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206.728.6000
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SALES FAX 206.728.1855

January 27, 2015

Aleutians East Borough
P.O. Box 349
Sand Point, Alaska 99661

Peter Pan Seafoods, Inc., Port Moller, AK
Onshore Seafood Processing Land Use Permit Application

To the Members of the Aleutians East Borough Assembly,

Attached you will find our application for an Onshore Seafood Processing Land Use Permit for the Peter Pan Seafoods, Inc., Port Moller, AK Facility.

As per the application you will also find these required documents –

- Plan of Operations
- Alaska Fisheries Business License
- Permit to Operate
- ADEC Seafood Processor's Application (most recent)
- APDES/NPDES General Permit for Waste Water Discharge
- Annual Waste Water Discharge Report (including Notice of Intent)
- Location Map – Port Moller, AK
- Port Moller Ingress/Egress Map
- Proof of Ownership
- ADEC Food Establishment Permit
- Sanitary Survey of Water System
- AK Dept. of Commerce Tobacco Endorsement
- U.S DEA Controlled Substance Registration
- ADEC Solid Waste Permit
- State of Alaska Water Appropriation Certificate
- ADEC Pre-Approved Emission Limit

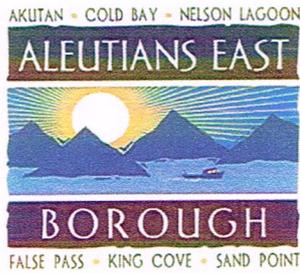
The following Peter Pan Seafoods, Inc., Port Moller, AK supporting documents are available upon request –

- Facility Response Plan
- Risk management Plan
- Emergency Response Plan
- Best Management Practices Plan

Sincerely,

A handwritten signature in black ink that reads "Mark A. Briski". The signature is written in a cursive, flowing style.

Mark A. Briski
Plant Manager
Peter Pan Seafoods, Inc.
Port Moller, Alaska Facility



ALEUTIANS EAST BOROUGH

ONSHORE SEAFOOD PROCESSING LAND USE PERMIT

Authority: Aleutians East Borough Municipal Code Title 40

Mail Permit Application to:
Aleutians East Borough
P.O. Box 349
Sand Point, Alaska 99661
907-383-2699

AEB Use Only	
Permit No.	OSP: <u>2015 01</u> -_____
Date Received:	<u>1 / 27 / 2015</u>
Date Approved:	___ / ___ / ___

Section No. 1: Permit Applicant Information	
Type of Seafood	<input checked="" type="checkbox"/> Fish <input type="checkbox"/> Shellfish <input type="checkbox"/> Other _____
<input checked="" type="checkbox"/> New Permit	<input type="checkbox"/> Permit Renewal
<input type="checkbox"/> Minor Permit Amendment (administrative change)	<input type="checkbox"/> Major Permit Amendment (any increase in impact)
Name of Individual or Corporation: <u>Peter Pan Seafoods, Inc., Port Moller, AK Facility</u>	
Business Name: _____	
Mailing Address: <u>P.O. Box 181</u> (City) <u>Cold Bay</u> (State) <u>AK</u> (Zip) <u>99571</u>	
Contact Person: (name) <u>Mark A. Briski</u> (title) <u>Plant Manager</u>	
Physical Address: (Street) <u>181 Cannery Road</u> (City) <u>Port Moller</u> (State) <u>AK</u> (Zip) _____	
Office Phone: (<u>907</u>) - <u>375</u> - <u>2702</u>	Cell Phone: (<u>509</u>) - <u>674</u> - <u>6299</u>
Satellite Phone: (____) - ____ - ____	Office Fax: (____) - ____ - ____
Email Address: <u>markb</u> @ <u>ppsf</u> .com Webpage Address: <u>www. ppsf</u> .com	
Number of Years in Business: <u>101</u>	
Alaska Business License No.: <u>F0141</u> Issue Date: <u>12/4/14</u> Expiration Date: <u>12/31/15</u>	
ADEC Permit No.: <u>AK-56-M</u> Issue Date: <u>1/1/15</u> Expiration Date: <u>12/31/15</u>	
Federal Tax Identification EIN No. <u>91-0556456</u>	

Section No. 2: Facility Information	
Township: <u>48 South</u> , Range: <u>72 West</u> Section: <u>29</u> , Meridian: <u>Seward</u>	
Name of Facility: <u>Peter Pan Seafoods, Inc., Port Moller, AK</u>	
Property Address : <u>Port Moller, AK</u>	
Describe Operations and Location: <u>Salmon Processing & Freezing - Alaska Peninsula 90 miles NE of Cold Bay</u>	
Geographic Coordinates: Latitude <u>55.9849225 North</u> Longitude <u>-160.57415138 West</u>	
Hours of Operation: _____ Start Date: <u>5/1/15</u> End Date: <u>9/20/15</u>	
Months of Operation: <input type="checkbox"/> January <input type="checkbox"/> February <input type="checkbox"/> March <input type="checkbox"/> April <input checked="" type="checkbox"/> May <input checked="" type="checkbox"/> June <input checked="" type="checkbox"/> July <input checked="" type="checkbox"/> August <input checked="" type="checkbox"/> September <input type="checkbox"/> October <input type="checkbox"/> November <input type="checkbox"/> December	
<input checked="" type="checkbox"/> Map(s) of Location Attached to Application (required) <input checked="" type="checkbox"/> Routes of Access Shown on Map(s) (required)	

Section No. 3: Property Ownership and Access

Land Owned by Applicant AEB Land State Land Federal Land
 Private (Name): _____ Other (Name): _____
Contact Name: Mark A. Briski Phone: 907-375-2702 or 206-727-7210

For properties not owned by the Applicant, describe the instrument used to obtain legal access to land.

Lease Contract Permit License Other
Name of legal document: Dept. of the Air Force, license #DACA85-3-95-45 continued use of the airstrip.
Date of Agreement/Issue: _____ Expiration Date: 1/1/02

Does the instrument used to obtain legal access allow for the type, location, amount, and extent of operations described in this permit application? Yes No

If you answered "yes," are there any limitations placed on your operations? Yes No

If you answered "yes," please describe the limitations _____

Existing Facilities: Legal Access Granted to Use/Operate Existing Facilities on Property: Yes No
Access Granted to These Existing Facilities: Building/Structure Runway Road Port/Dock
 Other: _____
 Other: Legal access to the road and landfill site is neither granted nor prohibited at this time.
 Other: _____

New Facilities: Legal Access Granted to Construct/Operate New Facilities on Property: Yes No
Access Granted to These Existing Facilities: Building/Structure Runway Road Port/Dock
 Other: _____
 Other: _____
 Other: _____
Construction/Installation Date: _____ All Required Permits Obtained? Yes No

For facilities not owned by the Applicant, describe legal access to use or operate the facilities.

Lease Contract Permit License Other
Name of legal document: _____
Date of Agreement/Issue: _____ Expiration Date: _____

Section No. 4: Required Attachments to Permit Application

- Location Map(s): Must clearly show land ownership, all buildings, and township, range and section.
 - Transportation Map(s) including routes of access, showing ingress and egress routes
 - Plot plan showing the location, name, and brief description of all buildings in the seafood processing facility including housing and employee services. Attach a drawing with buildings labeled by name and use.
- All maps & drawings must be submitted electronically for incorporation into the Borough's electronic system.
- | | |
|--|---|
| <input checked="" type="checkbox"/> Plan of Operations | <input type="checkbox"/> Local Economic Development Plan |
| <input type="checkbox"/> Design Plans (for any new facilities) | <input type="checkbox"/> Historical and Cultural Resources Protection Plan |
| <input checked="" type="checkbox"/> Reclamation Plan | <input checked="" type="checkbox"/> Pollution Prevention Plan |
| <input checked="" type="checkbox"/> Emergency & Medical Plan | <input checked="" type="checkbox"/> Hazardous Materials and Hazards Assessment Plan |
| <input checked="" type="checkbox"/> Transportation Plan | <input type="checkbox"/> Good Neighbor Plan |
- A copy of the most recent complete (all five pages) applicant's ADEC Seafood Processors Application
 - A copy of the most recent complete (all three pages) applicant's Application for Federal Processor Permit
 - A copy of all State of Alaska Permits, Fisheries Business License, and APDES/NPDES (Notice of Intent Form)
 - A copy of all federal permits including EPA Seafood Processing Waste Permit
 - Fee Payment to the Aleutians East Borough for the Application Fee
- (\$1,000 for new permit applications and renewal applications. \$50 for each permit amendment.)

Section No. 5: Prior Operating Experience in Aleutians East Borough

- Business has previously processed seafood within the AEB boundaries. Yes No
- Business has operated this business in AEB boundaries in prior years. Yes No Number of Years: 101
- Business has all required private, local, state, and federal permits, licenses, and/or authorizations. Yes No
- Business has operated in compliance with all local, state & federal requirements since inception. Yes No
- Business paid sales tax to AEB as required. Yes No
- Permits, licenses and/or authorizations for this business are subject to current enforcement action. Yes No
- Reason for enforcement action : _____
- Permits, licenses and/or authorizations for this business have been revoked in the past. Yes No
- Reason for revocation: _____

Section No. 6: Agreement to Comply with Sales Tax Payment

The Aleutians East Borough collects a two percent sales tax of raw fish product within its boundaries. The tax applies to the sale of raw fish whether delivered directly or indirectly to the buyer in the Borough. The tax levied by the Borough is an obligation of the seller. The buyer shall collect the tax at the time of sale by withholding from payment to the seller the amount of the tax. If payment is not made at the time of sale or delivery, the buyer shall segregate from funds of the buyer an amount equal to the tax due on the sale. I agree to comply with Aleutian East Borough's Municipal Code Chapter 60.20, Sales Tax payment requirements.

Applicant Name (printed): Mark A. Briski Title: Plant Manager

Applicant Signature: *Mark A. Briski* Date: 1/27/15

Section No. 7: Certification of Accuracy and Agreement to Comply, Indemnify and Hold Harmless

I certify that the information given by me in this land use permit application is true, complete, and correct. I agree to comply with local, state and federal laws, regulations and requirements pertaining to my business operations and land use. I agree to comply with all permit stipulations placed on this permit. I have reviewed the AEB penalty schedule and agree to immediately notify AEB of any potential violations, remedy any violations on the schedule required by AEB and pay penalties within 30 days. I hereby defend, indemnify, and hold the Aleutians East Borough harmless from any and all claims, damages, law suits, losses, liabilities and expenses related to the death or injury of persons and for the damage to or loss of property arising out of or in connection with the entry on and use of the property within the Aleutian's East Borough boundaries by me, the company I represent, and all contractors, subcontractors, guests, clients and their employees.

Applicant Name (printed): Mark A. Briski Title: Plant Manager

Applicant Signature: *Mark A. Briski* Date: 1/27/15

Section No. 8: Permit Decision [AEB Use Only]

Fee Paid: Yes No Check No.: _____ Amount: _____

Minor Amendment or Renewal Eligible for AEB Administrator Approval?: Yes No

Approved Approval Date: _____ Expiration Date: _____

Additional Permit Stipulations Attached (in addition to Section No. 9 Permit Stipulations) Yes No

AEB Administrator or Designee Name (printed): _____

AEB Administrator or Designee Signature: _____

New Permit, Major Amendment or Renewal Not Eligible for AEB Administrator Approval?: Yes No

Pre-Application Meeting Held Date: _____

Application Meeting Held Date: _____

Final Complete Application Submitted Date: _____

90 Day Application Review Period Start Date: _____ End Date: _____

Note: 90 day review period includes 30 day written public review that must be completed within that 90 day period.

30 Day Public Review Period Start Date: _____ End Date: _____

90 Day Application Review Period Extended No Yes New End Date: _____

Administrator Recommendation to PC Date: _____

60 Day PC Application Review Period Start Date: _____ End Date: _____

Note: 60 day review period includes one meeting of Planning Commission (PC) with opportunity for public comment

60 Day Application Review Period Extended No Yes New End Date: _____

PC Recommendation to Assembly Date: _____

30 Day Assembly Decision Period Start Date: _____ End Date: _____

Note: 30 day review period includes one meeting of Assembly with opportunity for public comment

30 Day Assembly Decision Period Extended No Yes New End Date: _____

Assembly Decision

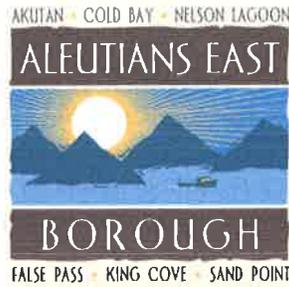
Approved: Approval Date: _____ Expiration Date: _____

Denied: Reason: _____

Additional Permit Stipulations Attached (in addition to Section No. 9 Permit Stipulations) Yes No

Mayor or Designee Name (printed): _____

Mayor or Designee Signature: _____



Sent by E-mail and U.S. Mail

February 2, 2015

Peter Pan Seafoods, Inc.
Mark A. Briski, Plant Manager
Port Moller Facility
P.O. Box 181
Cold Bay, Alaska 99571
Phone: 907-375-2702
E-mail: markb@ppsf.com

**Re: AEB Permit Application No. OSP 2015-01,
Peter Pan Onshore Seafood Processing Plant, Port Moller Facility
Request for Additional Information for Land Use Permit Application**

Dear Mr. Briski,

The Aleutians East Borough (AEB) received Peter Pan Seafoods, Inc.'s (Peter Pan's) January 27, 2015 land use permit application. Your permit application has been assigned AEB Permit No. OSP 2015-01. Please refer to this AEB permit number in all correspondence with us.

Thank you for your application and cooperation in applying for the Borough's new permit. While AEB appreciates your efforts to provide a majority of information required in your application, there are a few additional pieces of information needed to process your permit application; therefore, at this time your permit application has been determined to be **incomplete**. Your application is suspended until the additional information listed below is received. Please provide this information by March 5, 2015.

Please provide the following information to complete your application:

- 1. Property Ownership and Access, Application Page 2, Section No. 3,** Thank you for providing documents to show that Peter Pan's onshore seafood processing plant and equipment is located on property owned by Peter Pan Seafood Inc. It appears from your application that all facilities, equipment, and operation, with the exception of the landfill operation, airstrip and road use, and water source location are located on Peter Pan's property. Please confirm this is correct, or provide further information.

Your application lists an expired (1/1/02) Department of the Air Force License for use of the airstrip. The airstrip and lands adjacent to the Peter Pan facility have been conveyed by the state and federal government to the AEB. As part of this permit approval process, the AEB staff will make a recommendation to the Planning Commission and Assembly about Peter Pan's continued use of the airstrip and access roads. We have sufficient information to make that recommendation.

The Alaska Department of Environmental Conservation (ADEC) Solid Waste Permit No. SWGPCAMP-18 indicates the solid waste disposal location ("landfill") is located 300 yards east of the Bering Sea Beach and ½ mile west of Port Moeller Bay within Section 29, Range 72 West, Township 48 South. These lands adjacent to the Peter Pan facility have been conveyed by the state and federal government to the AEB. Please provide a map showing the location of the landfill, and the access road from the Peter Pan facility to the landfill.

As part of this permit approval process, the AEB staff will make a recommendation to the Planning Commission and Assembly about Peter Pan's continued use of the landfill. To make that recommendation, AEB needs the map, and a complete ADEC permit approval for the landfill listing all the terms and conditions (please see our request below for a complete permit approval document) and a commitment to reclaim AEB lands.

2. **Reclamation Plan:** AEB is pleased that Peter Pan plans continued operations in Port Moeller. Peter Pan's operations are important to our borough and residents. However, an important part of this new permit process approved by AEB's Assembly and Planning Commission is to clarify and obtain agreement with companies on their reclamation commitment prior to permit approval.

For the property owned by Peter Pan, AEB staff will make a recommendation to the Planning Commission and Assembly on Peter Pan's reclamation plan. AEB requests Peter Pan's reclamation plan be revised to state (at a minimum) that:

- a. Peter Pan will develop a reclamation closure plan for its property that includes removal of all hazardous waste, fuel, chemicals, spilled material and contaminated soils, and debris prior to closure, including a plan to retain the facilities and equipment for beneficial reuse, later use, or a plan to remove the facilities;
- b. Peter Pan will submit the plan to AEB at least 6 months prior to plant closure for review and approval;
- c. Peter Pan will fund and complete the reclamation; and,
- d. Peter Pan will ensure the reclamation is completed within 180 days of the plant closure.

For operations conducted by Peter Pan on AEB property (e.g., use of roads, airstrip, and landfill area), AEB requests the reclamation plan be revised to state (at a minimum) that:

- a. Peter Pan will hire a solid waste engineer to develop a landfill closure plan that meets State of Alaska Landfill Closure Design Requirements and Best Management Practices at the time of the planned closure; and develop a reclamation plan that includes removal of all hazardous waste, fuel, chemicals, spilled material and contaminated soils, and debris from AEB property;
- b. Peter Pan will submit the plan to AEB at least 6 months prior to plant closure for review and approval;
- c. Peter Pan will fund and complete the reclamation; and,
- d. Peter Pan will ensure the reclamation is completed within 180 days of the plant closure.

3. **ADEC Permit AK 56-M.** Thank you for providing a copy of Peter Pan's ADEC Permit to Operate a large land-based seafood processing facility. Your application included the approval certificate, but did not include the complete permit approval document with stipulated requirements. Please clarify if the approval included any conditions of approval or stipulations, and if so, please provide a complete copy.

4. **Seafood Processor's General Permit No. AK-G52-0014.** Thank you for providing a copy of Peter Pan's compliance reporting records associated with Seafood Processor's General Permit No. AK-G52-0014. Please provide a copy of the Seafood Processor's General Permit No. AK-G52-0014, and a copy of the associated Best Management Practice Plan.
5. **ADEC Permit SWGPCAMP-18.** Thank you for providing a copy of ADEC's February 15, 2013 cover letter approving Peter Pan's operation of a landfill under general permit SWGPCAMP-18. Please provide a complete copy of the permit approval listing all stipulated requirements. Peter Pan's Plan of Operations states the facility operates with a crew of approximately 150 people. Please explain how this facility operates under a solid waste general permit for waste generated at a remote camps or lodges with an average daily population of less than 50 people.
6. **Oil Spill Response Plans.** Please provide a copy of Peter Pan's United States Coast Guard (USCG) Facility Response Plan (FRP) that was submitted for approval January 1, 2015, and Peter Pan's Environmental Protection Agency (EPA) Spill Prevention Control & Countermeasure Plan. An electronic copy of both is sufficient.
7. **Emergency Response and Risk Management Plans.** Please provide these plans. An electronic copy is sufficient.
8. **Best Management Practices Plan.** Please provide a copy of the Port Moller Emergency Response Plan. An electronic copy is sufficient.
9. **Air Pollution Control.** Thank you for providing a copy of ADEC's approval allowing Peter Pan's facility to burn up to 315,000 gallons of diesel per year in its power generators. The AEB requires companies to use best available air pollution control technology unless it is not technically feasible and we would like to better understand a few items related to air pollution control:
 - a. Has Peter Pan installed any air pollution control on its diesel fired-generators? If so, what type of pollution controls is installed? If not, please explain why pollution control is not feasible. It would be helpful for Peter Pan to provide information on the age and type of power generation units.
 - b. Has Peter Pan considered, or is Peter Pan using, solar, wind, or other alternative power sources to reduce the amount of air emissions? If so, what type of alternative power is used? If not, please explain why it is not feasible.
 - c. Is Peter Pan currently using ultra-low sulfur diesel fuel for power generation? If not, please explain why it is not feasible.

The Borough appreciates your cooperation in filing your first permit application. We look forward to working with you to complete this application. AEB Staff, Tina Anderson has been assigned to your permit, and can be reached by e-mail at tanderson@aeboro.org, or by phone at (907) 383-2699 if you have any questions about this request or need further assistance.

Sincerely,



Rick Gifford
Aleutians East Borough Administrator

Cc: AEB Clerk
AEB Permit No. OSP: 2015-01 File



Port Moller, Alaska

March 4, 2015

Aleutians East Borough
P.O. Box 349
Sand Point, AK 99661
Attention: Tina Anderson

**Re: AEB Permit Application No. OSP 2015-01
Peter Pan Onshore Seafood Processing Plant, Port Moller Facility
AEB Request for Additional Information for Land Use Permit Application**

To the AEB Planning Commission and Assembly,

In response to the Borough's request for additional information regarding AEB Permit Application OSP 2015-01 Peter Pan offers the following:

- 1. Property Ownership and Access, Application Page 2, Section 3:** The majority of the Peter Pan Seafoods, Inc., Port Moller facility is located on property owned by Peter Pan Seafoods, Inc. As previously indicated, the landfill site, airstrip, road and water source location are currently on land conveyed to the AEB by the state and federal governments. Additionally our recent review of the 2008 survey by McClintock Land Associates for the Aleutians East Borough indicates structures along the west boundary of U.S. Survey No. 1147 (Peter Pan property) that extend beyond the property line and are believed to be located on AEB land. These buildings include: 2 employee housing units, approximately 6 fishermen's storage containers, the GCI tele-communications container along with associated communications satellite dishes, and various sidewalks and pathways leading to these structures. It is our belief that Peter Pan has had structures in this area since at least the 1950's. Peter Pan would like to request continued use and access of this AEB land or would like to request the Borough's consideration of conveying this land to Peter Pan. The attached partial plot of the West Boundary of Amended U.S. Survey No. 1147 better identifies the land and structures stated.

Please reference attached file:
Survey-West Boundary.pdf

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)
Peter Pan appreciates the efforts of the AEB staff and their recommendation to the Planning Commission and Assembly for Peter Pan's continued use of the landfill, airstrip and access roads leading to these locations. As previously stated, the continued use of the air strip is vital to the operation of the Port Moller facility in addition to others such as local air taxi services, the Alaska Department of Fish & Game and hunting and fishing guides that work in the area. As requested, you will see the attached information regarding a map (aerial photo) showing the location of the landfill and access road from the Peter Pan facility to the landfill as well as the complete ADEC permit approval for the landfill listing all the terms, conditions and regulations required by the State.

Please reference the attached files:
PML Solid Waste General Permit.pdf
Landfill Site Aerial Veiw.jpg

- 2. Reclamation Plan:** Salmon are a renewable and sustainable resource, neither Maruha Capital Investments nor Peter Pan Seafoods, Inc. have any immediate intention of closing or abandoning the Port Moller operation. When closure of the facility is determined to be imminent, a working Reclamation Plan will be developed and submitted to the Aleutians East Borough for review and approval six months prior to abatement of the operation.

The Port Moller Facility Reclamation Plan for property owned by Peter Pan Seafoods, Inc. will specify the removal of all hazardous waste, fuel, chemicals, spilled materials and contaminated soils, and debris prior to closure. The Plan will also include a provision to retain the facilities and equipment for beneficial reuse, later use or a plan to remove the facilities. Peter Pan will fully fund the Reclamation Project and will be committed to seeing the plan through to completion. Peter Pan will ensure the reclamation of this property is completed within one year of the plant closure.

Regarding operations conducted by Peter Pan Seafoods, Inc. on Aleutians East Borough property (e.g. use of roads, airstrip and landfill site):

To satisfy AEB reclamation requirements Peter Pan will hire a solid waste engineer to develop a landfill closure plan that meets the State of Alaska Landfill Closure Design Requirements and Best Management Practices at the time of the planned closure. Provisions in the Reclamation Plan will include removal of all hazardous waste, fuel chemicals, spilled material and contaminated soils and debris from AEB property. Peter Pan will submit the plan to the AEB for review and approval at least six months prior to the plant closure. Peter Pan will fully fund the Reclamation Project and will be committed to seeing the plan through to completion. Peter Pan will ensure the reclamation of this property is completed within one year of the plant closure.

Note: Peter Pan would like to request the Borough's consideration of extending the length of time allowed to fully complete the reclamation of both Peter Pan and AEB properties from 180 days to 365 days of the plant closure. Peter Pan believes a period of one year would be necessary to effectively complete the reclamation project based on the size of the facility, amount of equipment on site, seasonality of the operation, and the potential for delays caused by inclement weather and tides.

- 3. ADEC Permit AK-56-M:** ADEC Seafood Permitting Coordinator & Environmental Health Officer, Aaron Poloni, confirmed the status of Peter Pan's ADEC Permit to Operate approval certificate for the operation of a land-based seafood processing facility as follows. "A Permit to Operate is issued to the processing company with the understanding that the firm must operate under ADEC regulations. Operating a seafood processing plant under ADEC regulations include the "stipulated requirements". These regulations are monitored by ADEC through the seafood inspection program."

Please reference the attached file:
ADEC 18 AAC 34 Seafood Processing and Inspection Regulations

4. **Seafood Processor's General Permit No. AK-G52-0014:** As requested by the Aleutians East Borough the following information is provided regarding the Port Moller Facility Seafood Processor's General Permit AK-G52-0014 and a copy of the associated Best Management Practices Plan. Note pages 2-3 of the attachment titled APDES-NPDES Waste Water Permit.pdf is the Port Moller Facility's Notice of Coverage and Authorization to Discharge approval document issued by ADEC. In addition the associated Port Moller Best Management Practices Plan has been attached. Please note, the EPA has turned over waste water discharge permitting to ADEC and the State of Alaska is currently in the process of issuing new waste water discharge permits to seafood processors.

Please reference the attached files:
APDES-NPDES Waste Discharge Permit.pdf
AKG520000 General Permit Regs.pdf
PML 14 Best Management Practices.pdf

5. **ADEC Permit SWGPCAMP-18:** A brief history regarding the Peter Pan, Port Moller Landfill: Dating back to the early 1980's, the Port Moller landfill was initially permitted by ADEC as a Class III Municipal Landfill, permit #8821-BA002. In June of 2000, following guidance provided by ADEC, the Port Moller Landfill was reassigned to a General Permit for the Operation of a Landfill for Remote Camps and Lodges with Fewer than 50 residents. This was based on the seasonality of the Port Moller operation and the variable range of the Port Moller population, 2 employees for 7 months and a minimum of 40 employees to a maximum of 150 employees for 5 months. Since the reassignment, the Port Moller Landfill continues to be in good standing and maintained as a General Permit.

Please reference the attached file:
PML Solid Waste General Permit.pdf

6. **Oil Spill Response Plans:** As requested please reference the attached files :
PML Facility Response Plan.pdf
PML SPCC Plan.pdf

7. **Emergency Response and Risk Management Plans:** Please reference the attached files:
PML Emergency Response Plan.pdf
PML Risk Management Plan.pdf

8. **Best Management Practices Plan:** Please reference the attached file:
PML 14 Best Management Practices.pdf

9. **Air Pollution Control:** a) The Peter Pan, Port Moller facility has been approved and permitted by the Alaska Department of Environmental Conservation, Division of Air Quality, Air Permits Program to operate under a Pre-Approved Emission Limit (PAEL). The PAEL permit allows for limits of nitrogen oxide emissions from diesel engines to be established by restricting the amount of fuel that may be burned in an engine or set of engines on an annual basis. The Port Moller plant is permitted to consume 315,000 gallons of diesel annually. As indicated in the attached ADEC Air Quality Compliance Evaluation Report, the Port Moller Power Plant's highest amount of diesel fuel burned in any consecutive 12 months has been well below its pre-approved limit. It is Peter Pan's understanding that operating under these "pre-approved" emission limits no additional department approval is required as long as Port Moller complies with the limit while the limit is in effect. The Port Moller Power House continues to operate in compliance with State regulations which have not necessitated the installation of additional air pollution controls.

Port Moller power generation units are as follows:

<u>Source</u>	<u>Manufacturer/Model</u>	<u>Year</u>	<u>Rating/Size</u>
Main Power House #1	Caterpillar/3412	1979	420 kW
Main Power House #2	Caterpillar/3412	1979	420 kW
Main Power House #3	Caterpillar/3512	1990	830 kW
Main Power House #4	Caterpillar/399	1975	850 kW
Main Power House #5	Caterpillar/3516	2008	1285 kW
Winter Power House #1	John Deere/6068	2007	100 kW
Winter Power House #2	John Deere/6068	2007	100 kW
Emergency Power #1	GMC/6-71	1976	80 kW

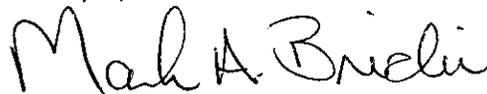
b) Following State regulation, Peter Pan has not found it necessary to pursue alternate power sources such as solar, wind, hydro or geothermal power generation. Peter Pan has made substantial investments in the power generators currently in operation at Port Moller. The primary focus has been on developing an economical, reliable, and consistent source of electrical power that is sizable enough to meet the fluctuating power demands of a seasonal processing facility. Maintenance of the entire Port Moller power generation system is managed with an extraordinary amount of pride and commitment. Both engines and generators are maintained and rebuilt on schedule to insure they operate as efficiently and economically as possible. The most recent upgrades to the Port Moller Power House were made in 2007-2008 with the purchase and installation of two John Deere 6068 – 100kW generators for winter power and the Cat 3516 – 1285 kW generator in the main Power House.

c) Peter Pan is compliant with U.S. EPA and ADEC diesel fuel standards and transitioned to using ultra-low sulfur diesel fuel for power generation and marine distribution in 2010.

Please reference attached files:
ADEC 18 AAC 50 Air Quality.pdf
ADEC Air Quality Permit.pdf
PML Air Quality Evaluation.pdf

Peter Pan Seafoods, Inc. appreciates your support in working with us to successfully complete our Land Use Permit Application. We hope the above information and attached documents clarify any outstanding questions / requirements that the Aleutians East Borough has in order to approve our AEB Permit Application No. OSP 2015-01

Thank you,



Mark A. Briski
Plant Manager
Peter Pan Seafoods, Inc.
Port Moller, Alaska Facility