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Mr. Seth Robinson
Alaska Department of Environmental Conservation
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VIA electronic mail dec.cpr@alaska.gov

RE: Proposed updates to 18 AAC Chapter 75, Chapter 1

Thank you for the opportunity to comment on the proposed rule changes to 18 AAC Chapter 75, Chapter 1. Marathon Petroleum Corporation "MPC" supports the updates within the proposed regulation package. Marathon Petroleum Corporation is an integrated refining, logistics and marketing company with assets from Nikiski to North Pole. Besides our Kenai refinery, we also operate fuel storage terminals at Nikiski, the Port of Alaska and North Pole.

The proposed change would adopt the American Petroleum Institute ("API") Standard 653, *Tank Inspection, Repair, Alteration, and Reconstruction*, 5th edition, 1st addendum in place of the 3rd edition, 1st addendum that is currently cited in Alaska regulations. The proposed adoption of the 5th edition, 1st addendum represents nearly 15 years of practical and technological advancements.

A brief description of the API National Testing Standards may be helpful in better understanding the rigor that goes into developing and publishing new guidance. From the API website:

"API standards are developed under API's American National Standards Institute accredited process, ensuring that the API standards are recognized not only for their technical rigor but also their third-party accreditation which facilitates acceptance by state, federal, and increasingly international regulators."

In relation to API 653, which the rule addresses, API strives to continually improve the standard with the latest industry knowledge including design rules, materials, fabrication and inspection techniques. One of the most significant improvements is the inclusion of Table 6.1, the Tank Safeguard table. This table incentivizes owners to install additional measures like release prevention barriers, cathodic protection, corrosion allowance, and internal linings. The measures as outlined significantly decrease the likelihood of a release from the storage tank. Moreover, the implementation of the new guidance ensures that private operators and public regulators are operating in synch by limiting conflict between most current industry practices and outdated regulation references.

Overall, the proposed regulation update is a move in the right direction and represents a win-win for the State of Alaska and responsible operators alike.

Thank you again for the work on this update and for the opportunity to provide our reasons for support.

Sincerely,

Casey E. Sullivan
Government and Public Affairs Manager