Ms. Clynda Case November 22, 2012
Alaska Department of Environmental Conservation
Air & Water Quality Division
555 Cordova Street
Anchorage, Alaska 99501

RE: **REQUEST FOR WAIVER TO OPERATE WITHIN ONE MILE OF EXCLUDED AREA**
Trident Seafoods Corporation – Petersburg Facility
APDES Permit No. AKG520476

Dear Ms. Case:

With this letter Trident Seafoods Corporation requests a waiver from ADEC to discharge in waters within one mile of the Tongass National Forest Wilderness Area, specifically the Petersburg Creek-Duncan Salt Chuck Wilderness, under AK-G52-0000 Seafood Processors in Alaska General Permit. Trident Seafoods Corporation's Petersburg facility outfall terminus is located at latitude 56° 48.844N, longitude 132° 57.722W (labeled mark #508 on enclosed maps). A one-nautical mile radius buffer boundary surrounding this location extends approximately 500 feet into the wilderness area's southeastern-most point. Trident believes that it is unlikely that any outfall activity will have a significant impact on this small portion of the wilderness area based on the oceanographic conditions at this location, as well as direct observational evidence based on past discharge activity (see attached waiver request and map entitled "Outfall Location Review – Petersburg").

If you have any questions regarding this request, please do not hesitate to contact me.

Sincerely,

TRIDENT SEAFOODS CORPORATION

Shawn Stokes
Environmental Compliance Director

Enclosures (4)
AK-G52-0476 Notice of Intent
Waiver Request for Petersburg Facility
Detailed Area Map
2012 Seafloor Survey for Petersburg Facility

Trident Seafoods Petersburg Facility
Request for a Waiver to Discharge in an excluded area
In accordance with Parts IV.D.1-7, of the
AK-G52-0000 Seafood Processors in Alaska General Permit

1. *A Notice of Intent to be authorized to discharge under this general NPDES permit in accordance with the requirements of Parts IV.A-C.*

   Please find the attached complete Notice of Intent to operate under this general permit in accordance with the requirements of Parts IV. A-C

2. *A detailed description of the circumstances requiring discharge to the excluded area. This description should address alternatives to discharging within the excluded area.*

   Trident Seafoods Petersburg Facility has been in operation for many years. The plant's current location was established in 1943 by the Ohmer family after a fire destroyed their original site, which had been in operation since 1916. The plant functioned primarily as a shrimp and crab processing facility, but over the years it has evolved to primarily process salmon. In 2003 it was acquired by Trident Seafoods Corporation.

   The Petersburg Creek-Duncan Salt Chuck Wilderness Area was established in 1980 and comprises 46,849 acres. A section of the wilderness area, approximately 500 feet, extends into a 1-nautical mile boundary buffer surrounding the outfall for the Petersburg Facility. In order to move outside of this 1-nautical mile buffer, the plant would have to relocate its outfall south along the Wrangell Narrows. Relocating the plant outfall would be extremely costly and potentially cause more environmental degradation than leaving it in the historic site.

3. *A detailed description of the nature, magnitude and duration of the seafood processing operation and its discharges within the excluded area.*

   The Petersburg Facility historically operates from March through mid-November. The primary production of salmon occurs from mid-May to mid-October (see NOI for AK-G52-0476). Most of the seafood processing waste is produced from the heads and guts of finfish, which are ground to ½ inch or smaller prior to discharge. Since Trident's purchase of the nearby Wrangell processing facility in 2009 and subsequent expansion of the Wrangell facility, Trident has dramatically decreased production in Petersburg from a maximum of 13 million lbs in 2010 to less than 7.5 million lbs of raw product each year from 2011-2013. Trident currently has no plans to expand production in Petersburg to return to pre-2011 levels.

4. *A detailed map showing the proposed or existing facility location, outfall location, receiving water bathymetry, surrounding upland topography and any protected water resources, special habitats or areas listed in Part III which are located within three (3) nautical miles of the site or its outfall. This area map of the facility and its outfall(s) shall be based upon an official map or chart of NOAA or USGS of a scale of resolution from 1:20,000 to 1:65,000.*

   See attached map

5. *A description of how and why the discharges will not cause a violation of state water quality standards, including antidegradation, zone of deposit and mixing zone, in the receiving waters. [see 18 AAC 70]*

   The Trident Petersburg plant is situated near the mouth of the narrows, where there are strong currents up to 3.7 knots, with even stronger tidal surges. There has never been any evidence of a zone of deposit in this location, despite many years of operation, because the strong flushing quickly disperses any pollutants in the receiving water. A dive study conducted in 2012 concluded that there is no waste pile at the end of the outfall, marine life is normal and abundant for this location, and there is no visible impact from seafood processing observed (see Envirotech Diving survey attached).

6. *A description of how and why the discharges will not cause a significant degradation of the physical, chemical or biological integrity of the receiving water, especially essential fish and shellfish habitat. Examples of such environmental degradation include but are not limited to persistent seafloor deposits of residues, shoreline deposits of residues, and increased mortality in communities of marine life.*

   Because of strong flushing and historical monitoring in this area, we do not anticipate a zone of deposit on the seafloor or accumulation of waste residue on the shoreline. Seafood processing does not appear to impact the physical, chemical, or biological integrity of the receiving water, as after many years of operation we have had very few observations of residue on the surface or shoreline.

7. *A description of how and why the discharges will not harm or impair the reproduction and growth of any threatened or endangered species within three (3) nautical miles of the proposed operation and discharge.*

   The only excluded area within three (3) nautical miles of the outfall is the Petersburg Creek-Duncan Salt Chuck Wilderness Area. Very few endangered species have critical habitat in this area. Only Steller Sea Lions are listed as having a few major haulout sites in Southeast Alaska. Regardless, it is not anticipated that seafood processing activities will impact their reproduction or growth because of the lack of accumulation of residues on the seafloor or shoreline, and the fact that the nearest major haulout is over 45 miles away.