



Alaska Regional Response Team (ARRT)  
c/o USEPA Region 10  
ECL Emergency Response, AOO  
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Anchorage, AK 99513  
<http://alaskarrt.org/>

March 16, 2012

Mr. Larry Stanton  
Chair, National Response Team  
Office of Emergency Management (5104AR)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Mr. Stanton:

Please allow us to thank you for your attendance at the 22/23 February 2012 Alaska RRT semi-annual meeting in Juneau. During that meeting you requested information on the Alaska RRT's decision-making process for dispersant use in Alaska.

The Alaska RRT's Science and Technology Committee met on 15 March 2012 to discuss your request. Attached is a copy of the Alaska RRT-approved *Dispersant Use Guidelines for Alaska*, which includes the decision-making process. These guidelines are included in Annex F of the *Alaska Federal/State Preparedness Plan for Response to Oil & Hazardous Substance Discharges/Releases* (the Unified Plan).

Acknowledging that the Unified Plan is flexible 'living' guidance, there are a few current practices and other points of emphasis which may not be readily apparent in Annex F:

- Alaska has an effective, proven process – as used in the M/V SELENDANG AYU and M/V COUGAR ACE cases – to request and approve the use of dispersants. Moreover, these processes are routinely exercised in Cook Inlet and Prince William Sound regions/subareas.
- The decision to request use of dispersants is vetted and made in a timely manner in the context of a Unified Command (i.e., FOOSC, SOSOC, RPOSC).
- Equipment and supplies necessary to carry-out dispersant application and monitoring operations are mobilized even as required concurrence and consultation documentation is under review. Mobilization of these resources takes several hours at a minimum.
- In accordance with Subpart J of the National Contingency Plan, the required concurrence (i.e., EPA, State of Alaska) and consultation (i.e., DOI, DOC/NOAA) reviews are conducted and documented in a timely manner either 'in committee' or individually by agencies' representatives telephonically.

- 'Zone 1' (i.e., dispersant preauthorization) areas in Cook Inlet and Prince William Sound as described in Annex F have been subsumed into Zone 2 and the policies and procedures for dispersant use therein apply. It should be noted that there have never been Zone 1 areas anywhere else in Alaska.
- All policies, regulations, and responsibilities of a FOSC are followed (e.g., incident-specific natural resource trustee consultation of activity in Essential Fish Habitats and compliance with Section 7 of the Endangered Species Act).
- Requirements for outreach and consultation with federally recognized tribes are met both in planning cycles and response operations.

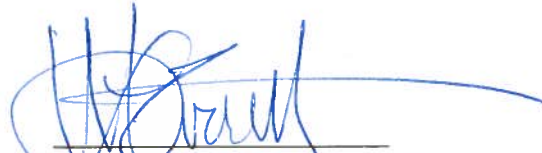
As with all such guidance, we are continuously collecting, assessing, and cataloguing required updates to the Unified Plan. In fact, the ARRT's Science and Technology Committee will be meeting on April 25, 2012, to discuss revisions to the Dispersant Use Guidelines for Alaska, including dispersant preauthorization.

We look forward to support from the National Response Team on numerous issues that will enable the Alaska RRT to be well positioned and meet expectations in an effort to work together to protect Alaska's unique peoples and preserve its pristine environment.

Sincerely,

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Mr. Chris Field  
EPA – ARRT Co-Chair



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Commander Mark L. Everett  
USCG – ARRT Co-Chair

Encl: Annex F, Unified Plan