

**Department of Environmental Conservation  
Response to Comments**

**For**

**Peter Pan Seafood Company, LLC – King Cove Facility  
APDES Permit No. AK0052388**

**Public Noticed  
October 12, 2023 – November 13, 2023**

**FINAL**



**Alaska Department of Environmental Conservation  
Wastewater Discharge Authorization Program  
555 Cordova Street  
Anchorage, AK 99501**

## **1 Introduction**

### **1.1 Summary of Facility / Permit**

The Alaska Department of Environmental Conservation (DEC or the Department) proposes to reissue an Alaska Pollutant Discharge Elimination System (APDES) individual permit to Peter Pan Seafood Company, LLC – King Cove Facility for discharge of seafood processing waste and wastewater to waters of the U.S. The permit authorizes discharges to King Cove. The permit is the reissuance of AK0052388, previously issued on August 10, 1999.

In order to ensure protection of water quality and human health, the permit places limits on the types and amounts of pollutants that can be discharged from the facility, outlines best management practices (BMPs) to which the facility must adhere, and requires effluent and receiving water monitoring.

### **1.2 Opportunities for Public Participation**

DEC proposed to reissue an APDES wastewater discharge individual permit, *Peter Pan Seafood Company, LLC – King Cove Facility*. To ensure public, agency, and tribal notification and opportunities for participation, the Department:

- identified the permit on the annual Permit Issuance Plan posted online at: <http://dec.alaska.gov/water/wastewater.aspx>
- notified potentially affected tribes and local governments that the Department would be working on this permit via letter, fax, and/or email on July 28, 2023
- posted a preliminary draft of the permit online for a 10-day applicant review September 1, 2023 and notified tribes, local government(s), and other agencies
- formally published public notice of the draft permit on October 12, 2023 in the Anchorage Daily News and the Dutch Harbor Fisherman and posted the public notice on the Department's public notice web page
- posted the proposed final permit online for a 5-day applicant review on November 20, 2023
- sent email notifications via the APDES Program Listserv when the preliminary draft, draft, and proposed final permits were available for review

The Department did not receive comments from any interested parties on the draft permit and supporting documents during the public notice period. The applicant did submit comments on the proposed final permit during the 5-day applicant review period. The Department requested comment from the Department of Natural Resources (DNR), the Alaska Department of Fish and Game (ADF&G), the National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), and the U.S. Environmental Protection Agency (EPA). The Department did not receive comments from any government agencies.

### 1.3 Final Permit

The final permit was adopted by the Department on November 30, 2023.

## 2 Comments Received During the Five-Day Applicant Review Period

### 2.1 Comment Summary

Comment was received requesting that the Department specify that the meal plant condenser cooling water discharged from Outfall 002 is “non-contact” and delete Fact Sheet language comparing that discharge to stickwater.

**Response:**

The Department determined that the meal plant condenser cooling water is contact wastewater, as micro particulates from the product can make it into the condenser and be soaked by the water, which could absorb pollutants from the product.

No changes were made to the permit documents in response to these comments.

### 2.2 Comment Summary

Comment was received requesting that the Department match the Outfall 002 sampling requirements to those in the AKG250000 Non-contact Cooling Water General Permit (monitoring temperature, pH, and total residual chlorine monthly, and not monitoring ammonia or density).

**Response:**

As noted above, the Department determined that the discharge from Outfall 002 is contact wastewater and that it is appropriate to monitor that discharge for temperature and pH weekly, as is done under other seafood industry individual permits. Total ammonia monitoring is appropriate to determine whether ammonia (previously found present in the Outfall 002 discharge) has the reasonable potential to cause or contribute to an exceedance of the water quality standards, and effluent density measurement is needed to assist in future mixing zone modeling if required. However, the Department determined that it was appropriate to change the ammonia and density monitoring frequency from weekly to monthly, and to allow the permittee to apply for a monitoring frequency reduction after two years if data show no exceedances of water quality standards. To apply for this, the permittee would need to collect ambient receiving water data for temperature, pH, and salinity, as these parameters are needed in order to calculate the ammonia water quality standards for King Cove.

Table 2 was updated to change the ammonia and density monitoring frequencies to monthly from weekly, and to allow for the permittee to apply for a monitoring frequency reduction for those parameters after two years of data collection.

## 2.3 Comment Summary

Comment was received requesting that the Department change the Outfall 003 monitoring frequency from weekly to monthly (like in the AKG521000 Onshore Seafood Processors in Alaska General Permit) to reduce sampling burden on the facility.

### **Response:**

The Department determined that it is appropriate for the facility to sample the seafood processing wastewater at the higher (weekly) frequency, as it processes a greater volume of raw product (around double what the largest facilities under the AKG521000 general permit process).

Additionally, the facility processes products (e.g., surimi) different than those allowed to be processed under the General Permit and thus has a greater potential for discharging the monitored parameters at levels that may be detrimental to the receiving water quality. The facility is already required to monitor several of the parameters (total suspended solids, settleable solids, and pH) weekly, under its current administratively extended permit.

No changes were made to the permit documents in response to this comment.