



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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2 November 2010

Water Docket
U.S. Environmental Protection Agency
Mail Code: 2822-1T
1200 Pennsylvania Avenue, NW.
Washington, DC 20460
ATTN: Docket ID No. EPA-HQ-OW-2010-0126

Re: Clean Water Act Section 312(b): Petition to Revise the Performance Standards for Marine Sanitation Devices

To whom it may concern:

The International Association of Drilling Contractors is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States, as well as all MODUs registered in the United States.

The purpose of this letter is to respond to the 12 July 2010 EPA Notice of petition and other request for rulemaking (75 FR 39683), which solicited input regarding the use of sewage treatment devices and suggestions on any changes to the performance standards that might be appropriate.

IADC offers the following comments regarding this notice of petition for your consideration:

NPDES Permit-

Though use of a marine sanitation device (MSD) is excluded under the NPDES Vessel General Permit, coverage is still recognized by other NPDES permits, such as the EPA Region 6 Oil and Gas General Permit (GMG290000). Per the sanitary waste discharge requirements and exceptions of GMG290000, an offshore facility meets the prohibition and limitation requirements of the permit if that facility properly operates and maintains a U.S. Coast Guard type-approved MSD that complies with the pollution control standards and regulations under section 312 of the Clean Water Act. Additionally, under that permit, the MSD is required to be tested yearly for proper operation with the test results maintained on board or at an alternative site for three (3) years.

Service-

Due to the unique character and operational requirements of a MODU, at times it functions as an offshore facility under an Oil and Gas general permit, while at other times it functions as a vessel.

IADC appreciates the opportunity to comment on this notice of petition and requests that our comments be given due consideration. If you have any questions about these comments or recommendations, please contact me by phone at (713) 292-1945, ext. 203.

Sincerely,

A handwritten signature in cursive script that reads "John Pertgen".

John Pertgen
Assistant Director, Offshore Technical
and Regulatory Affairs