

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF WATER

SEAN PARNELL, GOVERNOR
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January 21, 2011

DEC File 300.45.132

Karen Wuestenfeld
Regulatory Compliance & Environmental Manager
BP Exploration Alaska, Inc.
900 East Benson Blvd.
Anchorage, AK 99519-6612

Re: **Comments on Draft §401 Certification of NPDES Permit AK0029840, BP Exploration Alaska, Inc. – Prudhoe Bay Seawater Treatment Plant**

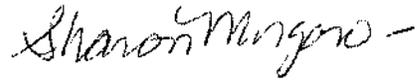
Dear Ms. Wuestenfeld,

The following is in response to the comments BP Exploration, Alaska, Inc. (BPXA) provided to the Alaska Department of Environmental Conservation (DEC) on DEC's §401 Certificate of Reasonable Assurance for National Pollution Discharge Elimination System (NPDES) draft permit AK0029840, which was publicly noticed from October 28, 2010 to November 29, 2010. Responses will be restricted to those comments directly related to the DEC §401 Certification.

- BPXA commented that the Toxicity Reduction Evaluation (TRE) trigger of 12.3 TUc appearing in the Whole Effluent Toxicity testing requirement of the draft permit and the §401 Certification was incorrect and should be replaced with a trigger of 13.3 chronic toxic units (TUc). DEC concurs with this assessment and understands that the 13.3 TUc is based on dividing the DEC minimum compliance evaluation level for total residual chlorine of 100µg/L by the Alaska Water Quality Standard for chronic total residual chlorine of 7.5µg/L to obtain a dilution factor of 13.3:1 that corresponds to 7.5% effluent.
- DEC concurs with the BPXA request to change the added test concentrations from 64% and 100% to 60% and 100%. DEC understands that the added 60% concentration furthers the serial dilution beyond 30%.
- DEC understands BPXA's comment that the definition for TUc in the §401 Certification is inconsistent with the language in the NPDES permit and has added clarifying language about the 25% Inhibition Concentration (IC₂₅) to the final certification.

If you have any questions concerning this final certification, please contact Marc H. Bentley at marc.bentley@alaska.gov or (907) 269-6287.

Sincerely,

A handwritten signature in black ink that reads "Sharon Morgan" followed by a horizontal dash.

Sharon Morgan
Program Manager

Enclosure: Final Certificate of Reasonable Assurance for NPDES Permit AK0029840

cc: Michelle Bonnet, DEC/Juneau
Sharmon Stambaugh, DEC/Anchorage
Erin Seyfried, EPA/Seattle
Kenwyn George, DEC/Juneau
Marc Bentley, DEC/Anchorage