



CORPORATE OFFICE
3015 112th Ave. NE, Suite 100
Bellevue, WA 98004
Tel 206.682.5949 Fax 206.682.1825
www.westwardseafoods.com

ALASKA OFFICE
P.O. Box 530
Unalaska, AK 99685
Office# (907) 581-1211 Fax# (907) 581-1695

August 13, 2021

Alaska Department of Environmental Conservation

Wastewater Discharge Authorization Program
555 Cordova Street
Anchorage, AK 99501

Below are my comments on the draft permit and associated documents for the Alyeska APDES permit Number AK000027-2.

From the draft permit:

For Section 1.4.5. 4. 1, Alyeska requests a modification of the language in this section specifically for the testing of ammonia. Hach TNTPlus method 10205 is an EPA equivalent method for ammonia testing that many states across the U.S.A. have already approved without the requirement of further validation studies. 40 CFR 136.6.b.1 states that if the underlying chemistry and determinative technique in a modified method is essentially the same as an approved method, then it is an equivalent and acceptable alternative as long as performance can be demonstrated. Alyeska has been using this method for many years and has validated the accuracy of this method with EPA's DMRQA quality assurance studies. Alyeska has been passing the laboratory validation studies for ammonia using this method. The Hach TNTPlus method is more accurate for wastewater containing seawater than the EPA approved ion selective electrode due to interference with sodium and potassium using the electrode method. Also, due to the remote location of the Alyeska processing facility, it is a logistical challenge to send weekly samples to an external lab hundreds or thousands of miles away for ammonia analysis. Alyeska requests that the Hach TNTPlus method be allowed for ammonia analysis in this permit. Also, Alyeska requests adding the words "unless approved by the Department" to the end of this section to allow flexibility of discretion to use EPA equivalent methods if the Department agrees that it is appropriate and meets the requirements of 40 CFR 136.6.

In Table 4, for outfall 002A, the previous permit had monitoring for flow and temperature only. The proposed permit adds conditions for pH, Arsenic, Copper, and Zinc. This outfall is for non-contact cooling water of powerhouse engines. Seawater passes through a heat exchanger to cool the engine cooling water without contact of the engine water and the seawater is then discharged back to the bay. The cooling water does not enter the engine and has no contact with anything other than the pipe and heat exchanger. Nothing is added to the water so the pH would not change and arsenic, copper, and zinc would be unlikely to change from what was taken from the Bay. The Department has allowed for the monitoring frequencies be reduced or eliminated for Arsenic, Copper, and Zinc after two years of monitoring and reporting demonstrates no values above the applicable water quality criteria. Alyeska asks that pH be included in this footnote and allow reduction or elimination in monitoring after 2 years after demonstration of compliance with the water quality standards for pH. Finally, Alyeska requests

the modification of the language in footnote “c” to state that if there is no response from ADEC within 60 days of submission of a request to reduce or eliminate of a monitoring parameter under this section, it will be considered a default approval. This is consistent with other environmental regulations to ensure that regulators issue a timely response to permittee requests.

For Condition 1.5.2.4. There appears to be an inconsistency in the timeline. Both “Within 12 months from the permit’s effective date” and “within 180 days of the effective date of the permit” are included in this section. These timelines are inconsistent. Please clarify. In addition, Alyeska requests the modification of the last sentence to read “The permittee must submit for Department approval the method(s) proposed to determine the Outfall 001A facility-specific conversion factor within 180 days of the effective date of the permit prior to using the facility-specific conversion factor in the SS discharge calculations. If there is no response from the Department within 60 days of submittal, the permittee shall consider the method(s) approved by the Department.” As it is written, Alyeska could be out of compliance with this condition through no fault of their own if the Department does not reply with a timely response to the submittal.

For Condition 1.7.3, Alyeska requests that the language be changed to “The permittee must submit a written notification of the receiving water monitoring locations to DEC within 180 days of the effective date of the permit. If no response is received from the Department within 60 days of submittal, then the monitoring locations are to be considered approved.” The locations are already described in the permit. As written, Alyeska is at the mercy of the Department responding to the Alyeska submittal. If the Department doesn’t provide a timely response, then Alyeska will be out of compliance with the permit through no fault of their own due to slow or lack of response by the Department. Alyeska understands to need to ensure that DEC and Alyeska are on the same page about appropriate monitoring locations, but it is a compliance risk to Alyeska to require DEC approval of the locations. The modified language would ensure that DEC is given the opportunity to have input on the monitoring locations, but Alyeska would not be at the mercy of the Department to be in compliance with the monitoring requirement.

For condition 1.8.3.5.1, this timeline (April-June) is inconsistent with Appendix F, Part I, paragraph 1 on page F-6 which states it should take place during the last quarter of the year, by December 31st. Please modify the language in Appendix F to reflect the April-June schedule.

Please let me know if you have any questions on my comments.

Regards,

A handwritten signature in black ink, appearing to read "Greg Peters". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Greg Peters
QA Director, Alyeska Seafoods, Inc.