

**Department of Environmental Conservation
Response to Comments**

For

**Trident Seafoods – Saint Paul Facility
APDES Permit No. AK0053490 (Modification)**

**Public Noticed
December 8, 2025 – January 7, 2026**

January 29, 2026



1.0 Introduction

1.1 Summary of Facility / Permit

The Alaska Department of Environmental Conservation (DEC or the Department) proposes to modify an Alaska Pollutant Discharge Elimination System (APDES) individual permit for Trident Seafoods – Saint Paul Facility for discharge of seafood processing and crab rearing waste and wastewater to waters of the U.S. The permit authorizes discharges to the Bering Sea. The permit is the modification of AK0053490.

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 modify an APDES wastewater discharge individual permit, *Trident Seafoods – Saint Paul Facility*. To ensure public, agency, and tribal notification and opportunities for participation, the Department:

- formally published public notice of the draft permit modification on December 8, 2025 on the Department's public notice web page
- posted the proposed final permit online for a 5-day applicant review on January 9, 2026
- sent email notifications via the APDES Program Listserv when the draft and proposed final permit modifications were available for review

The Department received comments from one interested party on the draft permit modification and supporting documents. 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.

This document summarizes the comments submitted and the justification for any action taken or not taken by DEC in response to the comments.

1.3 Final Permit

The final permit was adopted by the Department on January 29, 2026. There were some changes from the public noticed permit modification.

2.0 General Requirements (Part 1.4)

2.1 Comment Summary

Comment was received requesting that DEC clarify which monitoring requirements apply to crab rearing activities.

2.1.1 Response:

All monitoring in this part applies to crab rearing waste and wastewaters. The Department edited the permit text to make that clear.

3.0 Effluent Limits and Monitoring Requirements (Part 1.5)

3.1 Comment Summary

Comment was received requesting that DEC clarify which monitoring requirements apply to crab rearing activities.

3.1.1 Response:

Only some of the monitoring applies to crab rearing waste and wastewaters. The Department edited the permit Table 2 and Table 3 to make that clear.

4.0 Receiving Water Quality Monitoring (Part 1.6)

4.1 Comment Summary

Comment was received requesting that DEC clarify which monitoring requirements apply to crab rearing activities.

4.1.1 Response:

The monitoring in this part only applies if discharge of seafood processing waste and wastewater occurs. The Department edited the permit text to make that clear.

5.0 Seafloor Monitoring (Part 1.7)

5.1 Comment Summary

Comment was received requesting that DEC clarify which monitoring requirements apply to crab rearing activities.

5.1.1 Response:

The monitoring in this part only applies if discharge of seafood processing waste and wastewater occurs. The Department edited the permit text to make that clear.

6.0 Sea Surface and Shoreline Monitoring (Part 1.8)

6.1 Comment Summary

Comment was received requesting that DEC clarify which monitoring requirements apply to crab rearing activities.

6.1.1 Response:

The monitoring in this part only applies if discharge of seafood processing effluent discharge occurs. Since that is already stated in the permit, no edits were made.

7.0 Annual Report (Part 1.9)

7.1 Comment Summary

Comment was received requesting that DEC clarify which monitoring requirements apply to crab rearing activities.

7.1.1 Response:

An Annual Report submittal is required even if only crab rearing waste and wastewaters are discharged. The Department edited the permit to note that the rearing days and amount of crab released would need to be reported, and columns were added to Attachment A to reflect that requirement. If no seafood processing occurred that year, the processing-related columns in the attachment could be left blank.

8.0 Additional Updates

In response to the comment received, the Department also edited other permit parts to clarify which permit requirements apply to seafood processing and/or crab rearing operations. These include Part 1.2 (Discharges Not Covered), Part 1.3 (Prohibited Discharges), and Part 2.2 (Best Management Practices Plan).