



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE  
Prevention, Preparedness, and Response Program

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Facility #: 2028

January 13, 2023

Phillip Zavadil  
City of Saint Paul  
PO Box 901  
Saint Paul, AK 99660

**Subject: City of Saint Paul Bulk Fuel Storage Facility Oil Discharge Prevention and Contingency Plan, ADEC Plan #: 20-CP-2018; Joint- St. Paul Fuel/City of Saint Paul Discharge Exercise**

Dear Mr. Zavadil:

The Alaska Department of Environmental Conservation (department) conducted an announced discharge exercise for the City of Saint Paul Bulk Fuel Storage (facility) in Saint Paul, AK on October 12, 2022. The exercise was conducted to assure the approved City of Saint Paul Bulk Fuel Storage Facility Oil Discharge Prevention and Contingency Plan (plan) is adequate in content and execution. Exercises that demonstrate a plan holder can implement the plan effectively count as one of the two discharge exercises the department may require in each 12-month period under 18 AAC 75.485(a). Because this exercise demonstrated the City of Saint Paul was able to implement the plan with minor limitations, this exercise will not be repeated during this 12 month period. Refer to the evaluation below for more details.

The joint exercise was an oil spill equipment deployment drill focused on the local spill response capabilities of St. Paul Fuel, LLC, and the City of Saint Paul. The exercise scenario was a mechanical failure at the St. Paul Fuel marine header leading to a 10,000-gallon diesel spill into the waters of the city harbor. The scenario called for St. Paul Fuel and the City of Saint Paul to work cooperatively in response to the spill as they likely would in the event of a real spill event. The main objectives of the exercise were required spill notifications, effective spill response equipment deployment, and general safety during the exercise.

The first objective of the exercise was completion of required spill notifications. The St. Paul Fuel facility manager successfully completed spill notifications to the department, the US Coast Guard Sector Anchorage, the National Response Center, and the Environmental Protection Agency (EPA). The second objective was effective spill response equipment deployment to mitigate the spill. Employees from the City of Saint Paul and St. Paul Fuel, LLC worked in cooperation to effectively deploy St. Paul Fuel containment boom around the hypothetical spill with the aid of the City's small boat. Specifically, the spill scenario called for deployment of St. Paul Fuel's boom and the City's skimmer. Although, the containment boom was successfully deployed as required in the drill scenario, City of Saint Paul employees were unable to deploy the city's skimmer in a timely manner. The third and final objective was general safety throughout the exercise. Oil spill response

operations always have potential for safety hazards (slips, trips, falls, pinch, etc.), however, no injuries were reported during this exercise and safety was emphasized throughout.

### **Strengths**

During the exercise the department recognized the following areas where facility employees excelled:

1. City of Saint Paul employee Marc Galanin demonstrated excellent situational awareness and a keen emphasis on safety by manning a radio to coordinate boom retrieval and deployment with the response team members on the response boat.
2. City of Saint Paul employees displayed excellent teamwork and notable skill during the spill response equipment deployment.
3. City of Saint Paul employees completed the exercise with a noteworthy focus on safety.

### **Lessons Learned**

Although the exercise was largely successful, it revealed the following issues that require corrective action:

1. The City of Saint Paul spill response container was missing hoses necessary for operation of the skimmer system.
2. The City of Saint Paul employees were not familiar with the new skimmer operation.

Based on the exercise, the department requests the following information:

1. Supply the department verification that the City of Saint Paul has all necessary hoses and components for the operation of its skimmer.
2. Supply the department with video documentation of deployment of the assembled skimmer verifying suction and discharge of water.
3. The City of Saint Paul should verify that the new skimmer is listed in Section 3.6.1 of the plan, Owned Equipment Inventory, and, if necessary, update the plan accordingly.

The City of Saint Paul must submit a written response to the items that require corrective action and the information requests by February 24, 2023. The written response must include specific remedies for each issue identified, along with a schedule for implementation of these remedies. Failure to address these issues by the dates agreed upon with the department may result in formal enforcement action.

The department would like to thank David Joyner, Marc Galanin, and Steven Melovidov, Sr. for their assistance during the exercise. If you have any questions, please contact me at 907-269-0910 or [Lucas.Ellis@alaska.gov](mailto:Lucas.Ellis@alaska.gov).

Sincerely,

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Lucas Ellis  
Environmental Program Specialist

Enclosures: Photo Sheet

Phillip Zavadil  
City of Saint Paul

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January 13, 2023

cc with enclosure:

Bernie Nowicki, ADEC  
Mark Sielaff, ADEC  
John Ebel, ADEC  
Howard Minor, ADEC  
David Joyner, City of Saint Paul

Photo # and Description	Photo
<p><b>Photo #1</b></p> <p><b>Photo File Name:</b> PA120755.JPG</p> <p><b>Date of Photo:</b> 10/12/22</p> <p><b>Photographer:</b> Howard Minor</p> <p><b>Description:</b> City of Saint Paul bulk fuel operator Steven Melovidov Sr., boat crewman, on City boat during boom deployment</p>	
<p><b>Photo #2</b></p> <p><b>Photo File Name:</b> PA120779.JPG</p> <p><b>Date of Photo:</b> 10/12/22</p> <p><b>Photographer:</b> Howard Minor</p> <p><b>Description:</b> City of Saint Paul bulk fuel operator Marc Galanin in response connex during boom deployment</p>	