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I share a number of concerns with the RCACs regarding the proposed regulations changes pertaining to oil spill drills, best available technology, and RCAC oversight.

There are proposed changes to regulatory language that have the potential to reduce the number of oil spill drills and exercises required to be conducted by larger plan holders, such as the Valdez Marine Terminal and associated shippers. These drills and exercises are a key component of a robust oil spill prevention and response system, ensuring rapid deployment of resources for effective containment and cleanup should a spill occur and supporting safety for responders by allowing them to practice response activities ahead of an actual emergency. The drills also reinforce the provisions of and a company's intimate knowledge with the provisions of its contingency plans.

#2: The regulations previously committed to examining best available technologies (BAT) in use outside of Alaska, engaging in studies, evaluating and identifying where new technologies could be applicable in Alaska, and holding a conference related to advancing this knowledge, as well as providing findings to plan holders. With the language requiring the BAT conference removed, how will ADEC meet the vision and intent of ensuring that spill response and prevention equipment, and other spill functions that have previously been subject to this BAT analysis, is the most effective and available as new technologies emerge?

The regulations previously required both RCACs (Prince William Sound and Cook Inlet) as well as the Alaska Department of Natural Resources and the Alaska Department of Fish and Game receive printed materials during contingency plan renewals, updates, and amendments. This language should not have been removed. The RCACs are integral to the C-Plan review process and should be integrated into a state system of citizen oversight including government agency operations. Their reviews very often improve and strengthen contingency plans, ensuring better and safer operations.