

To: Paul Philemonoff, General Manager, St. Paul Fuel, LLC
Phillip Zavadil, City Manager, City of Saint Paul

From: Breena Weller, Consultant, Integrity Environmental, LLC

Date: August 24, 2023

RE: St. Paul Fuel Bulk Fuel Facility NPREP Exercise Memo Report

On August 15, 2023, Integrity Environmental LLC (Integrity) was present for an announced spill drill exercise for the St. Paul Fuel, LLC Bulk Fuel Facility in Saint Paul, Alaska. Integrity was also contracted to provide drill training, attend the drill, and to provide feedback for the exercise. This drill was intended to demonstrate St. Paul Fuel's spill response capabilities, allow the Terminal Manager to gain on-scene command experience, exercise Memorandum of Agreement (MOA) between the City of Saint Paul and St. Paul Fuel/TDX entities, and to perform the quarterly qualified individual (QI) notification (St. Paul Fuel/TDX) and semi-annual equipment deployment exercise (St. Paul Fuel/TDX and City of Saint Paul) in accordance with the National Preparedness for Response Exercise Program (NPREP), 33 CFR 154.1055.

The exercise began at 13:30 (Alaska Standard Time) and concluded at 16:00 on August 15, 2023.

Summary of Events

Scenario: at 13:30 on August 15, 2023, the JetA fuel truck owned and operated by St. Paul Fuel (TDX) drives partially off the road and overturns near the TDX warehouse, east of the Trident Facility. The truck was transferring JetA from a barge to their bulk JetA tanks at the airport. Recent construction activities softened the road bed sucking the back tires down and rolling the truck. The driver is injured and fuel is slowly exiting the fuel truck from several vents and drainage valves. The driver was able to turn off the ignition in the truck, exit the vehicle, and notify his supervisor, Stacy Bourdukofsky. The total capacity of the JetA truck is 10,000 gallons.

At 13:42 the spill drill was initiated. The spill occurred due to a tank truck rollover and the truck driver was injured. The cell phones were not working, so Stacy Bourdukofsky was notified via verbal communication and assumed the duties of the on-scene incident commander (IC).

At 13:50, the St. Paul Fuel IC confirms JetA product was spilled, confirms that the ignition sources were shut off, and appropriate PPE is assigned. The IC called 911 and requested EMS for the injured driver and the fire department for air monitoring at the site for the initial site safety. The IC determines the site was safe to respond.

The IC conducts personnel notifications and requests mobilization of off-site responders and response equipment from St. Paul Fuels, TDX, and City of Saint Paul. The IC notifies the QI. The IC calls Phillip Zavadil at the City of Saint Paul to confirm what resources are available.

The QI conducts agency notifications (NRC and ADEC), Chadux, and other local notifications listed in the St. Paul Fuel ODPCP-FRP.

At 13:55 the sorbent boom, sorbent pads, visquene, and a Volvo Loader arrives onsite. The St. Paul Fuel and TDX crew onsite begins to place sorbent boom into two rows of berms. The loader will dig trenches that will be lined with visquene to help contain the spreading fuel.

At 14:00 more response equipment and personnel arrive onsite. The City of Saint Paul personnel are onsite to begin on-water containment tactic which includes the 18' work skiff, containment boom, and anchors.

At 14:08 the ambulance is onsite to tend to the injured truck driver. City of Saint Paul personnel set up cones to block and divert traffic away from the spill site.

At 14:15 the three local bird responders from the Ecosystem Conservation Office (ECO) arrive onsite. They called the Alaska Department of Fish and Game (ADF&G) to request a hazing permit and received verbal approval for hazing and deterrence from Andrew Kastining. Hazing activities were simulated and no hazing activities were performed as part of this exercise.

The City of Saint Paul radios arrive on scene. The first Nixle announcement is made to the community to inform them about the spill.

At 14:30 the on-water containment operations began. The 18' work skiff and three City of Saint Paul employees are on the water with the containment boom in tow.

The IC requests pumps and hoses to be mobilized to begin the recovery operations.

At 14:55 the containment boom is secured in place with two anchors. On-water recovery operations are ready to begin.

At 15:00 four ducks (decoys) fly into the spill zone on water.

At 15:10 the pumps and the TDX 500-gallon truck arrived onsite and on-land recovery operations begin.

At 15:30 the bird responders from the ECO call the US Fish and Wildlife Service (USFWS) to obtain the USFWS Bird Salvage Permit, Office of Law Enforcement

(OLE) Authorization for carcass collection, and the USFWS Migratory Bird Rehab Permit. The USFWS send permits and approval for bird salvage/carcass collection as well as the bird rehabilitation at 15:50. There are currently three live, oiled diving ducks and one dead duck (decoys). Two of the local bird responders continue with the live and dead duck capture once permits are received. One bird responder continues with hazing activities.

The deployment of response equipment is successful, and the spilled fuel has been contained. The drill is complete at 16:00 and response equipment is packed up.

Drill Observations

- The initial response actions were completed in a timely manner and to completeness.
- The ADEC spill notifications were successfully completed during the drill.
- ICS 201, 204, 205, 205A, and 208HM forms were correctly filled out during the drill.
- St. Paul Fuel, TDX, and City of Saint Paul personnel became familiar with initial spill response strategies.
- The facility's ODPCP-FRP was referenced properly during the drill to obtain important contact information for state, federal, and local notifications as well as essential response equipment.
- The St. Paul Fuel DF2 tank truck was down due to exhaust issues, but typically the 5,000-gallon DF2 tank truck would have been used for temporary storage and product transfer to one of the City of Saint Paul contingency tanks.

Lessons Learned

- Integrity observed that the participants seemed more confident in the roles and responsibilities concerning the actions required during a spill response.
- St. Paul Fuel/TDX and City of Saint Paul need to ensure that all spill drill responders have appropriate PPE and train for safe operation of equipment. Having a designated Safety Officer would be helpful in ensuring that all responders have proper PPE. High visibility vests with pockets for radios are helpful to secure the radios during a spill or spill drill.
- Consider installing permanent eye bolts in strategic locations along the harbor to provide safe boom securement in the future.
- Future training should rely on radio communications as cell phone service is not reliable. Ensure all responders have issued radios and base charging stations. Consider installing a VHF base station at the airport so that TDX and Saint Paul Fuels staff can be notified of a spill response even if phones are down.
- Air monitoring equipment should be maintained and serviced regularly to ensure it is in working order.
- If fuel is spilled at a choke point, getting resources staged at the dock could be

impossible without driving through the spill. Consider staging some resources on both sides of the choke point to ensure rapid response can occur without driving through the scene.

- Ambulance drivers should be reminded to keep a safe distance from the spill site when parking the ambulance since the engine will be on while they are onsite.
- USFWS resources are limited to issuing permits for specific tactics such as live animal or carcass collection. Recommend requesting future USFWS technicians assigned on island to have 40-Hr Hazwoper certification so that they could be a valuable local resource to the community while working on-island.
- Recommend both ECO and St. Paul Fuels refresh hazing equipment and storing that equipment with other emergency response equipment, which would include at least one hazing kit at the airport. Recommend more people take the wildlife hazing training so there are more on island responders.
- Ensure all spill responders have 40-Hr Hazwoper certification. Bearing Sea Campus is hosting a 40-Hr Hazwoper class in November 2023 and all spill responders are encouraged to attend.
- All responders in leadership roles (Terminal Managers, Crew leads, etc.) should take the ICS 100, 200, 700, and 800 refresher course. With new personnel in leadership roles, this is critical.
- Consider installing cleats or tow bar to back of the 18' City of Saint Paul work skiff to assist in boom towing.
- Nixle is a good tool to inform people of an event, but practice is needed to ensure the message contains enough detail and the information is accurate.
- The spill drill ended up covering a large area. Only one person was assigned scene check-in duties. In the future IC should consider adding a second check-in person to allow for better site control and flow.
- Provide site maps/sketches/updates/photos during the initial spill response so that leadership in Anchorage can communicate situation to regulators and understand actions taken.
- Consider additional vessel and boom training for spill responders assigned to the on-water response teams. One spill responder suggested looking to the SERVS program for ideas/resources.
- The IC did not communicate tide, temperature, or windspeed information. She has been trained to communicate that in the future, but Anchorage based leadership can assist by requesting missing information when filling out ICS forms.
- City Manager agreed to provide Command mentorship to both St. Paul Fuel's Terminal Manager and TDX's On-Island Lead for future trainings and drills.
- Make sure on-water operations have proper PPE and safety equipment including life jackets and life rings aboard the skiffs.
- Ensure that all temporary storage and means of storage transfer are ready and equipped to take recovered fuel in the case of a spill.
- Make sure there are proper 2-inch fittings onsite for the trash pumps used for fuel recovery.
- Make sure to have equipment, like rebar stakes and mallets, onsite necessary for staking down sorbent boom.

Drill Attendees

Participant Name	Company Affiliation
Paul Philemonoff	St. Paul Fuel, LLC
Phillip Zavadil	City of Saint Paul
Stacy Bourdukofsky	St. Paul Fuel, LLC
Jason Kozloff	TDX
Charles Stepetin	TDX
Neon Krukoff Jr.	TDX
James Simeonoff	TDX
Joe Kozloff	TDX
Karen Scott	St. Paul Fuel, LLC
Artemey Merculief	City of Saint Paul
Gabe Rukovichnikoff	City of Saint Paul
Aubrey Wegeleben	City of Saint Paul
Marc Galanin	City of Saint Paul
Adrian Dirks	City of Saint Paul
Paul Melovidov	Tribe – Eco Office
Aaron Lestenkof	Tribe – Eco Office
Ethan Mandregan	Tribe – Eco Office
Katrina Melovidov	City of Saint Paul
Caitilin Bourdukofsky	City of Saint Paul
Lawerence Hale	St. Paul Fuel, LLC
Damon Zacharof	TDX
Mac Mandregan	City of Saint Paul

This drill fulfills the quarterly QI notification for St. Paul Fuel and equipment deployment exercise requirements for St. Paul Fuel and the City of Saint Paul in accordance with NPREP, 33 CFR 154.1055. Please retain this memo for a minimum of five years.

Breana Weller
 Consultant
 Integrity Environmental LLC
 Office: 907-854-7347
 breana@integrity-env.com

Attachments

Attachment A – Completed ICS Forms
Attachment B – Photo Log

Attachment A
ICS Forms

INCIDENT BRIEFING (ICS 201)

1. Incident Name:

St. Paul Fuel Spill Drill

2. Incident Number:

N/A

3. Date/Time Initiated:

Date: 08/15/2023 Time: 1330

4. Map/Sketch (include sketch, showing the total area of operations, the incident site/area, impacted and threatened areas, overflight results, trajectories, impacted shorelines, or other graphics depicting situational status and resource assignment):



5. Situation Summary and Health and Safety Briefing (for briefings or transfer of command): Recognize potential incident Health and Safety Hazards and develop necessary measures (remove hazard, provide personal protective equipment, warn people of the hazard) to protect responders from those hazards.

Initial spill (10k truck roll over) reported at 13:42 (8/15/2023). Ignition sources shut off. Initial site safety procedures were conducted. Drive received injury of dislocated shoulder, treated by local EMS crew. Approximately 14:30 tanker wall failed resulting in loss of full tanker volume. Trenching and booming on land was initiated immediately to slow/prevent fuel from entering harbor. Fuel entered harbor after tank failure. Water booms deployed by 14:45 to contain fuel in water. Level D plus PPE used by spill responders. Four Ducks were impacted by spill, 3 wildlife personnel responded. Wildlife personnel took charge on duck response.

6. Prepared by: Name: Paul Philemonoff Position/Title: General Manager Signature: _____

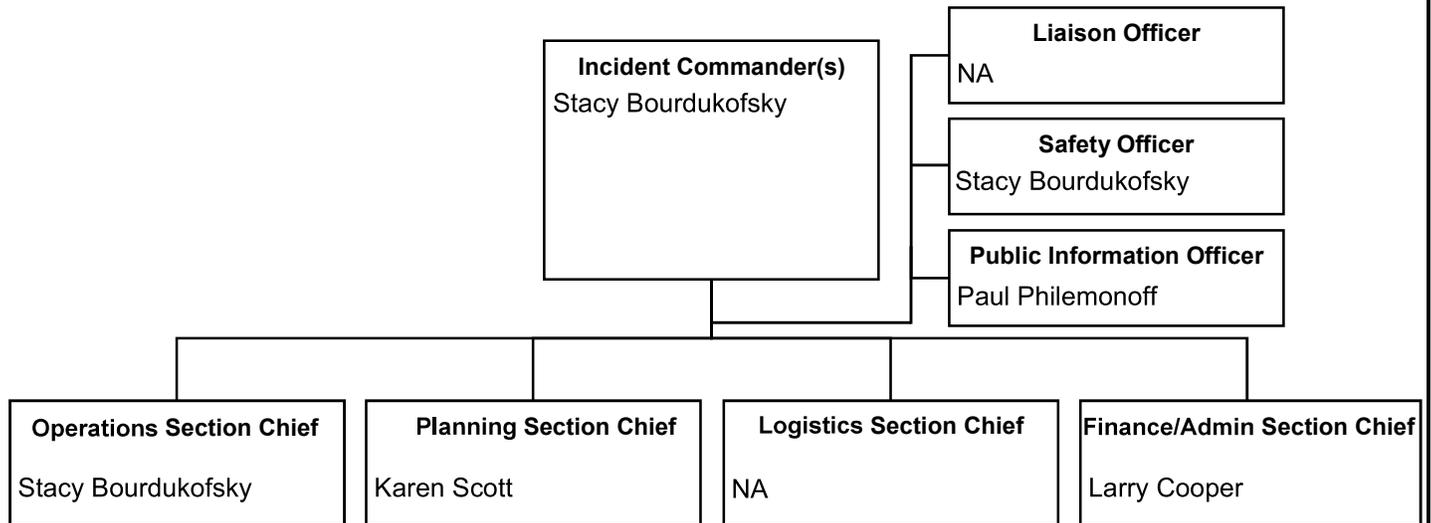
INCIDENT BRIEFING (ICS 201)

1. Incident Name: St. Paul Fuel Spill Drill	2. Incident Number: N/A	3. Date/Time Initiated: Date: 08/15/2023 Time: 1330
7. Current and Planned Objectives: Containment and recovery of spill. Absorbent booms used on land in conjunction with visquine lined trenches. Containment booms used on water with surface skimmers.		
8. Current and Planned Actions, Strategies, and Tactics:		
Time:	Actions:	
1342	Spill discovered	
1350	The Fuels Manager, who serves as the initial IC, conducts personnel notifications. The IC requests off-site responders, St. Paul Fuels (SPF), TDX, and City of St. Paul (CSP) to the site. Fire and police requested to respond and establish a security area and to ensure spill site is safe for responders.	
	IC conducts safety survey, initial site assessment, and QI notification	
1351	QI conducts agency notifications (NRC and ADEC) and other local notifications; IC requests mobilization of local response equipment including CSP work skiff; assemble onsite personnel	
1355	Sorbent boom, visquene, and loader arrive at spill site. Sorbent boom deployed across spill flow line at spill site.	
1415	Excavate cut-off trench and line with visquene to create collection trench to collect fuel for recovery before spill reaches water. ADFG called for Hazing permit to prevent wildlife entering spill site.	
1430	Tank failure on truck resulting in remaining fuel spilling for the full volume of the truck (10k gallons)	
1445	Booms in Harbor fully deployed. Total of 400' of boom deployed	
1500	Ducks found in spill site.	
1525	Wildlife responders call USFWS for permits for live and dead capture of ducks.	
1530	Skimmers are deployed on water and land, discharging to available tank truck, bladder, and contingency tanks	
6. Prepared by: Name: <u>Paul Philemonoff</u> Position/Title: <u>General Manager</u> Signature: _____		
ICS 201, Page 2	Date/Time: _____	

INCIDENT BRIEFING (ICS 201)

1. Incident Name: St. Paul Fuel Spill Drill	2. Incident Number: N/A	3. Date/Time Initiated: Date: 08/15/2023 Time: 1330
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9. Current Organization (fill in additional organization as appropriate):



6. Prepared by: Name: Paul Philemonoff Position/Title: General Manager Signature: _____

ICS 201, Page 3 Date/Time: _____

INCIDENT BRIEFING (ICS 201)

1. Incident Name: St. Paul Fuel Spill Drill	2. Incident Number: N/A	3. Date/Time Initiated: Date: 08/15/2023 Time: 1330
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10. Resource Summary:

Resource	Resource Identifier	Date/Time Ordered	ETA	Arrived	Notes (location/assignment/status)
Responders (3)	SPF	1350	1350	<input checked="" type="checkbox"/>	
Responders (5)	TDX	1350	1355	<input checked="" type="checkbox"/>	
RESPONDERS (8)	CSP	1350	1400	<input checked="" type="checkbox"/>	
Responders (3)	ECO	1350	1415	<input checked="" type="checkbox"/>	Bird Responders
Sorbent rolls	SPF	1350	1355	<input checked="" type="checkbox"/>	Recovery
Sorbent pads	SPF	1350	1355	<input checked="" type="checkbox"/>	Recovery
Trash pump (1)	SPF	1350	1510	<input checked="" type="checkbox"/>	Recovery
Discharge hose	SPF	1350	1510	<input checked="" type="checkbox"/>	Recovery
Suction hose	SPF	1350	1510	<input checked="" type="checkbox"/>	Recovery
Front end loader	CSP	1350	1355	<input checked="" type="checkbox"/>	Recovery
24 mil tank liner (3 rolls)	SPF	1350	1355	<input checked="" type="checkbox"/>	Recovery
Tank truck 500 gal	SPF	1500	1510	<input checked="" type="checkbox"/>	Temporary storage and transfer
Skiff	CSP	1350	1400	<input checked="" type="checkbox"/>	On-water containment
Containment boom	CSP	1350	1400	<input checked="" type="checkbox"/>	On-water containment
				<input type="checkbox"/>	
				<input type="checkbox"/>	
				<input type="checkbox"/>	

6. Prepared by: Name: Paul Philemonoff Position/Title: General Manager Signature: _____

ASSIGNMENT LIST (ICS 204)

1. Incident Name: St. Paul Fuel Spill Drill		2. Operational Period: Date From: 08/15/2023 Date To: 08/15/2023 Time From: 13:30 Time To: 16:00		3. Branch: Division: Group: Staging Area: Marine Header, TDX
4. Operations Personnel: <u>Name</u> _____ <u>Contact Number(s)</u> _____ Operations Section Chief: <u>Stacy Bourdukofsky</u> Branch Director: _____ Division/Group Supervisor: _____				
5. Resources Assigned:		# of Persons	Contact (e.g., phone, pager, radio frequency, etc.)	Reporting Location, Special Equipment and Supplies, Remarks, Notes, Information
Resource Identifier	Leader			
Responders	Stacy Bourdukofsky	7	Channel 1, EMR-1	
Skiff/containment boom	Stacy Bourdukofsky			
Sorbent rolls	Stacy Bourdukofsky			
Sorbent pads	Stacy Bourdukofsky			
Trash pump and hoses	Stacy Bourdukofsky			
Front-end loader	Stacy Bourdukofsky			
Backhoe	Stacy Bourdukofsky			
24 mil tank liner	Stacy Bourdukofsky			
Tank Trucks	Stacy Bourdukofsky			
Bladder tank (6 bbl)	Stacy Bourdukofsky			
6. Work Assignments: Deploy sorbent materials across spill area. Use heavy equipment to construct a trench with sumps to intercept spill path and collect and divert fuel. Line trench with impermeable liner and sorbent materials. Deploy pumps to recover pooled product in sumps and transfer to tank truck. Recovered product is transported to the contingency tanks and bladder. Utilize sorbents when pumps are no longer effective to recover remaining product. Deploy skiff with containment booms to isolate spill in harbor water. Recover product with Skimmer once spill is isolated.				
7. Special Instructions: All operations require PPE. All responders must sign tailgate safety brief and read SSHP (when available). Immediately report sightings of oiled wildlife to the IC.				
8. Communications (radio and/or phone contact numbers needed for this assignment): Name/Function _____ Primary Contact: indicate cell, pager, or radio (frequency/system/channel) _____ St. Paul Fuel (4) / _____ VHF Channel 1, Emergency Radio Channel 1, Paul Cell 907-317-3840 TDX Responders (5) _____ City Of St. Paul (8) / _____ Tribal Government / _____				
9. Prepared by: Name: <u>Paul Philemonoff</u> Position/Title: <u>General Manager</u> Signature: _____				
ICS 204	IAP Page _____	Date/Time: _____		

SITE SAFETY AND CONTROL PLAN ICS 208 HM	1. Incident Name: St. Paul Fuel Spill Drill	2. Date Prepared: 08/15/2023	3. Operational Period: Time: 16:00											
Section I. Site Information														
4. Incident Location: St. Paul Harbor Area														
Section II. Organization														
5. Incident Commander: Stacy Bourdukofsky	6. HM Group Supervisor:	7. Tech. Specialist - HM Reference:												
8. Safety Officer: Stacy Bourdukofsky	9. Entry Leader:	10. Site Access Control Leader:												
11. Asst. Safety Officer - HM:	12. Decontamination Leader:	13. Safe Refuge Area Mgr:												
14. Environmental Health:	15.	16.												
17. Entry Team: (Buddy System) Name: PPE Level		18. Decontamination Element: Name: PPE Level												
Entry 1 See Log in Sheet	Level D +	Decon 1												
Entry 2		Decon 2												
Entry 3		Decon 3												
Entry 4		Decon 4												
Section III. Hazard/Risk Analysis														
19. Material:	Container type	Qty.	Phys. State	pH	IDLH	F.P.	I.T.	V.P.	V.D.	S.G.	LEL	UEL		
Jet-A	Fuel Truck	10k ga	Liquid											
Comment:														
Section IV. Hazard Monitoring														
20. LEL Instrument(s): N/A						21. O ₂ Instrument(s): N/A								
22. Toxicity/PPM Instrument(s):						23. Radiological Instrument(s):								
Comment:														
Section V. Decontamination Procedures														
24. Standard Decontamination Procedures:									YES:	<input checked="" type="checkbox"/>	NO:	<input type="checkbox"/>		
Comment: disposal of single use PPE. Wash and scrub of all other items including equipment that leaves site.														
Section VI. Site Communications														
25. Command Frequency: EMR-1				26. Tactical Frequency: 1				27. Entry Frequency:						
Section VII. Medical Assistance														
28. Medical Monitoring:			YES:	<input checked="" type="checkbox"/>	NO:	<input type="checkbox"/>	29. Medical Treatment and Transport In-place:				YES:	<input checked="" type="checkbox"/>	NO:	<input type="checkbox"/>
Comment:														

Section VIII. Site Map

30. Site Map:



Weather Command Post Zones Assembly Areas Escape Routes Other

Section IX. Entry Objectives

31. Entry Objectives:

1: Limit Spill Area 2: recover and contain fuel

Section X. SOP S and Safe Work Practices

32. Modifications to Documented SOP s or Work Practices:

YES:

NO:

Comment:

Section XI. Emergency Procedures

33. Emergency Procedures:

Call 911/ Radio on site EMS for assistance.

Section XII. Safety Briefing

34. Asst. Safety Officer - HM Signature:

Safety Briefing Completed (Time):

35. HM Group Supervisor Signature:

36. Incident Commander Signature:

Attachment B
Photo Log



Photo 1: Loader arrives onsite near the JetA truck and spill site.



Photo 2: EMS onsite; sorbent boom and diapers staged at the spill site.



Photo 3: Sorbent boom placed to assist with berming until trenches are dug.



Photo 4: EMS onsite to tend to the injured truck driver.



Photo 5: Stacy, the IC, receives radio equipment from the City of St. Paul.



Photo 6: The St. Paul Island ECO bird responders arrive onsite.



Photo 7: The City of St. Paul responders begin onwater tactics with containment boom.



Photo 8: The containment boom is in place and anchored.



Photo 9: The ECO bird responders watch for birds and continuing hazing activities.



Photo 10: Four birds (decoys) fly into the spill zone.



Photo 11: Pumps, hoses, and 500-gallon truck arrive onsite to begin recovery operations.



Photo 12: ECO bird responders collect the oiled ducks after receiving USFWS permits.

Attachment C
Personnel Certifications



INTEGRITY
ENVIRONMENTAL LLC

CERTIFICATE
of **COMPLETION**

Charles Stepetin

SPILL DRILL TRAINING AND COMPLETION OF NPREP SPILL DRILL

On this day: 8/15/2023

Shannon Oelkers
Shannon Oelkers, Instructor

Breana Weller
Breana Weller, Instructor

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Stacy Bourdukofsky

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Adrian Dirks

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Artemey Mercurief

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Caitilín Bourdukofsky

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Katrina Melovidov

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of **COMPLETION**

Marc Galanin

SPILL DRILL TRAINING AND COMPLETION OF NPREP SPILL DRILL

On this day: 8/15/2023

Shannon Oelkers
Shannon Oelkers, Instructor

Breana Weller
Breana Weller, Instructor

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Mac Mandregan

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