



23 October 2018

Mr. Gregg Wood
State of Maine Department of Environmental Protection
Bureau of Water Quality - Division of Water Quality Management
17 State House Station
Augusta, ME 04333-0017
gregg.wood@maine.gov

RE: Maine Pollutant Discharge Elimination System (MEPDES) Permit #ME0037478
Maine Waste Discharge License (WDL) #W009190-6F-A-N

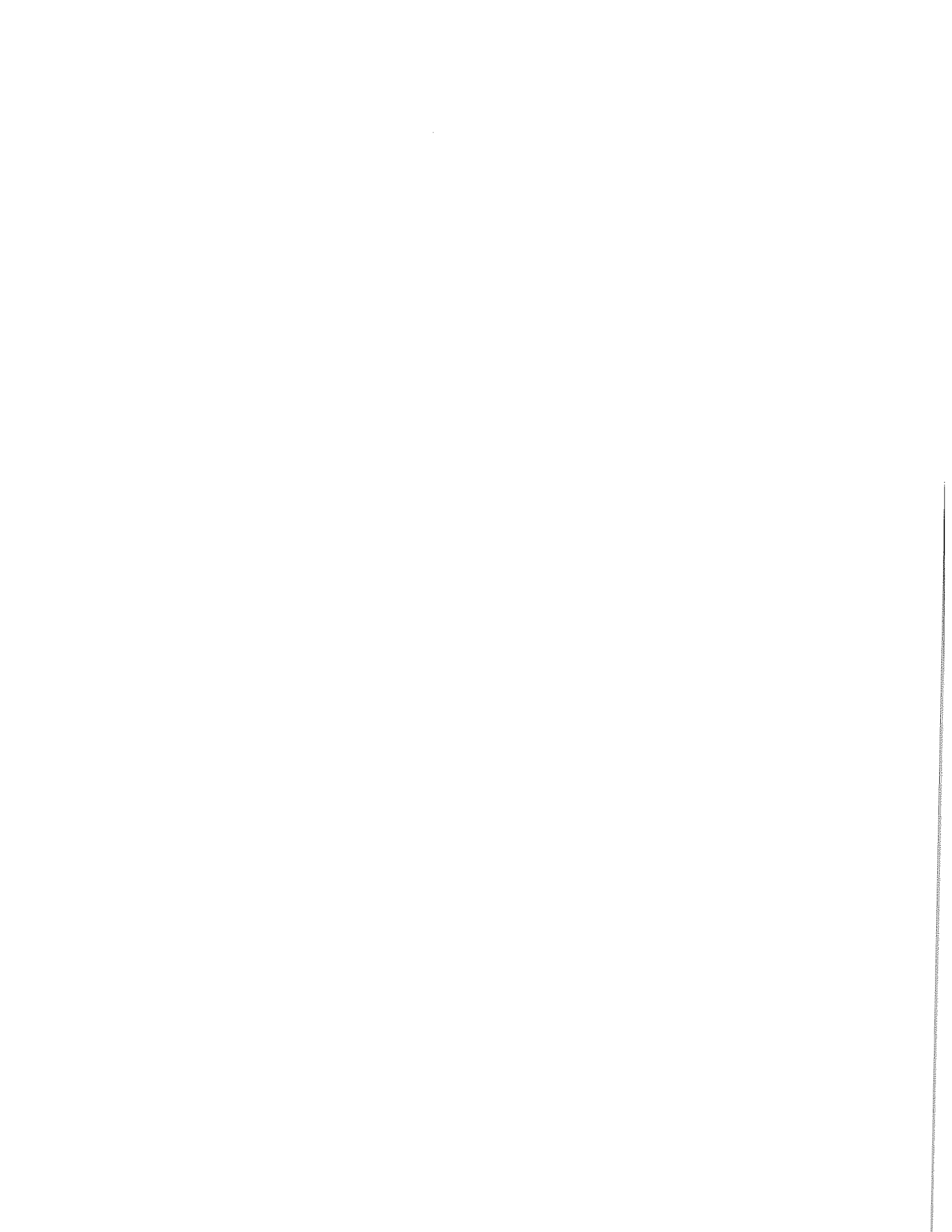
To Whom It May Concern:

Kennebec River Biosciences (KRB) is an internationally recognized aquatic animal health company located in Richmond, Maine. In over 20 years in the aquatic animal health sector, KRB has developed a regional, national and international reputation as a leader in the field of aquatic diagnostics, regulatory certification, and biologics. KRB has worked with a wide range of commercially important aquatic species, and provides an equally wide range of aquatic health services. These include laboratory services for cultured finfish, mollusks, crustaceans; vaccine development for existing and emerging piscine diseases; pathogen surveillance; facilitation of investigational therapeutic compounds and field trial monitoring; regulatory requirement consultations; biosecurity consultations; and a variety of aquatic animal veterinary services.

KRB has reviewed the draft Maine Pollutant Discharge Elimination System Permit/Maine Waste Discharge License developed and submitted by Whole Oceans, LLC for its proposed land-based recirculating aquaculture system (RAS) for Atlantic salmon, located in Bucksport, ME along the Penobscot River. Based on the technical and other parameters provided in the draft Permit for the phased-in production of Atlantic salmon biomass, KRB concurs with the Maine Department of Environmental Protection's findings, conclusions, and recommendations for issuance of the draft Permit and License (with applicable conditions).

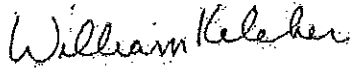
Whole Oceans has worked for years to assemble an outstanding design, management and operational team that understands and optimizes all relevant aspects of raising Atlantic salmon in an RAS. As part of the development of Whole Oceans' draft Permit/License application, KRB has also provided the company with preliminary analysis and/or review of a number of important fish health risk factors. Based on these and other inputs, Whole Oceans intends to utilize a comprehensive fish health program that will include the use of certified healthy salmon eggs; the establishment and maintenance of optimal environmental quality for fish rearing purposes; and an ongoing surveillance approach through periodic testing for potential fish pathogens in either the water or fish stocks.

As part of a detailed overall biosecurity plan, these three sectors provide the basis of an effective program to prevent or minimize any adverse effects on fish health. In addition, Whole Oceans recognizes that the use of vaccination against a number of pathogenic agents for Atlantic salmon can help eliminate or minimize the need for therapeutic treatments.




In KRB's opinion, Whole Oceans is committed to providing the highest quality Atlantic salmon for its market through building, operating, maintaining and monitoring an efficient and environmentally sound production facility. KRB supports the issuance of Maine Pollutant Discharge Elimination System Permit #ME0037478 and Maine Waste Discharge License #W009190-6F-A-N.

Sincerely,



William R. Keleher
President/CEO



Peter L. Merrill, DVM
Director, Professional Services and Regulatory Affairs