

## Trident Seafoods Sand Point – PAZOD Request

Trident Seafoods is requesting a revision to the existing Project Area ZOD. Included in this package are the shapefiles and vertices for the Project Area ZOD modification. A map of the requested revision is provide on the last page of this document.

All five requirements of the zone of deposit regulation ((1) alternatives that would eliminate, or reduce, any adverse effects of the deposit; (2) the potential direct and indirect impacts on human health; (3) the potential impacts on aquatic life and other wildlife, including the potential for bioaccumulation and persistence; (4) the potential impacts on other uses of the waterbody; (5) the expected duration of the deposit and any adverse effects; and (6) the potential transport of pollutants by biological, physical, and chemical processes) have been reviewed and are addressed below.

(1) alternatives that would eliminate, or reduce, any adverse effects of the deposit.

The seafood processing wastewater discharge through Outfall 001 was extended in late 2018/early 2019 to approximately 1,300-feet west of the facility at an elevation of -50 feet MLLW. This location provides for discharge into a hydrodynamically energetic water to encourage dispersion and natural attenuation of the seafood processing wastewater discharge. Various terminus locations were investigated during the design phase of the outfall extension to minimize impacts as much as possible to the receiving water before the final location was selected. This location is a well flushed area and in deeper water and as such provides a reduced risk of adverse effects of the deposit. Impacts to the waterbody are believed to be minimal as available data indicate that unreasonable degradation is not likely to occur in areas of adequate dispersion and dilution. With the modifications to the Sand Point treatment system in 2021 (the solids handling system, consists of a 3,000-gallon holding tank and two Urschel grinders designed to treat seafood solids to less than 1-mm in dimension) and the new discharge location in Popoff Strait, adverse effects are reduced to the extent practicable.

(2) the potential direct and indirect impacts on human health.

There are no anticipated direct or indirect impacts on human health resulting from a deposit on the seafloor as a result of the discharge of seafood processing wastewater in Humbolt Harbor from the Sand Point Facility.

(3) the potential impacts on aquatic life and other wildlife, including the potential for bioaccumulation and persistence.

Numerous studies and investigation have been conducted in the Humbolt Harbor and Popoff Strait area during the previous 5+ year using a variety of scientific investigation tools including seafloor surveys, sediment profile imaging and plan-view imaging, and sediment coring. These studies and investigations have consistently documented healthy aquatic life and other wildlife conditions with the exception of limited benthic impacts. Benthic impact areas have been reduced and are expected to continue to decrease over time.

(5) The expected duration of the deposit and any adverse effects.

In 2018, historical deposits of seafood processing waste (pre-meal plant utilization of pollock and cod seafood solids) in the previous area of discharge were removed. A pre-removal seafloor visual survey of the area, conducted on June 8 and 9, 2018, identified an area of 5.4 acres on the seafloor that required remediation. A post-removal seafloor visual survey conducted on September 6 – 8, 2018 found a ZOD of 0.21 acres in the removal area indicating that the goal of the Sand Point remediation project was successfully achieved. A post-removal bathymetric survey of the removal area showed that the seafloor appeared to have been returned to nearly a pre-deposit contour and confirmed that approximately 19,000 cubic yards of material was recovered.

In addition to the physical relocation of the outfall in 2018 Trident has also greatly reduced the scale of operations in the Sand Point facility. Pollock is no longer processed at the facility to produce surimi and the amount of seafood processed at the facility has also significantly reduced (see the NOI). With the modifications to the Sand Point treatment system in 2021 and the new discharge location in Popoff Strait, adverse effects are reduced to the extent practicable, and the duration of deposits should not persist if processing ceases at the facility.

(6) the potential transport of pollutants by biological, physical, and chemical processes.

While there will be some transport of pollution by biological, physical, and chemical processes, impacts to the waterbody are believed to be minimal as available data indicates that unreasonable degradation is not likely to occur in areas of adequate dispersion and dilution. With the modifications to the Sand Point treatment system in 2021 (the solids handling system, consists of a 3,000-gallon holding tank and two Urschel grinders designed to treat seafood solids to less than 1-mm in dimension) and the new discharge location in Popoff Strait, adverse effects are reduced to the extent practicable.

