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SUBMITTED VIA EMAIL TO <BFRIEDMA@jpo.doi.gov> AND REGULAR MAIL

Bonnie Friedman
ADEC/JPO
411 West 4th Avenue
Anchorage, AK 99501

Re: Supplemental comments from the Alaska Forum for Environmental Responsibility on the Trans-Alaska Pipeline 2001 Draft Oil Spill Contingency Plan

Dear Bonnie:

In light of the Oct. 4 bullet hole spill at Trans-Alaska Pipeline System (TAPS) MP 400, the Alaska Forum for Environmental Responsibility, on behalf of the Sierra Club, Arctic Connections, Northern Alaska Environmental Center, Alaska Center for the Environment, Greenpeace, and Cook Inlet Keeper, offer the following supplemental comments on the TAPS Oil Spill Contingency and Prevention Plan (C-plan).

In comments on the draft C-plan submitted Oct. 8, the Alaska Forum questioned the value of the filing by Alyeska of essentially the same 12 spill scenarios in 2001 that were written for the 1998 plan. We also reiterated concerns – expressed clearly at and after the stakeholder C-plan meetings at Glennallen December 8, 1999 and November 16, 2000 – that ADEC should require field testing by Alyeska of its ability to execute the responses outlined in the scenarios. The undersigned groups believe believes that the unacceptably long delay in closing the bullet hole at MP 400 demonstrates the consequences of the failure to require Alyeska to write and field-test C-plan scenarios in a meaningful manner.

Even before TAPS entered service, the *Fairbanks Daily News-Miner* reported that more than 50 bullets had been fired at TAPS and that a high-powered rifle could penetrate the pipeline, resulting in a high-pressure oil release (see: "Pipeline potshots worry Alyeska," *Fairbanks Daily News-Miner*, June 10, 1977, p. 1). In both the current and the draft contingency plan, Alyeska states that it has a variety of clamps available for emergency response, including a device known as a bullet hole clamp (GP-35-1, Sec. 1.7.2.2). In view of this history, we are dumbfounded by the 36-hour hiatus between the spill and Alyeska's application of the clamp that stopped the leak.

One of the consequences of the delay in response is needless degradation of land that might not have been affected had Alyeska spill responders been trained to implement prompt abatement measures. We note that a 1978 spill of 16,000 barrels oiled 2.1 acres of land near Fairbanks. At last report, the recent spill of less than half that amount at MP 400 has already resulted in the destruction

of three acres of forest; from examination of spill maps, we believe the area that will eventually be affected is liable to be larger.

With this background in mind, the undersigned groups believe that Alyeska should be required, as a condition of approval of the TAPS C-plan currently under review, to (a) set a schedule to field-test the existing scenarios in a manner that finds and corrects weak spots in the response system and (b) complete a new set of scenarios that can be used to test and improve response capabilities.

Based on Alyeska's apparent inability at MP 400 to deploy trained personnel and equipment in a timely manner to minimize environmental damage resulting from a single bullet hole at an accessible site in relatively good weather, we renew the Alaska Forum's previous request that Alyeska be required to demonstrate, as a condition of the TAPS C-plan, that the closure of four pump stations since 1996, have not degraded Alyeska's response capabilities. A host of operational problems that include mainline and valve corrosion, valve sealing problems and the failure of the fiber optics communications system underscore the importance of this concern.

Finally, with regard to the MP 400 spill itself, we believe the new C-plan should be conditional on completion of a report on the MP 400 spill that allows concerned members of the public to assess Alyeska's spill response capabilities. At a minimum, that report should include clear, detailed and verified answers to the following questions:

1. Clamps and Clamp Application

- a. Time of arrival and number of 48-inch line clamps (bullet hole and hydraulic) delivered to MP 400 spill site;
- b. Time of arrival and summary description of equipment needed to apply (1) bullet hole and (2) hydraulic clamp referenced in TAPS C-plan at Sec. 1.7.2.2 (5) (if different from the clamp used);
- c. Specific reason bullet hole clamp was not used;
- d. Drills and Application of Bullet Hole Clamp
 - (1) List briefly all training in this cycle using the bullet hole clamp.
 - (2) When were drills or exercises (simulating and testing actual response conditions) conducted?
 - (3) How many miles of the line operate under pressure higher than the field-tested limits of the bullet hole clamp?
 - (4) For each above ground river crossing south of an RGV, has the quantity of oil that would have to be removed after valve closure to reduce line pressure to the point that the bullet hole clamp could be applied been calculated?
 - a. How much would be by [1] release, [2] pump-around or [3] other (specify means).
 - (5) Has Alyeska (a) developed procedures or (b) ever attempted to apply the bullet hole clamp from a pipeline bridge? (Please describe results of test.)
- e. Drills and Application of Hydraulic Clamp
 - (1) List briefly all training in this cycle using (a) the hydraulic clamp employed at MP 400 and (b) the hydraulic clamp referenced in the 1998 and 2001 C-plan (if different).
 - (2) When were drills or exercises (simulating and testing actual response conditions) conducted?
 - (3) How many miles of the line operate under pressure higher than the field-tested limits of the hydraulic clamp?

- (4) For each above ground river crossing south of an RGV, has the quantity of oil that would have to be removed after valve closure to reduce line pressure to the point that the hydraulic clamp could be applied been calculated?
 - a. How much would be by [1] release, [2] pump-around or [3] other (specify means).
- (5) Has Alyeska (a) developed procedures or (b) ever attempted to apply the hydraulic clamp from a pipeline bridge? (Please describe results of test.)

f. If Alyeska pre-determined that bullet hole and/or hydraulic clamps could not be applied under normal line pressure for significant portions of TAPS:

- (1) What measures did Alyeska take to revise the C-plan to minimize spill leaks?
- (2) Did Alyeska develop other clamps or patches that might have mitigated spill effects?
 - (a) If so, when was such a patch developed and when was it tested?
 - (b) Was it put into service?
 - (c) Why wasn't it used or put into service?

2. Pump-Around (please provide source of information for each answer – i.e., individual in field providing information, Alyeska engineering [Fairbanks] or OCC [Valdez]).

a. First Pump-around pump at RGV-65

- (1) At what time was the first pump-around pump in place at RGV-65 and capable of actually pumping?
- (2) At what time did pumping actually begin?
- (3) What was the reason for the difference between a. and b. (if any)?
- (4) What was the northbound pump-around rate for this pump?
- (5) How long was this pump in operation?
- (6) How much oil was pumped north by this pump?
- (7) What was the estimate "leak-by" (southbound flow) at RGV-65?

b. Was a second pump installed at RGV-65?

- (1) At what time was the second pump-around pump in place at RGV-65 and capable of actually pumping?
- (2) At what time did pumping actually begin?
- (3) What was the reason for the difference between a. and b. (if any)?
- (4) What was the northbound pump-around rate for this pump?
- (5) How long was this pump in operation?
- (6) How much oil was pumped north by this pump?

3. Line Pressures (please provide source of information for each question – i.e., individual in field providing information, Alyeska engineering [Fairbanks] or OCC [Valdez]).

- a. In the case of a bullet hole to the south of a check valve, please explain how is the oil moved to the north to reduce pressure at the bullet hole.
- b. In the event of a shutdown, what is the static pressure against the south side of each check valve on TAPS?

4. Did changes in the composition of TAPS oil due to (a) shipment of NGL's and/or (b) effects of production from fields other than Prudhoe Bay: (1) increase, (2) decrease, or (3) have no effect on the safety hazards associated with the response to the Oct. 4 spill?

5. Valves

- a. As the Alaska Forum indicated in its September 20, 2001 comments on TAPS to Argonne National Laboratory regarding lease renewal, a continued valve testing program is necessary to ensure that the ability of each TAPS mainline valve (and each major pump station valve) to block oil flow in an emergency is not deteriorating over time.
- b. Please provide current leak-by data for each TAPS mainline valve.

6. Site Safety Plan

When was a site safety plan put into place that:

- a. established minimum distance from the bullet hole for an individual without appropriate protective gear and/or respiratory device?
- b. ensured all persons within a specified distance from the bullet hole leak had appropriate protective gear and/or respiratory device?
- c. ensured that all workers had the required safety training to perform their jobs?
- d. identified and blocked access to other hazardous areas (containment areas, vehicle lanes, etc.)?

7. Communications Plan

- a. Describe in detail how communications were established:
 - (1) from the spill containment sites to the Incident Commander;
 - (2) from the Incident Commander to (a) Pump Station #7 and (b) Fairbanks?
- b. At what time were these communication lines established?

8. Lessons Learned

- a. Provide all "lessons learned" observations and comments and communications from individual employees, contract responders and management personnel.

If you need information or clarification on any of these questions, please don't hesitate to contact me at (907) 479-6946.

Sincerely,

Ross Coen
Executive Director

For: Sara Callaghan Chapell, Alaska Representative
Sierra Club

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