

Alaska Oil and Gas Association



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Kate Williams, Regulatory Affairs Representative

September 15, 2011

Mike Bussell
Director
Office of Water & Watersheds
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, Suite 900, OWW-130
Seattle, WA 98101

Re: Proposed Reissuance of General NPDES Permit for Oil and Gas Activities on the Alaska North Slope, AKG-33-0000

Dear Mr. Bussell:

The Alaska Oil and Gas Association (“AOGA”) appreciates this opportunity to submit comments on the proposed reissuance of the National Pollutant Discharge Elimination System (“NPDES”) General Permit for facilities related to oil and gas extraction on the North Slope in the State of Alaska, AKG-33-0000. AOGA is a private, nonprofit trade association whose 15 member companies account for the majority of oil and gas exploration, development, production, transportation, refining, and marketing activities in Alaska.

AOGA believes this permit should be reissued with the changes described in more detail below and in comments submitted by our member companies. This permit has been in place since 1997, and has proven highly effective in the regulation and management of discharges from oil and gas activities on the North Slope. Comments on the draft permit will also be submitted individually by AOGA members, including Alyeska Pipeline Service Co. (“APSC”). AOGA supports these comments and urges the Environmental Protection Agency (“EPA”) to incorporate the changes described therein in the final permit.

Fact Sheet Comments

Section III. E. New additions to the GP: The following sentence in subsection E is confusing and should be clarified.

It is not the intent of EPA in this GP to cover construction storm water or industrial storm water discharges except for industrial activities within the North Slope Borough.

This statement should be refined to make clear that the General Permit covers discharges from oil and gas industry-related construction activities.

Section IV. B. 6. Secondary Containment: The definition for secondary containment should be further clarified. Currently, secondary containment water is defined as:

stormwater (rainfall & snowmelt) accumulated in areas of secondary containment (i.e., diked or bermed areas) surrounding tanks, tank farms, or tanker truck loading racks.

AOGA interprets this definition to not include small, portable containments such as drip pans and drum pallets. Portable containments are already covered under the stormwater section – i.e. Stormwater associated with industrial activities, Discharge 006. At a minimum, AOGA recommends that EPA limit the provisions for secondary containment in the General Permit to fixed tank containments (preferably of some size limit).

Draft Permit Comments

Section II. F. Effluent Limitations and Monitoring Requirements for Secondary Containment: If a spill has occurred into secondary containment within a one-year period, but no sheen exists, impounded water should preferentially be sampled prior to discharge, rather than from the discharge stream. If samples are collected prior to discharge, a determination can be made whether or not the water would meet the discharge standards. AOGA suggests including a provision in Best Management Practices Plans to sample impounded water prior to discharge for comparison with effluent limits to avoid inadvertent discharge of pollutants.

Finally, AOGA believes that EPA should remove the Trans-Alaska Pipeline System (“TAPS”) corridor from coverage under the North Slope General Permit unless EPA can address the concerns raised by APSC in its comments. Due to differences in operations and projects in this area, the General Permit as drafted is simply not a good fit for the pipeline system. AOGA believes wastewater discharges along the TAPS corridor should be covered under a separate permit, as has been done since 1993, if APSC’s concerns cannot be addressed.

AOGA appreciates EPA’s work on the North Slope General Permit and urges EPA to make the changes listed above as well as those outlined in the comments of our members and reissue the permit as expeditiously as possible.

Mike Bussell
Reissuance General NPDES Permit
September 15, 2011

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If you have any questions on these comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Kate Williams". The signature is written in a cursive, flowing style.

KATE WILLIAMS
Regulatory Affairs Representative