

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION CRUISE SHIP PROGRAM

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April 17, 2008

John Turvey, Senior Manager
Holland America Lines
300 Elliott Avenue West
Seattle, WA 98119

RE: Large Commercial Passenger Vessel Wastewater Discharge General Permit No. 2007DB002, Sequence of Events Necessary for Discharge under Interim Effluent Limits

Dear Mr. Turvey:

Holland America requested clarification from the Department regarding the sequence of events that were necessary in order to be granted authority to discharge wastewater using the interim effluent limits. The Department has produced the following timeline.

Notice Of Intent (NOI) Timeline¹

1. The permittee requests approval to discharge ammonia, copper, nickel, and/or zinc using the interim effluent limits found in Table 1 of the permit. The request must be accompanied by documentation that the long-term effluent limits for these parameters have been exceeded. The documentation may include sampling data collected in 2005 through 2007 within the waters of the state in accordance with an approved QA/QC Plan and VSSP that has been previously submitted to the Department. Requests without the supporting documentation will be denied.
2. A request to discharge under the interim effluent limits may be made as part of the Notice of Intent (NOI), which is due on or before April 24, 2008.

¹ A permittee may also request approval to discharge ammonia, copper, nickel, and zinc at the interim effluent limits at any time during 2008 and 2009. The Department will revise the permittee's authorization letter accordingly. The Source Reduction Evaluation (SRE) is due to the Department 30 days after the request for interim effluent limits. If the SRE is disapproved, the approval to discharge under the interim effluent limits will be revoked.

3. The Department will include an approval to discharge under the interim compliance limits in the authorization letter to the permittee to discharge under the general permit. Discharge under the interim compliance limits may be authorized prior to submittal of the Source Reduction Evaluation. The permittee is still required to submit a Source Reduction Evaluation that meets Department approval. The authorization to discharge under the interim compliance limits can be withdrawn if the Source Reduction Evaluation is not submitted on time or is disapproved by the Department, or if other permit deadlines are missed.
4. The permittee must submit a Source Reduction Evaluation (SRE) plan to the Department on or before May 24, 2008 for review and approval. (NOTE: This is the Saturday of Memorial Day weekend. As such, the Department will accept SRE plans on or before Tuesday May 27, 2008.) DEC is willing to consult with permittees on their SRE plan elements prior to the permittee submitting their SRE.
5. If the Department approves the Source Reduction Evaluation, the permittee will be issued an approval letter.
6. If the Department disapproves the Source Reduction Evaluation, the permittee will be sent a letter that details the deficiencies along with a deadline for addressing the deficiencies. If deficiencies are not corrected by the established deadline and the permittee continues to discharge wastewater in Alaska waters, it must meet the long term effluent limits until the permittee submits a Source Reduction Evaluation that is approved by the Department. Alternately, the permittee may choose to discharge outside of Alaska waters.

If you have any questions or concerns, please feel free to contact me.

Sincerely,



Denise Koch
Cruise Ship Program Manager

cc: Alaska Cruise Association
Northwest Cruise Ship Association