

STATE OF ALASKA

**DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER
CRUISE SHIP PROGRAM**

SARAH PALIN, GOVERNOR
410 Willoughby Ave., Ste 303
P.O. Box 111800
Juneau, AK 99811-1800
PHONE: (907) 465-5300
FAX: (907) 465-5274
<http://www.state.ak.us/DEC>

July 28, 2008

Elaine Heldewier
Carnival Cruise Lines
Environmental Director
Carnival Place
3655 NW 87 Avenue
Miami, FL 33178-2428

Subject: Source Reduction Evaluation Completeness Review – More Information
Necessary by August 19, 2008

Dear Ms. Heldewier:

Per Section 1.9 of the Large Commercial Passenger Vessel Wastewater Discharge Permit number 2007DB0002, a permittee may request, with supporting information, approval for a vessel to discharge treated wastewater at concentrations that exceed the long-term effluent limits established in Table 1 for ammonia, copper, nickel, and/or zinc. The vessel's discharge must then comply with the interim effluent limits for the parameter(s) of concern. (See GP Section 1.9.1.)

The permit requires the submittal of a Source Reduction Evaluation (SRE) within 60 days of a request for interim limits. (See General Permit Section 1.9.3.) Carnival Cruise Lines submitted its SRE on July 11, 2008.

The Alaska Department of Environmental Conservation (DEC) has reviewed your SRE, and finds it incomplete. I have specified the additional information that is needed before DEC can approve this document.

I strongly recommend that you refer to the attached DEC April 18th SRE guidance letter for details on what DEC expects in your re-submitted SRE. In addition, I have listed the DEC expectations for any interim reports that may be submitted under the SRE.

General Comments – Additional Information Needed in SRE

- The re-submitted SRE must indicate the series of steps and actions that the company will take in order to comply with the long-term effluent limits before 2010.
- The re-submitted SRE must identify deadline(s) for the submittal of evaluations of the potential sources of the parameters of concern in your influent to DEC.
- The re-submitted SRE must identify implementation steps or actions that will be taken to reduce the level of the parameters of concern. The re-submitted plan should include when actions will be taken based upon the potential source identification. The implementation schedule may not extend beyond the beginning of the 2010 cruise ship season. (See GP Section 1.9.5 and 1.9.7).
- 18 AAC 70.910(c) and the General Permit contemplates that this schedule may be refined as additional information is discovered. (See GP Sections 1.9.5, 1.9.6 and 1.9.12.) Therefore, Carnival Cruise Lines may revise and resubmit its SRE to DEC for approval in the future as necessary. However, the initial SRE that DEC approves must provide the implementation schedule to show how the company plans to meet long-term effluent limits. This is an enforceable condition of the permit. (See GP Section 1.9.13.)
- Please include additional information such as vessel class, type of potable drinking water system, and advanced wastewater treatment system information for the Carnival Spirit.
- The SRE must include the requirement for the annual progress report due within two weeks of the end of the calendar year for both 2008 and 2009. (See GP Section 1.9.12.)
- The SRE must include a plan to evaluate and submit the findings to DEC regarding potential operational and equipment changes that Carnival Cruise Lines will investigate in order to reduce the concentration of specific pollutants. For example, this section of the SRE should detail the steps and research that is planned, when Carnival Cruise Lines expects to receive the findings, and when the findings will be reported to DEC. For example, the section could list the deadline for when the company will hire a contractor to investigate the available technology, the scope of the contractor's investigation, the deadline(s) for the contractor's reports, when the reports will be transmitted to DEC, etc.

- The SRE should describe the volumes of potable water that each vessel typically bunkers at particular ports and include any plans for intake sampling done for metals at the vessel intake. Compliance data collected by public water systems are not representative of the quality of the drinking water bunkered by the vessel. Therefore, DEC recommends that at least two potable water intake sampling events be included in the evaluation.

DEC Expectations for Any Interim Reports Submitted under the SRE

- Any interim evaluation report, as well as the annual progress report, should discuss the methodology used to obtain the information.
- The annual progress report should summarize the success or failure of actions that were implemented to meet the long-term effluent limits. The progress report will be an update to DEC on all Source Reduction Evaluation activities. This report should include and summarize: all reports and applicable sample results, description of any actions taken to achieve compliance with the long-term effluent limits, the quantification of the level of reduction of the pollutants of concern, and whether or not the deadlines established in your SRE were met. If the deadlines were not met, the progress report needs to include an adequate explanation of why a deadline was not met. (See also 18 AAC 70.910(b).)

DEC must receive the updates to your SRE by August 19, 2008. If the updates are not received by that date, DEC may withdraw the Carnival Spirit's approval to discharge under the interim compliance limits for copper and zinc.

Subsequent to DEC approval of the Carnival Cruise Lines SRE, your company may revise and resubmit its SRE to DEC for review and approval in the future if changes are necessary based upon findings or if different ships will be visiting Alaska during the 2009 cruise ship season.

Sincerely,



Denise Koch
Cruise Ship Program Manager

Enclosures:

Large Commercial Passenger Vessel Wastewater Discharge General
Permit No. 2007DB002, Source Reduction Evaluation letter dated April
18, 2008

cc: Lynn Kent, Director Division of Water
Ruth Hamilton Heese, Attorney, Department of Law
Albert Faure, Engineer, Cruise Ship Program
Edward White, Environmental Program Specialist, Cruise Ship
Program