



Alaska Department of Environmental Conservation

July 17, 2023

Dear Sir / Madam,

We are writing to express support for the proposal by the Alaska Department of Environmental Conservation to repeal the regulation of Class 2 facilities that store non-crude oil products.

One of the foremost reasons for our support is the aim to reduce bureaucratic red tape. The current regulation requires facilities to register their storage tanks with the state, which, while well-intentioned, has become an unnecessary burden on the facilities due to the duplication of oversight provided by federal agencies. The Environmental Protection Agency (EPA) and the U.S. Coast Guard already have authority over these facilities, making the state regulation somewhat redundant. This repeal would allow for a more streamlined and efficient process for these facilities, minimizing the duplication of tasks and ultimately reducing operational costs.

We also believe that safety standards are being satisfactorily met under the current system. The federal agencies, namely the EPA and the U.S. Coast Guard, have been diligently conducting regular inspections of these tanks. Their rigorous protocols ensure that environmental and safety standards are met, providing a robust mechanism of oversight without the need for state regulation.

It is also worth noting that the current inspection process at the state level can be seen as cumbersome and ineffective. Due to budget constraints, the state halted its regulation activities in mid-2020, illustrating that the process may not be sustainable or effective in the long term. Moreover, with nearly 1,000 facilities and over 4,000 tank records, the magnitude of the task at hand has perhaps surpassed the capacity of the state to effectively manage.

To conclude, the proposal to repeal the state regulation of Class 2 facilities is a practical and economically wise decision. It reduces unnecessary administrative processes, ensures adherence to safety standards through federal oversight, and acknowledges the inefficiencies of the current state-level system. Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Loren Peterson".

Loren Peterson  
Chairman & President

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