

**Table 1.0: Request for Additional Information on Delta Western Juneau ODPCP (25-CP-1020)**

#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
<b>Section 1</b>					
--	1-3	1.2	--		Updated Table 1-1 to reflect new QI updates.
1.	1-5	1.2	18AAC75.449	<ul style="list-style-type: none"> <li>• <b>ADF&amp;G:</b> In Table 1-2B, change ADF&amp;G contact number to 907-465-4105 in Juneau.</li> <li>• <b>ADNR:</b> Update contact information for ADNR SAIL to: 907-465-3513 or email at <a href="mailto:dnr.sero.spill@alaska.gov">dnr.sero.spill@alaska.gov</a>.</li> <li>• <b>USFWS:</b> In Table 1-2B For the NMFS row, change phone numbers to 907-957-8147 (primary) and 323-366-9150 (alternate).</li> </ul>	Table 1-2B was updated to include the changes called out here.
2.	1-7	1.3	18AAC75.449(a)(3)	This section states that Delta Western will utilize the ICS208 form for developing a safety plan. The form is not included in the appendices or in the response scenario. Please include the form.	<p>The ICS 208 Form has not been included since the most recently updated version is readily available on FEMA’s website.</p> <p>Language has been added to Section 1.3 to describe the information to be considered when developing the safety plan.</p>
3.	1-3	1.3 spill scenario	18AAC75.449(a)(6)(C)	For procedures to stop the discharge, the plan states <i>“access and implement prompt removal actions to contain and remove the spill substance.”</i> Please describe further what procedures are being described here.	<p>Section 1.1 of the CPLAN provides additional details regarding initial emergency action steps.</p> <p>Language has been added in Section 1.3 of the response scenario to further elaborate stopping the flow at the source as well as containing and removing the spill substance.</p>

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4.	1-6	1.8 spill scenario	18AAC75.449(a)(6)(I)	Section 1.8 on lightering, transfer and storage of oil states that “ <i>the most likely scenario would be a tank-to-tank transfer followed by a tank-to-barge transfer. As the latter is only possible in certain circumstances, this section focuses on the procedures of tank to tank transfers.</i> ” Per the spill scenario, a barge is listed as being involved in the response. Please update this section to include transfer procedures to barges.	The statement “ <i>As the latter is only possible in certain circumstances, this section focuses on the procedures of tank to tank transfers.</i> ” has been removed from the text. Language has been added to address tank-to-barge transfers as requested.
5.	1-8	1.10 spill scenario	18AAC75.449(a)(6)(K)	Per section 1.10, procedures and locations for temporary storage are found on the corresponding ICS 204 forms. The forms do not detail specific temporary storage/waste staging locations. Please update to include.	Additional notes were added to section 8 of TF-1 for land based temporary storage/waste staging location.  On-water bladders and barges themselves specify location of storage/waste locations on the current ICS-204a for their assigned task force.  To further specify the specific location for temporary storage a footnote has also been added on page 1-10.
6.	1-10	1.12 spill Scenario	18AAC75.449(a)(6)(M)	<b>ADF&amp;G:</b> The newest version of the Alaska Regional Response Team <i>Wildlife Protection Guidelines for Oil Spill Response in Alaska</i> (Version 2020.02, September 2023) should be referenced.	The reference has been updated as suggested here in Section 3.3 and in the bibliography.
7.	2-5	2.1 spill scenario	18AAC75.449(a)(6)	DEC recommends including all start and stop times for task force work to ensure work can be completed in listed operating periods.	Task force equipment operating hours are listed on the Oil Recovery Calculations.  Per the regulation cited, the start and stop times of each task force are not required to be included.

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8.	2-7	2.1 spill scenario	18AAC75.449(a)(6); 18AAC75.451(g)	The table on page 2-7 does not include storage specifications for all of the response equipment. The ISO tanks, vac trucks, and storage bladders do not specify storage capacity. Please update the table to include all equipment specifications.	Storage specifications for capacity of temporary storage is provided on the Oil Recovery and Temp Calculation.
9.	2-5	Spill Scenario 2.1	18AAC75.449(a)(6)(B)&(C)	ICS 201 current actions summary does not provide description of immediate response actions to demonstrate source control and cleanup after discovery of release in alignment with the RPS. Please include steps taken at what time in the ICS 201 actions summary. At 11am, SEAPRO responders and equipment arrive on scene. Per the resource summary, some equipment and responders are listed as arriving at 12pm. Please update to include all arrival times for responders. Please also include additional detail regarding immediate response actions.	The actions summary has been updated to incorporate initial emergency action steps.  The action summary provides a 0725 order time for SEAPRO responders and equipment. Arrival times for responders are tied to the arrival of the equipment for a specific task force. Arrival times updated.
10.	2-7, 2-8	Spill Scenario	18AAC75.449	ICS204 on page 2-8 lists Task Force Three as having zero people assigned. Page 2-7 also does not list any responders for TF3. Please update to include the number of responders for TF3.	Responders have been added to TF-3. Updated throughout page 2-7 and 2-8.

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11.	all	2 Spill Scenario	18AAC75.449	The response scenario does not describe or include any detail on how decontamination will be conducted for responders and equipment. Please update the spill scenario to include detailed description on decontamination teams/taskforces, location of decon sites, and ensure all response equipment needed is listed.	<p>Additional language has been added to Section 1.3 of the response scenario to describe the implementation of a decontamination plan as part of the incident-specific safety plan.</p> <p>Decontamination information would be included in the safety plan if deemed necessary by the SO.</p> <p>Decontamination teams / task forces, location of decon sites, and relevant equipment needed for this is not required to be included in the plan by regulation. For consistency with other approved CPLANs, further information has not been added.</p> <p>The OSHA acronym was also added to the acronym list in Section 3.1 of the scenario.</p>

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12.	2-17	Spill Scenario	18AAC75.449	<p>The allocation of recovery and storage equipment among the task forces is confusing and the details in the 204s do not provide enough description on how DW can manage recovered oil in a spill incident such as the scenario. Please review the assigned recovery and storage equipment for task forces 1, 2, 3, and 7 to ensure responders are assigned the appropriate amount of equipment for recovery and storage.</p> <ul style="list-style-type: none"> <li>• TF1 has a cumulative storage capacity of 63,850 but is listed as recovering a total of 104,832gal.</li> <li>• TF2 has cumulative storage capacity of 270,774 but is listed as recovering a total 7,975gal.</li> <li>• TF3 has cumulative storage of 17,060 but is listed as recovering a total of 36,844gal.</li> <li>• TF7 Waste recovery- assigned 9,000gal of storage via the tank trucks.</li> </ul>	<p>Task Force 7 is designed to transfer and store recovered product from all recovery operations and move it to appropriate storage devices. Clarifying language to this effect was added to Section 8 of the TF-7 ICS-204a.</p> <p>Cumulative available temporary storage for operational period 1 is 96,504. Cumulative recovery during operational period 1 is 94,978.</p> <p>As noted in TF-3, on-water storage assets will be rotated to the Unitor bladder once on-scene.</p> <p>The information contained in this scenario regarding recovery and temporary storage is largely unchanged from the prior approved CPLAN.</p>
13.	2-17	Spill Scenario ICS232	18AAC75.449	<p><b>ADNR:</b> Specify OHA as an agency resource to consult for the potential for sites within a spill area. Under Section 4: Archaeo-cultural and socio-economic issues</p> <p>Update Narrative statement to include: “Consult with the on-scene coordinator and available agency resources, <i>including the DNR Office of History and Archaeology</i> for potential sites.”</p>	<p>The Narrative statement under Section 4: Archaeo-cultural and socio-economic issues section has been updated to specify OHA as an agency resource.</p>
<b>Section 2</b>					

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14.	2-7	2.1.2	18AAC75.450;	There is insufficient description on the process for the monthly facility inspections, and what all components are assessed. Additionally, the plan does not include the monthly inspection form. Please update to include additional description for the monthly inspection walkthrough and what items are assessed.	<p>Specific requirements / details for the monthly inspections are not required to be included by regulation.</p> <p>For consistency with other approved CPLANs, the monthly inspection forms are not included as they are not required by regulation.</p> <p>No updates to the text have been made.</p>
15.	2-16, 2-19	2.1.6.1	18AAC75.065	<p>There is conflicting information in the API 653 3rd Party inspection reports and the tank information in Table 2-4. Per the API 653 3<sup>rd</sup> Party Reports, DEC can confirm that Tanks 2, 3, 4, 5, 6, 7, &amp; 8 have a “cone-up” bottom design, but Table 2-4 does not consistently describe the tank bottoms as such. Please review the tank data on:</p> <ul style="list-style-type: none"> <li>• Bottom Construction: All tanks were described as having a cone up bottom construction but the table only lists some of the tanks as that construction. See comment #18.</li> <li>• Liner: Page 2-19 states that Tanks 1, 4, 5, &amp; 7 have internal liners, but Table 2-4 indicates that Tank 4 is uncoated.</li> </ul>	Table 2-4 updated to include a consistent approach for the description of tank bottom design and internal liners.

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16.	2-19	2.1.6.1	18AAC75.065	This section does not contain enough description on leak detection systems for the tanks, and the API 653 reports provide conflicting information on leak detection design. While some of the API 653 reports indicate leak detection for tanks is provided by the cone up construction, other reports simply indicate there is no leak detection. Please confirm tank construction data and update the plan accordingly.	Referenced Table 2-4 was updated in accordance with comment #15 to incorporate the cone-up construction of the tank bottoms. Language in the section 2.1.6.1 slightly updated.
17.	2-19	2.1.6.1	18AAC75.065(k)	The plan states “High liquid level alarms are tested monthly by pushing the test button. Alternatively, high liquid level alarms can be manually activated by physically lifting the switch.” Please add additional detail on how often high-level alarms are manually tested.	Additional information related to manual testing of high liquid level alarms was added to text.
18.	2-20	2.1.6.3	18AAC75.075; 432	This section does not contain enough explicit detail to support DW’s claimed RPS reduction credit for “ <i>impervious containment area extending under the full area of each storage tank OR double bottoms with leak detection.</i> ” Please update this section to include additional detail to support the RPS reduction credit. Please also see comment #28.	<p>Secondary Containment structure details are provided in Table 2-6. As noted, the shared containment consists of impermeable concrete.</p> <p>Additional details regarding the secondary containment to support the RPS reduction credit have been added. Namely that the XR-5 liner extends under the entire containment area including concrete tank foundation pads.</p>
<b>Section 3</b>					

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19.	3-1	3	18AAC75.451	All sections except Section 3 include a cross-reference table at the beginning of the section with regulatory references. Please update to include a cross reference table for consistency.	Sections that focus on a single regulation include their own dedicated cross-reference table. In contrast, other sections (such as Section 3) incorporate cited regulations that are less sequential; these are consolidated with the main plan cross reference table rather than having a separate section specific table.  No changes to the text were made.
20.	general	3.1/general	18AAC75.451	<b>ADF&amp;G:</b> ADFG recommends including a table listing agency permit requirements for various response strategies. Of note, A Fish Habitat Permit from the Department of Fish and Game Habitat Section is required for placing boom anchors in or across anadromous streams and also for active hazing of avian and terrestrial wildlife. See the Alaska Regional Response Team <i>Wildlife Protection Guidelines for Oil Spill Response in Alaska</i> document for full explanation of agency permit requirements.	For consistency with other approved CPLANs, a table has not been incorporated with this information. Language has been added in Section 3.9 to reference this guidance document.
21.	3-1; 1-11	3.1, 1.7	18AAC75.451(c)	Per regulation, maps and facility diagrams must show nearby contaminated sites. Per the DEC Contaminated Sites maps there are several in the vicinity. Please update to include.	DEC contaminated sites nearby the Juneau Bulk facility are in “Cleanup Complete” status. As such, the sites are not considered “potential contaminated sites” and are not included in facility diagrams.  No changes to figures made.



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22.	3-11	3.5, response scenario	18AAC75.451(g):	<p>The plan states “DW owned equipment is stored at the Sitka Samson Bulk Facility and maintained in “ready” status in secured and marked locations. Routine maintenance is performed, as required by the manufacturer, where applicable. Spill response equipment is inventoried and inspected twice a year. Facility personnel also deploy a subset of their spill response equipment twice a year to periodically test it and ensure proper operation.”</p> <p><b>18 AAC 75.451(g)</b> states that the plan must have ready access to enough equipment, must include a complete list of contracted equipment and related response equipment, including vessels, to meet the applicable response planning standards to: <b>(g)(1)</b> include location, inventory and ownership; <b>(g)(2)</b> time frame for delivery and startup of response equipment and trained personnel located outside of the facility’s primary region of operation; <b>(g)(4)</b> each vessel designated for recovery operations must be of proper operational capacity to support response; <b>(g)(8)</b> and procedures for storage, maintenance, and inspection of spill response equipment under the immediate control of the operator when not in use, including procedures for periodic testing and maintenance of response equipment.</p> <p>The plan lacks detail for the following items. Please review the cited regulation and update the plan to include additional detail for the following:</p> <ul style="list-style-type: none"> <li>• <b>(g)(1)&amp;(2):</b> Location for all equipment. The list of response equipment in the response scenario does not include information on where contracted material is physically located or being ordered from.</li> </ul>	<p>Language has been added in a footnote on page 3-11 to describe where contracted response equipment is located and who it would be ordered from.</p> <p>Specifications have been added for the vessels cited in the response scenario.</p> <p>Additional language has been added to Section 3.5 to further elaborate spill equipment inspections and deployment.</p>
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				<ul style="list-style-type: none"> <li>• <b>(g)(4):</b> The plan does not include any description of the skiffs listed as available response equipment. Please update to include specifications for vessels listed for response.</li> <li>• <b>(g)(8):</b> Procedures, maintenance, and inspection of spill response equipment, including procedures for periodic testing and maintenance of response equipment.</li> </ul>	
23.	Pdf. 79	3.9	18AAC75.451	<b>USFWS</b> Table 3-4 Endangered Species column: Change heading to “Threatened and Endangered Species.”	Table 3-4 has been updated to include the changes suggested here.
<b>Section 4</b>					
24.	4-13	4 BAT	18AAC75.452(a)(2)(A)	Please clarify if the 2” ABS pipe under tanks is currently in use as the table is not clear.	This technology does not exist at the facility and Table-4-5 has been updated.
25.	4-14&15	4.6	18AAC75.452(a)(2)(C)	Table 4-6 only includes one alternative method for determining liquid level. As indicated in other DW plans, there is more than one alternative available to industry. Please update this section to include a more detailed BAT analysis.	<p>The Juneau facility utilizes mechanical liquid level float style gauges for determining liquid level equipped with mechanical level switches with audible output. Alternatives cited in other DW plans include the use of digital/radar gauges.</p> <p>Table 4-6 has been updated to include applicable equipment at the facility.</p>
26.	4-16&17	4.7	18AAC75.452(a)(2)(D)	Table 4-7 does not include any comparative analysis of BAT for protective coating. Page 4-16 states that other available technology is not feasible at the facility. Please update the section to include a full BAT analysis for available technology to include why alternative methods are not feasible at the facility.	Table 4-7 has been updated to include a comparative analysis for protective coating alternatives.

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<b>Section 5</b>					
27.	5-2	5	18AAC75.432	The plan claims 25% credit reduction per <b>18 AAC75.432(d)(5)(C)</b> for “ <i>impervious containment area extending under the full area of each storage tank OR double bottoms with leak detection.</i> ” For readability and clarity of facility construction, DEC recommends it be specified which is claiming the credit for. Please update the RPS form in both this section and where it is included in the response scenario.	The RPS table has been updated to only specify credit for impervious containment under the full area of each storage tank.
<b>Section 6</b>					
28.	6-15	6	18AAC75.408(c)(2)	The log of revisions in appendices states “ <i>table below is used to document amendments to this CPLAN</i> ” and table lists plan is renewal, no previous changes. Please update this section to include revision log for all previous changes and amendments to the facility’s ODPCP.	<p>The cited regulation refers to documenting changes when submitting a plan or amendment application. The duty to carry forward past revisions from prior approved plans is not required by regulation and is inconsistent with all of Delta Western’s other approved CPLANs.</p> <p>No changes to the text have been made.</p>