

# INTERIOR ALASKA SUBAREA CONTINGENCY PLAN

## SCENARIOS SECTION

<b>SCENARIOS: PART ONE – OIL &amp; PETROLEUM PRODUCTS .....</b>	<b>F-1</b>
A.    WORST CASE SCENARIO.....	F-1
B.    MAXIMUM MOST PROBABLE SCENARIO .....	F-6
C.    AVERAGE MOST PROBABLE SCENARIO .....	F-7
<b>SCENARIOS: PART TWO – HAZMAT.....</b>	<b>F-9</b>

# SCENARIOS: PART ONE – OIL & PETROLEUM PRODUCTS

## A. WORST CASE SCENARIO

This scenario is based on scenarios in the Alyeska Pipeline Service Company, Trans Alaska Pipeline System Pipeline Discharge Prevention and Contingency Plan (C Plan).

**Date:** July 15

**Size of Discharge:** 60,000 barrels of crude oil

**Location:** Burbot Creek at PLMP 351.8. (65° 53.6' North, 149° 44.1' West)

**Spill Information:** Approximately 60,000 bbls (2,520,000 gallons) of crude oil has been released to land and water. A large amount of oil has entered Burbot Creek and the Yukon River.

**Scenario:** Pipeline leak in the Trans-Alaska Pipeline System (TAPS) due to a structural failure of a longitudinal weld resulting in a guillotine cut in section of aboveground pipe. Multiple valves fail to close for 120 minutes due to a communications link failure. 60,000 barrels (bbls) of oil are released from the pipeline by the time the valves are manually closed. The oil drains into Burbot Creek, which empties into the Yukon River 1 mile southwest of the pipeline crossing.

**Hydrology:** The water level in the Yukon River is low. The current in Burbot Creek is 0.25 feet per second (fps). Current in Yukon River 3-6 fps (2-4 miles per hour).

**Sensitive Areas at Risk:** Specific information on resources at risk can be extracted from the *Sensitive Areas Section* in consultation with the resource trustees. From a general viewpoint, resources in the immediate area of the spill that are at risk include the Yukon River, and the waterfowl and fish species that utilize these waters.

The Yukon River is an anadromous fish stream and is considered critical habitat. Moose are widely distributed in this area. A concentrated nesting habitat for the peregrine falcon and other raptors is located along the Yukon River, downstream of the Yukon River Bridge. Activity in this area after April 15 is restricted.

**On-Scene Weather:** Temp: High 70° F, Low 50° F; Winds: SW @ 8 mph. Precipitation: None.

**Cargo Salvage:** Not applicable to this scenario.

1. **Notification:** Facility personnel notify the NRC and ADEC. The NRC notifies EPA Region 10 Alaska Operation's Office personnel who then notify appropriate Federal agencies including Natural Resource Trustees. (Assume the responsible party (RP) has notified the required agencies in accordance with the facility response plan).

FOSC (EPA will notify the following):

- ADEC (also notified by the RP)\*\*\*
- ADNR\*
- ADF&G\*
- ADMVA, DHSEM\*
- ARRT\*\*\*
- NRC, National Response Center\*\*\*
- USCG\*\*\*
- DOI\*\*\*
- DOC\*\*\*
- NOAA SSC, Scientific Support Coordinator\*\*\*
- NSFCC, National Strike Force Coordinating Center\*\*
- NPFC, National Pollution Fund Center\*\*
- Local Emergency Managers of directly impacted communities\*\*\*
- Federally-recognized tribes in impacted communities\*\*\*

Key:	*	= Notification initiated by State
	**	= Message notification
	***	= Notification by FOSC

## 2. Response Activation:

- Commence with notification of all potentially involved parties and provide initial situation assessment. Be brief but concise and provide specific spill information: exact location, quantity spilled, potential immediate threats, source is/is not controlled, etc.
  - Upon notification and request from the FOSC/SOSC, federal and state agencies located in the Joint Pipeline Office (JPO) designate "agency representatives" to work directly in the unified government response organization which is established to oversee the response and direct activities as necessary.
- Dispatch representatives to the scene at the first opportunity
- FOSC/SOSC/RP Representatives establish direct communications.
- Begin recall of local in-house personnel (EPA, ADEC, ADNR, etc.) as needed to support 24-hour operations for a spill of this magnitude.
- Evaluate spill size, direction, area of coverage, proximity to Yukon River, wildlife impacts, wildlife observed in area, on scene weather, etc.
- Determine what response actions have occurred or are underway
- Issue Notice of Federal Interest and State Interest to RP
- Consult with DOI, DOC and the State of Alaska on potential resources at risk.
- Conduct Endangered Species Act consultation with DOI and DOC.
- Activate FOSC's Historic Properties Specialist.

## 3. Initial On-Scene Investigation/Inspection, Evaluation & Recommendations:

- Dispatch pollution investigators (EPA Anchorage and ADEC NART) to the scene at the earliest opportunity. Aircraft schedules may not allow arrival until the following day depending upon time of spill and time of notification.

- Recognize that information will come from individuals on scene that may or may not be knowledgeable of emergency procedures or pollution response. Conflicting reports can be expected during the early phases of gathering information.
- Ensure notification of resource trustees using the Emergency Notification Checklist.
- Evaluate RP's plan for securing the source.
- Evaluate the capability of the RP to carry out an appropriate response given the situation.
- Prepare Initial POLREP (EPA).
- Prepare Initial SITREP (State).
- Instruct RP to determine his/her ability to mechanically recover spilled product on land prior to reaching Burbot Creek or Yukon River, and in the waters of Burbot Creek and the Yukon River.

#### 4. Initial Response Actions:

- Secure the Source. The Alyeska response team and additional local/regional resources are activated.
- The Federal/State *Unified Plan* and Bristol Bay Subarea Contingency Plan are also implemented.
- Using *Unified Plan, Annex B* Implement the Incident Command Systems (ICS) principles listed below. An EPA FOSC and an ADEC SOSC contact the facility Incident Commander and establish a Unified Command (UC). By 5:00 PM that night a UC and incident management team composed of industry, federal, state and local government personnel arrive at Alyeska's headquarters in Fairbanks, AK.
  - Evaluate RP's capability to carry out an appropriate response.
  - Determine name of incident.
  - Determine goals and objectives
  - Determine UC staff and size- Liaison and RSC positions are critical for this region.
  - Establish an appropriate ICP to support UC activities in Fairbanks, AK.
  - Establish an appropriate Forward Operating Base at Yukon River Response Base (former Pump Station 6.)
  - Establish a Joint Information Center (JIC). Ensure joint website and/or appropriate local stakeholder communication plan is used to maximize information sharing.
- The SOSC initiates a statewide callout for a Type 1 incident. Additional ADEC spill responders from other response areas are mobilized, and the SOSC also requests mobilization of other State agency support personnel.
- The SOSC and EPA FOSC also activate the ADEC term contractors and EPA START contractors, respectively. The contractors are notified for possible mobilization to assist with the federal and state oversight operation.
- Both Federal and State field observers are deployed to the initial control sites to monitor cleanup operations and advise the FOSC and SOSC of the status of on-going operations.
- Deploy containment boom and/or plan and prioritize shoreline protection and cleanup areas.
- Utilize local knowledge, SSC and other NOAA hazmat resources as necessary to predict spill trajectory and potential impacts.
- Prepare initial press release with the UC.
- Complete notification procedures. Include up-channel notification to include the ARRT, NPFC, and NSFCC.
- Issue Notice to Airmen, through the FAA, restricting aircraft traffic in the immediate vicinity of the incident.
- Ensure preparation of Site Safety Plan.

- Consider alternatives to mechanical response: dispersant application, *in situ* burning. The use of dispersants is not appropriate due to the inland/fresh water location of spill and time of year.
- Schedule routine overflights of the impacted area. Request FAA support in developing an aviation operations plan for the spill to control air traffic in the area.
- In consultation with trustee agencies, determine requirements for wildlife protection, collection, and rehabilitation.
- Consult with natural resource trustees on the protection of sensitive areas and resources.
- Consult with the Historic Properties Specialist on the protection of historic properties.
- Receive recommendations from trustee agencies on wildlife response strategies. Make decision on any recommendations (e.g. migratory bird deterrent and capture and treatment program.)
  - Initiate wildlife hazing.
  - Additional measures may be initiated during subsequent operational periods, beyond the initial response.
- Determine feasibility of removal actions based on:
  - Will removal actions cause more damage to the environment than allowing the pollutant to naturally dissipate?
  - Can cleanup be initiated before the pollutant disperses, making recovery impractical?
  - Can equipment be deployed without excessive risk to the life and health of personnel?
- Considerations for future actions:
  - Determine any fisheries impacts, including subsistence fisheries, and take appropriate action.

5. Spill Response Organization: A spill of this magnitude may be declared a Spill of National Significance (SONS). If the UC determines the spill to be a SONS, the command structure, roles and responsibilities of a SONS scenario are identified in the *Unified Plan, Annex B*. The pre-designated FOSC for the region becomes the Area Operations Coordinator. The SONS incident continues as a UC response. The elevation of an incident into a SONS is intended to make more resources and personnel available for the response.

A Liaison Officer will be assigned to act as a sounding board for landowners, leaseholders, affected interest groups that have no jurisdictional authority, and other interested parties. The Regional Stakeholder Committee will be formed to serve as the official stakeholder and community representative voice to the UC.

6. Containment, Countermeasures and Cleanup Strategies: Immediate containment is required to mount an effective recovery operation.

A spill of this volume that is not contained immediately but is allowed to spread will likely not be recoverable under these conditions. The time required to mount an effective response added to the extraordinary travel time and logistical difficulties will make this operation a challenge.

- In accordance with the Alyeska C-Plan, response tactics to contain and clean-up the spill are implemented. Primary objectives are:
  - Site security.
  - Keep oil on land and out of Burbot Creek.
  - Prevent oil from reaching the Yukon River.
  - Implement recovery operations.
  - Protect sensitive resources and wildlife
  - Preserve the crime scene (No work on pipeline until FBI completes initial investigation).

- Agency and stakeholder notification  
Tactics to achieve these objectives include:
- Contain spill on land, to extent possible, with containment dikes and trenches constructed using earthmoving equipment
- Use booms to contain oil at point of entry and in side channels of the Yukon River.
- Recovery of oil in river using sorbent material (sweeps and booms) and skimmers.
- Organize Shoreline Cleanup Assessment Teams (SCAT) in preparation for shoreline surveys.
- Ensure the migratory bird deterrent, capture and treatment program is in place.
- Ensure that trustee agencies with responsibility for determining the requirement for implementation of a Federal/State Natural Resource Damage Assessment (NRDA) are notified that wildlife may be affected. The lead trustee will then coordinate the NRDA separate from the response and with funds provided by the NPFC.
- Request NOAA provide spill tracking and trajectory modeling to determine present location and path of spill. Consider spill tracking/surveillance systems; the University of Alaska Fairbanks' Synthetic Aperture Radar facility, USCG Forward Looking Infrared Radar equipped aircraft, and USCG Side Looking Airborne Radar are potential resources.

#### 7. Response Requirements:

- a. Equipment: The equipment required for the RP's spill response includes: heavy equipment for building dams, culverts, and berms for containment; vac trucks, sandbags, boom, pumps, skimmers, and some form of oil storage. The APSC Mobile Command Post will be deployed. The EPA Command Trailer and ADEC Command Trailer may likewise be deployed to provide on-scene command, control, and communications.
- b. Personnel: Initial RP response personnel would likely have to be augmented by their contractors on call for oil spill response and recovery. The RP's crew should be capable of deploying equipment and recovering product with assistance from their contractors. Representatives of Federal/State personnel would be required to reach the scene.

8. Resource Availability and Resource Procurement: The RP provides all spill response related equipment with their contractors supplementing any shortage. Any FOSC or State expenses not directly covered by the RP would be paid through the Federal Oil Spill Liability Trust Fund or the State 470 Fund, and reimbursement would be sought at a later date.

#### 9. Shortfalls:

- a. Equipment: No shortfall of cleanup equipment anticipated. Limited housing and personnel support for response workers is limited at the Yukon River Response Base (former Pump Station 06). A Portable work-camp will be necessary, 4-6 days required to transport and set-up portable accommodations.
- b. Personnel: Personnel shortfalls are not anticipated.
- c. Funding: Funds availability and access are not anticipated to be a problem.
- d. Minimum Response Times: RP response times must meet the times required in their approved response plans. These plans, having been approved by Federal and/or State agencies, will not be reevaluated here.

#### 10. Spill Cleanup Timetable:

- a. Mechanical Cleanup Only: Mechanical cleanup time will depend on the duration of the discharge as well as the velocity of the creeks affected.
- b. Mechanical in Conjunction with Non-Mechanical: Not applicable

11. Disposal Options: Debris disposal is the responsibility of the RP. Recovered oil would be the largest volume of debris, although burning would significantly reduce the volume of oil collected. Oil contaminated response equipment will require cleaning in an area capable of collecting and treating the runoff. Disposal options are further discussed in the *Unified Plan, Annex E, Appendix VI*. A Waste Management Plan will also be developed for the incident.

12. Cleanup Termination: Termination of cleanup should be a joint decision by the UC based on the following criteria:

- There is no longer any detectable oil present on the water, adjoining shorelines, or places where it is likely to reach the water again; or
- Further removal operations would cause more environmental harm than the oil to be removed; or
- Cleanup measures would be excessively costly in view of their insignificant contribution to minimizing a threat to the public health and welfare; and
- Activities required to repair unavoidable damage resulting from removal actions have been performed.

## **B. MAXIMUM MOST PROBABLE SCENARIO**

**Date:** May 19

**Size of Discharge:** 100,000 gallons of diesel and jet fuel

**Location:** Near Dunbar in the Minto Flats.

**Spill Information:** Approximately 100,000 gallons of diesel and jet fuel were released to land and water.

**Scenario:** An Alaska Railroad train of 70 cars derails near Dunbar in the Minto Flats with 19 tank cars leaving the tracks and at least seven rupturing. Approximately 100,000 gallons of diesel and jet fuel spilled. The fuel entered nearby ponds

**Sensitive Areas at Risk:** Specific information on resources at risk can be extracted from the Sensitive Areas Section in consultation with the resource trustees. The spill is located in the Minto Flats State Game refuge. This area is composed of sensitive wetlands which drain to the Tanana River. From a general viewpoint, resources in the immediate area of the spill that are at risk include the Minto Flats wetlands, and the waterfowl and fish species that utilize these waters. The Minto Flats supports very high density duck nesting, producing, including one of the largest trumpeter swan breeding populations in North America. Minto Flats is also an important spring and fall waterfowl staging area, particularly for geese and swans. Sandhill cranes, loons, bald eagle and peregrine falcon also nest in these wetlands. Chinook, chum and coho salmon migrate through the flats. A number of other fish species are found in the lakes and streams of the wetlands. Moose, black bear and fur-bearing mammals (beaver, muskrat, river otter, lynx, wolverine, red fox and mink) are also abundant.

**Cargo Salvage:** ARRC response crew begins transferring fuel from the damaged tank cars to keep discharge at a minimum. Salvage of the remaining tank cars is successful.

**Equipment:** The equipment required in the ARRC spill response plan with the ADEC will need to be augmented with vacuum units, super suckers, and possibly other oil recovery equipment to insure timely recovery. It is possible that additional equipment can be brought in a timely manner from the North Slope oil spill response organizations to respond to this spill volume. Alaska Chadux Corporation (ARRC's contracted oil spill response organization) will likewise be deploying personnel and equipment. The ARRC may establish a mobile command post at the scene. The EPA Command Trailer and ADEC Command Trailer may likewise be deployed to provide on-scene command, control, and communications.

**Containment, Countermeasures and Cleanup Strategies:** Immediate containment is required to mount an effective recovery operation.

A spill of this volume that is not contained immediately but is allowed to spread will likely not be recoverable under these conditions. The time required to mount an effective response added to the travel time and logistical difficulties will make this complicate the operation.

### **C. AVERAGE MOST PROBABLE SCENARIO**

**Event Description:** A fuel truck departs Fairbanks traveling to Delta Junction. The driver loses control of the vehicle and overturns, spill approximately 1,000 gallons of gasoline is released and is migrating towards the Tanana River.

**Location:** Richardson Highway, approximately one mile south of Harding Lake

**Time of Year:** October

**On-Scene Weather:** Air temperature 30°F, freezing rains

**Initial Actions Description:** The accident is reported by passing motorists to the State Troopers who proceed to the site and notify ADEC of the spill. The trucking company's dispatcher in Anchorage, Alaska is notified by the State Troopers and in turn notifies company management. Company managers contact the operators of the Trans Alaska Pipeline, with whom they have a contract to haul fuel, and request assistance to contain the spill. The trucking company contacts a local spill response contractor in Anchorage to respond to the incident.

Within 2 hours of the accident, a crew from Pump Station #9 is on scene with company response equipment. Initial response crews block off several highway drainage culverts to contain spilled fuel in the ditches adjacent to the roadway. The remaining fuel in the damaged tanker is pumped off into another tanker truck that was sent to the scene by the RP.

Approximately 300 gallons of additional oil and water is recovered over the next 12 hours by the commercial cleanup contractor's vacuum truck and by personnel using sorbent materials.

An undetermined amount of oil, estimated to be less than 50 gallons, enters the Tanana River but on the following day, no visible traces of oil are observed in the river during an overflight of the area by company personnel.



**Cleanup Strategies:** After initial response actions are accomplished, residual soil contamination of approximately 0.25 acres still remains saturated with approximately 700 gallons of oil. Under the supervision of ADEC personnel, the cleanup contractor recovers an additional 400 gallons from recovery and interception trenches. The area is flushed several times with fresh water in an attempt to remove free oil from surrounding gravels. A long-term remediation plan involving soil sampling, runoff collection and bioremediation is developed and approved by the FOSC/SOSC with input from adjacent landowners.

## SCENARIOS: PART TWO – HAZMAT

**Situation:** At approximately 10:00 am on June 1, a tanker truck transporting hydrochloric acid (37% concentration) overturns on the Dalton Highway while en-route to Prudhoe Bay (Deadhorse). The MC 312 liquid cargo tank contains approximately 4,500 gallons of hydrochloric acid. The driver of the tanker truck swerved to avoid a head-on collision with another vehicle, driven by a tourist. The tires on the right side of the truck caught the soft shoulder of the road and the truck rolled over and came to rest on its right side in a shallow embankment. The driver escaped serious injury and notified his dispatch center in Fairbanks before evacuating the cab of the truck. The tourist stops to render assistance, other vehicles are flagged down, and traffic is restricted from passing through the area. The truck driver observed liquid leaking from the rear portion of the tanker. There is no evidence of fire at this time.

**Location:** The incident occurred near milepost 65 on the Dalton Highway, approximately 10 miles North Northwest of Pump Station 6 along the Trans Alaska Pipeline System (TAPS). The pipeline is located approximately one-half mile away from the accident site.

**Release Information:** Over a period of approximately 30 minutes, approximately 700 gallons of hydrochloric acid has been released into the shallow ditch next to the road. The volume released begins to slow after 30 minutes, as the leak appears to be from the upper half of the tank, near the manhole assembly and outlet shutoff valve.

**Date of Incident:** June 1

**On-scene Weather:** Winds: Westerly at 5 mph; Temperature: 45°F; Sunny and clear, with no rain forecasted

**Cargo Salvage:** The trucking company's representative will survey the situation and determine when it is safe to transfer the remaining liquid cargo from the overturned truck to another tanker truck or suitable tanker.

**Sensitive Areas at Risk:** See *Sensitive Areas Section* of this plan.

Phelps Creek is approximately 1.5 miles southeast of the accident site. The creek is known to contain arctic grayling at this time of year. The accident is also several miles north of a known subsistence use area which is used by the residents of Stevens Village to gather plants.

### Initial Actions:

1. **Notification:** The truck driver contacts his dispatch center and informs them of the accident. A worker assigned to the maintenance crew at Pump Station 6 also noticed the accident and notified Alyeska Pipeline Service Company through their emergency communications system.

The truck company's dispatch center staff notifies the NRC and ADEC's Northern Alaska Response Team in Fairbanks. The NRC notifies EPA of the incident and the FOSC is notified through channels. The State Troopers are also notified of the accident.

Alyeska Pipeline Service Company emergency dispatch also notifies the NRC and the ADEC office in Fairbanks.

The SOSC notifies the Fairbanks North Star Borough's Emergency Manager of the incident and requests that the Fairbanks Hazardous Materials (Hazmat) Team be placed on alert for possible mobilization.

2. Response Activation: The driver consults with the dispatch center staff and they direct him to establish an isolation perimeter of at least one-half mile around the accident site (in accordance with the Emergency Response Guidebook, Guide 157). Traffic on either side of the highway is halted by passersby who have been put to work by the truck driver. TAPS Pump Station 6 personnel are also helping with traffic control pending the arrival of law enforcement officials.

The FOSC and SOSC confer via teleconference with the truck company and confirm the contents and quantity of the tanker vehicle, and receive an update on the situation.

The FOSC and SOSC also confer with the Fairbanks Hazmat Team and inform them of the situation and discuss possible options.

The primary objective is to ensure health and safety of all responders and the general public.

3. Initial Response Actions: Evacuate personnel from the immediate vicinity of the accident, using the Emergency Response Guidebook data for hydrochloric acid (Guide 157).

Complete the notification process.

Activate the response structure to the level deemed necessary. For an incident of this nature, a full-scale incident management team is not envisioned.

Ensure notification of resource trustees and land owners/managers using Emergency Notification Checklist. A preliminary review of the land management maps in the Interior Alaska Subarea Contingency Plan indicates that the land is categorized as State-selected, while the Federal land manager is the Bureau of Land Management.

Activation of an Emergency Operations Center is not deemed necessary. The truck company's dispatch center in Fairbanks will coordinate all activities related to the response (at the direction of the on-scene, RP Incident Commander).

Evaluate the RP's plan for securing the source.

Ensure preparation of a Site Safety Plan prior to any entry into the area.

4. Spill Response Organization: Establish a basic command structure as described in the *Unified Plan, Annex B*. Include FOSC representative, SOSC representative, and RP's Incident Commander. The response group agrees to convene on scene and manage the situation. The UC (FOSC, SOSC, and RP IC) agree to establish a general staging area at Five Mile Airstrip (in coordination with Alyeska Pipeline Service Company). The airstrip is located approximately three miles north of the incident.

5. Containment, Countermeasures, and Cleanup Strategies: Determine the location and extent of the leak and secure the source.

Remove as much of the tanker's remaining liquid cargo as possible by pumping it into another tanker truck. A serviceable, MC312 tanker is not immediately available to offload the remaining liquid. Alaska West Express (Fairbanks) does have an MC312 tanker, but it does not meet DOT regulations due to a bottom discharge configuration. A waiver from DOT will be required to use this tanker truck. Another option is to use a vacuum truck, but additional safety precautions must be taken. The receiving tank must be rubber-lined, and the tank must not contain any residual chemicals that could react with the hydrochloric acid solution.

After the State Trooper completes his/her on-scene investigation, the overturned truck will be carefully raised into an upright position and towed back onto the highway.

Determine whether neutralizing the acid-soil mixture will be an effective countermeasure. Neutralization of the spill in situ, if possible, should be the priority cleanup option rather than excavation and removal of soil. This would minimize vegetation/organic soil disruption and permafrost degradation in the immediate area. The minimization of permafrost degradation is particularly important if the fuel gas line is next to or underlies the spill area, as there have been problems in the past with erosion along the fuel gas line ditch.

Minimize any removal and excavation of contaminated soil.

#### 6. Response Requirements:

- a. Equipment: Any action to contain, plug or prevent additional release will require the use of appropriate personal protective equipment (PPE).
- b. Personnel: Personnel responding to this incident (State Troopers, firefighters, and other responders) will be required to be trained to at least the first responder awareness level. Those entering the scene to secure the leak source and initiate cleanup and containment will require training to the technician level.

7. Resource Availability and Resource Procurement: The Alaska State Troopers will respond to this incident upon notification. Additional resources, outside of those provided by the first responders will be the responsibility of the RP. An incident of this size will require evacuation of the immediate area around the accident site, and an isolation perimeter of at least one-half mile is required.

#### 8. Shortfalls:

- a. Equipment: Firefighting equipment and law enforcement vehicles will be needed as a precautionary measure in the event the tanker truck and product ignites, and to control traffic/limit access to the incident; the Fairbanks Hazmat team will most likely not be deployed unless the situation deteriorates further. The trucking company, serving as the RP, will be coordinating with Alaska West Express in Fairbanks, who maintains a trained Hazmat response team. The team will be dispatched to secure the source and initiate cleanup.
- b. Personnel: Due to the location of the accident and the localized hazard (i.e., liquid hydrochloric acid on the ground), additional emergency response personnel are not deemed necessary. Alyeska Pipeline Service Company, acting as a Good Samaritan, offers to provide assistance with the overall response under the direction of the RP or the SOSC/FOSC.
- c. Funding: Funding of response and clean-up actions will be the responsibility of the RP.
- d. Minimum Response Times: Response should be initiated immediately. Based on the location of the incident, the State Trooper, SOSC, and the RP's designated Incident Commander will arrive

at the scene via helicopter by early afternoon (a few hours after the incident.) The FOSC, deploying from Anchorage, is expected to arrive at the scene sometime in the evening.

9. Spill Cleanup Timetable: This response should last no more than several days. Cleanup of the immediate area will be required, and contaminated soil will need to be collected and transported. The RP indicates that he will transfer the remaining liquid to another tanker (or suitable container) and remove the vehicle from the culvert (using a heavy-duty tow truck). The cleanup crew will then attempt to neutralize the acid-saturated soil, and minimize excavation and removal of the remaining contaminated soil as necessary.

10. Disposal Options: Some waste material will be generated during this response; however, there are no facilities in Alaska that are licensed to accept hazardous materials. All wastes generated in this response will have to be contained and transported to a facility in the continental U.S. in an EPA, ADEC and DOT-approved manner.

11. Cleanup Termination: The FOSC and SOSC will determine the appropriate time to terminate cleanup operations based on the RP's ability to return the accident site to an acceptable condition.