

Robert Archibald

Please see attached comments

Respectfully,
Robert Archibald

To
Jason W. Brune
Alaska Department of Environmental Conservation

January 30, 22

Subject
Comments On
Proposed Changes to Oil Pollution Prevention Requirements in the Regulations
of ADEC

Greetings,
Please accept the following comments on the proposed changes.

The minimum number of exercises required for crude oil plans should be set at one significant Incident Management Team and two field deployment exercises per year, as well as other unannounced exercises as ADEC deems necessary.

Regulations should also retain the commitment that if a plan holder fails to demonstrate the ability to implement their plan, ADEC will require additional exercises or take other appropriate action.

The adage of Practice Makes Perfect IS NOT True.
PRACTICE MAKES BETTER IS WHAT SHOULD BE IN ALL THE BOOKS!

The State of Alaska and ADEC should continue to show leadership in staying informed and promoting best available technology. Regulatory changes should not result in any diminished emphasis on best available technology, including retaining the requirement that a BAT conference be held every five years or otherwise stating how they will examine new technologies to meet the mandates of AS 46.04.030(e).

Technology development is moving at a fast speed and if Alaska has no specific regulation to KEEP UP, we will stay in the dark ages.

The regulations should continue to name the RCACs for Cook Inlet and Prince William Sound as recipients required to be notified of plan reviews, updates, and amendments, electronically or otherwise.

Federal law, the Alaska Oil Spill Commission, and the Alaska Department of Environmental Conservation all recognize the RCACs' special role in reviewing contingency plans.

The adoption of International Maritime Organization (IMO) standards for emergency towing arrangements is appropriate, but with the additional requirement that tankers calling at the Valdez Marine Terminal be able to deploy the arrangement from the forward (bow) position in 15 minutes.

Improvements to the regulations were noted and appreciated, such as gains in clarity and useability, previously redundant sections of regulation combined, and modernization of workflow.

Best Regards
Robert Archibald & Roberta Highland