

February 23, 2009

Albert Faure
Program Engineer
Cruise Passenger Vessel Environmental Compliance Program
Alaska Department of Environmental Conservation
410 Willoughby Ave. Suite 303
Juneau, AK, 99811

Regarding: Preliminary Questions ADEC HAL SRE Report 1 14 09

Thank you for granting me a short extension in which to provide answers to your questions we received on January 26, 2009. Below is my response to those preliminary questions stemming from our Source Reduction Evaluation Report (SRER) submitted January 14th, 2009.

I note you referred to our August 2008 SRE as an "approved" Source Reduction Evaluation Plan (SRE) - we have been conducting activities according to that approved plan.

I have copied and numbered your questions into a tabular format which presents my responses in a manner that can be tracked and tied directly to the questions posed, as well as provide easier cross-referencing. This table is found in Attachment A. Given the specific nature of your questions, I felt it best to respond this way rather than attempt to re-edit the original submittal and perhaps lose focus in responding to the questions. Another reason I did not re-edit the original submittal is because in several instances you requested information or conclusions (e.g. "What technology will you focus on?") that was either not available, or were not scheduled to be concluded in our approved SRE by the January 14th SRER due date.

I believe I've provided complete answers to the great majority of your questions. Where possible I have attempted to provide the requested information, but in some instances have deferred answering until further information is developed per the schedule in our approved SRE. I will of course provide an update in the 2009 Alaska Pre-Season Status Report due April 30, 2009.

Other questions seek to probe further into information presented in the SRER. In some instances we have not performed the analysis to provide the requested information as our overall conclusion is that our best chance of success in meeting the 2010 limits lies with research and development of additional treatment technology rather than to re-plumb or re-engineer elements of the water sourcing and distribution system upstream of the discharge. This is particularly true given the

extremely low limits for copper and ammonia. In those instances we have indicated that we do not have the requested information, and that we are not pursuing it at this time. We may revisit such items if the technology development process does not bear fruit.

In other instances, the question was unclear. Where the context of the question allowed, I attempted to respond, but in some instances I was unable to discern the questioner's intent – I need further clarification to which I will respond quickly.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please do not hesitate to contact me if you have further information.

Sincerely,

A handwritten signature in purple ink, appearing to read "WJ Morani, Jr.", written in a cursive style.

William J. Morani, Jr.
Vice President, Environmental Management Systems

WJM/jg

Attachments