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Public Comment

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General Comment

30 CFR 254.43 requires monthly inspections of spill response equipment. Alaska Clean Seas is an Oil Spill Removal Organization on the North Slope of Alaska with several member companies that have facilities regulated under this CFR site. Much of our equipment is pre-staged in remote sites which makes it hard to access on a monthly basis. The remote site locations are situated for close access to potential spill sites, but not easily accessible during all seasons. The monthly inspection criteria is an unnecessary burden. All of the equipment is inventoried and maintained at least annually.

For the majority of the year, the North Slope is frozen and snow/ice covered. Spill response equipment for this type of environment consists mostly of "yellow gear" which is front end loaders, dump trucks, trenchers, etc. for removing contaminated snow and ice. This equipment is not owned/operated by the OSRO, but is obtained from many service companies on the North Slope. Again, it may not be inspected monthly but is readily available and maintained. Requiring these service companies to inspect all this equipment on a monthly basis is another unnecessary burden.

The North Slope is an unusual situation but we strive to meet the requirements of the regulations.