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June 24, 2008

Ms. Denise Koch  
Program Manager,  
ADEC/Division of Water CPVEC  
410 Willoughby Avenue, Suite 303  
P.O. Box 111800  
Juneau, AK 99811-1800

RE: Revised Source Reduction Evaluation – June 24, 2008

Dear Ms. Koch:

With the recent submittal of our May Discharge Monitoring Reports under the Alaska General Permit, we felt that now was an appropriate time to revisit our Source Reduction Evaluation submitted with our original Notices of Intent. As we have received and reported on additional samples, we have noted several instances in which the Long Term Limits of the permit were exceeded. For vessels discharging in permit waters as of this writing, these instances have previously been reported to the Alaska Department of Environmental Conservation in accordance with requirements of the permit. For those not discharging in Alaska as of this writing, we are submitting analytical results obtained from the vessel albeit not when discharging into Alaska waters.

This letter transmits a revised Source Reduction Evaluation (SRE) for the Holland America Line fleet sailing in Alaskan waters during the 2008 cruise season under the Large Commercial Passenger Vessel Wastewater Discharge General Permit No. 2007DB002. The SRE is being revised to reflect these data, with our request for authorization to discharge under the interim limits for the indicated constituents. The changes are summarized in the table below:

<b>Vessel</b>	<b>Discharge Authorization Number</b>	<b>Previously Authorized to Discharge Under Interim Limits</b>	<b>Requesting Interim Limits Authorization</b>	<b>Lab Report Dated:</b>
Oosterdam <sup>1</sup>	2007DB0002-0011	Ammonia, zinc	Copper, Nickel	May 30, 2008 <sup>2</sup>
Veendam	2007DB0002-0014	Ammonia, copper, nickel	Zinc	June 11, 2008
Volendam <sup>3</sup>	2007DB0002-0015	Ammonia, copper, nickel	Zinc	June 9, 2008
Westerdam	2007DB0002-0016	Ammonia, nickel,	Copper Zinc	June 11, 2008 <sup>9</sup> June 2, 2008
Zaandam	2007DB0002-0017	Ammonia, copper, nickel	Zinc	Previously submitted and authorized by D. Koch, June 17, 2008 see email copy attached.

We have also attached the analytical laboratory reports documenting our effluent performance relative to the Long-Term and Interim limits, and have taken the liberty of highlighting the specific information supporting our request. These changes are the only changes included in this revised version of the SRE.

You will note that the samples referenced were all drawn in the month of May. The delay in submitting our request is only administrative in nature – as we awaited receipt of the lab reports and subsequently prioritized preparation and submittal of the required Discharge Monitoring Reports. Consequently, we would like to request that the authorization for interim limits be made effective to discharges on or after June 1, 2008. We believe this is consistent with the intent of the inclusion of interim limits in the General Permit, as described in the May 1, 2008 information sheet in which ADEC wrote, “Public comment and ADEC analysis indicate that large commercial passenger vessels are not likely to be able to immediately comply with the strict point of discharge effluent limits in the General Permit. ... ADEC has incorporated a compliance schedule into the final General Permit that will allow the cruise ship industry the 2008 and 2009 seasons to come into compliance with the water quality criteria based on limits found in Table I of the final permit.”<sup>4</sup> This would also simplify reporting for the June DMR, eliminating the possible complexity of reporting under two separate effluent limitations for the same constituent in a given month.

<sup>1</sup> No permit covered discharges in Alaska as of June 24, 2008

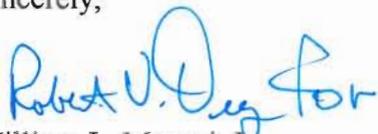
<sup>2</sup> Nickel result of 8.3 ug/L rounded down to 8.0 on cover sheet

<sup>3</sup> No permit covered discharges in Alaska as of June 24, 2008

<sup>4</sup> See “Final Large Commercial Passenger Vessel Wastewater Discharge General Permit Information Sheet,” ADEC, May 1, 2008, pp 10-11

We appreciate your attention to this request. Please feel free to contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Robert U. Deg for". The signature is stylized and appears to be a signature for a representative.

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

WJM/jg

Attachments:

- \* Revised Source Reduction Evaluation 6-11-08
- \* Various Analytical Reports
- \* Email from Denise Koch dated June 17, 2008