

SCOMM

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**Notice of Public Meeting for the
Task Force on Motorized Oil Transport –
Response Planning Standard Work Group Meeting.**

The Alaska Department of Environmental Conservation (ADEC), Division of Spill Prevention and Response announces that a public meeting will be held on August 30, 2000 in the Legislative Information Office, 716 West 4th Avenue, 2nd Floor, suite 200, Anchorage, Alaska 99501 from 9:30 a.m to noon and 1:00 p.m to 4:30 p.m. This meeting is intended to address implementation of the response planning standard to the Alaska Railroad.

This is one of a series of Task Force on Motorized Oil Transport work group meetings to determine how to implement response planning standards for a railroad tank car contingency plan and for a nontank vessel contingency plan as set out in Senate Bill 273 regarding oil discharge prevention and contingency plans for all self-propelled nontank vessels exceeding 400 gross registered tonnage and railroad cars carrying bulk oil and authorizing the inspection of nontank vessels and trains.

The agenda for the meeting will be posted to the Task Force website at: <http://www.state.ak.us/local/akpages/ENV.CONSERV/nontank/home.htm>. Any person interested in further information is encouraged to review the website or contact Task Force facilitator Brian Rogers at (907) 452-2461, email at: brogers@infoinsights.com. You may also contact Judith Erickson of Capital Information Group at (907) 586-3118, email at jerickso@pobox.alaska.net.

If you are a person with a disability who may need special assistance to participate in the process on the proposed regulations, please contact Joel Casto at (907) 465-5041 as soon as possible to make necessary arrangements.

ARRC/Rail Sciences System Risk Assessment

Summary

The ARRC and Rail Sciences will conduct a systemwide safety audit designed to identify operating, maintenance, and static conditions that contribute to elevated levels of derailment risk. The results of the audit will include recommended actions to measurably reduce risk. Other work products and principal tasks include:

- ▶ Synthesize digital track information and physical inspection to audit current track repair, maintenance, inspection, and capital investment plans to determine priorities for risk reduction, improved operating efficiency, and reduction in long-term maintenance costs. Audit car and locomotive repair, inspection, and maintenance programs for quality and risk reduction;
- ▶ Audit ARRC documentation of FRA or AAR reporting requirements;
- ▶ Audit condition of ARRC and leased petroleum tank car fleet;
- ▶ Audit mechanical condition of ARRC and contractor passenger cars;
- ▶ Audit contractor documentation and quality assurance plans for their passenger equipment;
- ▶ Audit operating procedures related to hazardous material transport and passenger service;
- ▶ Recommend rule changes, process changes, and "best practices" into operating system safety manual for the ARRC;
- ▶ Link derailment risk probabilities to sensitive area and community information to aid development of new, state-mandated oil spill prevention and response plan.

1. Track/engineering issues

- ▶ Tie and fastener condition in curves
- ▶ Differential plate cutting
- ▶ Rail lubrication patterns (low and high rail lubrication)
- ▶ Rail weights and wear conditions (amount of gauge face wear/head loss)
- ▶ Rail flaw detection schedule and testing
- ▶ ✓ Track geometry car inspection frequency
- ▶ Rail grinding practices along route
- ▶ Turnout conditions
 - Switch points
 - Heel blocks
 - Frog condition
 - Switch machine/head block ties
 - Switch geometry
- ▶ ✓ Track drainage issues (including vegetation management)
- ▶ ✓ bridges and trestle inspections
- ▶ Tunnel conditions and clearances
- ▶ Detector locations

5. Perform simulations on any possible adverse track geometry locations

- ▶ Determine critical locations containing yellow-flag defect levels
- ▶ Bunched spiral (entry/exit, loaded/empty)
- ▶ Rock and roll areas (combinations of cross-level and speed)
- ▶ Track twists and warp

✓ 6. Review highway crossing protection issues

(This module needs to be customized for our route. Many of the issues confronting railroads in the Lower 48 do not exist here).

7. Review derailment and operating safety incidents for the past five years

- ▶ Develop trend lines and statistical analysis
- ▶ Determine high frequency/high cost failures
- ▶ Upgrade database content, integrate with ARRC Information Services

8. Review rule and efficiency testing data for past 3 years

- ▶ Determine quality of current efficiency testing
- ▶ Develop statistical analysis of testing failures

9. Evaluate susceptibility to L/V derailments

Response Planning Standard Work Group

August 30, 2000 Meeting Summary
Alaska Railroad issues
Anchorage Legislative Information Office
9:30 - 12:00

Task Force members present: RPS Work Group members Doug Lentsch, Terry Murphy (for Bob Heavilin), Ernie Piper, Pat Carter (for Sen. Pearce), Denise Henderson (for Rep. Pete Kott)

DEC staff present: Larry Dietrick, Susan Harvey, Ken Rogowski, Leslie Pearson

Alaska Railroad staff: Ernie Piper, Jeff Ginalias

Task Force Facilitation: Brian Rogers; Judy Erickson in Juneau on teleconference

RPS Work Group Recommendations:

Work group members reached consensus on the following recommendations:

1. The RPS work group endorses the Alaska Railroad Risk Assessment process, and recommends the process be followed through to completion.
2. The RPS work group recommends the Alaska Railroad follow the Response Planning Standard methodology being developed by the work group, designed to meet a Response Planning Standard of 15% of maximum fuel carried.
3. The RPS work group recommends the Alaska Railroad undergo a Contingency and Prevention Plan review under the rigor of existing law for currently regulated industry.
4. The RPS work group requests the Alaska Railroad brief the full Task Force in late October on (a) progress on the Risk Assessment process, (b) plans to meet the Response Planning Standard, and (c) proposed timetable for Contingency and Prevention plan review.

Agenda Item 1: Overview Dunbar Incident Consent Agreement

Larry Dietrick reviewed the Alaska Railroad's "starter" contingency and prevention plan now in place. The basis of the plan is a consent agreement worked out by the Alaska Railroad and the State after the 1990 Dunbar oil spill. Unique aspects of the plan include: it is an electronic plan on a web site with a secure access; and it has an integrated contingency plan layout along the Incident Command System structure that could satisfy both state and potential federal requirements. The consent agreement required the Railroad to obtain aerial photos of the alignment and maintain spill response equipment as specified on an initial start-up list. Dietrick said DEC and the Railroad discussed where that equipment would be prepositioned along the Railroad right of way and whether to carry equipment on each train or to seasonally position equipment. He said DEC would like to continue building on this consent agreement so that the Railroad's contingency plan can meet all the state requirements that now apply to fully-regulated oil and gas facilities.

Agenda Item 2: RPS/Alaska Railroad Strategy

Jeff Ginalias, with the Alaska Railroad's Environmental Compliance Section, said the Alaska Railroad's major contract is hauling fuel from the Williams Refinery in North Pole to Anchorage. Ginalias said there are generally two fuel trains each day with a maximum of 75 cars. He said the tank cars have a capacity of 22,000 gallons on average, although some hold up to 30,000 gallons.

As part of the financial responsibility information required by SB 273, Ginalias said the Railroad provided DEC with calculations based on hauling of 75 fuel cars, with maximum fuel hauling capacity of 41,250 bbls. Ginalias said 15 percent of this capacity is 6,200 bbls. He noted that the predominant fuel the Railroad is hauling is nonpersistent product, although the Railroad does haul some persistent product.

Ginalias described the work the Railroad's spill response preparations. Spill response equipment is positioned in Anchorage, Fairbanks and Healy, with smaller amounts of equipment positioned elsewhere along the line. Ginalias said the risk assessment will show where the greatest threats of spills exist, helping the Railroad determine where to place response equipment and how much is needed. The Railroad also has contract in place for spill response with an environmental response contractor and remediation firm. If the Railroad is short of equipment or resources, this firm can be called out for assistance. He suggested the work group might want to address the Railroad's ability to use some of the other primary response action contractors in Alaska.

Agenda Item 3: ARR Risk Assessment: Effect on Response Planning and Prevention

Ernie Piper, Alaska Railroad, responded to work group questions:

Piper said the tank cars are built by a variety of builders to standards set by the federal Dept. of Transportation and the American Association of Railroads. He said the bulk of Railroad's fleet of cars are leased by Williams, with only 40 and 60 cars owned by the Railroad.

The Alaska Railroad inspects all the track, including spur track that is privately owned. Piper said the Railroad has six inspectors, one system-wide and five regional.

Piper said rail car inspections and maintenance in Alaska are done by the Alaska Railroad to Federal Railway Administration (FRA) standards. He said the Alaska Railroad is one of the few railroads in the United States that still has its own inspectors and maintenance staff.

Piper was asked who is responsible for a spill from a car that has been delivered to a customer on a privately-owned spur. Once the Railroad delivers a car to a customer, Piper said, the customer is responsible for it.

In September 1999, the Alaska Railroad began gathering data for a risk assessment of its petroleum tank car trade, looking at the entire system from the fuel going into the cars at the North Pole refinery until they are spotted in Anchorage. Piper said the Railroad's principal contractor for the risk assessment is Gary Wolfe, of Rail Sciences, the leading integrated rail science firm in North America. Rail Sciences will do a system-wide risk assessment, which will include oil spill response, prevention and planning. The firm will also produce a "safety systems manual."

Piper distributed a document describing the Railroad operations being studied by Rail Sciences.

Piper said the Railroad will receive preliminary results from the risk assessment in October, and a final report in December. This is the first risk assessment undertaken by the Alaska Railroad.

UPDATED FINAL DRAFT

FROM Paul Fuhs

MEETING REPORT

RPS EQUIPMENT SUBCOMMITTEE

Prepared by Paul Fuhs

The meeting was held at DEC headquarters in Anchorage on August 31. In attendance were Larry Dietrick, Susan Harvey, Ken Rogowski, Steve Provant, all of DEC, Terry Murphy from Chadux Corporation, Doug Lentsch and Dennis Rome of CISPRI, and Paul Fuhs as facilitator.

The purpose of the meeting was to lay out a reasonable process for determining what new equipment would be required under the new response planning standard for non-tank vessels contemplated in SB 273 so that adequate equipment would be in place and so that costs of the program could be more clearly defined.

The subcommittee discussed and agreed upon several assumptions and findings:

1. Acquisition schedules for phasing in equipment under the tank vessel program would be considered to be adequate under the non-tank program.
2. Control and containment equipment is considered as applicable to both persistent and non-persistent fuels. When it comes to skimmers, different equipment is needed for each type of spill.
3. In areas where there was good geographic distribution of existing equipment stockpiles for control and containment for tank vessels, it would be considered adequate for non-tank vessels since in all cases, tank vessels were carrying far more fuel.
4. In areas where non-tank vessels are operating where tank vessels do not operate, and in areas where persistent oil is being used where the tank vessels were carrying only non-persistent fuels, these areas will be considered as gaps to be filled by new equipment. The subject of gaps was addressed by the full RPS Committee on August 23rd and the gaps were identified along with the capacity of the largest persistent fuel carrying vessels operating in that region.
5. The equipment listed as needed in this report are designed to meet a planning standard. It is assumed that a response contractor will immediately respond upon notification of a fuel spill and will commit sufficient resources to address the full spill in a cascading response system. The equipment located in the more remote areas are seen as a starter kit with more equipment to arrive later if needed.
6. Response equipment locations would be identified as primary or secondary response centers. Primary centers will have control and containment equipment and cleanup equipment (skimmers), and secondary centers will have only control and containment equipment. Boom will be maintained in the amount of 3 times the length of the largest vessel operating in the area.
7. The cleanup equipment must be mobile and probably designed to fit in a DC-6 as there are only 2 hercs in Alaska and they are not always available.

8. Skimmers will have a daily recovery capacity of 20% of the RPS of 15%. In other words, if the largest vessel in the area carry 30,000 barrels of fuel, then 15% of that would represent the RPS at 4500 barrels. Taking 20% of that figure results in a requirement of a skimmer which could recover 900 barrels per day. The assumption on sea states for meeting the planning standard is 0 - 3 feet wave height. Terry Murphy of Chadux is going to check on what persistent oil skimmers are available and what their cost is.

9. Portable storage was discussed and a 500 barrel rubber bladder costs \$98,000 without the shipping and if it is used for persistent oil, it cannot be reused again. Terry Murphy of Chadux was also checking on what storage is available in several locations to address the storage issue in a more cost effective way.

SPECIFIC FINDINGS AND RECOMMENDATIONS ON EQUIPMENT:

1. Southeast, Cook Inlet, Prince William Sound and Kodiak are considered to have (or are phasing in) adequate equipment for non-persistent and persistent fuels.

2. The geographic and persistent oil gaps were in Western Alaska with the exception of Seward. Anchorage and Dutch Harbor would be the primary response centers for Western Alaska so a persistent oil skimmer would need to be purchased for Dutch. The Subcommittee also felt that a persistent oil skimmer was necessary in Seward due to the nature and frequency of vessel traffic there, so it would also be considered a primary response center. New secondary response centers (primarily boom and deployment gear) would be established in Adak, Atka, Akutan and St. Paul.

3. Mutual aid agreements between the regions of the state were seen as important to increasing the available equipment in the event of a major incident.