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APSC Contingency Plan

As we discussed on July 6, the Alyeska response to the Department's questions regarding APSC's contingency plan is superficial at best.

Technically, their response probably satisfies the regulation requirements on paper, however APSC has never been able to demonstrate that the recovery rates listed in Appendix B are possible to attain.

In fact, all our experience with APSC oil spill recovery rates indicate that the recovery rates listed are 80% too high. The equipment may be capable of the capacities listed but in practice on small spills (up to 1000 gallons) they are not very efficient.

The skimmers that APSC now have are not capable of working efficiently in any weather or sea conditions beyond windless, glassy seas regardless of what the advertising brochures may indicate.

Even with the acquisition of a large (80 ft. or more) open ocean skimmer, oil spill recovery would be difficult at best. The staging and support required for this type operation is staggering with difficulty increasing exponentially as distance doubles.

Alyeska's indication that a tanker is only 12 hours away is misleading. There have been and continues to be periods of time when the closest tanker loaded or empty is 24 - 36 hours away.

Since oil once spilled is difficult to recover, let's put more emphasis on oil spill prevention.

The towing packages are nice but we should occasionally exercise them complete with rescue tug and crews. If APSC considers them part of the contingency and response plan then we should have a right to ask for a demonstration of their effectiveness.

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