



KENAI PENINSULA BOROUGH

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June 29, 2006

JOHN J. WILLIAMS
MAYOR

Mr. Ben A. Greene, PhD.
Alaska Coastal Management Program
Office of Project Management and Permitting
550 West 7th Avenue, Suite 1660
Anchorage, Alaska 99501

Subject: Tesoro APC, Pipeline Ballast Water Treatment Facility - Nikiski

Dear Mr. Greene:

Kenai Peninsula Borough (KPB) Coastal District staff reviewed the above referenced project for consistency with KPB Coastal Management Program enforceable policies. The review concerns a permit to discharge treated ballast water sought by Tesoro Alaska Petroleum Company at Nikiski, Alaska.

Project Description and Scope

The U.S. Environmental Protection Agency (EPA) has completed an initial draft of a permit which would allow Tesoro Alaska Petroleum Company to continue discharging treated ballast water at its facility at Nikiski, Alaska. The draft permit contains a mixture of technology and water quality-based effluent limitations and represents a significant change from the current permit under which Tesoro operates. The existing permit, authorized in 1979, has effluent limits covering oil and grease alone. The proposed permit will regulate, in addition to oil and grease, biochemical oxygen demand, total suspended solids, total aromatic hydrocarbons, and total aqueous hydrocarbons. The permit places limits on the amount of these pollutants that may be discharged from the facility.

Findings

The permit under which Tesoro Alaska Petroleum Company operates was issued in 1979 and subsequently found consistent with the ACMP in 1986. The proposed permit conditions are similar to those imposed on the Cook Inlet Pipeline Company, Drift River Terminal, in 2004 which add regulations covering end-of-pipe effluent limits for petroleum hydrocarbons. The additional regulations will enable Tesoro to operate the ballast water treatment facility in conformance with state and federal regulations and be consistent with Kenai Peninsula Borough Coastal Management Policy 13.1, Hazardous and Toxic Substances. This policy requires that hazardous materials must be disposed at a facility designed and approved for such disposal.

Thank you for the opportunity to comment.

Sincerely,

Gary Williams
Coastal District Coordinator