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We are pleased to welcome you to the 1994 Year in Review. Nineteen ninety-four was a year of significant accomplishment and formidable challenge for the Regional Citizens' Advisory Council.

RCAC's biggest challenge in 1994 was to improve relations with industry and regulators. RCAC has a unique charge: to represent the interests and concerns of our member organizations and communities, while fostering a cooperative partnership with industry and regulators. Our ability to build and sustain good working relationships will be the key to our long-term success, indeed perhaps to our very existence.

We are pleased to report significant progress in this area. In the final stages of the two-year Disabled Tanker Towing Study, we worked closely with industry and regulators to handle potentially sensitive issues in a responsible manner.

A year ago, the prospects were bleak for federal funds to improve weather reporting in Prince William Sound. Thanks to active support from industry, local regulators, communities and Sen. Ted Stevens, Congress approved funding that will make oil transportation safer.

RCAC took a more participatory, team-player approach to major oil spill drills. In a three-day drill conducted by ARCO Marine in September, RCAC was part of the response team with personnel assigned to communications and evaluation. RCAC also monitored the drill and shared its observations with response managers so that they could benefit from our independent monitoring.

RCAC continued its aggressive support for controls to reduce hydrocarbon emissions at the Valdez Marine Terminal. But 1994 brought a more cooperative atmosphere as we worked with Alyeska, state and federal regulators to search for consensus on the specifics of a vapor control system.

We talk much more frequently, both formally and informally, with Alyeska officials, shippers and other industry representatives. We are also working more closely than ever with regulators, in particular the Alaska Department of Environmental Conservation and the U.S. Coast Guard, Marine Safety Office, Valdez.

We continue to meet frequently with Alyeska in our on-going efforts to forge a positive and productive relationship that fosters what we all want: safe oil transportation.

In these pages, you'll find a comprehensive overview of RCAC's work and activities over the past year. A few highlights merit particular note:

A major study of disabled tanker towing in Prince William Sound provided new and important information about ways to increase our margin of safety in preventing oil spills from disabled tankers.

A coordinated effort by RCAC and others resulted in a federal appropriation to pay for improved reporting of weather and sea conditions in Prince William Sound.

RCAC worked for compromise legislation on the state's oil spill prevention and response activities. The bill as passed could and would have been much worse without the efforts of RCAC and other concerned groups.

In work that continues into 1995, RCAC reviewed scores of complex, technical documents representing the oil spill contingency plans for the Valdez Marine Terminal and most of the tankers carrying North Slope crude from Valdez.

RCAC submitted extensive comments to state regulators, raising questions, pointing out deficiencies and giving praise where due.

RCAC welcomed a new member organization to its ranks in March. The Oil Spill Region Environmental Coalition (OSREC) replaced the National Wildlife Federation to represent environmental interests on the RCAC Board of Directors.

Mission & Responsibilities

The Prince William Sound Regional Citizens' Advisory Council is guided by its mission: citizens promoting environmentally safe operation of the Alyeska terminal and associated tankers.

Consistent with that mission, RCAC's structure and responsibilities stem from two documents. Under a contract with Alyeska Pipeline Service Company, RCAC receives funding for services provided to Alyeska and the public. The second guiding document, enacted after RCAC was created, is the federal Oil Pollution Act of 1990, which provided for citizen oversight councils for Prince William Sound and Cook Inlet. The RCAC is certified as the citizen council for Prince William Sound.

Contract

The contract between Alyeska and the Regional Citizens' Advisory Council is explicit about RCAC's independence:

"The independence, and public perception of independence, of the Committee is of overriding importance to the Committee in fulfilling its functions and in meeting public needs. This contract shall be interpreted in such a way as to promote the independence, both actual and perceived, of the Committee from Alyeska. . . . Alyeska shall have no right... to have any degree of control over the formation or operation of the corporation. . . ."

Under the terms of its contract, the RCAC provides specific services to Alyeska and the public. They include:

- Review, monitor and comment on:
  - Alyeska's oil spill response and prevention plans;
  - Alyeska's prevention and response capabilities;
  - Alyeska's environmental protection capabilities; and
  - the actual and potential environmental impacts of terminal and tanker operations;

- Increase public awareness of:
  - Alyeska's oil spill response and prevention capabilities,
  - Alyeska's environmental protection capabilities, and
  - actual and potential environmental impacts of terminal and tanker operations;

- Comment on and participate in monitoring and assessing the environmental, social and economic consequences of oil related accidents;

- Provide input on actual or potential environmental impacts in or near Prince William Sound;
Comment on the design of measures to mitigate the potential consequences of oil spills and other environmental impacts of terminal and tanker operations;

- Participate in development of the spill prevention and response plan; annual plan review; periodic review of operations under the plan, including training and conducting exercises;
- Comment on and participate in selection of research and development projects.

The contract states that the council may work on other related issues not specifically identified when the contract was written. The RCAC was initially funded at $2 million per year. The funding level is reviewed every three years.

Oil Pollution Act of 1990

RCAC’s contract with Alyeska pre-dates the Oil Pollution Act of 1990 (OPA 90), but the similarities are not coincidental. Many of the people involved in the establishment of the RCAC also actively promoted citizen involvement provisions in the federal law.

OPA 90 established two demonstration projects in Alaska – one in Prince William Sound, the other in Cook Inlet – designed to promote partnership and cooperation between local citizens, industry and government; build trust and provide citizen oversight of environmental compliance by oil terminal facilities and tankers.

The law specifically allowed for an alternative, existing organization to meet the requirement for a citizen group and the RCAC is certified as the voluntary alternative advisory council for Prince William Sound. As such, RCAC:

- Advises and makes recommendations on policies, permits, and site-specific regulations relating to the oil terminal and tankers;
- Monitors the environmental impacts of the terminal and tankers;
- Monitors terminal and tanker operations that affect or may affect the environment in the terminal vicinity;
- Reviews the adequacy of oil spill prevention and contingency plans for crude oil tankers operating in Prince William Sound;
- Advises and makes recommendations on port operations, policies and practices;
- Recommends standards and modifications for terminal and tanker operations to minimize the risk of oil spills and other environmental impacts, and enhance prevention and response.
Oil Spill Prevention

Disabled Tanker Towing Study

A two-year study of tanker escorts and towing was completed, providing new and valuable information about ways to make oil transportation safer. The Disabled Tanker Towing Study was a joint project of RCAC, the Prince William Sound Tanker Association, Alyeska Pipeline Service Co., the U.S. Coast Guard and the Alaska Department of Environmental Conservation. The study was conducted to evaluate the capability of existing emergency towing equipment and practices, and to examine alternatives to enhance escort and assist capabilities for disabled tankers.

Using computer simulations of various scenarios, the study found that equipment and operating procedures that had been in use could not keep a disabled tanker from grounding in certain extreme situations. The study also revealed ways to improve the effectiveness of towing and assistance capabilities through changes in equipment and operating procedures.

Federal escort requirements

RCAC submitted comments and recommendations to the U.S. Coast Guard on the final rule on escort requirements for Prince William Sound and Puget Sound. RCAC also recommended other changes in operating procedures to reduce the risk of a tanker being stranded and enhance the ability of escort vessels to successfully assist tankers in trouble.

RCAC’s comments were based on the findings of the Disabled Tanker Towing Study. RCAC’s comments included recommendations on weather and sea restrictions, tanker speed through the Valdez Narrows, one-way traffic zones and tug type.

Weather reporting

Several years of work culminated in a federal appropriation of $500,000 for additional weather reporting equipment in Prince William Sound. The new equipment will make oil transportation in Prince William Sound safer by providing more accurate and timely information about weather and sea conditions. Equipment is scheduled for delivery in May 1995. Industry groups, communities, interest groups and regulatory officials actively supported the appropriation.

Plans call for two weather buoys, one at Hinchinbrook Entrance near Seal Rocks and one in the middle of Prince William Sound. Each buoy will have equipment to measure wind speed and
Barometric pressure, wave height and period, air and water temperature. Equipment is also to be installed near Bligh Reef to measure wind speed and direction, barometric pressure and air temperature. In addition, existing monitoring equipment will be upgraded at Potato Point.

Human factors in maritime casualties

In a cooperative effort with the Cook Inlet RCAC, the RCAC conducted a scoping study of human factors that contribute to maritime casualties in Alaskan waters. Through interviews with 40 mariners in Prince William Sound and Cook Inlet, the study identified nine issues for further research. The findings were used by a state panel, the Hazardous Substance Spill Technology Review Council, to solicit and select proposals for research on human factors. RCAC representatives assisted the review council in the selection process.
Incident Monitoring
RCAC routinely monitored terminal, tanker and port operations, ranging from minor problems on tankers and procedural changes in tanker traffic, to spills and port closures. In 1994, RCAC monitored approximately 20 incidents, including the Eastern Lion oil spill in May, a hazardous substance spill at the terminal in June, and a five-day period of extremely high winds that closed the port in late November.

State programs
RCAC took an active role in the 1994 legislative session on issues affecting oil spill prevention and response. Most of RCAC's lobbying and grassroots organizing efforts focused on SB 215, which reduced the amount of funding available for the state's work in spill prevention and response. Although the bill did become law, efforts by RCAC and others resulted in a compromise measure less damaging than other versions.

Eastern Lion Oil Spill
RCAC monitored all aspects of the Eastern Lion oil spill, May 21, in Port Valdez. RCAC stationed personnel around the clock for the first 48 hours and filed written situation reports as events unfolded. After the incident, RCAC worked with industry and regulators on “lessons learned” sessions regarding the causes of the spill and the response to it.

Prince William Sound Tanker Spill Prevention & Response Plan
RCAC commissioned a report to analyze the history and issues regarding Alyeska's relationship to the Prince William Sound Tanker Spill Prevention and Response Plan. This plan is called the "core" plan because it is the contingency plan for any tanker spill in the Sound. RCAC formally requested that Alyeska continue to be the planholder for that plan. Until the last couple of years, the plan was written by Alyeska and referred to as Alyeska's plan. In recent years, Alyeska has adopted the position that it responds to a spill on behalf of tankers and is not itself the "planholder." The Alaska Department of Environmental Conservation concurred with Alyeska's position that although Alyeska is required by state law to respond to a tanker spill, it does so as a response action contractor, not as the planholder.

RCAC continues to be concerned that if Alyeska is not the planholder there will be loss of accountability and degradation of response efforts in the event of another major tanker spill.
Other Advice & Comments

RCAC submitted comments to the National Oceanic Atmospheric Administration (NOAA), Office of Coastal Resource Management, on proposed changes to the Alaska Coastal Management Program resulting from state legislation enacted earlier in the year.

RCAC submitted comments to the U.S. Coast Guard regarding safety and inspection requirements that could impact the use of fishing vessels as oil spill response vessels.

Community impacts planning

A subcommittee was formed to plan and develop strategies to lessen the impacts on communities of a major oil spill. The work was divided into two parts, technical and social. In the social portion, a demonstration project was developed for Cordova to mitigate mental health impacts. The technical impacts portion includes community response, contingency planning and information exchange following an oil spill. RCAC began working with industry representatives to develop community response plans.

Spill response handbook

In response to requests, RCAC developed a handbook, "Oil Spill Response: A guide to oil spill equipment, management and terminolo-
The handbook, to be available in 1995, will be especially valuable to fishermen and community leaders in the event of a spill.

**State contingency plans**

Oil terminals and shippers operating in Alaska must have state-approved oil spill contingency plans. The state plans are revised and reviewed every three years. As part of the state's review process, RCAC conducted a comprehensive review of the core plan for tanker spills in Prince William Sound, the terminal plan and individual plans for tankers. RCAC's comments were distributed to the shippers, Alyeska and the Alaska Department of Environmental Conservation, which is responsible for ensuring that the plans meet state laws and regulations. RCAC identified deficiencies in some of the plans and monitored the state's efforts to have the plan holders address the deficiencies before the plans are approved. The review process continued into 1995.

**Prince William Sound Area Plan**

RCAC submitted comments to the U.S. Coast Guard on the Prince William Sound Area/Regional Coastal Zone Contingency Plan (Volume II). This plan is specific to Prince William Sound. It contains policy guidelines for industry response and describes the response by federal agencies if the federal government manages a spill response in Prince William Sound. RCAC also participated in work sessions on the plan as an ex-officio member of the Prince William Sound Area Committee, which is charged with drafting and reviewing the plan. The area committee is composed of local, state and federal regulatory agencies.

**Prince William Sound Plan Steering Committee**

Nineteen ninety-four was the fifth year that RCAC has participated in a steering committee established by the state to work on modifications to the Prince William Sound Tanker Spill Prevention and Response Plan. This plan is the blueprint for action in the first three days of a major oil spill from a tanker, when Alyeska manages the spill response. In addition to RCAC, the steering committee consists of industry representatives and regulatory agencies.

The steering committee's work is accomplished primarily through technical working groups. Working group activity in 1994 focused on coastal resources, mechanical training and coordination of the "core" plan with the individual tanker plans prepared by oil shippers. In 1994, the steering committee also began a review of its internal procedures.
Spill drills & exercises

With the assistance of a contract drill monitor in Valdez, RCAC monitors nearly all spill drills and exercises conducted in Prince William Sound and actively participates in major drills.

In 1994, RCAC took an expanded approach to its role in major drills. In the past, RCAC has been an independent observer. At a three-day drill conducted by ARCO Marine in September, RCAC representatives also worked closely with industry and regulators as contributing members of the response effort.

Nearshore Strike Team Demonstration Project

RCAC provided input into development of two state-funded demonstration programs in Seldovia and Southeast. The demonstration project, actively supported by RCAC, is designed to demonstrate equipment positioned in coastal communities for use by local volunteers using local vessels of opportunity to contain and recover oil. The demonstration programs are to serve as prototypes for response units elsewhere in the state.
Long term environmental monitoring program (LTEMP)

The second year of monitoring was completed in a program collecting baseline data on hydrocarbon concentrations at specific sites in Prince William Sound and the Gulf of Alaska. The study provides baseline measurements of polycyclic aromatic hydrocarbons and aliphatic hydrocarbons present in shallow and deep sub-tidal sediments and inter-tidal mussels. The study also identifies the source of any hydrocarbons present. Field surveys are conducted twice a year at sites in Prince William Sound and the Gulf of Alaska. The data provide a benchmark for assessing the impacts of oil transportation and future oil spills.

An extra sampling of mussels was conducted at Saw Island five days after the Eastern Lion oil spill. Saw Island, one of the regular sampling sites, is adjacent to Berth 5 at the Valdez Marine Terminal, where the May 21 oil spill occurred. It was the first time that data collected under the program were used for comparison after an incident.

Ballast water influent monitoring

After a series of delays, RCAC and the Alaska Department of Environmental Conservation began sampling and analyzing ballast water off-loaded from tankers calling at the Valdez Marine Terminal. Preliminary samples were taken over the summer and actual monitoring began in October.

The purpose of the program is to detect any incoming materials that might not be treatable by the ballast water treatment plant, materials inappropriate for discharge at the plant, or higher than expected levels of materials approved for discharge. It tests for volatile, semi-volatile and chlorinated organics and metals in the ballast water influent. The program is conducted jointly by RCAC and the Alaska Department of Environmental Conservation, with funding left over from a 1991 legislative appropriation to RCAC. All data collected are forwarded to Alyeska, which usually conducts parallel sampling on behalf of the tanker operators.

Port Valdez environmental monitoring

Discussions between RCAC, Alyeska and state and federal regulators continued through 1994.

RCAC is seeking changes in current monitoring programs to provide more useful analysis of ballast water effluent and the aquatic environment in the vicinity of the terminal. RCAC retained consulting scientists to review existing data and reports.
and draft recommendations for modifications and/or improvements to ballast water and environmental monitoring programs in Port Valdez.

Other ballast water treatment issues

Initial work began on review of Alyeska's application for renewal of its National Pollutant Discharge Elimination System (NPDES) permit for the ballast water treatment facility. The NPDES is the federal permit that allows discharge of waste water from the ballast water treatment facility into Port Valdez. The permit expired in June 1994 but it remains in effect until a new permit is issued.

RCAC reviewed the results of a test of the "splitter box" at the ballast water treatment plant. The test showed no detectable emissions of volatile hydrocarbons. However, the test relied on relatively high detection limits. Alyeska conducted the study as a requirement of its state permit.

Port Valdez/Impaired Water Body

The Terminal Operations/Environmental Monitoring (TOEM) Committee urged the Alaska Department of Environmental Conservation to designate Port Valdez as an impaired water body because of possible violations of state water quality standards near the outfall of the ballast water treatment facility. The agency did not do so.

Vapor controls at terminal

RCAC submitted comments to the U.S. Environmental Protection Agency (EPA) on the proposed federal rule on marine vessel loading vapors and monitored progress on Alyeska's plans for installing vapor controls. RCAC concluded that a new "tracer study," to track the path of hydrocarbon vapors released during tanker loading, would not be necessary because of Alyeska's commitment to install vapor controls and the impending federal rule.

Later in the year, discussions began between RCAC, EPA, Alyeska and the Alaska Department of Environmental Conservation. The ongoing talks sought an accord under which Alyeska would begin installing vapor controls at two berths prior to promulgation of the EPA's final vessel loading rule, now expected in early summer 1995.

Corrosion inhibitors

RCAC monitored plans by Alyeska to inject a corrosion inhibitor into the pipeline. In response to RCAC concerns about the potential effects of the corrosion inhibitor on marine life, Alyeska agreed to conduct toxicity testing.

RCAC retained a marine toxicologist, in part to assist in monitoring testing of corrosion inhibitors.

Sodium hydroxide spill

RCAC closely monitored a 7,000-gallon spill of sodium hydroxide, a caustic chemical, at the Valdez Marine Terminal's power house in June. RCAC monitored the environmental impacts of the spill and issued periodic reports to its directors and member entities.
Public Education & Outreach

The Observer

RCAC increased public awareness on a wide range of issues pertaining to crude oil transportation through publication of The Observer, a quarterly tabloid newsletter distributed to 33,000 post office boxes and homes in Prince William Sound, lower Cook Inlet and Kodiak Island. The Observer is also sent on request to interested citizens outside the region, as well as regulators and industry.

Each issue of The Observer typically includes coverage of RCAC activities, developments in the oil transportation industry and news about policy and operational issues related to marine oil transportation. Major oil spill drills are usually covered in The Observer, and Alyeska Pipeline Service Co. writes its own column for each issue. In the course of preparing articles for The Observer, RCAC frequently invites feedback from appropriate industry and regulatory personnel.

During 1994, one full issue of The Observer was devoted to the Eastern Lion oil spill. Articles covered steps taken by the tanker operator, state and federal follow up, and Alyeska’s assessment of its response to the incident. Another article examined the difficulty of determining tanker ownership.

Another issue of The Observer gave extensive coverage to escort of single-hull laden tankers, with articles on the new federal escort rule, the Disabled Tanker Towing Study, the differences between tractor and conventional tug boats as escort vessels and RCAC’s recommendations.

Outreach

In 1994, RCAC began a modest program of community outreach. Working with the directors from each community, staff visited Seward, Kodiak, Homer and Chenega Bay. These visits included formal presentations and informal discussions. To reach Prince William Sound fishermen, RCAC staffed an information booth at Fish Expo in Seattle.

In an effort to foster more effective communications, RCAC retained a noted consultant in cross-cultural communications to conduct a seminar for staff, directors and committee volunteers.

RCAC presented three papers at a conference marking the five year anniversary of the Exxon Valdez oil spill: on changes in spill prevention and response; on RCAC’s experience in citizen oversight; and on the development of nearshore response as an important tool in fighting an oil spill.

Periodically throughout the year, RCAC published newspaper advertisements and submitted guest columns to local newspapers. Topics included state legislation affecting oil spill prevention and response, federal funding for weather stations in Prince William Sound and other issues.

In 1994, RCAC developed a system for making its reports and other documents available to libraries and citizens throughout the region.
Much of the council’s work is done through volunteer committees, consisting of council members and other citizens with interest, experience and background in a given field. The committees work for the council, with assistance from staff provided by the council. All official policy is presented to the full council for approval and further action. Public members of the committees are selected through a formal application process.

*RCAC Board Member

**Oil Spill Prevention & Response Committee**
The Oil Spill Prevention and Response (OSPR) Committee works to minimize the risks and impacts associated with oil transportation through strong spill prevention and response measures, adequate contingency planning and effective regulations.

Chair: Floyd Heimbuch
Members: Wayne Coleman*
        Tom Copeland*
        Gail Evanoff
        Dean Rand
        Tim Robertson
        Gordon Scott
        Kristin Stahl-Johnson*
        Carol Till*
        Clark Torell
        Lou Weaver

**Scientific Advisory Committee**
The Scientific Advisory Committee (SAC) sponsors independent scientific research. It also provides scientific assistance and advice to the other RCAC committees on technical reports, scientific methodology, data interpretation and position papers.

Chair: Richard Tremaine
Members: Bill D’Atri
         Jocelyn Barker
         Ivan Frohne
         David Hite
         A. J. Paul
         David Salmon
         Kristin Stahl-Johnson*
         James D. Steward

**Port Operations & Vessel Traffic Systems**
The Port Operations and Vessel Traffic Systems (POVTS) Committee monitors port and tanker operations in Prince William Sound. It identifies and recommends improvements in the vessel traffic and navigation systems. The POVTS Committee is based in Valdez.

Chair: Bill Conley
Members: Tex Edwards*
         Vince Kelly
         Pete Kompkoff
         Dennis Lodge*
         Vince Mitchell
         Tom McAlister
         Neil Schultz

**Terminal Operations & Environmental Monitoring**
The Terminal Operations and Environmental Monitoring (TOEM) Committee evaluates operations at the Valdez Marine Terminal with respect to their effect on the environment and identifies actual and potential sources of chronic pollution. The TOEM Committee is based in Valdez.

Chair: E.A. Jim Levine
Members: Bob Benda
         Michael Frank
         Julie Howe
         Susie Kendrick
         Paul McCullom
         George Skladal
         Stan Stephens*
Board of Directors

Stan Stephens
Alaska Wilderness Recreation
& Tourism Association
President

Michelle Hahn O'Leary
Cordova District
Fishermen United
Vice President

Ivan Widom
City of Seldovia
Secretary

Tom Chapple
Alaska Department of Environmental Conservation

Claudia Slater
Alaska Department of Fish and Game

Jerry Brosia/Ed Barber
Alaska Department of Natural Resources

Pete Petram
Alaska Division of Emergency Services

John Whitney
National Oceanic & Atmospheric Administration

Cmdr. Greg Jones
MSO Valdez U.S. Coast Guard

Doug Mutter
U.S. Department of Interior,
Office of Environmental Affairs

Carl Lautenberger
U.S. Environmental Protection Agency

Bruce Van Zee
U.S. Forest Service

Bill Walker
City of Valdez
Treasurer

Wayne Coleman
Kodiak Island Borough
Member At-Large

Charles Christiansen
Kodiak Village Mayors Association

Jim Cloud
Alaska Chamber of Commerce
(replaced Carl Marrs in September)

Tex Edwards
City of Homer

Keith Gordaoff
Chugach Alaska Corp.

Blake Johnson
Kenai Peninsula Borough

Margy Johnson
City of Cordova
Larry Evanoff  
Community of Chenega Bay

Gary Kompkoff  
Community of Tatitlek  
(replaced Darrel Olsen in May)

Mike Gallagher  
City of Valdez

Dennis Lodge  
City of Seward

Kristin Stahl-Johnson  
City of Kodiak

Carol Till  
City of Whittier

Charles K. Weaverling  
Oil Spill Region  
Environmental Coalition
## Consultants' Reports
- "Alyeska Planholder Responsibilities," review and analysis of Alyeska and the Prince William Sound Tanker Spill Prevention and Response Plan. Author: Richard Townsend. May 94 (Ref. #2.5.2065)
- "Saw Island Sampling," supplemental report, Long Term Environmental Monitoring Program. Author: Kinnetic Laboratories, Inc. July 6, '94 (Ref. #4.5.4009F)

## Other Publications
- 1993 RCAC "Year in Review," an overview of work and activities. (Ref. #5.9.511.93)

## Advice & Comments
- Comments to ADEC on Oil and Hazardous Substances Pollution Control Regulations. Jan. 18, '94 (Ref. A/C 6519)
- Comments to U.S. Coast Guard on the Prince William Sound Area/Regional Coastal Zone Contingency Plan. April 8, '94. (Ref. A/C #2.2.2525)
- Comments to ADEC on the Alyeska Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan. June 1, '94 (Ref. A/C #2.2.2528).
- Comments to Alyeska regarding the Eastern Lion Oil Spill. June 3, '94 (Ref. A/C #10.2.1019)
- Comments to ADEC on Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans. June 15, '94 (Ref. #2.2.2529)
- Comments to EPA on proposed federal standards for marine tank vessel loading and unloading operations. July 15, '94 (Ref. A/C #1.2.1528)

## Comments to ADEC on Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans for Baltimore Trader, Chesapeake Trader and Potomac Trader. Aug. 10, '94 (Ref. A/C #2.2.2530)

## Comments to the Alaska Division of Governmental Coordination, request for additional information on the Alyeska Terminal Plan. Aug. 10, '94 (Ref. A/C #2.2.2531)

## Comments to U.S. Department of Commerce (NOAA/OCRM) regarding proposed changes to Alaska Coastal Management Program. Sept. 15, '94. (Ref. #2.2.2533)

## Comments to U.S. Coast Guard on proposed interim rule for financial responsibility for water pollution for vessels and the final regulatory impact analysis. Sept. 28, '94 (Ref. #2.2.2535)

## Recommendations to U.S. Coast Guard, Alyeska Pipeline, Prince William Sound Tanker Association and Alaska Department of Environmental Conservation on escort vessel operations. Oct. 31, '94. (Ref. #A/C 10.2.2023)

## Comments to the Office of Oil Policy, U.S. Department of Energy, on priorities for oil spill research and development. Oct. 20, '94. (Ref. #A/C 2.2.2534/2.4)
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