

**After Action Report**

**Exercise:** ARRT Tabletop Exercise, Yukon River Trans Alaska Pipeline System Discharge

**Date:** September 15, 2020

**Time:** 9:00-12:30 PM

**Location:** Virtual (Adobe Connect and Teleconference)

**Exercise Development, Background References:**

- [After Action Report and Gap Analysis of Response Logistics to a Trans-Alaska Pipeline System Worst-Case Discharge Exercise](#) (an internal EPA tabletop exercise, 2016)
- [Alaska Scenarios Compendium](#)
- Alyeska Pipelines Service Corporation, Trans Alaska Pipelines System, Pipelines Oil Discharge Prevention and Contingency Plan, CP-35-1 (Available at [Industry Contingency Plans for ADEC-regulated facilities](#))

## Exercise Materials:

- [Player Handbook](#) (NEW)
- [Exercise Presentation](#) (NEW)
- [Regional Contingency Plan 2020 Interim Draft](#);
- [Alaska Inland ACP, Chapter 5 Logistics](#) (Final Draft, 2020.0)

The ARRT Tabletop Exercise occurred on September 15, 2020 via Adobe Connect and teleconference. An exercise Hot Wash was conducted on September 16, 2020 12:30-1:30 PM.

The exercise participants included On Scene Coordinators from the EPA, USCG and ADEC and ARRT members. The participating ARRT Member Agencies and the observing agencies are listed below.

<b>ARRT Member Agency in Attendance</b>	<b>Hotwash Participant</b>
Alaska Department of Environmental Conservation	X
Department of Health and Human Services/ Agency for Toxic Substances and Disease Registry	X
Department of the Interior	X
Department of Justice	
Environmental Protection Agency	X

Federal Emergency Management Administration	
U.S. Coast Guard	X
Department of Commerce, National Oceanic and Atmospheric Administration	X
Department of Energy	
<b>Exercise Observer Agencies</b>	
Alaska Department of Fish and Game	
Alaska Department of Natural Resources, State Pipeline Coordinators Section	X
Department of the Interior, Bureau of Indian Affairs	X
Department of the Interior, Bureau of Land Management	
Department of the Interior, U.S. Fish and Wildlife Service	X
Hilcorp Alaska LLC	
USCG, National Pollution Fund Center	

This exercise did include one functional aspect: a testing of the USCG's Alert Warning System. ARRT Members and Agency Representatives were sent a voice, text and email message notifying them of the exercise. This system allows for recipients to respond to the message indicating their if they would be participating in the exercise. This test of the Alert Warning System had the following results:

- 45 notifications sent
- 34 responses received
- 11 non-responses

No members/representatives reported a failure to receive the message, although some members did not get the message in all three formats. Corrections and additions to the contact list will be made per feedback received.

All participants providing feedback regarded the exercise as a valuable experience. Participants looked favorably upon:

- The organization and presentation of the exercise;
- Use the Adobe Connect to facilitate involvement of ARRT members, especially those from agencies that are not 'key players' in an incident response;
- The scenario's ability to depict the challenges and scope of responding to a significant discharge to the Yukon River, with thousands of miles of potentially oiled shoreline; dozens of potentially impacted communities in remote Alaska.

The input from participants regarding areas for improvement was generally focused on the need to further identify options and resources for resource gaps, these are described in “Key Exercise Areas for Improvement.”

#### Key Exercise Strengths:

- Excellent scenario to highlight the substantial challenges of a response to significant discharge in remote Alaska, particularly with an immense impact area (2500 miles of shoreline)
- Scenario and resources requests focused on identification of gaps in staffing and equipment/supplies and challenges in deploying these resources and supporting field operations.
  - Key challenges to Filling Gaps:
    - Mid-summer response is during peak field season. Agency assets (personnel and equipment) are deployed for field assignments.
    - DOD and USCG personnel and equipment, if available, are not available for long-term re-assignment to a spill response.
- Resources requests sought input from agencies not typically providing assets to a response;
  - Good use of Adobe Connect to allow for input via chat and “raise hand” function to facilitate discussions

#### Resource Gaps Identified in Exercise

- Transportation logistics for responders – deploying to field base camps and for daily response work: fixed wing, helicopter, and boats.
  - Local Transportation was out of scope of the scenario. Availability of ATVs and other ground transportation should be explored in a future exercise.
  - Fixed wing aircraft are more common than helicopters.
  - Fire Service Aircraft is generally committed to Alaska Fire Service missions or re-assigned to Lower 48 in the event of a low-risk/low-incident year.
  - Boats are likely deployed for regular summer field work.
  - USCG does not have any vessels suitable for the Yukon River.
  - DOD and USCG aircraft are assigned to primary agency missions and are unlikely be reassigned to response for long-term use.
    - Need to explore options and availability of Alaska-based aircraft.
- Training/ Just-in-Time Training. Many responders will require mission-specific and safety training prior to assignment. This may include SCAT training, HAZWOPER, and wilderness safety.
  - Potential Solution/ HAZWOPER: USCG can provide HAZWOPER training. OSHA may also be able to assist (8-hour refresher and 24- or 40-hour course)
  - Potential Solution/ SCAT Training: NOAA can provide SCAT training in a half-day course.

#### Key Exercise Areas for Improvement:

- Include cost for resources in the agency reply to Resource Requests.
  - Examine options for costing for non-traditional assets, or from agencies not typically providing resources to an NCP incident (FEMA, GSA, FAA)
- Include assets of additional bureaus/agencies within the ARRT Member Department. (Example DOD member from Navy was unable to speak to assets of Air Force or Army located in Alaska.)

**Issues Raised without Resolution During Exercise:**

- Mapping & Situational Awareness.
  - Can NOAA's ERMA mapping application be used to maintain situational awareness, or would industry provide a mapping application for this purpose?
  - What limitations are there regarding sharing of proprietary or sensitive data?
- Finance & Cost Issues:
  - Agencies need to assess which of their resources have pre-assigned costs associated with their use during a response;
  - ARRT should assist member agencies to determine how cost reimbursement to non-traditional response agencies can be accomplished, especially those not identified in NCP (FEMA, GSA, FAA)

**Future Exercise Planning/ Exercise Recommendations:**

- Provide resource requests in advance to allow ARRT members to query/involve additional Department bureaus/agencies
- Refine the scope further
- Include in scenario narrative the member agency's roles in Incident Management and response (their non-ARRT, response duties)
- Ensure, to extent practical participation of members not able to attend this tabletop – in particular those that have equipment that could support response: DOD Alaska Command, GSA, and U.S. Forest Service.
- Include Spill of National Significance and/or State and Presidential Disaster Declaration in scenario. This would make additional resources available that should be examined.
- Explore transfer of command from EPA to USCG FOSC; See Refugio Beach Spill After Action Report/Lessons Learned.
- Explore response beyond Day 4 of months-long response.

**Corrective Action Plan:**

*The following recommendations should be distributed to the ARRT Statewide Planning Committee*

- Improve understanding of ARRT Members that they represent their entire department and not just their agency. Consider appropriate ARRT Members and if the assigned individually can really represent the full department especially if they are located outside of Alaska.
- Review changes in content for Alaska Inland ACP
  - Planning Chapter: Review plan content on Situation Unit and Mapping for the following:
    - Use of industry (RP/RRP) mapping platforms vs. government platforms (i.e. Arctic ERMA)
    - What limitations are there regarding sharing of proprietary or sensitive data, sensitive infrastructure (i.e. ports), investigative, or other legally discoverable information subject to due process?
  - Finance Chapter: Review plan guidance regarding cost tracking of federal and state department resources. Including the following subjects:
    - Cost tracking and reimbursement of resources without pre-assigned costs associated with their use during a response;
    - Cost tracking and reimbursement of resources from agencies not described in the NCP (i.e. FEMA, GSA, FAA)

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**Department of the Interior Comments and Inject Responses**

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**For context regarding DOI's role(s) - Resources at Risk managed by our agency include:**

Anadromous salmon. The USFWS has international treaty obligations with Canada for salmon escapement in the Yukon River and their Fairbanks Field Office would immediately be notified about spills in the Yukon. The FWS and Alaska Department of Fish and Game coordinate constantly regarding in-season management of the Yukon River fishery.

Other fisheries resources used for subsistence include whitefish, Burbot, pike, and anadromous Sheefish, and their habitats. Rampart Rapids, downstream from the bridge, is a significant fish camp location for people from Tanana, with at least two or three fish wheels running every summer. Fish camps exist along the river.

Many migratory bird species managed by USFW utilize the Yukon River and associated riparian habitats for nesting, rearing of young, and/or migration during the spring and fall. Of particular concern during an oil spill, due to their life history characteristics, are raptors including peregrine, bald eagle, and osprey nest along the Yukon River corridor.

As noted later within the presentation, the FWS would not have any Threatened and Endangered species concerns.

FWS, BLM and BIA would have concerns regarding impacts to subsistence resources. Most conservation units in Alaska (e.g., refuges, national parks, and public lands) were established, in part, to provide access to subsistence resources.

BIA also has concerns regarding restricted lands (discussed later), cultural resources, biological resources, and forest resources.

Land management responsibilities of the USFWS, BLM and BIA will be discussed in more detail later, when considering sensitive areas.

**Unified Command:**

DOI anticipates that multiple trained specialists would be available to work within the Unified Command to support EPA's efforts. These would include wildlife agency staff, a NRDAR liaison (essential given the magnitude of this spill), and other technical specialists. This support would include staff operating within the Incident Command Post and those providing support from other locations.

The BLM's Pipeline Monitoring and Environmental Compliance Section plays an oversight role regarding TAPS operations. Their staff would be actively be involved within the Unified Command.

- One BLM Environmental Protection Specialist would report (fly) to Fairbanks EOC to oversee Alyeska's response actions/coordinate with PMECS field personnel
- One Realty Specialist can work remotely to provide any land use permit issues
- One Geologist can work remotely to provide assistance in coordinating any material use issues from mineral material sites in the area

- Their section has a PIO available and BLM staff have brought them in on exercises to work in the JIC in the past (*new information provided after the exercise*)

BLM also plays a significant land management role within the Yukon River corridor.

The BIA would also play a key role in supporting the response, within the Unified Command and/or from other office locations. Alaska Native allotments, discussed later, would be a significant concern.

Additionally, DOI would check with other DOI bureaus (e.g., NPS and USGS) to see what incident-specific expertise they could offer.

The need for historic property specialist support for field operations (SCAT) is discussed later. HPS and cultural resource manager involvement in the spill response within the Unified Command is also essential. DOI recommends that identification of an HPS to advise the FOSC be a high priority as soon as possible during the spill. This urgency reflects the great abundance of historic properties and cultural resources we anticipate may be impacted, given the number of communities, fish camps, historic, and archaeological sites located throughout the Yukon River corridor downstream of the spill. The FOSC's HPS would coordinate with the State Historic Preservation Officer (SHPO) and subject matter experts representing the responsible party regarding historic properties issues. DOI, in coordination with the SHPO, could help the FOSC identify potential HPS candidates.

#### **Field assets:**

From BLMs Pipeline Monitoring and Environmental Compliance Section:

- Three field personnel assigned in Fairbanks able to respond upon notification –
- Two Maintenance and Operations Specialists to oversee Alyeska's field operations depart Fairbanks for Pump Station 6/Yukon Response Base in their assigned truck
- One Environmental Engineer to Alyeska's Fairbanks EOC to observe Alyeska's Engineering section's repair actions to return pipeline to service

The USFWS manages several very large National Wildlife Refuges throughout the Yukon River watershed. Their potential response assets are discussed below.

The Nowitna National Wildlife Refuge is located 100+ miles downriver from the TAPS Yukon River crossing. The western boundary of the Yukon Flats NWR is upriver about 10 miles. During type of incident FWS spill response staff would ask the Refuges for assistance, if needed (personnel for wildlife observations, boats, and such).

#### **FWS HAZWOPER-certified employees**

- Fairbanks: 16
- Anchorage: 30
- Tok: 2
- Other areas in AK: 21

Primarily biologists, refuge maintenance staff, and FWS law enforcement officers. Time to arrive on scene varies depending on location, but could start arriving within 48 hours, particularly from Fairbanks.

Helicopter travel for FWS staff on non DOI certified aircraft may be possible, however this would necessitate development and signing of a cooperative agreement. Agreements can be obtained within one working day (meaning there may be a delay over the weekend). Additionally, FWS employees must wear OAS-approved helmets during flight. Availability of approved flight helmets may limit number of FWS employees able to fly.

**2. If you cannot answer the question** –Respond with how much time you need to determine capability. FWS would be able to provide a better estimate within 8 hours and more specifics within 24. NPS would need at least 24 hours (more if over the weekend) to determine NPS cultural resource specialist capacity.

**Slides 32-33:**

**Tribal notifications**

The slide says tribes have been notified. If additional assistance is needed, NPS has SOI-qualified cultural anthropologists that could help with tribal notifications. To my knowledge none have the 24-hour HAZWOPER but they could help with notifications from an office setting. Estimate of 2 anthropologists available. Time to mobilize to FAI would be 2 days or less.

**Slide 34: Sensitive/protected areas** – shows Innoko and Yukon Delta NWRs,

The spill would almost immediately impact BLM managed public lands along the Yukon River directly below the spill origin and in many sections of the river downstream. DOI would work with BLM to generate land status maps/data layers which would be provided to the Unified Command. As noted above, BLM would also be represented in the Unified Command.

Alaska Native allotments would also be impacted almost immediately following the discharge of oil. The BIA has trust responsibility for restricted lands (including allotments and townsites). More than 50 such allotments could be impacted between the spill origin and Tanana. This number is based on my quick review of a generalized land status map and it is almost certainly too low. Allotments are also found throughout the Yukon River corridor downstream of Tanana. BIA would work to identify impacted allottees as the spill progresses downstream, and to facilitate communications with them.

Based on the map on page 18, discharged oil would enter the western boundary of the Nowitna NWR by hour ~35 / Day 2. As discussed on this slide, the Innoko and Yukon Delta NWRs would be impacted later. FWS spill response staff would coordinate with their refuge counterparts regarding resources at risk and other issues.

**Slides 40-42: SCAT teams, including HPS support**

FWS could supply 1-2 field personnel for this within 24-48 hours, although they would overlap with personnel requested on slide 43, at least initially (with helicopter caveats from above).

NPS had a good number of CR staff at the 2019 HPS workshops and all are SOI qualified, but few to none have the 24-hour HAZWOPER training. Would “just in time” HAZWOPER training be available?

NPS cultural resource staff in Alaska would contact their counterparts in the lower 48 and they expect that they could find 1-3 people available with HAZWOPER certification. Mobilization would likely take 2-3 days to FAI.

FWS may be able to provide cultural resource support. They would know within 2-3 days whether a Cultural Resource Specialist/ Secretary of Interior Qualified Archaeologist would be available. This person’s role might be within the Unified Command or field (TBD)? Addition – after the exercise I learned this responder lacks HAZWOPER certification, so their role would either be limited to providing support to the UC, or that person would need “just in time” training.

Other DOI staff might be available for SCAT team support (TBD), depending on their training and availability.

**Wildlife Observers:**

In addition to SCAT, FWS may also be able to provide other field staff, particularly deployment of wildlife observers. DOI recommends inclusion of trained wildlife observers in the response, as outlined in the Wildlife Protection Guidelines.

**Slide 43:** Request for support for water and sediment sampling, biological (food safety) sampling, etc. USGS, FWS and others might have staff but are they HAZWOPER trained?

FWS could supply 3-5 HAZWOPER certified personnel for this within 24-48 hours, although they would overlap with personnel requested on slides 40-42 (with aviation support caveats from above).

**Slide 50:** Would your agencies be able to supply your own staff with camping essentials and would you have spare tents, etc.

FWS would be able to outfit their own staff with camping equipment from Field Offices and National Wildlife Refuges. They would require 4-5 days to determine if extra gear were available. That may be unlikely during the summer field season.

HPS or other cultural resource staff from NPS and FWS would have field gear.

DOI would also coordinate with other bureaus to assess resource availability.

**Slide 51: Availability of helicopters to help support spill response efforts?**

Our office would work with the DOI Office of Aviation Services (OAS) to assess this request. They in turn would coordinate with Regional Aviation Managers in the FWS, BLM and NPS to determine aviation resource availability. I believe DOI may have some helicopters, however fixed wing aircraft are much more common.

This spill would occur at the height of the field season for DOI biologists, cultural resource specialists, physical scientists and others. Also, a number of the aircraft in the DOI fleet are dedicated to wildfire response (e.g., BLM Alaska Fire Service). It is unlikely these wildfire-related assets could be freed up, given this mission critical need. If there is a less active fire season in Alaska, these AFS aircraft would be repositioned to the Lower 48, as occurred this year.

Each DOI bureau would need to evaluate field crew support and safety issues and mission critical work prior to committing aircraft.

Helicopter travel for USFWS staff on non-DOI certified aircraft may be possible, but requires a cooperative agreement and USFWS employees must wear OAS-approved helmets during flight. Agreements can be obtained within one working day (meaning there may be a delay over the weekend), Availability of approved flight helmets may limit number of FWS employees able to fly.

Additionally, as a preliminary response, the FWS noted that they would not be able to support the helicopter request, but 1-2 fixed-wing aircraft might be available. These aircraft would be outfitted with floats or tundra tires and have experienced pilots. These types of aircraft can operate along the Yukon River with its numerous gravel bars, wide expanses of water, and small gravel strips. Would need at least 24 hours to determine availability. I believe that FWS is not alone in having more fixed wing aircraft vs. helicopters.

Another capability DOI has had in the past was the ability to support various missions (wildfires, volcanic events, science missions) through use of Unmanned Aviation System (UAS) aircraft and trained pilots. I understand that DOI has the largest civilian government fleet. I previously heard that our fleet was grounded due to cybersecurity concerns. I just checked and the fleet is still grounded.

**Slide 52: Similar question re: river boats**

The USFWS Fairbanks Field Office Fisheries programs, Fairbanks-based National Wildlife Refuges (Yukon Flats and Arctic), and downriver National Wildlife Refuges (Nowitna, Innoko, Yukon Delta) have multiple river boats. The FWS expects 1-2 boats with operators could be available within 48 hours and more may be requested if needed. They would need 2-3 days to query all sources.

DOI would also reach out to other bureaus to determine if other boats and/or trained boat operators within Alaska could be made available to support this spill response. As mentioned above, this would be at the height of field season, and field crew safety and support issues would take precedence.

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**National Pollution Fund Center Comments**

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**From:** Buie, Gregory W CIV <[Gregory.W.Buie@uscg.mil](mailto:Gregory.W.Buie@uscg.mil)>

**Sent:** Wednesday, September 16, 2020 8:37 AM

**To:** Goolie, Mary <[Goolie.Mary@epa.gov](mailto:Goolie.Mary@epa.gov)>; Sheldrake, Beth <[sheldrake.beth@epa.gov](mailto:sheldrake.beth@epa.gov)>; Everett, Mark CIV <[Mark.Everett@uscg.mil](mailto:Mark.Everett@uscg.mil)>; Randolph, Marc A CIV <[Marc.A.Randolph2@uscg.mil](mailto:Marc.A.Randolph2@uscg.mil)>; Fisher, Samantha <[sfisher@ene.com](mailto:sfisher@ene.com)>

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**Subject:** Alaska Regional Response Team Table Top Exercise - thoughts for hotwash

I thought the exercise was very well planned and well run and it certainly raised a lot interesting questions and spotlighted the challenges for the AK response community and the AKRRT.

Integrating RRT agency support into the UC's resource ordering process is always challenging, and probably even more so in Alaska. The resource requests of yesterday's exercise were very thought provoking; I was often asking myself "how would we do that in the real world?"

At the end of the day I think it comes down to effectively and rigorously using the standard ICS 213RR resource request and ordering process. From NPFC's perspective; we prefer the RP provide as much tactical and logistical support as possible, with government resources backstopping the RP as necessary - e.g. the Army Chinook helicopters that were used during the MODU KULLUK response.

( [https://www.army.mil/article/94329/army\\_helicopters\\_aid\\_stranded\\_oil\\_rig](https://www.army.mil/article/94329/army_helicopters_aid_stranded_oil_rig) )

NPFC recognizes that the NCP and Area Plans often lay out inherently governmental Federal, State, Tribal, and Local government roles in response that need funding and that RPs may not be able to easily reach funding or "vendor" agreements with government agencies in the heat of a response . That is where the NPFC and the OSLTF can help with the PRFA and MIPR process.

Nationally, NOAA, DOI, SUPSALV, and the bigger coastal states are pretty familiar with these processes, but many Federal, State, Local, and Tribal agencies and DOD elements are not because of the relative infrequency of large spills.

If the AKRRT desires, I could provide a presentation or participate in a future workshop to explain how these processes work and provide some real world examples of how the OSLTF was used to fund agency efforts alongside RP efforts on major oil spills.

Greg

Ps. I have attached an excellent DOI guidance document on how DOI Bureaus and Offices can use PRFAs to fund activities that support FOSCs. It can be found here:

[https://www.doi.gov/sites/doi.gov/files/uploads/ecm\\_16-4\\_department\\_procedures\\_related\\_to\\_pollution\\_removal\\_funding\\_authorizations\\_issued\\_by\\_federal.pdf](https://www.doi.gov/sites/doi.gov/files/uploads/ecm_16-4_department_procedures_related_to_pollution_removal_funding_authorizations_issued_by_federal.pdf)