From:	Noland, Laura J (DEC)
To:	Pavia, Clare A (DEC); Munson, Dianne R (DEC); Spiegel, Rebecca A (DEC); DEC-SPAR IPP.REGULATIONS (DEC sponsored)
Cc:	Robinson, Seth R (DEC)
Subject:	RE: ODPCP Requirements: Public Scoping - DNR comments
Date:	Wednesday, March 18, 2020 8:43:59 AM

Yes, you are correct. My apologies – I drafted an email reply yesterday and forgot to send it. It was decided that all sister agency comments will be treated as public comments and published on our website.

From: Pavia, Clare A (DEC)
Sent: Wednesday, March 18, 2020 8:28 AM
To: Munson, Dianne R (DEC) <dianne.munson@alaska.gov>; Spiegel, Rebecca A (DEC) <rebecca.spiegel@alaska.gov>; DEC-SPAR IPP.REGULATIONS (DEC sponsored) <DEC.SPAR.IPP.REGULATIONS@alaska.gov>
Cc: Noland, Laura J (DEC) <laura.noland@alaska.gov>; Robinson, Seth R (DEC) <seth.robinson@alaska.gov>
Subject: RE: ODPCP Requirements: Public Scoping - DNR comments

Yes, after work yesterday I thought about it and thought we decided to make them public and that Laura contacted Sylvia about that. Laura please let me know if I am mis-remembering.

Thanks, Clare

From: Munson, Dianne R (DEC)
Sent: Tuesday, March 17, 2020 5:49 PM
To: Spiegel, Rebecca A (DEC) <rebecca.spiegel@alaska.gov>; DEC-SPAR IPP.REGULATIONS (DEC sponsored) <DEC.SPAR.IPP.REGULATIONS@alaska.gov>
Cc: Noland, Laura J (DEC) <laura.noland@alaska.gov>; Robinson, Seth R (DEC) <seth.robinson@alaska.gov>
Subject: RE: ODPCP Requirements: Public Scoping - DNR comments

I agree that we should accept them and I do recall that we decided they are all public.

From: Spiegel, Rebecca A (DEC)
Sent: Tuesday, March 17, 2020 4:59 PM
To: DEC-SPAR IPP.REGULATIONS (DEC sponsored) <DEC.SPAR.IPP.REGULATIONS@alaska.gov>; Munson, Dianne R (DEC) <dianne.munson@alaska.gov>
Cc: Noland, Laura J (DEC) <laura.noland@alaska.gov>; Robinson, Seth R (DEC) <seth.robinson@alaska.gov>; Spiegel, Rebecca A (DEC) <rebecca.spiegel@alaska.gov>
Subject: RE: ODPCP Requirements: Public Scoping - DNR comments

I'd accept them. And, I believe we decided they would all be public.

Thanks,

Becky

Becky Spiegel
Prevention & Technical Support Section Manager
Prevention, Preparedness, & Response Program
Spill Prevention and Response Division
Alaska Department of Environmental Conservation

555 Cordova Street
Anchorage, AK 99501

Telephone: (907)269-7543
Cell: (907) 602-6212
Fax: (907) 269-7687
rebecca.spiegel@alaska.gov

From: DEC-SPAR IPP.REGULATIONS (DEC sponsored) <DEC.SPAR.IPP.REGULATIONS@alaska.gov>
Sent: Tuesday, March 17, 2020 3:33 PM
To: Spiegel, Rebecca A (DEC) <rebecca.spiegel@alaska.gov>; Munson, Dianne R (DEC) <dianne.munson@alaska.gov>
Cc: Noland, Laura J (DEC) <laura.noland@alaska.gov>; Robinson, Seth R (DEC) <seth.robinson@alaska.gov>
Subject: FW: ODPCP Requirements: Public Scoping - DNR comments

Hello,
DNR submitted their comment today and Sylvia called to follow-up. It is not controversial. Since they are a sister agency I am thinking we should accept them. Do you agree Becky and Dianne?

ADF&G did submit comments through Smart Comment.

Laura – to save me looking through my files, can you remind me what was decided about posting other state agency comments publicly?

Thanks, Clare

From: Kreel, Sylvia A (DNR)
Sent: Tuesday, March 17, 2020 3:08 PM
To: DEC-SPAR IPP.REGULATIONS (DEC sponsored) <DEC.SPAR.IPP.REGULATIONS@alaska.gov>
Subject: ODPCP Requirements: Public Scoping

Mr. Robinson,
Please accept the following comments from the Department of Natural Resources on DEC's Oil Spill Discharge Prevention and Contingency Plan requirements.

The Alaska Department of Natural Resources (ADNR) appreciates the opportunity to comment on the request by the Alaska Department of Environmental Conservation (ADEC) to seek input on current spill prevention and response regulations and statutes, specifically those within 18 AAC 75, Article 4 regarding Oil Discharge Prevention and Contingency Plan (ODPCP) requirements, and any related statutes that authorize the Article 4 regulations.

The purpose of ODPCPs is not only to ensure that a plan holder has the financial ability and measures in place to prevent and respond to a release, but it also provides guidance to those involved in the response actions to effectively address a release. ODPCPs are specific to both the plan holder's operations and to the surrounding environment, to best minimize potential impacts from a release.

The ability to review ODPCPs and engage in associated spill drills and training is essential for ADNR. These opportunities establish clear communication channels between all involved agencies, outline informed processes to handle responses to various spill scenarios, and equip ADNR staff with the knowledge and experience required of such events to better contribute to a streamlined spill response that is timely and efficient.

ADNR supports 18 AAC 75, Article 4, and all related statutes that authorize the Article 4 regulations, as they are currently written, as it pertains to ADNR's mission to provide for the appropriate use and management of Alaska's state owned land and water, aiming toward maximum use consistent with the public interest.

Thank you for the opportunity to comment. Please contact me If you have any questions or need additional information.
Sylvia

Sylvia A. Kreel
Large Project Coordinator
DNR/Office of Project Management and Permitting
907-465-3177