208 Lake St, Suite 2E | Sitka, AK 99835 | Phone: (907) 966-3110
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April 26th, 2021

Jackie Ebert
Department of Environmental Conservation
Seafood Permitting Program
555 Cordova Street
Anchorage, AK 99501

RE: Comments from Silver Bay Seafoods for the Draft AKG521000 Permit

Ms. Ebert:

I appreciate the opportunity to review and comment on the Draft AKG521000 Permit. Silver Bay Seafoods is an integrated seafood processing company with six processing facilities in Alaska, five of which, will be regulated under the Alaska Seafood Processors General Wastewater Permit.

Below I will list each specific condition followed by our comments.

2.3.5.1 Pre-Discharge Biological Survey (Table 7)

Installation of a new outfall location, or facility re-starting production after not operating for more than 12 months.

SUGGESTED CHANGE
Change the timeline for facility re-starting to 5-10 years.

Reasoning:
It is unlikely that a year without discharge would create such a large rebound of the seafloor to require a survey. This requirement is costly and unnecessary for processors who may decide to opt out of a processing season for any number of reasons.

Appendix E

Part I Surveyor and Survey Information

2(a) Surveyor's name, signature, and contact information.

SUGGESTED CHANGE
Company Name and Project Manager signature for survey.

Reasoning:
Surveys are conducted by a team led by a project manager, not a single person.

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Part I Digital photographs

4(a) Photographs shall include a digital date and time stamp. The photograph log shall include the name of the seafood processor, survey date, and photographic sample plot location identifier.

SUGGESTED CHANGE
A Master Data spreadsheet with Point #, Time, GPS location, Depth, Waste thickness and descriptors along with high-definition video can be used in place of a photo log.

Reasoning:
This requirement is labor intensive and would add an unnecessary amount of work when the same result could be accomplished by providing the video with information where the photos could be found.

Part I Beggiatoa or other types of Bacterial Mats

4(c) All Beggiatoa or other bacterial mat areas shall be counted as continuous coverage.

SUGGESTED CHANGE
Underlying seafood waste would be a more appropriate measure than Beggiatoa.

Reasoning:
Beggiatoa can be present where seafood waste is minimal or non existent, and the rationale for counting those as continuous does not align with the purpose of the condition, which is to determine seafood waste.

Part I Sea Flora and Fauna

4(d) Type and number of macro sea fauna (sea life) and type of aquatic vegetation observed on the seafloor during the photographic survey. Types and quantities of sea life observed adjacent to, on, or feeding on any seafood processing waste deposits during videotaping, along with representative photos with time and date stamp.

SUGGESTED CHANGE
Reduce the specificity in this clause to be more general about life seen during the dive.

Reasoning:
Identification of each species during the dive is an unreasonable request of the divers when it would be sufficient to note general comments about flora and fauna seen.

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Part I Substrate (Page E-8)

4(f) Composition of substrate (soft sediments, cobble, gravels, solid rock and/or glacial silts, or ground/screened seafood waste, etc.). If previous benthic assessments, dive surveys, or remediation actions have documented the presence of buried seafood waste, this waste must be included in continuous coverage calculations if those buried areas are located directly adjacent to outfalls discharging seafood processing waste and wastewaters, or to other continuous coverage areas. The surveyor has the option to obtain new core samples to document whether seafood waste is or is not present at the previously identified locations.

SUGGESTED CHANGE
The presence of buried waste will be based on the most recent seafloor survey.

Reasoning:
Buried seafood waste should not be calculated in the continuous coverage if it was already accounted for in the previous survey.

Part II Dissolved Oxygen and other Gases. (Appendix E, Page 7, 4, m)

4(l) When gas is observed escaping from the seafloor in the vicinity of the outfall or from the seafood waste pile, the surveyor is required to collect water samples or measure directly for dissolved oxygen, methane, and hydrogen sulfide. Samples shall be collected at six inches or less above the seafloor/seafood waste deposit where the greatest amounts of gas release are observed.

SUGGESTED CHANGE
Surveyor is required to collect water samples or measure for dissolved oxygen. (strike methane and hydrogen sulfide)

Reasoning:
Methane and hydrogen are expensive and unnecessary measurements in addition to dissolved oxygen and should not be required. It would be logistically impossible to consistently get samples to lab in the required 7-day holding time.

If there is any questions or comments that arise from this submittal, please contact me at 360-420-3002.

Sincerely,

Tiffany Hanson
Silver Bay Seafoods, LLC
Director of Compliance