

DEPARTMENT OF THE INTERIOR

ALASKA PIPELINE OFFICE

808 E Street, Anchorage, Alaska 99501

DEPARTMENT OF TRANSPORTATION

SEVENTEENTH COAST GUARD DISTRICT

P.O. Box 3-5000, Juneau, Alaska 99802

MEMORANDUM OF UNDERSTANDING BETWEEN THE ALASKA PIPELINE OFFICE, DEPARTMENT OF THE INTERIOR AND THE SEVENTEENTH COAST GUARD DISTRICT, DEPARTMENT OF TRANSPORTATION CONCERNING RESPECTIVE RESPONSIBILITIES IN CONNECTION WITH SPILLS OF OIL AND OTHER POLLUTANTS FROM THE TRANS-ALASKA PIPELINE SYSTEM UNDER THE FEDERAL WATER POLLUTION CONTROL ACT, AS AMENDED (33 U.S.C. 1321 et seq.) AND THE AGREEMENT AND GRANT OF RIGHT-OF-WAY FOR THE TRANS-ALASKA PIPELINE.

The Alaska Pipeline Office (APO) and the United States Coast Guard (USCG) both have statutory and regulatory responsibilities in connection with spills of oil and other pollutants from the Trans-Alaska Pipeline System (TAPS). The APO has been delegated the responsibility for insuring Permittee compliance with the terms and conditions of the Agreement and Grant of Right-of-Way for the Trans-Alaska Pipeline. In addition, the Environmental Protection Agency (EPA), under the provisions of the Federal Water Pollution Control Act, has designated the Authorized Officer (AO) as Federal On-Scene Coordinator(OSC) for all pipeline related spills. The USCG has responsibility for prevention and control

of oil or hazardous substance spillage under the Federal Water Pollution Control Act, as amended (33 U.S.C. 1321 et seq.) and for coordinating Federal agency response to spills.

To clarify the respective roles and responsibilities where they interface, the Authorized Officer, Alaska Pipeline Office and the Commander, Seventeenth Coast Guard District agree that the following provisions shall be observed in the exercise of their authority and the discharge of their responsibilities.

1. The APO will perform as OSC for all oil spills related to TAPS that enter or threaten to enter Inland Waters.

2. The USCG will perform as OSC for all oil spills related to TAPS that enter Coastal Waters.

3. For purposes of clarification, the delineation between Inland and Coastal Waters shall be as follows:

- a. The Alaska Pipeline Office shall perform as On-Scene Coordinator (OSC) for any spills upstream of the Dayville Road Bridge across the Lowe River and the United States Coast Guard shall perform as OSC for any spills downstream from the bridge. For any spill that originates upstream of the Dayville Bridge but spreads downstream of the

bridge, the Alaska Pipeline Office and United States Coast Guard On-Scene Coordinators shall mutually assess the spill on a case-by-case basis to determine which will perform as the Federal OSC.

b. The dividing line between Coastal and Inland Waters in the vicinity of Prudhoe Bay shall be the interface of marine and fresh water at the mouths of the Sagavanirktok and Kuparuk Rivers. For any spill that originates upstream of that point but spreads downstream and into marine waters, the APO and USCG On-Scene Coordinators shall mutually assess the spill on a case-by-case basis to determine which will perform as the Federal OSC.

4. The first person on the scene of an oil spill from the APO or USCG will perform as OSC, irrespective of location, until the responsible agency OSC arrives as set forth in paragraphs 1, 2 and 3 above.

5. The APO and the USCG will assist, advise, and support each other upon request in any way it can, either directly or through the Regional Response Team.

6. Nothing herein is intended to conflict with current USCG or Department of the Interior directives or the Alaska Coastal Region Oil and Hazardous Substance Pollution Contingency Plan.

7. This Memorandum of Understanding shall be reviewed annually and shall continue in force until it shall be amended or terminated by mutual agreement.

Done this 26th day of October, 1978.

AUTHORIZED OFFICER
ALASKA PIPELINE OFFICE

COMMANDER
SEVENTEENTH COAST GUARD DISTRICT




