

**Department of Environmental Conservation
Response to Comments**

For

Alaska Pollutant Discharge Elimination System

Individual Permit

AK0001155 – Kenai Liquefied Natural Gas (LNG), LLC

Publically Noticed September 22, 2020 – October 23, 2020

October 29, 2020



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

1 Introduction

1.1 Summary of Facility/Permit

The facility is located at 48237 Kenai Spur Highway on the eastern shore of Cook Inlet, Alaska. Historically, the facility received natural gas from Cook Inlet and Kenai Peninsula wells and processed it into Liquefied Natural Gas (LNG) for transport and sale to overseas markets. The facility has not operated for several years but has recently undergone a retrofit in order to receive LNG shipments for distribution to regional users.

On June 30, 2006 ConocoPhillips Alaska, Inc. (CPAI) submitted an updated application to EPA who chose not to reissue the permit before the state obtained primacy under the APDES Program. Accordingly, DEC reissued the Permit under the APDES Program on August 1, 2015 based on a revised application from CPAI submitted on August 22, 2013. In early 2018 CPAI sold the plant to Andeavor who later merged with Marathon Petroleum Corporation (Marathon) in an agreement giving Marathon ownership of the Kenai LNG Plant. Hence, the Kenai LNG Plant is now owned by Kenai LNG, LLC, a subsidiary of Marathon. On February 3, 2020 Kenai LNG, LLC submitted a timely and complete application for reissuance to DEC who issued an administrative extension until the Permit is reissued. This will be the second reissuance of the Permit under the APDES program and will impose effluent limits and monitoring for pH, flow, temperature, five-day biochemical oxygen demand, total suspended solids, oil and grease, total residual chlorine, fecal coliform and enterococci bacteria, ammonia, total aqueous hydrocarbons, copper, and mercury.

The Department is reissuing the Permit authorizing the discharge of non-domestic and domestic wastewater up to maximum daily rate of 350,000 gallons per day to Cook Inlet via Outfall 001 located at Latitude 60° 40' 41" North and Longitude 151° 23' 37" West. The dimensions and orientations of the mixing zones are described below:

- The acute mixing zone will extend from the sea surface to the sea floor with a length of 78 meters, a width of three meters, and an associated dilution factor of 53.
- The chronic mixing zone will extend from the sea surface to the sea floor with a length of 136 meters, a width of 3 meters and an associated dilution factor of 106.

Both the acute and chronic mixing zones are rectangular in shape with Outfall 001 positioned as the centroid, and are oriented with the longitudinal axis parallel to the nearest shoreline.

1.2 Opportunities for Public Participation

DEC is reissuing the Permit after considering all substantive public comments received; however, no comments were received. To ensure participation by the public, agencies, 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 January 21, 2020;

- Posted the Preliminary Draft Permit online for a 10-day applicant review on July 8, 2020 and notified tribes, local governments and other agencies;
- Posted the public notice on the Department’s public notice web page on September 22, 2020 or a 30-day public review on the Draft Permit and Factsheet; and
- Sent email notifications via the APDES Program List Serve when the Preliminary Draft, Draft, and Proposed Final Permits were available for review.

The Department requested comments on the Preliminary Draft documents from Kenai LNG, LLC (Marathon), Environmental Protection Agency, National Marine Fishery Service, Fish and Wildlife Service, Alaska Department of Fish and Game, and Alaska Department of Natural Resources. No comments were received on the Preliminary Draft Permit.

This document summarizes the comments submitted during the 30-day 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

DEC did not receive comments during the 30-day public notice of the Draft Permit. Given there were no comments submitted on the Draft Permit and Fact Sheet, there were no substantive changes from the Draft Permit and Fact Sheet during development of the Final Permit and Fact Sheet. However, minor modifications to correct spelling and grammatical errors were made between the draft and final permit documents.

The Proposed Final Permit is being issued for a five-day applicant review prior to issuing the Final Permit.