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Subject Comment from ADEC on EPA PSD Permit for Shell's OCS
Activities in the Chukchi Sea

ADEC would like to submit the following comments on the EPA's PSD Permit for Shell's OCS Activities in the Chukchi Sea:

Permit Condition

1. A permit condition should be added prohibiting the permittee from causing or contributing to an ambient air quality standard violation.
2. A permit condition should be added that the owner or operator will not cause or contribute to a violation of the standards at 18 AAC 50.110 (air pollution prohibited).

Shell PSD Permit - Statement of Basis Document

1. Page 20, paragraphs four and five: Definition for OCS source – The most logical definition from the perspective of ADEC would be when the drill ship has all anchors set and is prepared for exploratory drilling. This is the moment before the drill ship begins operations, propulsion has ceased and the engines associated with drilling have been started up and emissions have begun that would be covered under this PSD permit. The other definition, which relates to the placement of a single anchor on the seabed is far too general. If the drillship drops anchor for any other reason (other than to drill), such as extreme weather conditions during the transit to drilling locations, then it could theoretically fall under the permit while it is not involved in OCS drilling operations.
2. Page 25, paragraph two: The final sentence in this paragraph should have the word "source" added so it would then read: *Because the PTE for this project is greater than 100 tons per year for several criteria pollutants, it is a major source under Title V and Part 71 and must apply for an operating permit as provided in 40 C.F.R. §71.5(a)(1)(i) within 12 month of first becoming an OCS source on Shell's current leases in the Chukchi Sea.*