Ground	1994	4	203	No
Juneau Bulk Facility	Tank 8 to Marine Header	Above Ground	1994	4	1,039	No

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#### *General Facility Oil Piping Requirements*

**18 AAC 75.080(a), 18 AAC 75.080(b)**

DW's maintains metallic facility oil piping containing oil in accordance with a written corrosion control program.

#### *Aboveground Piping Requirements*

**18 AAC 75.080(i), 18 AAC 75.080(m)**

All aboveground facility oil piping is supported consistent with the requirements in ASME B31.3-2004. Additionally, aboveground facility oil piping is protected against corrosion by its protective coating.

#### *Facility Oil Piping Inspection Requirements*

**18 AAC 75.080(j), 18 AAC 75.080(n)**


DW employees the following inspections as required by 18 AAC 75.080(j) and 18 AAC 75.080(n) at the Juneau Bulk Facility:

- API 570
- Monthly visual inspection of aboveground facility oil piping:
  - For leaks and/or damage
  - To confirm that all aboveground facility oil piping continues to be protected from damage by vehicles

Table 2-8 is included on the following page to summarize piping inspection schedules.

Table 2-8: Piping Inspection Schedule

Sub-Location	Inspection Type	Frequency	Last (Year)	Next (Year)
Bulk Facility	API 570	5 Years	2025	2030
Bulk Facility	HYDROTESTING	1 Year	2025	2026

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### *Out of Service Piping Requirements*

#### **18 AAC 75.080(o)**

In the event facility oil piping is removed from service for more than one year, the piping will be confirmed to be:

- Free of accumulated oil
- Marked on the exterior with the following:
  - “Out of Service”
  - The date taken out of service
  - Information on the origin of piping
- Secured in a manner to prevent unauthorized use (i.e., blank flanged or otherwise isolated)

Additionally, DW will notify ADEC when facility oil piping is removed from service and when the actions described above have been completed.


## **2.2 Facility Discharge History**

#### **18 AAC 75.450(b)(2), 18 AAC 75.020(d)**

A list of all known oil discharges greater than 55 gallons that have occurred at the facility are presented in Table 2-9 on the following page.

Table 2-9: Discharge History

Date	Source	Cause	Amount (Gallons)	Product	Corrective Actions	Relationship Analysis	Actions to Prevent a Potential Discharge
10/12/2012	TTLR	Human error    Overfill	80	Jet-A	Stopped the transfer; completed cleanup	Single incident    Human error	Personnel training

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## 2.3 Potential Discharge Analysis


**18 AAC 75.450(b)(3)**

An analysis of potential oil discharges is presented in Table 2-10 on the following page.

# Table 2-10: Potential Discharge Analysis

Type	Size	Frequency	Cause	Duration	Location	Actions to Prevent a Potential Discharge	Facility Best Practices Identified
Aboveground Storage Tanks - Structural Failure (Catastrophic)	Depends on rate of flow and duration; range is <1 gallon to volume of the largest tank	Very Unlikely (Less than once in 20 years)	Earthquake Equipment failure Physical damage Rupture	A shell rupture may be discovered in minutes and stopped in minutes to hours	Secondary Containment Area	Active monitoring Inspections Maintenance Transfer procedures	N/A
Aboveground Storage Tanks - Structural Failure (Corrosion)	Depends on rate of flow and duration; range is <1 gallon to volume of the largest tank	Unlikely (Once every 5-20 years)	Corrosion Physical damage	A small corrosion hole on the bottom of the tank might endure for weeks or months depending on flow rate	Secondary Containment Area	Inspections Automated Shutoff Secondary Containment Structure	Water settlement mitigation
Aboveground Storage Tanks - Overfill	Depends on rate of flow and duration; range is <1 gallon to 500 gallons	Unlikely (Once every 5-20 years)	Human error Overfill Physical damage	Immediately up to 2 minutes based on design of emergency shut offs	Secondary Containment Area	Active monitoring Inspections Maintenance Personnel training Transfer procedures	Ensure sound output level of high-level alarm is appropriate for the facility
Pipelines	Depends on if actively pumping or not; range is <1 gallon to the entire volume of pipeline plus the duration times pumping rate	Very Unlikely (Less than once in 20 years)	Corrosion Earthquake Equipment failure Overfill Physical damage Rupture	< 1 hour	Along pipeline in downgradient direction	Active monitoring Inspections Maintenance Transfer procedures	N/A
Marine Header	Depends on rate of flow at time of occurrence and duration; estimated maximum is 1,000 gallons	Very Unlikely (Less than once in 20 years)	Earthquake Equipment failure Physical damage Rupture	< 5 minutes	Adjacent to marine header, including adjoining water body	Annual pressure testing Inspections Maintenance Transfer procedures	N/A
Transfers at Tank Truck Loading / Offloading Rack	Up to 300 gallons	Unlikely (Once every 5-20 years)	Equipment failure Human error	< 3 minutes	Tank Truck Loading / Offloading Rack	Active monitoring Personnel training Transfer procedures	N/A
Valves	<1 gallon	Very Unlikely (Less than once in 20 years)	Equipment failure	< 1 hour	Facility-Wide	Inspections Maintenance	N/A
Camlock Connections	0.25 to 1 gallon	Unlikely (Once every 5-20 years)	Equipment failure	< 1 minute	Fuel Transfer Areas	Active monitoring Personnel training Transfer procedures	N/A
Transfer Hoses	2 to 10 gallons	Very Unlikely (Less than once in 20 years)	Equipment failure Physical damage	< 5 minutes	Fuel Transfer Areas	Annual pressure testing Inspections Maintenance	N/A



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## 2.4 Specific Conditions

### 18 AAC 75.450(b)(4)


The following conditions specific to the Juneau Bulk Facility apply:

- Strong winds
- Earthquake / Tsunami
- Landslides
- Vessel traffic patterns
- Vandalism / Sabotage
- Permafrost / Frost Heaves
- Avalanches

Each applicable condition and the measures that have been taken to reduce the risk of a discharge are presented in Table 2-11 on the following page.

Table 2-11: Specific Conditions

Condition Type	Specific Condition	Description	Mitigation Measures
Physical or Navigational Hazard	Strong winds	Facility is located in an area with the potential for high winds.	Aboveground storage tanks are anchored. Piping is braced.
Physical or Navigational Hazard	Earthquake / Tsunami	Facility is located in an area with periodic seismic events, including earthquakes and tsunamis.	Tank farm was designed and constructed to meet or exceed adopted versions of the International Building Code (IBC), International Fire Code (IFC), and the National Fire Protection Agency (NFPA) codes at the time of installation. Tanks and piping are inspected after any seismic event to ensure no damage or leaks have occurred. All tanks and piping are kept closed and/or locked when not in use.
Physical or Navigational Hazard	Landslides	Due to climate, topography, and other factors (such as potential for earthquakes), landslides may potentially occur.	Tanks and piping are inspected after any landslide event to ensure no damage or leaks have occurred. Tanks and piping are kept closed and/or locked when not in use.
Traffic Patterns	Vessel traffic patterns	Vessel impacts to the dock at or near marine headers.	Valving at marine header would be immediately closed.
Other Site Specific Factor	Vandalism / Sabatoge	Inherent potential for vandalism and/or sabotage exists as a marine facility.	Security and surveillance measures are in place at the facility. Refer to Section 2.1.4.
Other Site Specific Factor	Permafrost / Frost Heaves	Permafrost exists in areas where the winter freezing depth exceeds the depth of summer thawing.	During the spring and summer thaw, the ground below the length of the pipeline is closely monitored to ensure no significant frost heaving takes place, and if so, action is taken to prevent excessive stress on the pipeline.
Other Site Specific Factor	Avalanches	Avalanches are of special in concern in Juneau. The facility is not located within a mapped avalanche hazard zone, but it is located approximately 400 feet south of an area zoned as Avalanche Moderate Hazard – Zone B (City and Borough of Juneau 2004).	The State of Alaska Department of Transportation conducts avalanche control via explosions to mitigate the risk in the area near the Juneau Bulk Facility along Thane Road (City and Borough of Juneau 2009).

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## 2.5 Discharge Detection

### 18 AAC 75.450(b)(5)

The following existing means of discharge detection apply to this facility:

- Normal business hours: operational personnel visually monitor the facility
- Monthly: formal inspections of key facility infrastructure (tanks and piping) that include specific line items for discharge detection
- Prior to product receipt via any means: transfer equipment is visually inspected
- During product receipt via barge: at least two operational personnel are onsite with at least one of them stationed at the tank farm

In addition, each AST is elevated above grade, which allows for visual assessment of leaks from the tank bottom, and equipped with overfill protection and a liquid level gauge.

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## 3 Supplemental Information

### 18 AAC 75.451(a)

The Supplemental Information which comprises Section 3 of this plan is designed to provide the background and verification of information identified in 18 AAC 75.451(b) through 18 AAC 75.451(m). In some cases as noted on the Cross Reference Table, the information required by 18 AAC 75.451(b) through 18 AAC 75.451(m) has been located elsewhere in the plan for ease of use and to avoid unnecessary duplication.

### 3.1 Receiving Environment

#### 18 AAC 75.451(c)

This section contains the analysis of the amount and location of oil from the RPS, which might realistically be expected to reach open water within the applicable time limit. This analysis cross references the site drainage diagram, contained in the Section 1.7 (Figure 1-3), the response scenario<sup>22</sup>, and the facility's adjusted RPS, which is presented in Section 5.

The RPS assumes a catastrophic failure of Tank 6 and the associated secondary containment area. In this case, the most likely route to open water would be southwest of the facility, according to Google Maps.

The relative location of Tank 6 to Gastineau Channel is as follows:


Straight Line Distance	845 feet <sup>23</sup>
Elevation Distance	50feet <sup>24</sup>
Approximate Gradient	5.92%

The soil in the area is manmade fill (mine dump [Holocene]) according to the surficial geologic map of the Juneau urban area and vicinity, Alaska (U.S. Geological Survey, 1975).

<sup>22</sup> 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.

<sup>23</sup> Derived from Google Map measurement

<sup>24</sup> Derived from Alaska Department of Natural Resources (ADNR) mapping for 50 ft. contour lines

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Released product is anticipated to pool in low spots and follow the topography of the land. A portion of the released product will be absorbed into the vegetation and soil.

Taking into account the relative location of the tank, soil type, low spots, and level of vegetation, it is estimated that no more than 30% of the adjusted RPS could reach open water.

A mathematical depiction of how DW derived this estimate is presented in Table 3-1.

DW's initial action steps focus on initial containment and control as close as possible to the source to prevent a discharge from entering open water. Probable actions that may be taken are described in the response scenario<sup>25</sup>.


The response equipment required by 18 AAC 75.451(g) is presented in the response scenarios. As shown in the response scenario, the response equipment required has been determined to be sufficient to clean up the RPS discharge volume that is anticipated to enter open water within the applicable time limit.

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<sup>25</sup> <sup>25</sup> 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.

Table 3-1: Percentage of Adj RPS Remaining on Land

Category	Percentage of RPS	Comments / Rationale
Absorption	50	Based on distance and soil type
Pooling	20	Based on topography and limited areas that are topographically lower and would pool water; based on the drainages downgradient of the facility, there is little opportunity for pooling, although some may occur based on the exact flow path
Total	70	

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## 3.2 Command System

### 18 AAC 75.451(d)


DW intends to utilize the ICS, which is part of the National Incident Management System (NIMS). NIMS provides a consistent nationwide framework and approach to enable government at all levels, the private sector, and non-governmental organizations to work together to prepare for, prevent, respond to, recover from, and/or mitigate the effects of emergency incidents/events. The ICS integrates a combination of facilities, equipment, personnel, procedures, and communications operating within a common organization structure. The structure is flexible and scalable to meet the level of incident complexity (NIMS, 2017). Key parts of the ICS include:

IMTs	Rostered groups of ICS-qualified personnel
ICS Forms	Templated forms to document all aspects/stages of the incident response
The Operational Planning Period Cycle (Planning P)	A systematic cycle outlines the steps and sequence of which to execute them

With responses that involve multi-agency or multi-jurisdictional approaches, the incident command leadership may form into a Unified Command (UC) verses having a single IC. The UC is a structure that brings together ICs of the major organizations involved to coordinate an effective response and allow each organization to carry out their own jurisdictional, legal, and functional responsibilities. For example, a UC for an oil spill in Alaska may include the Responsible Party's IC, the State on Scene Commander, and the Federal on Scene Commander.

Incidents are categorized based on their complexity based on factors such as duration, resource requirements, etc., on a scale from one (1) to five (5) with type one (1) representing the most complex. Since not all incidents require standing up an IMT/SMT, DW utilizes incident typing to assist in determining if IMT/SMT standup is warranted for each incident. This assessment is typically completed as a mental exercise by DW's QI in consultation with others within the organization, as needed.



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An ICS diagram (Figure 3-1) is provided at the end of this section (3.2). As required, DW is prepared to fill the following functions: command staff (IC, liaison officer, public information officer, and safety officer), financial, operations, planning, logistics, and environmental<sup>26</sup>.

For DW, the goal of incident response operations is the restoration of normal operations as soon as feasible, while minimizing impacts to people, property, and the environment. As such, DW recognizes the need to organize initial oil spill response management in a manner that allows for efficient ramping up of response activity if the size or complexity dictates. DW envisions using a two-phase approach, as shown below.

Emergency Phase	Utilizes primarily local DW personnel relying on the QI and IOSC supported by facility spill response personnel. Expected to manage an incident until relieved; typically the first 8 to 12 hours.
Response Phase	Includes all of the above, but transitions from IOSC to designated IC. May include the standup of additional ICS command and general staff positions, as needed, which may include a combination of DW personnel, parent company personnel, and/or contacted personnel <sup>27</sup> . Assume control of the incident upon arrival; typically from hour 8 to 12, but not to exceed 24 hours.

Detailed personnel contact information for DW's designated QIs is provided in Table 1-1 (Section 1.2).

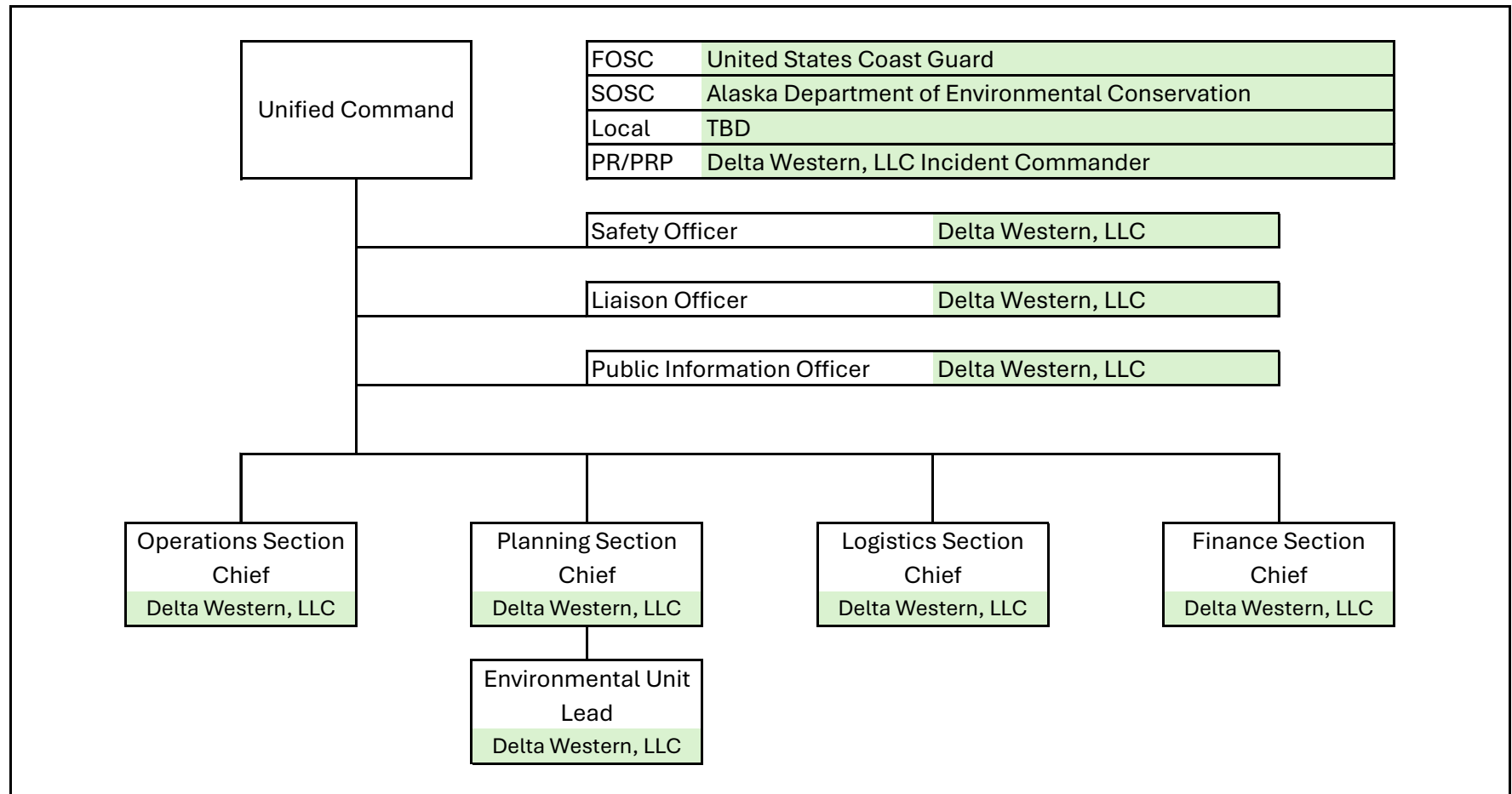
The names and detailed contact information for persons filling positions in DW's ICS is maintained in a separate document<sup>28</sup>, as allowed by 18 AAC 75.451(d). This document is incorporated by reference here and was submitted in conjunction with the original plan application package. However, as allowed by 18 AAC 75.451(d), this document is maintained as confidential and not available for public review. DW has committed to maintain and update this document in real time and provide updates to the Department at least once a quarter, if changes occur.


<sup>26</sup> Environmental falls under the Planning Section and will be fulfilled by the Planning Section Chief, unless a designed Environmental Unit Leader is activated; if an Environmental Unit Leader is activated, they will work under the general direction of the Planning Section Chief.

<sup>27</sup> Contracted personnel may integrate into the ICS at the request of DW with specific ICS roles filled by OSRO/PRAC, IMT/SMT providers, and/or other contractors dependent upon the size and complexity of the incident. DW does not anticipate relinquishing control of the management of a response, but rather maintains the right supplement their IMT/SMT as needed.

<sup>28</sup> This document is titled: YYYY\_MM\_XXX - 18 AAC 75.451(d) ICS Names & Detailed Contact Information where YYYY represents the year and MM represents the month in which the document was printed.

# Organizational Chart



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### 3.3 Realistic Maximum Response Operating Limitation Summary

#### 18 AAC 75.451(e)

Juneau has a subarctic oceanic climate. The coldest month of the year is January with an average high of 33°F and an average low of 25°F while the warmest month of the year is July with an average high of 64°F and an average low of 51°F. The average annual precipitation is 62.27 inches with September receiving the most rain at an average of 8.64 inches, and with April receiving the least rain at an average of 2.94 inches (Weather Spark 2025). The wind speed varies by month with December being the windiest month at an average wind speed of 9.30 knots and July being the calmest month at an average wind speed of 4.08 knots. Juneau has two predominant wind directions, from the south and east. (Weather Spark, 2025)


Table 3-2 describes the realistic maximum response operating limitations, including severe weather and environmental limitations, that might be encountered at the facility and contains the analysis of the frequency and duration of limitations that would render mechanical response methods ineffective<sup>29</sup>. The estimate provided in Table 3-2 was derived using a 5-year compilation of the Juneau International Airport weather station max windspeed records (Weather Underground, 2025). The data set was converted from miles per hour to knots and days affected by maximum windspeeds of greater than 20 knots were summed and divided by 5 to reach an annual estimate.

The table also includes additional specific temporary prevention or response measures that may be taken to reduce the environmental consequences of a discharge. DW does not propose nonmechanical response.

<sup>29</sup> This analysis accounts for environmental and safety considerations and is expressed as a percentage of time.

## Table 3-2: Realistic Max Response Operating Limits

Condition Type	Environmental Condition Precluding Response	Estimated Number of Days Affected per Year	Estimated Amount of Year Affected (Percentage)	Temporary Prevention or Response Measures	Discussion
Wind	Greater than 20 knots	51	14%	Cease fueling activities during extreme winds.	
Visibility	Less than 1/4 mile	5	1%	Additional employees during transfers. Focus response efforts on land based recovery.	
Precipitation	Heavy; greater than 0.30 inches per hour	1	0%	Adapt as necessary to prevent spills. Maintain vigilance as spills are more difficult to detect during periods of heavy precipitation.	While Juneau receives a lot of rainfall, it is rare to have heavy precipitation for an extended period with no ebbs in intensity.
Temperature	Below -20 degrees Fahrenheit with wind chill	0	0%	N/A	
Sea States	Greater than Beaufort scale 3	15	4%	Cease fuel transfers at dock when conditions are unsafe and secure valves. Focus response efforts on land based recovery.	Many skimmers require less than 3 ft waves to operate. While there are some available skimmers that can operate during larger swell, safe deployment and vessel operation may be an additional concern.
Tides	Extreme low or high; storm tides	0	0%	N/A	Response effectiveness is likely to be diminished during times of extreme tides but unless other factors (such as wind) are happening concurrently, the extreme tides alone would not preclude mechanical response for an extended period.
Currents	Greater than 1 knot	0	0%	Cease fuel transfers at dock when conditions are unsafe and secure valves. Focus response efforts on land based recovery.	Response effectiveness is likely to be diminished during times of extreme currents, but as nearshore currents are most likely to be affected by wind and tide, the combined effect of wind and tide on the current would be considered.
Hours of Daylight	Winter - 17 hours of darkness Spring - 12 hours of darkness Summer - 7 hours of darkness Fall - 12 hours of darkness	0	0%	N/A	Response efforts are likely to be halted during the night as water operations can be dangerous in the dark. All days of the year have some level of light.
Other Conditions	Extreme ice and debris	0	0%	N/A	Response efforts are likely to be halted or diminished during times of extreme ice or debris. However, this is unlikely to occur at this latitude.

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### 3.4 Logistical Support

#### 18 AAC 75.451(f)

DW has identified aircraft, vessels, and other means that may be used to transport equipment and personnel during a discharge response. This information, including ownership and availability, is presented on Table 3-3.

# Table 3-3: Logistical Support

Resource Type	Company Name	Availability	City	Phone	Website	Additional Details
Air Transportation & Services	Coastal Helicopters	Commercially Available	Juneau	907-789-5610	<a href="https://www.coastalhelicopters.com/">https://www.coastalhelicopters.com/</a>	
Air Transportation & Services	Alaska Airlines	Commercially Available	Anchorage	1-800-252-7522	<a href="http://www.alaskaair.com">www.alaskaair.com</a>	
Air Transportation & Services	Lynden Air Cargo	Commercially Available	Anchorage	907-243-7248	<a href="https://www.lynden.com/lac/index.html">https://www.lynden.com/lac/index.html</a>	
Air Transportation & Services	Grant Aviation	Commercially Available	Anchorage	907-644-4307	<a href="https://www.flygrant.com/">https://www.flygrant.com/</a>	
Air Transportation & Services	Northern Air Cargo	Commercially Available	Anchorage	1-800-727-2141	<a href="https://www.nac.aero/">https://www.nac.aero/</a>	
Air Transportation & Services	Alaska Seaplanes	Commercially Available	Juneau	907-789-3331		
Contractors	Channel Construction	Commercially Available	Juneau	907-789-0200	<a href="https://www.acsalaska.net/~akaconsuelo/channel.html">https://www.acsalaska.net/~akaconsuelo/channel.html</a>	
Contractors	Gastineau Contractors	Commercially Available	Juneau	907-789-7437		
Ground Transportation	Lynden Transportation	Commercially Available	Juneau	907-586-6600		
Ground Transportation	Simpson and Son Trucking	Commercially Available	Juneau	907-789-6356		
Lodging	Aspen Suites Hotel	Commercially Available	Juneau	907-500-7700		
Lodging	Ramada by Wyndham Juneau	Commercially Available	Juneau	907-228-3476		
Lodging	Four Points by Sheraton	Commercially Available	Juneau	907-586-6900		
Marine Transportation & Services	Kirby Transportation (tugs, barges)	Commercially Available	Statewide	206-443-9418	<a href="https://kirbycorp.com/marine-transportation/offshore-">https://kirbycorp.com/marine-transportation/offshore-</a>	
Marine Transportation & Services	Alaska Marine Highway	Commercially Available	Statewide	1-800-642-0066		
Marine Transportation & Services	Amak Towing	Commercially Available	Ketchikan	907-225-8847	<a href="https://amaktowing.com/">https://amaktowing.com/</a>	
Marine Transportation & Services	Anderson Tug and Barge	Commercially Available	Seward	907-224-5506	<a href="https://www.andersontug.com/">https://www.andersontug.com/</a>	
Marine Transportation & Services	Lynden Barge Service to Alaska	Commercially Available	Statewide	1-800-326-8346	<a href="https://www.lynden.com/aml/index.html">https://www.lynden.com/aml/index.html</a>	
Marine Transportation & Services	Crowley Marine Services (terminals,	Commercially Available	Statewide	907-777-5505	<a href="http://www.crowley.com">www.crowley.com</a>	
Marine Transportation & Services	Samson Tug & Barge Co.	Commercially Available	Statewide	1-800-331-3522	<a href="http://www.samson tug.com">www.samson tug.com</a>	

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### 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<sup>30</sup> 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<sup>31</sup>.

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.

<sup>30</sup> 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.

<sup>31</sup> 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.

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### 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)<sup>32</sup>; demonstration of this can be seen in the response scenario<sup>33</sup>.

<sup>32</sup> Information regarding calculations for recovery capacity is included in Section 1.9 of the Response Scenario.

<sup>33</sup> 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.



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### 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 Ketchikan, Alaska 99901
Telephone Number	907-225-7002
Affiliation by Company	Same as name above
Description of Response Equipment and Services Provided	PRAC/OSRO <a href="https://seapro.org/">https://seapro.org/</a>

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



## Southeast Alaska Petroleum Response Organization, Inc.

540 Water Street, Suite 201 Ketchikan, Alaska 99901

(907) 225-7002 Fax (907) 247-1117

[www.seapro.org](http://www.seapro.org)

As required by Alaska Statute and Regulations in fulfillment of a requirement for registration as a Primary Response Action Contractor and for approval of an Oil Discharge and Contingency Plan.

PLAN TITLE: Oil Discharge Prevention and Contingency Plan and/or Facility Response Plan

PLAN HOLDER: Delta Western, LLC

This statement is a certification to Alaska Department of Environmental Conservation summarizing the contract between Delta Western, LLC, the oil discharge and contingency plan holder, (hereinafter "PLAN HOLDER"), and Southeast Alaska Petroleum Response Organization, Inc., (SEAPRO), the Primary Response Action Contractor, (hereinafter "CONTRACTOR"), executed on December 20, 2018, the original of which is located at 540 Water Street, Ketchikan, Alaska, as evidence of the PLAN HOLDER's access to the containment, control and /or cleanup resources required under standards at AS 46.04.030 and 18 AAC 75.400 - 18 AAC 75.495. PLAN HOLDER and CONTRACTOR attest to the Department that the provisions of this written contract clearly obligate CONTRACTOR to:

- (A) provide the response services and equipment listed for the CONTRACTOR in the contingency plan;
- (B) respond if a discharge occurs;
- (C) notify the PLAN HOLDER immediately if the CONTRACTOR cannot carry out the response actions specified in this contract or the contingency plan;
- (D) given written notice at least 30 days before terminating this contract with the PLAN HOLDER;
- (E) respond to a Department conducted discharge exercise required of the PLAN HOLDER;
- (F) continuously maintain in a state of readiness, in accordance with industry standards, the equipment and other spill response resources to be provided by the CONTRACTOR under the contingency plan.

I hereby certify that, as the representative of the PLAN HOLDER, I have the legal authority to bind the PLAN HOLDER in this matter. I am aware that false statements, representations, or certifications may be punishable as civil or criminal violations of law.

Date January 6, 2020

Print Name Christina Bentz

Title Environmental Manager

Signature

For: Delta Western, LLC  
Plan Holder

I hereby certify that, as the representative of the CONTRACTOR, I have the legal authority to bind the CONTRACTOR in this matter. I am aware that false statements, representations, or certifications may be punishable as civil or criminal violations of law.

Date January 6, 2020

Print Name David Owings


Title General Manager

Signature

**Dave Owings**

Digitally signed by Dave Owings  
DN: cn=Dave Owings, o=SEAPRO, ou=General  
Manager, email=dave@seapro.org, c=US  
Date: 2020.01.06 13:22:19 -09'00'

For: Southeast Alaska Petroleum Response Organization, Inc.  
CONTRACTOR

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### 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<sup>34</sup> 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.

<sup>34</sup>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.

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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<sup>35</sup>.

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<sup>35</sup>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).

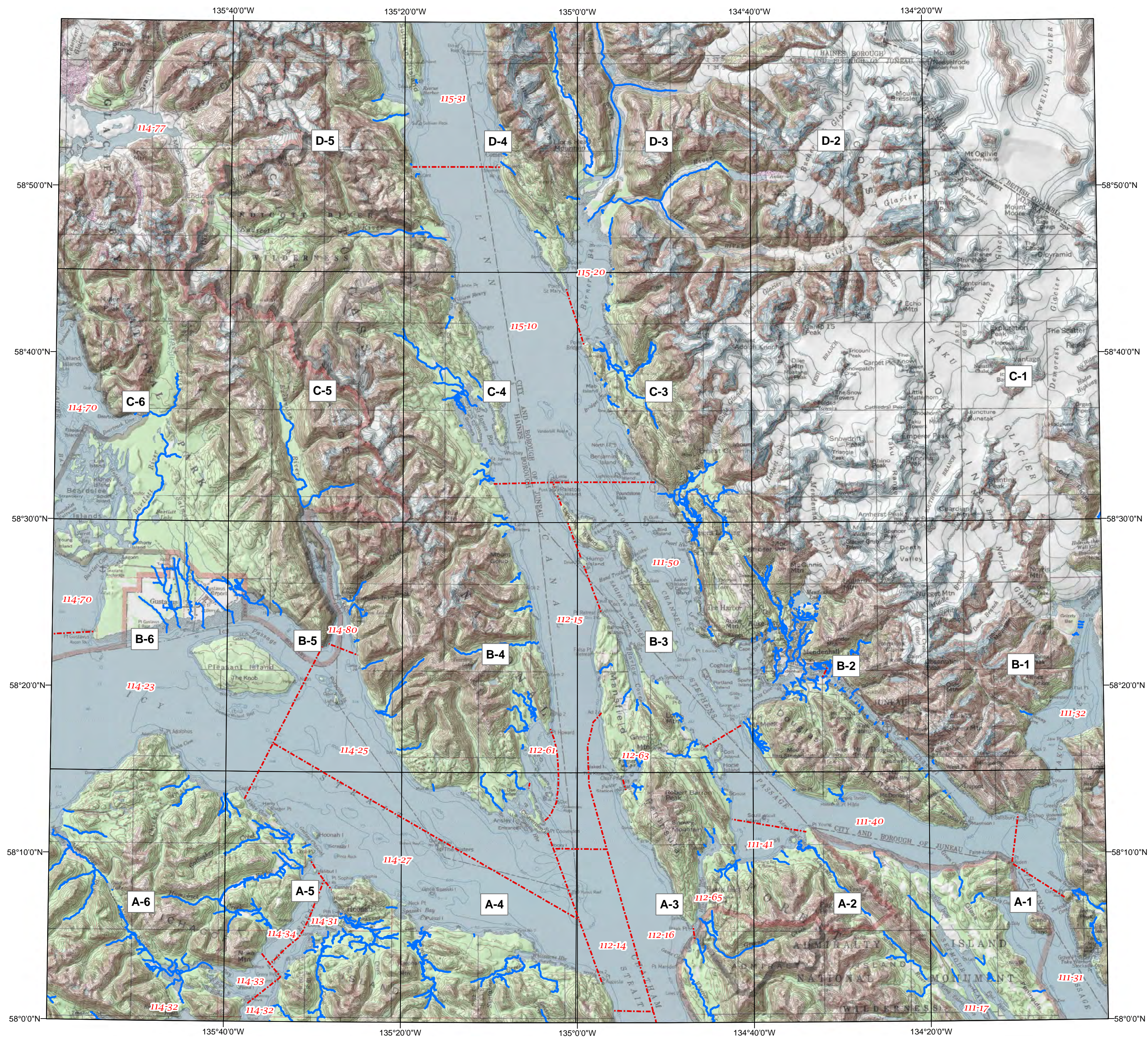
Table 3-4: Potential Areas of Concern

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 3-5: Anadromous Streams & Species

Stream Name	AWC Stream Code	Species Present	Species Spawning/Rearing
Snowslide Creek	111-40-10240		Coho
Salmon Creek	111-40-10150	Pink Dolly Varden	Coho Chinook
Lawson Creek	111-40-10890	Pink Chum Dolly Varden	
Kowee Creek	111-40-10900		Pink Chum
Gold Creek	111-40-10910	Pink Chum	
Grant Creek	111-40-10200	Coho	
Eagle Creek	111-40-10920	Chum Coho Dolly Varden	
Falls Creek	111-40-10940	Dolly Varden	
Neilson Creek	111-40-10960	Dolly Varden	Coho
Sheep Creek	111-40-10860	Pink Chum	
Ready Bullion Creek	111-40-10860	Pink	
Bullion Creek	111-40-10850		Pink





Anadromous Streams  
AWC Stat Area  
Regional Boundary  
1:63360 Quadrangle Boundary

Labeled Quadrangles indicate quadrangles that contain AWC information.  
Waters Important to Anadromous Fish are listed pursuant to AS 16.05.871.  
Specified species distribution and life functions reflect known data. Actual distribution and use may extend beyond specified limits. Migration upstream and/or downstream is assumed for specified stream reaches.



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Quad No. 011  
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Table 3-6: Product Toxicity Summary

Site	Product Type	Toxicity	Degradability	Dispersibility
Juneau Bulk Facility	#1 & #2 Diesel	High	High	High
Juneau Bulk Facility	Gasoline	High	High	High
Juneau Bulk Facility	Jet Fuel	High	High	High



JUNEAU-TAKU RIVER – Sensitive Biological Resources

BIOLOGICAL RESOURCES:

BIRD:

Species	S	F	Conc.	J	F	M	A	M	J	J	A	S	O	N	D	Nesting	Migrating	Molting
	-	-		-	-	-	-	-	-	-	-	-	-	-	-			
Gulls							X	X	X	X	X	X				APR-SEP	-	-
Shorebirds							X	X			X	X	X			-	-	-
Waterfowl				X	X	X	X	X	X	X	X	X	X	X	X	APR-AUG	-	-

FISH:

Species	S	F	Conc.	J	F	M	A	M	J	J	A	S	O	N	D	Spawning	Eggs	Larvae	Juveniles	Adults
	-	-		-	-	-	-	-	-	-	-	-	-	-	-					
Chinook salmon						X	X	X	X	X	X	X	X	X		-	MAR-SEP	-	-	-
Chum salmon (dog)						X	X	X	X	X	X	X	X	X	X	AUG-DEC	MAR-SEP	-	-	-
Coho salmon (silver)						X	X	X	X	X	X	X	X	X		-	MAR-SEP	-	-	-
Eulachon						X	X	X								MAR-MAY	-	-	-	-
Pacific herring						X	X	X								MAR-MAY	-	-	-	-
Sockeye salmon (red)						X	X	X	X	X	X	X	X	X		-	MAR-SEP	-	-	-

MARINE MAMMAL:

Species	S	F	Conc.	J	F	M	A	M	J	J	A	S	O	N	D	Mating	Calving	Molting	Pupping
	-	-		-	-	-	-	-	-	-	-	-	-	-	-				
Harbor seal				X	X	X	X	X	X	X	X	X	X	X	X	-	-	AUG-SEP	MAY-JUN
Steller (Northern) sea lion		T	HIGH	X	X	X	X	X	X	X	X	X	X	X	X	-	-	-	-

TERRESTRIAL MAMMAL:

Species	S	F	Conc.	J	F	M	A	M	J	J	A	S	O	N	D
	-	-		-	-	-	-	-	-	-	-	-	-	-	-
Black bear							X	X	X						
Brown bear							X	X	X						

JUNEAU-TAKU RIVER – Human-Use of Biological Resources

BIOLOGICAL RESOURCES:

FISH:

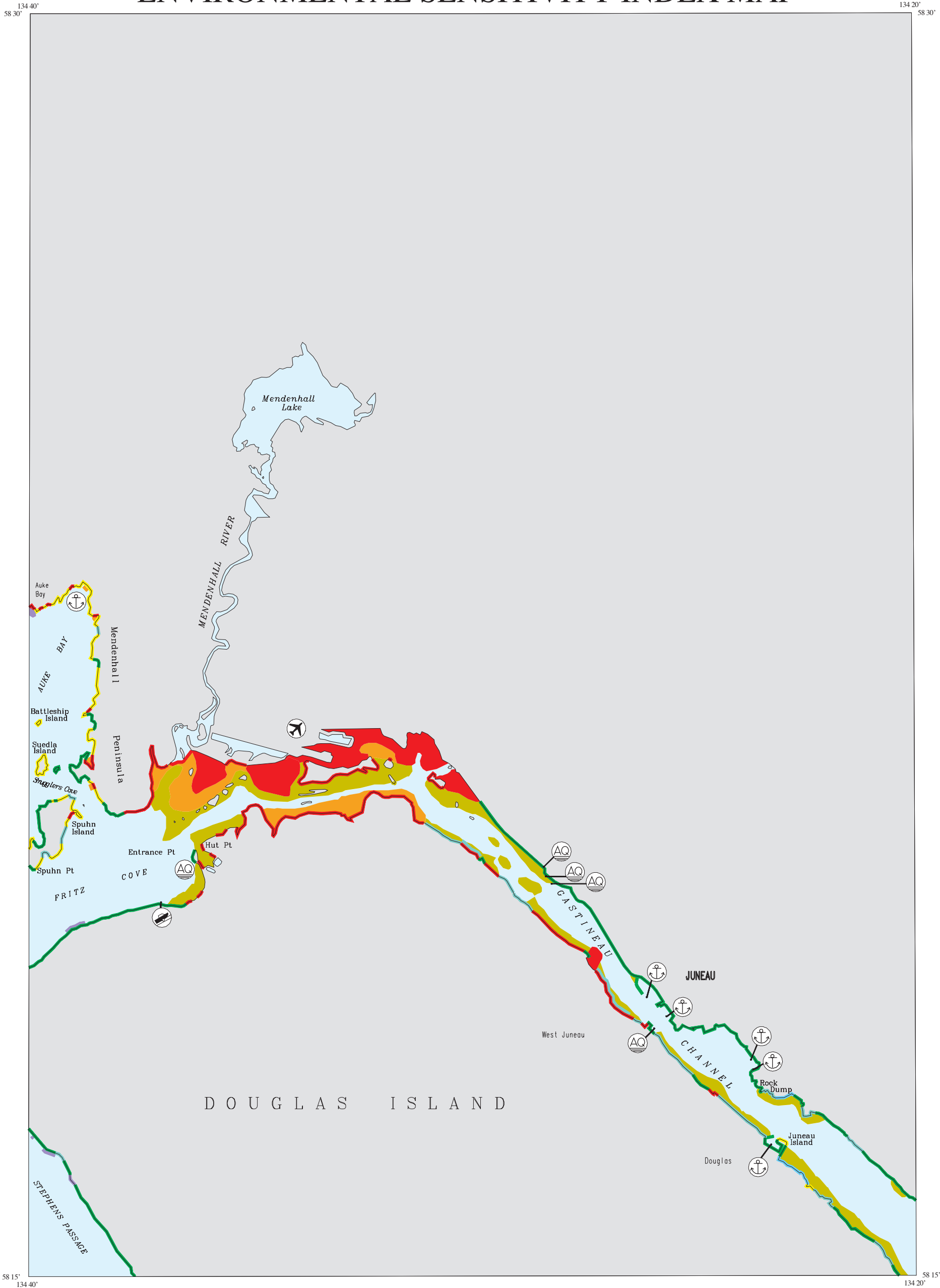
Species	S	F	Conc.	J	F	M	A	M	J	J	A	S	O	N	D	Spawning	Eggs	Larvae	Juveniles	Adults
	-	-		-	-	-	-	-	-	-	-	-	-	-	-					
Coastal Cutthroat trout				X	X	X	X						X	X	X	-	-	-	-	-
Pacific cod			Y	X	X	X	X	X	X	X	X	X	X	X	X	-	-	-	-	-
Pacific halibut																-	-	-	-	-
Pacific herring																-	-	-	-	-
Pollock			Y	X	X	X	X	X	X	X	X	X	X	X	X	-	-	-	-	-
Rainbow trout (steelhead)								X	X	X	X	X	X			-	-	-	-	-
Sablefish (blackcod)			Y	X	X	X	X	X	X	X	X	X	X	X	X	-	-	-	-	-
Salmon			HIGH													-	-	-	-	-

INVERTEBRATE

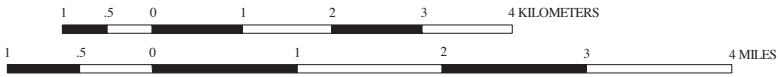
Species	S	F	Conc.	J	F	M	A	M	J	J	A	S	O	N	D	Spawning	Eggs	Larvae	Juveniles	Adults
	-	-		-	-	-	-	-	-	-	-	-	-	-	-					
Abalone				X	X	X	X	X	X	X	X	X	X	X	X	-	-	-	-	-
Dock shrimp				X	X	X	X	X	X	X	X	X	X	X	X	JUL-MAR	OCT-AUG	-	-	-
Dungeness crab				X	X	X	X	X	X	X	X	X	X	X	X	AUG-OCT	OCT-JUN	-	-	-
Geoduck				X	X	X	X	X	X	X	X	X	X	X	X	-	JUN-OCT	-	-	-
Golden king crab				X	X	X	X	X	X	X	X	X	X	X	X	AUG-OCT	OCT-JUN	-	-	-
Humpy shrimp				X	X	X	X	X	X	X	X	X	X	X	X	JUL-MAR	OCT-AUG	-	-	-
Ocean pink shrimp				X	X	X	X	X	X	X	X	X	X	X	X	JUL-MAR	JAN-DEC	-	-	-
Red king crab				X	X	X	X	X	X	X	X	X	X	X	X	AUG-OCT	OCT-JUN	-	-	-
Red sea urchin				X	X	X	X	X	X	X	X	X	X	X	X	-	-	-	-	-
Red sea urchin			HIGH	X	X	X	X	X	X	X	X	X	X	X	X	-	-	-	-	-
Spiny scallop				X	X	X	X	X	X	X	X	X	X	X	X	-	JUN-OCT	-	-	-
Spot shrimp				X	X	X	X	X	X	X	X	X	X	X	X	JUL-MAR	OCT-AUG	-	-	-
Tanner crab				X	X	X	X	X	X	X	X	X	X	X	X	AUG-OCT	OCT-JUN	-	-	-

Biological information shown on the maps represents known concentration areas or occurrences, but does not necessarily represent the full distribution or range of each species. This is particularly important to recognize when considering potential impacts to protected species.

# ENVIRONMENTAL SENSITIVITY INDEX MAP



SCALE 1:84000



JUNEAU  
B-2

PUBLISHED: DECEMBER 1992



## SHORELINE HABITATS DESCRIPTIONS

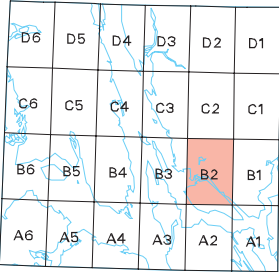
- 1. EXPOSED ROCKY SHORE
- 2. EXPOSED WAVE-CUT PLATFORMS
- 4. SAND BEACHES
- 5. MIXED SAND AND GRAVEL BEACHES
- 6A. GRAVEL BEACHES (GRANULES TO COBBLES)
- 6B. GRAVEL BEACHES (COBBLES TO BOULDERS)
- 7. EXPOSED TIDAL FLATS
- 8A. SHELTERED, IMPERMEABLE ROCKY SHORES
- 8B. SHELTERED, PERMEABLE ROCKY SHORES
- 9. SHELTERED TIDAL FLATS
- 10. INTERTIDAL MARSHES


## HUMAN-USE FEATURES

- MARINA
- BOAT RAMP
- AQUACULTURE
- AIRPORT
- LOG STORAGE AREA



## JUNEAU



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### 3.10 List of Resources for Greatest Possible Discharge

#### 18 AAC 75.451(l)

Resources available to DW are listed throughout this plan. In the event of GPD, DW may also look to the following sources for additional resources, as needed<sup>36</sup>:

- ADEC spill response equipment staged across Alaska
- Contractors, cooperative groups, and equipment providers within the local community that do not have a PRAC/OSRO designation
- Resources of other PRAC/OSROs outside the one(s) listed in this plan for whom DW has existing contracts

Review information presented in Section 1.8 for additional discussion.

### 3.11 Additional Information


#### 18 AAC 75.451(m)

The following resources were utilized in the development of this plan:

#### State of Alaska Resources:

Alaska Regional Contingency Plan	<a href="https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/regional-contingency-plan/">https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/regional-contingency-plan/</a>
ADEC Spill Tactics for Alaska Responders Manual (ADEC, 2014)	<a href="https://dec.alaska.gov/spar/ppr/response-resources/star-manual/">https://dec.alaska.gov/spar/ppr/response-resources/star-manual/</a>
ADEC Spill Response Permits and Tools Page	<a href="https://dec.alaska.gov/spar/ppr/response-resources/permits-tool/">https://dec.alaska.gov/spar/ppr/response-resources/permits-tool/</a>
Area Plan References and Tools	<a href="https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/tools/">https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/tools/</a>
Report a Spill	<a href="https://dec.alaska.gov/spar/ppr/spill-information/reporting">https://dec.alaska.gov/spar/ppr/spill-information/reporting</a>

<sup>36</sup> Note: this is not an exhaustive list of potential sources for additional resources, as that list would be extensive, but rather those that are most likely to be mobilized and which can be easily listed.


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## PRAC/OSRO Technical Manuals:


SEAPRO	<a href="https://www.seapro.org/techMan/SEAPRO_TechManHome.html">https://www.seapro.org/techMan/SEAPRO_TechManHome.html</a>
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## 3.12 Bibliography

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ADNR, 2025	50 ft. contours for the state of Alaska <a href="https://www.arcgis.com/apps/mapviewer/index.html?layers=a2030b55e5d949c6b47e44cc4f3bef9b">https://www.arcgis.com/apps/mapviewer/index.html?layers=a2030b55e5d949c6b47e44cc4f3bef9b</a> [accessed July 23, 2025]
ADNR, 2024	Fact Sheet: Generally Allowed Uses <a href="https://dnr.alaska.gov/mlw/cdn/pdf/factsheets/generally-allowed-uses.pdf">https://dnr.alaska.gov/mlw/cdn/pdf/factsheets/generally-allowed-uses.pdf</a> [accessed August 8, 2025]

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NIMS, 2017	National Incident Management System, Third Edition, October 2017, FEMA. 106 p
NOAA, 2001	ESI Index Map <a href="https://response.restoration.noaa.gov/esi_download#Alaska">https://response.restoration.noaa.gov/esi_download#Alaska</a> [accessed August 22, 2025]
National Weather Service (NWS), 2025	Beaufort Scale- printable <a href="https://www.weather.gov/pqr/beaufort">https://www.weather.gov/pqr/beaufort</a> [accessed August 21, 2025]
Weather Underground, 2025	Juneau International Airport Station, historical data <a href="https://www.wunderground.com/history/daily/us/ak/juneau/PAJN">https://www.wunderground.com/history/daily/us/ak/juneau/PAJN</a> [accessed August 20, 2025]
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## 4 Best Available Technology Review

### 18 AAC 75.452(a), 18 AAC 75.452(b), 18 AAC 75.452(c), 18 AAC 75.452(d)


This section of the plan constitutes the BAT analysis required under 18 AAC 75.452. For ease of review, the sections of 18 AAC 75.452 are presented here along with a statement or reference regarding applicability.

#### 18 AAC 75.452

Citation	Description	Reference
(a)(1)	All plans	
(a)(1)(A)	Communications	See Table 4-1
(a)(1)(B)	Source control	See Table 4-2
(a)(1)(C)	Trajectory analyses and forecasts	See Table 4-3
(a)(1)(D)	Wildlife capture, treatment, and release	See Table 4-4
(a)(2)	Oil terminal, crude oil transmission pipeline, and exploration or production facility plans	
(a)(2)(A)	Tank leak detection system	See Table 4-5
(a)(2)(B)	Another leak detection system	Not Applicable
(a)(2)(C)	Means of immediately determining liquid level	See Table 4-6
(a)(2)(D)	Oil terminal protective coating	See Table 4-7
(a)(3)	Tank vessel plans	Not Applicable
(a)(4)	Crude oil transmission pipeline plan	Not Applicable
(a)(5)	Barge plans	Not Applicable


All BAT analysis tables follow the same format presenting the following information shown on the following page from left to right. Where two questions or criteria appeared in the same regulatory section, two columns were provided to more effectively demonstrate completion of the BAT analysis. For example, 18 AAC 75.452(c)(3)(A) requires evaluation of (1) if the technology is the best in use in other similar situations **and** (2) is available for use by the applicant. As such, these two criteria are presented separately, but together comprise a comprehensive evaluation to meet the requirements set forth in 18 AAC 75.452(c)(3)(A).

Each applicable BAT analysis table can be found in the corresponding section.

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Heading	Description
Primary	Name of technology being evaluated
Description	Narrative description of technology being evaluated including any key facts
Type	Denotes whether the technology is an existing method or alternative method <sup>37</sup>
Regulatory Evaluation Criteria	The applicable regulatory criteria the technology is being evaluated against; refers to 18 AAC 75.452(c)...
(3)(A) – Best in use in other similar situations?	Identifies whether the technology is the best in use in other similar situations; typically a ‘yes’ or ‘no’ answer with a brief explanation [Part 1 of 2 with respect to 18 AAC 75.452(c)(3)(A)]
(3)(A) – Available for use by DW?	Identifies if the technology is available for use by DW; typically a ‘yes’ or ‘no’ answer with a brief explanation surrounding if it is currently owned or used by DW [Part 2 of 2 with respect to 18 AAC 75.452(c)(3)(A)]
(3)(B) – Provides increases spill protection?	Identifies if the technology is expected to provide increases spill protection; provided as a ‘yes’ or ‘no’ answer [Part 1 of 2 with respect to 18 AAC 75.452(c)(3)(B)]
(3)(B) – Offers other environmental benefits?	Identifies if the technology is expected to provide or other environmental benefits [Part 2 of 2 with respect to 18 AAC 75.452(c)(3)(B)]
(3)(C) – Cost to achieve BAT?	Identified the cost to achieve BAT; typically presented as a narrative description of value ranging from free to moderate to high; may be presented as variable if insufficient information is available to evaluate or if it varies. In cases where DW already owns or operates the technology and it is considered BAT, the response is simply ‘N/A’ to indicate not applicable
(3)(D) – Age?	Identifies the condition of the technology in use by the applicant; only applicable to existing methods; all alternatives are denoted as ‘N/A’ to indicate not applicable [Part 1 of 2 with respect to 18 AAC 75.452(c)(3)(D)]

<sup>37</sup> In this case, an existing method is considered a technology that is in use or utilized by DW whereas an alternative method is not in use or utilized by DW. In some cases more than one method is currently in use/utilized by DW. The number of technologies will vary by type.


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(3)(D) – Condition?	Identifies the age of the technology in use by the applicant; only applicable to existing methods; all alternatives are denoted as ‘N/A’ to indicate not applicable  [Part 1 of 2 with respect to 18 AAC 75.452(c)(3)(D)]
(3)(E) – Practical feasibility?	Identifies the practical feasibility of the technology with respect to engineering and other operational aspects; typically ‘yes’ for all technologies currently in use by DW and ‘yes’, ‘no’, or ‘maybe’ with brief explanation for those that are not
BAT	Check box field where a check mark indicates the technology is considered BAT

In all cases, under the evaluation required by 18 AAC 75.452(c)(3)(F), regarding environmental impacts of technology related to the benefits, there was no significant difference and therefore this information has been intentionally excluded from the tables.

For each applicable technology category a brief statement is also included under each subheading.



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## 4.1 BAT Analysis - Communications

VHF radios and cell phones are considered BAT within the oil industry. Both are currently owned and in use by DW at the Juneau Bulk Facility.

The full BAT analysis, following the layout described in Section 4, is provided in Table 4-1 on the following page.

Table 4-1: BAT Analysis - Communications

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
VHF Radios + Cell Phones	Use of VHF handheld radios and cellular phones	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	5-10 years	Excellent - Fully operational, well-maintained, meets industry standards	Yes	<input checked="" type="checkbox"/>
OSRO/PRAC Equipment	Use of OSRO/PRAC VHF radios and satellite phones	Existing Method 2	Yes - Technology is readily available and widely used in the industry	Yes - DW owns and/or operates technology	Yes - Expected to increase spill prevention effectiveness	Yes	Variable - Depends on incident location & duration	N/A	Excellent - Fully operational, well-maintained, meets industry standards	Yes	<input type="checkbox"/>
Sophisticated Video Units	Use of video cameras with emergency response base unit	Alternate Method 1	Maybe - Would need substantial infrastructure upgrades	No - Technology is not used or unavailable	No - Not Available to DW	No	High - Cost of installation & maintenance	N/A	N/A	No - Cost prohibitive	<input type="checkbox"/>

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## 4.2 BAT Analysis – Source Control

Equipment shutdown by actions to stop flow, close valves, and isolate discharge are considered BAT. DW is currently capable of utilizing equipment shutdown along with two other methods (equipment repair and OSRO/PRAC response) to achieve source control.

The full BAT analysis, following the layout described in Section 4, is provided in Table 4-2 on the following page.

Table 4-2: BAT Analysis - Source Control

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
Equipment Shutdown	Actions to stop flow; shut valves; and isolate discharge	Existing Method 1	Yes - Technology is readily available and widely used in the industry	Yes - DW uses applicable actions	Yes - Expected to increase spill prevention effectiveness	Yes	N/A	N/A	Excellent - Fully operational, well-maintained, meets industry standards	Yes	<input checked="" type="checkbox"/>
Equipment Repair	Actions to patch pipes; tanks.	Existing Method 2	Yes - Technology is readily available and widely used in the industry	Yes - DW uses applicable actions	Yes - Expected to increase spill prevention effectiveness	Yes	Minimal	N/A	N/A	Yes - DW has a dedicated projects team	<input type="checkbox"/>
OSRO/PRAC Response	Initiate OSRO/PRAC Response	Existing Method 3	Yes - Technology is readily available and widely used in the industry	Yes - DW uses applicable actions	Yes - Expected to increase spill prevention effectiveness	Yes	Free	N/A	N/A	Yes - DW holds contracts	<input type="checkbox"/>
Electric Valves	Use of Electric Valves	Alternate Method 1	Yes - Technology is readily available and widely used in the industry	No - Technology is not used or unavailable	No - Effectiveness is outweighed by constraints	Maybe	High - Cost of installation & maintenance	N/A	N/A	No - Cost prohibitive	<input type="checkbox"/>

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### 4.3 BAT Analysis - Trajectories

Current technologies are readily available and used exclusively in oil spill response meeting BAT. While aerial tracking via helicopter was previously considered BAT, it has been overtaken by the use of drone technology as a much quicker and less expensive means of tracking.

The full BAT analysis, following the layout described in Section 4, is provided in Table 4-3 on the following page.

Table 4-3: BAT Analysis - Trajectories

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
Visual via boat/beach	Utilize boat/beach for visual tracking	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	5-10 years	Excellent - Fully operational, well-maintained, meets industry standards	Yes	<input checked="" type="checkbox"/>
Visual via helicopter	Utilize helicopter for visual tracking	Existing Method 2	Yes - Technology is available	Yes - DW owns and/or uses technology	Yes - Expected to increase spill prevention effectiveness	Yes	Moderate	N/A	N/A	Yes - Helicopters are readily available in the area	<input type="checkbox"/>
Visual via drone	Utilize drone for visual tracking	Existing Method 3	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	N/A	Excellent - Fully operational, well-maintained, meets industry standards	Yes	<input checked="" type="checkbox"/>
Spill Modeling Software	Utilize Spill Modeling Software	Existing Method 4	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	Free	N/A	N/A	Yes - Software is readily available	<input checked="" type="checkbox"/>

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#### 4.4 BAT Analysis - Wildlife


In all cases, the BAT for wildlife relies on the use of trained personnel and service providers. DW has access to wildlife response organizations through its contract with SEAPRO. SEAPRO maintains contracts to respond to birds and marine mammals.

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

Table 4-4: BAT Analysis - Wildlife

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
OSRO/PRAC Contract	Initiate OSRO/PRAC Response	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	N/A	Excellent - Fully operational, well-maintained, meets industry standards	Yes	<input checked="" type="checkbox"/>
Additional Wildlife Organizations	OSRO/PRAC initiate subcontract with additional wildlife organizations	Existing Method 2	Yes - Technology is available	Yes - DW owns and/or uses technology	Yes - Expected to increase spill prevention effectiveness	Yes	Variable - Depends on incident location & duration	N/A	N/A	Yes - OSRO/PRAC already holds contracts with resources	<input type="checkbox"/>



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## 4.5 BAT Analysis - Tank Leak Detection

For this facility, crowned pads is considered BAT. This method is currently in use by DW.

The full BAT analysis, following the layout described in Section 4, is provided in Table 4-5 on the following page.

Table 4-5: BAT Analysis - Detection of a Discharge

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
Visual Monitoring	Visual observations of discharge; tank gauging	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	N/A	N/A	Yes	<input checked="" type="checkbox"/>
Digital/Radar Level Gauges	Tank level gauges	Existing Method 2	Yes - Technology is available	Yes - DW owns and/or uses technology	Yes - Expected to increase spill prevention effectiveness	No	N/A	N/A	Good - Fully operational with minor wear	Yes	<input checked="" type="checkbox"/>
Digital Sensor	Seawater intrusion, oil sensors	Alternate Method 1	Maybe - Would need substantial infrastructure upgrades	No - Technology is not used or unavailable	Maybe	No	High - Cost of installation & maintenance	N/A	N/A	No - Cost prohibitive	<input type="checkbox"/>

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## 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 two 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	<input checked="" type="checkbox"/>
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	<input checked="" type="checkbox"/>
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	<input type="checkbox"/>

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## 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	<input checked="" type="checkbox"/>
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	<input type="checkbox"/>

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## 5 Response Planning Standard

### 18 AAC 75.453

Table 5-1 provides the mathematical calculation of the applicable response planning standard as set out in 18 AAC 75.432, taking credit for the prevention measures described in Section 2 of this plan. Table 5-1 is provided on the following page.

Table 5-1: Response Planning Standard (Diesel)

**Response Planning Standards - Alaska****Oil Terminal Facilities 18 AAC 75.432**


<b>Volume of Largest Tank</b> (gallons)
<b>517,678</b>

<b>Prevention Measure</b>	<b>Possible Reduction</b>	<b>Realized Reduction</b>	<b>Discussion/Reference</b>	<b>Volume Reduction (gallons)</b>	<b>Adjusted Volume (gallons)</b>
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	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
<b>Total Adjusted RPS Volume (gallons)</b>					<b>147,539</b>
					<b>3,513 bbls</b>

<b>Estimated of RPS to Remain On Land</b>
<b>70%</b>

<b>Total Adjusted RPS to Remain on Land (gallons)</b>	<b>103,277</b>	<b>2,459 bbls</b>
<b>Total Adjusted RPS to Reach Water (gallons)</b>	<b>44,262</b>	<b>1,054 bbls</b>



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## 6 Plan Appendix


The following documents are provided in the overall Plan Appendix:

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### *Other*

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- Acronym List
- Other Supporting Documentation
  - Secondary Containment Calculations
  - ADNR Fact Sheet – Generally Allowed Uses (ADNR, 2024)
  - Beaufort Scale (NWS, 2025)
- Revision Log
- Approval Letters

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## 6.1 Acronym List

The acronyms, in alphabetical order, used in this plan are defined below.

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
API	American Petroleum Institute
AS	Alaska Statute
AST	Aboveground Storage Tank
BAT	Best Available Technology
CG	United States Coast Guard
CPLAN	Oil Discharge Prevention and Contingency Plan
DW	Delta Western, LLC
ERMA	Environmental Response Management Application
ESA	Environmentally Sensitive Area
FCAST	Field Constructed Aboveground Storage Tank
GPD	Greatest Possible Discharge
GRS	Geographic Response Strategy
IBC	International Building Code
IC	Incident Commander
ICS	Incident Command System
IFC	International Fire Code
IMT	Incident Management Team
IOSC	Initial On Scene Coordinator
ISO	International Standard Organization
NFPA	National Fire Protection Agency
NIMS	National Incident Management System
NOAA	National Oceanic and Atmospheric Administration

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NWS	National Weather Service
OSRO	Oil Spill Response Organization
PRAC	Primary Response Action Contractor
QI	Qualified Individual
RPS	Response Planning Standard
SFAST	Shop Fabricated Aboveground Storage Tank
SEAK ACP	Southeast Alaska Area Contingency Plan
SEAPRO	Southeast Alaska Petroleum Response Organization
SMT	Spill Management Team
STI	Steel Tank Institute
TTLR	Tank Truck Loading/Offloading Rack
UC	Unified Command
VHF	Very High Frequency

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## 6.2 Other Supporting Documentation

## SECONDARY CONTAINMENT CAPACITY CALCULATIONS

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Secondary containment capacities are calculated using the referenced equations below. At a minimum, the secondary containment is required to contain 110% of the volume of the largest tank within the containment, while accounting for the displacement of the remaining tanks. Additionally, consideration has been given to 25-year return period/24-hour duration storm events using published data from Technical Paper No. 47 (TP-47) publications, including from the National Oceanic and Atmospheric Administration (NOAA) and regional authorities.

(1)  $Volume_{Containment}$  (gallons)

*Rectangular Berm:*

$$= Containment_{Length} * Containment_{Width} * Containment_{Height,Min.} * 7.48$$

$$Circular\ Ber: = \pi * (Containment_{Radius})^2 * Containment_{Height,Min.} * 7.48$$

(2)  $Displacement\ Volume_{Tank,Vertical}$  (gallons)

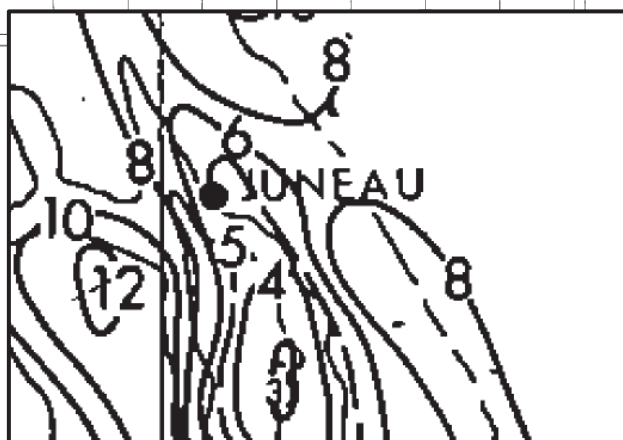
$$= \pi * Tank_{Radius}^2 * Containment_{Height,Min.} * 7.48$$

(3)  $Displacement\ Volume_{Tank,Horizontal}$  (gallons)

$$= Tank_{Length} * \left\{ Tank_{Radius}^2 * \cos^{-1} \left( \frac{Tank_{Radius} - Containment_{Height,Min.}}{Tank_{Radius}} \right) - \left[ \sqrt{2 * Tank_{Radius} * Containment_{Height,Min.}} - (Tank_{Radius} - Containment_{Height,Min.}) \right] \right\} * 7.48$$

(4)  $Volume_{Containment,Net}$  (gallons)

$$= Volume_{Containment} - \left| \begin{array}{l} Displacement\ Volume_{Tank,Vertical} \\ Displacement\ Volume_{Tank,Horizontal} \end{array} \right| + Volume_{Contents,Largest\ Tank}$$



## CONTAINMENT UNIT

## JUNEAU BULK PLANT TANK FARM

## CONTAINMENT AREA DIMENSIONS

Wall Height (ft)	3.5
Containment Length (ft)	275
Containment Width (ft)	126.5
Total Containment Capacity (ft <sup>3</sup> )	121,756
Total Containment Capacity (gal)	910,737

## VOLUME DISPLACEMENT FROM VERTICAL TANKS

Tank ID	Tank 1	Tank 2	Tank 3	Tank 4	Tank 5	Tank 6	Tank 7	Tank 8
Tank Diameter (ft)	47	47	47	36	47	47	47	36
Tank Footprint (ft <sup>2</sup> )	1735	1735	1735	1018	1735	1735	1735	1018
Tank Height (ft)	40	40	40	40	40	40	40	40
Tank Capacity (gal)	500,000	500,000	500,000	300,000	500,000	500,000	500,000	300,000
Concrete Pad Number of Sides	18	18	18	14	18	18	18	14
Concrete Pad Side Length (ft)	8.5	8.5	8.5	8.5	8.5	8.5	8.5	8.5
Concrete Pad Height (ft)	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
Displacement by Tanks (gal)	38,932	38,932	38,932	22,841	38,932	38,932	38,932	22,841
Displacement by Concrete Pads (gal)	6,896	6,896	6,896	4,144	6,896	6,896	6,896	4,144
Total Displacement (gal)	45,828	45,828	45,828	26,985	45,828	45,828	45,828	26,985

## NET CONTAINMENT CALCULATION

Largest Tank within Containment Area (gal)	500,000
Net Displacement by All Tanks, Less Largest Tank (gal)	240,343
Net Displacement by All Concrete Pads (gal)	49,664
Net Containment Capacity (gal)	620,730
Net Containment Capacity (Percentage of Largest Tank)	124%

## FREEBOARD CALCULATION

Capacity of Largest Tank (ft <sup>3</sup> )	66,845
Footprint of Additional Tanks (ft <sup>2</sup> )	10,710
Net Area, Less Footprint (ft <sup>2</sup> )	24,077
Minimum Containment Height for 100% of Tank Volume (ft)	2.78
Freeboard (in)	8.68

## Precipitation Data (NOAA Technical Paper No. 47)

Facility Location	Juneau, AK
25-year 24-hour Rainfall (in)	6
Freeboard Adequate for 25-year 24-hour Rain Event?	Yes



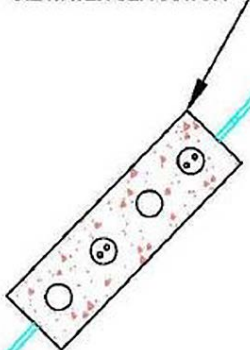
# LEGEND

- CONCRETE
- CATCH BASIN
- UNDERGROUND STORM DRAIN PIPE

## GENERAL NOTES

1. THE BASIS OF BEARING FOR THIS SURVEY WAS BETWEEN RECOVERED R&M ENGINEERING PRIMARY MONUMENTS ON THE SOUTHWEST BOUNDARY OF LOT 2, BORDERING JACOBSEN DRIVE, HAVING A RECORD BEARING OF S47°36'00"E.
2. THE BASIS OF VERTICAL CONTROL FOR THIS SURVEY WAS A TEMPORARY BENCHMARK ON A FIRE HYDRANT LOCATED NEAR THE INTERSECTION OF MT. ROBERTS STREET WITH JACOBSEN DRIVE, HAVING A RECORD ELEVATION OF 52.50' ON THE NORTH BOLT OF THE TOP FLANGE.
3. THIS SURVEY WAS CONDUCTED UTILIZING A TOPCON 3000 SERIES TOTAL STATION AND STANDARD PRISM RANGING METHODS FOR THE MAY FIELD SURVEY, AND A TRIMBLE S7 ROBOTIC TOTAL STATION FOR THE OCTOBER FIELD SURVEY.
4. FIELD SURVEY PERFORMED ON MAY 20, 2015 AND OCT. 03, 2015.
5. UNDERGROUND FEATURES SHOWN WERE DERIVED FROM 1994 DELTA WESTERN JUNEAU FACILITY DESIGN DRAWINGS.

OIL/WATER SEPARATOR



TRUCK BAY 1

EDGE OF CONCRETE TRUCK LOADING AREA

TRUCK BAY 2

GRAVEL SURFACED AREA

TRUCK BAY 3

TRUCK LOADING RACK EXISTING SECONDARY CONTAINMENT VOLUME CALCULATIONS

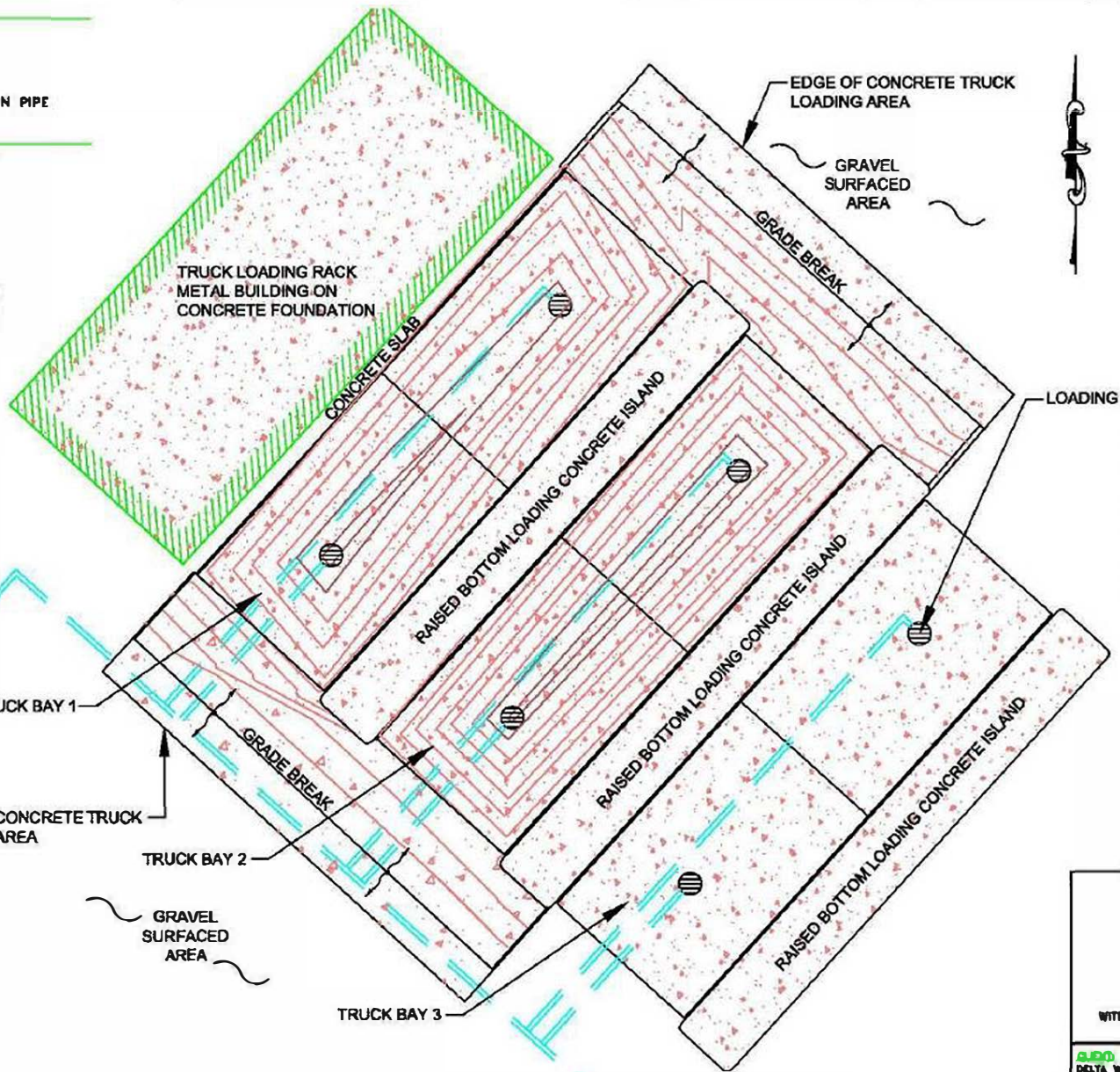
BAY 1, 2 & RAMPS (CONTOURED AREA) = 4,548.5 GALLONS

BAY 3 = 414 GALLONS

OIL/WATER SEPARATOR CONTAINMENT = 4,000 GALLONS

TOTAL TRUCK LOADER RACK CONTAINMENT VOLUME = BAY 1 & 2, OIL/WATER SEPARATOR, RAMPS = 8,548.5 GALLONS

CALCULATED USING AUTOCAD CIVIL 3D SOFTWARE



TTLR SCA



# Department of Natural Resources

## Division of Mining, Land and Water



## Fact Sheet: Generally Allowed Uses

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As provided in 11 AAC 96.020, the following uses and activities are generally allowed on state land managed by the Division of Mining, Land and Water (these uses and activities may be restricted in legislatively designated areas, or special management category or status as listed in 11 AAC 96.014<sup>1</sup>). Uses listed as “Generally allowed” do not require a permit from the Division of Mining, Land and Water. Note that this list does not apply to state parks, nor to land owned or managed by other state agencies such as the University of Alaska, Alaska Mental Health Trust, Department of Transportation and Public Facilities, or the Alaska Railroad. You may need other state, federal or borough permits for these uses or activities. Permits can be required from the Army Corps of Engineers, Department of Environmental Conservation, the Environmental Protection Agency, Alaska Department of Fish and Game Habitat Division (ADF&G-Habitat). Before beginning an activity on state land, the user should check to be sure it is generally allowed in that particular area.

### Travel Across State Land

**Hiking, backpacking, skiing, climbing, and other foot travel; bicycling; traveling by horse or dogsled or with pack animals.**

**Using a highway vehicle** with a curb weight of up to 10,000 pounds, including a four-wheel-drive vehicle and a pickup truck, **or using a recreational-type vehicle** off-road or all-terrain vehicle with a curb weight of up to 1,500 pounds, including a snowmobile (or other tracked vehicle), motorcycle or ATV, on or off an established road easement, if use off the road easement does not cause or contribute to water quality degradation, alteration of drainage systems, significant rutting, ground disturbance, or thermal erosion. (Curb weight means the weight of a vehicle with a full tank of fuel and all fluids topped off, but with no one sitting inside or on the vehicle and no cargo loaded. Most highway rated sport utility vehicles are within the weight limit as are most small ATVs, including a basic Argo.) Use of larger off-road vehicles over 1,500 pounds curb weight, and the off-road travel of construction and mining equipment requires a permit from DNR. An authorization may be required from the ADF&G-Habitat for any motorized travel in fish bearing streams.

**Landing an aircraft** (such as a single-engine airplane or a helicopter), or using watercraft (such as a boat, jet-ski, raft, or canoe), without damaging the land, including shoreland, tideland, and submerged land.

**Driving livestock**, including any number of reindeer or up to 100 horses<sup>1</sup> cattle, or other domesticated animals.

### Access Improvements on State Land

**Brushing or cutting a trail** less than five feet wide using only hand-held tools such as a chainsaw (making a trail does not create a property right or interest in the trail).

**Anchoring a mooring buoy** in a lake, river, or marine waters, or **placing a float, dock, boat haulout, floating breakwater, or boathouse** in a lake, river, or in marine waters, for the personal, noncommercial use of the upland owner, if the use does not interfere with public access or another public use, and if the improvement is placed within the projected sidelines of the contiguous upland owner’s parcel or otherwise has the consent of the affected upland owner. A float or dock means an open structure without walls or roof that is designed and used for access to and from the water rather than for storage, residential use, or other purposes. A boat haulout means either a rail system (at ground level or elevated with pilings) or a line attached from the uplands to an anchor or mooring buoy. A floating breakwater means a structure, such as a log bundle, designed to dissipate wave or swell action. A boathouse means a structure designed and used to protect a boat from the weather rather than for other storage, residential use or other purposes.

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<sup>1</sup> These special use areas are listed in 11 AAC 96.014 and on the last page of this fact sheet. Maps of the areas are available online at: <http://dnr.alaska.gov/mlw/sua/>

## Removing or Using State Resources

**Hunting, fishing, or trapping**, or placement of a crab pot, shrimp pot, herring pound or fishwheel, that complies with applicable state and federal statutes and regulations on the taking of fish and game.

**Harvesting** a small number of **wild plants, mushrooms, berries, and other plant material** for personal, noncommercial use. The cutting of trees is not a generally allowed use except as it relates to brushing or cutting a trail as provided above. Commercial harvest of non-timber forest products requires a permit (11 AAC 96.035) and harvest practices must conform to the Alaska Non-Timber Forest Products Harvest Manual for Commercial Harvest on state-owned Lands.

<https://dnr.alaska.gov/mlw/lands/permitting/ntfp-commercial-harvest-permit/>

**Using dead and down wood for a cooking or warming fire**, unless the department has closed the area to fires during the fire season.

**Grazing** no more than five domesticated animals.

**Recreational gold panning; hard-rock mineral prospecting or mining** using light portable field equipment, such as a hand-operated pick, shovel, pan, earth auger, or a backpack power drill or auger; or suction dredging using a suction dredge with a nozzle intake of six inches or less, powered by an engine of 18 horsepower or less, and pumping no more than 30,000 gallons of water per day. An authorization is required from ADF&G-Habitat prior to dredging in fish bearing streams.

## Other Improvements and Structures on State Land

**Setting up and using a camp** for personal, noncommercial recreational purposes, or for any non-recreational purpose (such as a support camp during mineral exploration), for no more than 14 days at one site, using a tent platform or other temporary structure that can readily be dismantled and removed, or a floathouse that can readily be moved. Moving the entire camp at least two miles starts a new 14-day period. Cabins or other permanent improvements are not allowed, even if they are on skids or another non-permanent foundation. The camp must be removed immediately if the department determines that it interferes with public access or other public uses or interests.

**Brushing or cutting a survey line** less than five feet wide using only hand-held tools (such as a chainsaw), or setting a survey marker (setting a survey monument—a permanent, official marker—requires written survey instructions issued by the Division of Mining, Land and Water under 11 AAC 53).

Placing a residential **sewer outfall** into marine waters from a contiguous privately owned upland parcel, with the consent of the affected parcel owners, if the outfall is within the projected sidelines of the contiguous upland parcel and is buried to the extent possible or, where it crosses bedrock, is secured and covered with rocks to prevent damage. Any placement of a sewer outfall line must comply with state and federal statutes and regulations applicable to residential sewer outfalls.

**Placing riprap or other suitable bank stabilization material** to prevent erosion of a contiguous privately owned upland parcel if no more than one cubic yard of material per running foot is placed onto state shoreland and the project is otherwise within the scope of the U.S. Army Corps of Engineers nationwide permit on bank stabilization.

## Miscellaneous Uses of State Land

**An event or assembly of 50 people or less**, including events sponsored by non-profit organizations or a commercial event. Entry for **commercial recreation** purposes **on a day-use basis** with no overnight camps or unoccupied facilities that remain overnight, as long as the use has been registered as required by 11 AAC 96.018.

**Recreational or other use** not listed above may occur on state land as long as that use

- is not a commercial recreational camp or facility, (whether occupied or unoccupied) that remains overnight;
- does not involve explosives or explosive devices (except firearms);
- is not prospecting or mining using hydraulic equipment methods (i.e. the use of pumped or flowing water to remove overburden or move gravels);
- does not include drilling in excess of 300 feet deep (including exploratory drilling or stratigraphic test wells on state land not under oil or gas lease);
- is not for geophysical exploration for minerals subject to lease or an oil and gas exploration license or for seismic surveys involving the use of explosives;

- does not cause or contribute to significant disturbance of vegetation, drainage, or soil stability;
- does not interfere with public access or other public uses or interests; and
- does not continue for more than 14 consecutive days at any site. Moving the use to another site at least two miles away starts a new 14-day period.
- \*does not include exploration for coal (a notice of intent to conduct exploration for coal must be filed with the DNR)

### **Check for special conditions and exceptions!**

All activities on state land must be conducted in a responsible manner that will minimize or prevent disturbance to land and water resources, and must comply with all applicable federal, state, and local laws and regulations. **By acting under the authority of this list, the user agrees to the conditions set out in 11 AAC 96.025** (a copy of these conditions are attached to this fact sheet). A person who violates these conditions is subject to any action available to the department for enforcement and remedies, including civil action for forcible entry and detainer, ejectment, trespass, damages, and associated costs, or arrest and prosecution for criminal trespass in the second degree. The department may seek damages available under a civil action, including restoration damages, compensatory damages, and treble damages under AS 09.45.730 or AS 09.45.735 for violations involving injuring or removing trees or shrubs, gathering technical data, or taking mineral resources. (11 AAC 96.145)

Remember that this list does not apply to state parks, University of Alaska lands, or Alaska Mental Health Trust lands. In addition, some other areas managed by the Division of Mining, Land and Water are not subject to the full list of generally allowed uses. Exceptions may occur because of special conditions in a state land use plan or management plan for example, a management plan may reduce the number of days that people can camp at a specific site), or by a “special use land” designation (for instance, a special use land designation for the North Slope requires a permit for off-road vehicle use). Special Use Areas are listed in 11 AAC 96.014; more information is available on the department’s website at <https://dnr.alaska.gov/mlw/lands/special-use-areas/>. GAU’s have also been modified for the Knik River Public Use Area.

Also, be aware that this list does not exempt users from the permit requirements of other state, federal, or local agencies. For example, the ADF&G - Habitat may require a permit for a stream crossing or if the use will take place in a state game refuge.

Finally, this list does not authorize a use if another person has already acquired an exclusive property right for that use. For instance, it does not give people permission to graze livestock on someone else’s state grazing lease, to build a trail on a private right-of-way that the Division of Mining, Land and Water has granted to another person, or to pan for gold on somebody else’s state mining location.

Department staff can help users determine the land status of state-owned land and whether it is subject to any special exceptions or to private property rights.

### **For additional information, contact the Department of Natural Resources:**

Anchorage/Southcentral  
Public Information Center  
550 West 7th Avenue, Suite 1360  
Anchorage, AK 99501-3561  
Phone: (907) 269-8400  
Fax: (907) 269-8901  
dnr.pic@alaska.gov

Juneau/Southeast  
Regional Land Office  
PO Box 111020  
400 Willoughby Avenue, 4<sup>th</sup> Floor  
Juneau, AK 99801  
Phone: (907) 465-3400  
Fax: (907) 465-3886  
sero@alaska.gov

Fairbanks/Northern  
Public Information Center  
3700 Airport Way  
Fairbanks, AK 99709-4699  
Phone: (907) 451-2705  
Fax: (907) 457-2706  
fbx-pic@alaska.gov

Statewide TTY: 711 for Alaska Relay or 1-800-770-8973

**CONDITIONS FOR GENERALLY ALLOWED USES**  
**(11 AAC 96.025)**

A generally allowed use listed in 11 AAC 96.020 is subject to the following conditions:


- (1) activities employing wheeled or tracked vehicles must be conducted in a manner that minimizes surface damage;
- (2) vehicles must use existing roads and trails whenever possible;
- (3) activities must be conducted in a manner that minimizes
  - (A) disturbance of vegetation, soil stability, or drainage systems;
  - (B) changing the character of, polluting, or introducing silt and sediment into streams, lakes, ponds, water holes, seeps, and marshes; and
  - (C) disturbance of fish and wildlife resources;
- (4) cuts, fills, and other activities causing a disturbance listed in (3)(A)–(C) must be repaired immediately, and corrective action must be undertaken as may be required by the department;
- (5) trails and campsites must be kept clean; garbage and foreign debris must be removed; combustibles may be burned on site unless the department has closed the area to fires during the fire season;
- (6) survey monuments, witness corners, reference monuments, mining location posts, homestead entry corner posts, and bearing trees must be protected against destruction, obliteration, and damage; any damaged or obliterated markers must be reestablished as required by the department under AS 34.65.020 and AS 34.65.040;
- (7) every reasonable effort must be made to prevent, control, and suppress any fire in the operating area; uncontrolled fires must be immediately reported;
- (8) holes, pits, and excavations must be repaired as soon as possible; holes, pits, and excavations necessary to verify discovery on prospecting sites, mining claims, or mining leasehold locations may be left open but must be maintained in a manner that protects public safety;
- (9) on lands subject to a mineral or land estate property interest, entry by a person other than the holder of a property interest, or the holder's authorized representative, must be made in a manner that prevents unnecessary or unreasonable interference with the rights of the holder of the property interest.

**List of Special Use Land Designations Excluded from Generally Allowed Uses**

- |  |   |
|--|---|
| • Alyeska Ski Resort                                     | • Lower Talarik Creek                           |
| • Baranof Lake Trail                                     | • Marmot Island Special Use Area                |
| • Caribou Hills  | • Nenana River Gorge and McKinley Village Subd. |
| • Exit Glacier Road                                      | • North Slope Area                              |
| • Glacier/Winner Creek                                   | • Northern Southeast Area, Tidelands            |
| • Hatcher Pass Special Use Area                          | • Nushagak                                      |
| • Haines State Forest                                    | • Poker Flat North                              |
| • Indian Cove  | • Poker Flat South                              |
| • Kamishak Special Use Area                              | • Resurrection Bay                              |
| • Kenai Fjords Coastline                                 | • Tangle Lakes Archaeological District          |
| • Kenai River Special Management Area Proposed Additions | • Thompson Pass                                 |
| • Lake Clark Coastline                                   |   |
| • Lower Goodnews River                                   | • Togiak National Wildlife Refuge Shorelands    |
|  | • Knik River Special Use Area                   |

# BEAUFORT SCALE

Estimating Wind Speed and Sea State with Visual Clues				
Beaufort number	Wind Description	Wind Speed	Wave Height	Visual Clues
0	Calm	0 knots	0 feet	Sea is like a mirror. Smoke rises vertically.
1	Light Air	1-3 kts	< 1/2	Ripples with the appearance of scales are formed, but without foam crests. Smoke drifts from funnel.
2	Light breeze	4-6 kts	1/2 ft (max 1)	Small wavelets, still short but more pronounced, crests have glassy appearance and do not break. Wind felt on face. Smoke rises at about 80 degrees.
3	Gentle Breeze	7-10 kts	2 ft (max 3)	Large wavelets, crests begin to break. Foam of glassy appearance. Perhaps scattered white horses (white caps). Wind extends light flag and pennants. Smoke rises at about 70 deg.
4	Moderate Breeze	11-16 kts	3 ft (max 5)	Small waves, becoming longer. Fairly frequent white horses (white caps). Wind raises dust and loose paper on deck. Smoke rises at about 50 deg. No noticeable sound in the rigging. Slack halyards curve and sway. Heavy flag flaps limply.
5	Fresh Breeze	17-21kts	6 ft (max 8)	Moderate waves, taking more pronounced long form. Many white horses (white caps) are formed (chance of some spray).  Wind felt strongly on face. Smoke rises at about 30 deg. Slack halyards whip while bending continuously to leeward. Taut halyards maintain slightly bent position. Low whistle in the rigging. Heavy flag doesn't extended but flaps over entire length.
6	Strong Breeze	22-27 kts	9 ft (max 12)	Large waves begin to form. White foam crests are more extensive everywhere (probably some spray).  Wind stings face in temperatures below 35 deg F (2C). Slight effort in maintaining balance against wind. Smoke rises at about 15 deg. Both slack and taut halyards whip slightly in bent position. Low moaning, rather than whistle, in the rigging. Heavy flag extends and flaps more vigorous.
7	Near Gale	28-33 kts	13 ft (max 19)	Sea heaps up and white foam from breaking waves begins to be blown in streaks along the direction of wind. Necessary to lean slightly into the wind to maintain balance. Smoke rises at about 5 to 10 deg. Higher pitched moaning and whistling heard from rigging. Halyards still whip slightly. Heavy flag extends fully and flaps only at the end. Oilskins and loose clothing inflate and pull against the body.
8	Gale	34-40 kts	18 ft (max 25)	Moderately high waves of greater length. Edges of crests begin to break into the spindrift. The foam is blown in well-marked streaks along the direction of the wind. Head pushed back by the force of the wind if allowed to relax. Oilskins and loose clothing inflate and pull strongly. Halyards rigidly bent. Loud whistle from rigging. Heavy flag straight out and whipping.
9	Strong Gale	41-47 kts	23 ft (max 32)	High waves. Dense streaks of foam along direction of wind. Crests of waves begin to topple, tumble and roll over. Spray may affect visibility.
10	Storm	48-55 kts	29 ft (max 41)	Very high waves with long overhanging crests. The resulting foam, in great patches is blown in dense streaks along the direction of the wind. On the whole, the sea takes on a whitish appearance. Tumbling of the sea becomes heavy and shock-like. Visibility affected.
11	Violent Storm	56-63 kts	37 ft (max 52)	Exceptionally high waves (small and medium-sized ships might be for time lost to view behind the waves). The sea is completely covered with long white patches of foam lying along the direction of the wind. Everywhere, the edges of the wave crests are blown into froth. Visibility greatly affected.
12	Hurricane	64+ kts	45+ ft	The air is filled with foam and spray. The sea is completely white with driving spray. Visibility is seriously affected.

	Oil Discharge Prevention & Contingency Plan (CPLAN)	
	Document Number	JNU-CPLAN-01; Rev. 0
	Revision Date	January 2026


## 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 <sup>38</sup>
0	January 2026	All	Plan Renewal	Plan Renewal

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<sup>38</sup> 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.

	Oil Discharge Prevention & Contingency Plan (CPLAN)	
	Document Number	JNU-CPLAN-01; Rev. 0
	Revision Date	January 2026

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## 6.4 Approval Letters