Fadely, Karen

From: Silawsky, Donald [Donald.Silawsky@hq.doe.gov]
Sent: Friday, October 28, 2005 11:23 AM
To: Fadely, Karen
Subject: FW: Comments on the Strategic Petroleum Reserve Expansion
Attachments: SPRexpansionCmtLtr.pdf

<<SPRexpansionCmtLtr.pdf>>
KAEN: Same request to you as I made in the previous message. Please review and forward as appropriate.

Thanx.

DON SILAWSKY

-----Original Message-----
From: Tangela Niemann
To: Silawsky, Donald
Sent: 10/28/2005 10:59 AM
Subject: Comments on the Strategic Petroleum Reserve Expansion

Hello-

Attached to this email please find the Texas Commission on Environmental Quality's comments regarding the"Strategic Petroleum Reserve Expansion".

If you have problems with the attachment format or this electronic transmission, or if you have any questions or concerns about the comments themselves, please contact me by return email or by phone at
[redacted]

TCEQ appreciates the opportunity to comment on this issue.

Tangela Niemann
Intergovernmental Relations
TCEQ
[redacted]

<<SPRexpansionCmtLtr.pdf>>

Kathleen Hartnett White, Chairman
R.B. "Ralph" Marquez, Commissioner
Larry R. Soward, Commissioner
Glenn Shankle, Executive Director

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

protecting Texas by reducing Pollution

October 28, 2005

Mr. Donald Silawsky
Office of Petroleum Reserves (FE-47)
U.S. Department of Energy
1000 Independence Ave SW
Washington, D.C. 20585-0301

Re: Strategic Petroleum Reserves Expansion

Dear Mr. Silawsky:

The Texas Commission on Environmental Quality (TCEQ) appreciates the opportunity to comment on the September 1, 2005, *Federal Register* notice concerning the intent of the U.S. Department of Energy to prepare an Environmental Impact Statement (EIS) for the expansion of the Strategic Petroleum Reserve (SPR). The notice indicates that the existing Big Hill SPR site will be expanded and that Stratton Ridge, Texas is being considered as a one of the four alternative locations for a new SPR site. The TCEQ offers comments on the applicability of the general conformity regulations to this project and on the construction and operational emissions.

General Conformity

The existing Big Hill SPR site is located in Jefferson County, Texas, which is designated as a marginal nonattainment area for ozone, while Stratton Ridge is located in Brazoria County, Texas, which is designated as a moderate nonattainment area for ozone. In nonattainment areas, major federal actions are subject to the general conformity rule. The general conformity rule was created to help ensure that major federal activities would not jeopardize a state's ability to achieve national ambient air quality standards.

The emissions that will result from the expansion of the Big Hill site will need to be documented in the EIS, and if the total volatile organic compounds (VOC) or oxides of nitrogen emissions (NOx) are estimated to be above 100 tons per year, then a general conformity determination will be required. Emissions will also need to be estimated for the new Stratton Ridge SPR site only, if it is the preferred alternative for the new location of a SPR site in the EIS. If the proposed new Stratton Ridge SPR site's estimated total emissions of either VOC or NOx are greater than 100 tons per year, then another general conformity determination will be required for that site.

Construction Emissions

Please estimate the emissions for the following construction activities and include them in the EIS:

- All nonroad and onroad equipment used for the construction of all onsite infrastructure needed for the water supply, brine disposal, and oil distribution systems
- The pumps needed for the cavern leaching process
- The construction of water supply, brine disposal, and oil distribution pipelines

Operational Emissions

Please estimate the emissions for the following operational activities and include them in the EIS:

- The initial filling of the caverns with crude oil
- Any future fills and drawdowns that are reasonably foreseeable.

The TCEQ will continue to monitor this project and will provide comments as needed throughout the development of this project. If you have questions about this information, please feel free to contact Ms. Candice Garrett, Director of the Air Quality and Implementation Division, at [redacted].

Sincerely,

David C. Schanbacher, P.E., Chief Engineer
Texas Commission on Environmental Quality