UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

SEP - 1 2006

Reply To
Attn Of: OWW – 130

ED BAHRT
ED BAHRT MANAGEMENT CO, LLC.
P.O. BOX 1591
SITKA, AK 99835

Re: Renewal of National Pollutant Discharge Elimination System (NPDES) Permit
Facility Name, NPDES Permit No.: AKG520040

Dear Permittee:

The Environmental Protection Agency (EPA) received the above referenced NPDES Notice of Intent to be covered under the Alaska Seafood Processors General Permit and supplemental materials. We have determined your application to be timely and complete. According to federal regulation 40 CFR 122.6(a), when a timely and complete application is received by EPA, and, through no fault of the permittee, EPA does not reissue a new permit prior to the expiration date of the existing permit, then the permit remains fully effective and enforceable. Accordingly, NPDES permit AKG520040 for ED BAHRT MANAGEMENT CO, LLC, will be administratively extended.

Please note that EPA may request additional information during the development of the draft permit to clarify, modify, or supplement previously submitted material. If you have any questions, please contact Lindsay Guzzo at (206) 553-0268.

Sincerely,

Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Katy McKerney, Alaska Department of Environmental Conservation

"McKerney, Katy" <Katy_McKerney@dec .state. ak.us>
07/24/2006 03:21 PM

To Lindsay Guzzo/R10/USEPA/US@EPA
cc
bcc
Subject Pelican Seafoods - AK-G52-0040_Response to Waiver Request

Lindsay,

I have reviewed the materials you faxed and their file. The maps could be more detailed and there could be a better map of the actual outfall location and cross section view of the slope of the bottom and the reported drop off. The dive surveys do not comply with all the requirements of VI.C. I have contacted Paula Burgner and we discussed the question of trying to get the outfall out further to avoid needing a waiver. She said they believe it would be problematic for them. They did not provide enough tangible information to base an informed discussion on for the line extension so I am trusting their opinion to a large degree.

However, given the maximum anticipated volume of seafood waste that they plan to generate is low (40,000 lbs) and the tidal influence in the area, I do not anticipate that their requested discharge depth of 40 feet in MLLW to be a problem. I am not an expert on that area however and they did not provide any current information other than to say it is strong in the area If a problem is discovered upon further review, than ADEC may withdraw concurrence of this waiver.

Katy McKerney

Alaska Department of Environmental Conservation

Permitter, Inspector, Enforcement and Compliance for

Alaskan Seafood Industrial Discharges

907-465-5302

Fax: 907-465-5274

KENNETH WOLFF
P.O. Box 94
Pelican, AK 99832

To: Robin Jordan
Plant Manager
Ed Bahrt Management Company LLC
Pelican Seafoods plant
P.O. Box 110
Pelican, AK 99832

To Whom It May Concern,

On June 20, 2006 I conducted a scuba dive survey of the seafloor surrounding the grinder outfall discharge point of Pelican Seafoods processing facility located on Lisianski Inlet at Pelican, Alaska to comply with the Tier 1 monitoring requirements of their NPDES Permit No. AK-G52-0040.

The weather was cloudy, underwater visibility was in the excess of 20 feet. The dive was conducted on the afternoon low tide at slack water. The tide was plus 2.2 feet and the boat sonar indicated the discharge point was in 45 feet of water. The bottom composition is rock and sand substrate that is typical of Lisianski Inlet.

The area surveyed (see map incl) was 100 feet square around the discharge point and included the old discharge points of both the defunct crab waste system and the fish house.

Findings: At the current discharge point there is a cratered area of fish waste approximately 15 feet in diameter and approximately 2 feet in height on the west end of the crater and no more than inches on the south and north ends of the round shaped crater. It is visibly caving in and washing away. There are many fish and crab feeding on the remaining waste. In my opinion there will be little or no remaining waste residue by the end of each strong tide.

At the previous discharge points there is nothing remaining. I previously dove in this area 4 years ago and the difference between then and now is amazing. The areas current bottom structure is extremely clean and natural.

Respectfully Submitted,

Ken Wolff

Kenneth M. Wolff
7/17/06

Ed Bahrt Management Co, LLC
PO Box 1591 ~ Sitka, AK 99835 Office: 907-735-2204 ~ Fax: 907-735-2281

July 17, 2006

To: EPA Region 10, NPDES Permits Unit, OW-130
1200 Sixth Ave.
Seattle, WA 98101

Re: Waiver Request

Dear sir or madam,

This letter serves as our official request for a waiver on our NPDES Permit No. AK-G52-0040 to discharge waste to a depth less than 60' MLLW.

In 2001 our discharge line was extended to a depth of approximately 7 fathoms (45'), bringing the discharge point to the end of the existing underwater shelf. At this point the underwater structure begins a rapid drop off to 51 fathoms (306'), and therefore it is not feasible to anchor any line against the tidal currents down such a steep slope. Furthermore the tidal action, whether ebb or flood is so strong at this location that all waste is swept out and away from the plant, town and harbor area.

Since all waste is swept into deep water the shorebirds, herring schools, salmon fingerlings, halibut and sea lions make short of any waste. In the crystal clear water at low tide you can visually see the discharge point and surrounding area and it is virtually free of waste. As daily shoreline monitoring program is done by the plant manager and there is no shoreline contamination by floating or submerged waste.

Please feel free to contact us with any comments or questions.

Regards,

Robin Jordan
Plant Manager
Pelican Seafoods operated by Ed Bahrt Management Co., LLC