

**Department of Environmental Conservation
Response to Comments**

For

APDES Individual Permit

AK0036994 – Shoreside Petroleum Inc.,

Cordova Bulk Fuel Facility

Public Noticed January 10, 2020 – February 11, 2020

February 27, 2020



**Alaska Department of Environmental Conservation
Wastewater Discharge Authorization Program
555 Cordova Street
Anchorage, AK 99501**

1 Introduction

1.1 Summary of Facility / Permit

Shoreside Petroleum Inc. (SPI) owns and operates a marine oil transfer facility located on Orca Inlet approximately one mile north of the community center of Cordova. The facility supplies gasoline, aviation fuel, diesel fuel, and heating oil to both marine and shore-based customers. Two above-ground storage areas identified as Upper Tank Farm (UTF) and Lower Tank Farm (LTF) house the bulk fuel storage tanks; each surrounded by a secondary containment area (SCA). A Truck Rack is also incorporated in the LTF SCA.

On January 30, 2019, the Alaska Department of Environmental Conservation (DEC or Department) received an application from SPI for reissuance of Alaska Pollutant Discharge Elimination System (APDES) Individual Permit AK0036994 – SPI, Bulk Fuel Storage Facility (Permit). The Department proposes to reissue the Permit, which authorizes discharges of accumulated rain and snowmelt wastewater from SCAs surrounding the storage tanks and Truck Rack at the facility. The Permit imposes effluent limits and monitoring for pH, oil and grease, and hydrocarbons and requires the development and implementation of a Best Management Practices (BMP) Plan. Mixing zones were not requested by the permittee nor authorized by DEC.

1.2 Opportunities for Public Participation

DEC proposes to reissue the Permit after considering all substantive public comments received. To ensure participation by the public, agencies, and tribal and local governments during Permit reissuance, the Department:

- Identified the permit on the annual Permit Issuance Plan posted online at: <https://dec.alaska.gov/water/wastewater/pip/>;
- Notified potentially affected tribes that the Department would be working on the Permit via letter, fax and/or email on March 12, 2019;
- Posted the Preliminary Draft Permit on-line for a 10-day applicant review on November 21, 2019 and notified tribes, local governments and other agencies;
- Posted the public notice on the Department’s public notice web page January 10, 2020 for a 30-day public review on the Draft Permit and Fact Sheet; and
- Sent email notifications via the APDES Program List Serve when the Preliminary Draft and Draft Permits were available for review.

The Department requested comments on the Preliminary Draft documents from SPI, Environmental Protection Agency, National Marine Fishery Services, United States Fish and Wildlife Service and State agencies including, but not limited to, the Alaska Departments of Fish and Game and Natural Resources. Only SPI provided comments on the Draft Permit during the 30-day applicant review.

This document summarizes the comments submitted during the public review period of the Draft Permit and the justification for any action taken or not taken by DEC in response to each comment.

1.3 Final Permit

Based on minimal comments, SPI requested a waiver to the five-day applicant review of the Proposed Final Permit on February 25, 2020. DEC approved this request for waiving the five-day applicant review and the Final Permit was adopted by the Department on February 27, 2020. There were minor changes from the Draft Permit and Fact Sheet after public notice to correct typographical and grammatical errors and to clarify information.

2 Comments by the Permittee

The Department received a comment from the permittee during the 30-day public comment and review period for the Draft Permit and Fact Sheet on February 10, 2020. The following summarizes the permittee comment and the response by DEC.

2.1 Typographical Error Identified

In Permit Section 2.2.5.2, the acronym PSI was used instead of SPI or Shoreside Petroleum, Inc. The permittee requested a revision from PSI to SPI or Shoreside Petroleum, Inc.

DEC Response:

During the public review period, SPI obtained a “No Exposure Certificate” for storm water that made specific BMP requirements for storm water in Permit Section 2.2.5.2 null and void. Therefore, DEC has removed Fact Sheet Section 7.3.1 and Permit Section 2.2.5.2 that were applicable to this requirement. In addition, DEC included the No Exposure Certification in the discussion in Fact Sheet Section 1.3 – Permit History. Given the section including the typographical error has been deleted, this correction is no longer necessary.