



P.O. Box 109, MS 730, Valdez, AK 99686

March 18, 2003

Government Letter No. 03-19685
APSC CARTS No. 5316
File 8.2.4

Larry Iwamoto
Alaska Department of Environmental Conservation
Prevention and Emergency Response Program
Prevention Section: attn: Larry Iwamoto
555 Cordova Street
Anchorage, Alaska 99501

Re: Change 3 to the Unified Plan (CARTS 5136)

Dear Mr. Iwamoto:

Alyeska has reviewed Change 3 of the Unified Plan and has no comments about those changes. However, we noticed there is still no reference to the Alaska Incident Management System Guide in the Plan. With this change, Alyeska had hoped there would at least be some reference or acknowledgement of the Guide. We recommend inserting the following in Annex B, Appendix I, Page B-1, between paragraphs 3 and 4:

"Between 1998 and 2002, representatives of federal and state agencies, oil industry, and spill cooperatives prepared standardized spill response management guidelines for spill responders in Alaska. These Guidelines merge the concepts of the NCP with NIIMS; has been customized to meet Alaska's unique needs; is consistent with the latest update published by the Western States/British Columbia Task Force FOG handbook; and provides a useful guideline for the Alaska spill response community. **Nothing in this guide is mandatory for response plan holders or regulatory in nature. The Federal and State On-Scene Coordinators will work with a response organization established by the responsible party that effectively addresses the functions and concepts described in this guide.** The Guide can be accessed through the Alaska RRT Web site (www.akrrt.org) or through the ADEC offices in Anchorage and Juneau."

At a later date, consideration should be given to slimming down Annex B by removing the sections that are duplicated by the AIMS Guide. In particular, Annex B's Appendix I through V have complimentary sections and duplicative subject matter to that in the AIMS Guide.

Also, Alyeska looks forward to working with the agencies on incorporating the use of this Guide in our company C-Plans.

Should you have any questions, please contact me at (907) 834-6833, or contact Pamela Chelgren-Koterba, (907) 834-6945.

Sincerely,

A handwritten signature in black ink that reads "Rod Hoffman" with "for R Hoffman" written below it.

Rod Hoffman
Regulatory Preparedness Manager

Cc: E. Morgan/730
W. Willson/881
T. Williams/502
M. Deely, USCG
M. Goolie, USEPA