Comments on Preliminary Draft Permit

AKG 521000

General

The permit is very well organized and a considerable improvement in terms of layout and readability over previous versions.

The existing permit has worked well for decades. It is a simple permit with requirements that are relatively easy for operators to comply with.

The new permit has additional requirements that are going to be difficult and expensive to meet and of are of questionable utility.

Flow Measurements Section 2.1.1.1.1

The new requirements to install flow meters and totalizers seem unwarranted and unnecessary. Flow is not restricted by the permit. The installation, maintenance, and access to these new meters is going to be expensive and expose operators to potential enforcement action and processing restrictions if there are problems with the units.

Section 2.1.9.1 Moored Vessels

This section implies that all processing waste from a moored vessel must be discharged through the facilities onshore waste treatment system. Many moored vessels have their own grinders and discharge systems. Why would it be necessary to re-route these systems through a shore-based system?

This could be expensive, unnecessary, and problematic.

DMR Reporting 2.2.2

Monthly DMR reporting seems unnecessary. All the information is captured in the Annual Report. I do not think it is likely that ADEC has the ability to review and analyze this amount of data submitted on a monthly basis, nor is it clear what purpose it would serve.

Receiving Water Quality Monitoring 2.3.2

It is unclear if these requirements only apply to facilities who are issued a site-specific Mixing Zone greater than 100 feet or to all processing facilities.

If, this applies to all facilities it seems unnecessary and will be expensive for operators to institute. It appears to trigger the need to develop a Quality Assurance Project Plan (**2.4)** which might be unnecessary otherwise.

The purpose of this section appears to be for data collection regarding Mixing Zone sizing.

This seems like a complicated and expensive method for the industry to collect data for regulatory information. These types of efforts have been exercises in futility. A good example is the metals testing required for Offshore processors which has been expensive and has not provided EPA with any usable information.

I think the Department should undertake a general study of outfall discharges in receiving water that are conducted in a more scientific method at a few facilities selected for their "type" of receiving water i.e. rivers, lagoons, ocean – etc.

This could provide more reliable information for future Mixing Zone decisions.

In addition, most facilities do not have personnel that are qualified to conduct this type sampling and will likely have to contract out the sample collection and development and maintenance of a QAAP. In remote areas, this would require flying contractors out and housing them to perform these responsibilities.

Ambient Receiving Water 2.3.2.6.2

I was not able to find the frequency at which this testing should be performed.

Seafloor Monitoring Requirements 2.3.5

Many processors discharge directly into rivers. Due to turbidity and current determining the size of a ZOD is practically impossible. My own personal observations in Bristol Bay where the extreme tides expose the outfalls it is that the current eliminates persistent ZOD's. Shortly after the end of the season, any waste debris has vanished.

I suggest that an exemption from the ZOD survey requirements be included in this section. A standard set of exemption criteria should be included in this section, including items such as: current, visibility, and seasonality of the discharge.