ALASKA CHADUX CORPORATION

January 27, 2020

Seth Robinson
Alaska Department of Environmental Conservation
Division of Spill Prevention and Response – Prevention, Preparedness, and Response Program
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Mr. Robinson:

The Alaska Chadux Corporation wishes to provide comments in response to the Alaska Department of Environmental Conservation's (ADEC) *Supplemental Notice of Public Scoping: Oil Discharge Prevention and Contingency Plan Requirements*. While Article 4 is primarily directed at regulated operators, one section in the regulations addresses the effectiveness of oil recovery devices when developing a contingency plan. The section in question, 18 AAC 75.445 (g)(5) requires that a plan holder "… us[e] an effective oil recovery capacity of 20 percent of the equipment manufacturer's rated throughput capacity over a 24-hour period…."

Chadux takes no issue with the derating of oil recovery capacity to 20% of throughput; in fact this derating corresponds to the 20% efficiency factor required when conducting the same calculations for the USCG (33 CFR Parts 154 and 155 Appendix B 6). However, the USCG refers to the "efficiency" factor and then applies it as an effectiveness factor. Throughput is capped at 20% of manufacturer's claims but the temporary storage required to support the recovery device is only twice the effective recovery capacity. In its guidance to plan holders, ADEC also confounds effectiveness and efficiency but fails to make a correction when applied to required temporary storage. Not only is the allowed throughput only 20% of the manufacturer's rated capacity (as it should be), but the required temporary storage to support the unit is five times (5x) the derated throughput.

While recovery systems are inherently inefficient, oleophilic recovery devices limit the amount of water collected during operation. In February of 2019, Alaska Chadux conducted a recovery device test in accordance with the procedures found in ASTM standard F2709-15.[1] The drum and brush unit tested consistently recovered >99.9% oil when operated with a drum head and >95% oil when operated with a brush head. In light of the ADEC guidance on recovery device effectiveness, however, there is little incentive for operators or Primary Response Action Contractors (PRAC) to employ more effective skimmers. Oleophilic devices are more expensive, require more maintenance, and tend to have lower throughput volumes than weir or suction skimmers. Unless a planholder or a PRAC realizes the effectiveness benefit of

[1] *Standard Test Method for Determining Nameplate Recovery Rate of Stationary Oil Skimmer Systems*

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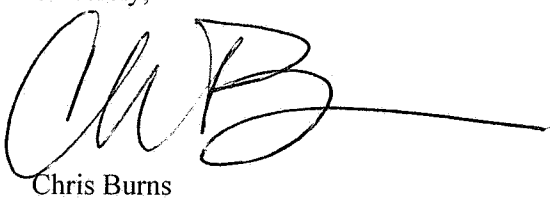
an oleophilic device, there is little incentive to adopt Best Available Technology (BAT). Alaska Chadux urges ADEC to align its efficiency and effectiveness guidance for recovery devices with that of the USCG.

Sincerely,



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