

May 28, 2025

Mitch Wallace, Chief of Consultation and Training
Occupational Safety and Health Enforcement
Department of Labor and Workforce Development
1251 Muldoon Road, Suite 109
Anchorage, AK 99504
Email: Mitch.Wallace@Alaska.Gov

Re: Request for Permanent Variance – Craig Employee Bunkhouses
Request for Interim Order Ex Parte

Dear Chief Mitch,

In accordance with the variance procedures and standards set forth in Alaska OSH Program Directive No. 85-6, 8 AAC 61.340, and 29 CFR 1905.11, please allow these letters to serve as the applicant's request for a permanent variance. The grounds for this request, are set forth in greater detail below.

Applicant Companies and Authorized Representative

Silver Bay Seafoods – Southeast, LLC (“Silver Bay”) respectfully requests a permanent variance from the safety and health standard prescribed in 8 AAC 61.1040(a), regarding the size of rooms used for sleeping purposes in employee bunkhouses in Craig.

Tiffany Lake, Director of Compliance for Silver Bay Seafoods, LLC, manager for Silver Bay Seafoods – Southeast, LLC, is headquartered at 208 Lake Street, Suite 2E, Craig, Alaska 99835. Telephone number: (907-966-3110).

Grounds for Variance Request

Specifically, Silver Bay seeks relief from the 60-feet-per-occupant threshold in 8 AAC 61.1040(a), which in turn relies on 29 C.F.R. 1910.142(b)(2), as amended and revised. Silver Bay Entities are fishermen-owned and bought the facility in Craig in 2009, at which time they also built worker housing inside the plant and Atcos adjacent to the facility. In 2012, they expanded production which required an additional Bunkhouse on the property to be built.

As Silver Bay's operations have expanded, Silver Bay has aggressively acquired and built additional bunkhouses to ensure employees have safe and healthy living quarters. With the high cost of living, remote locations, and seasonal nature of salmon processing, housing options are limited and bunkhouses are essential to Silver Bay's employees and operations.

To address the square footage allegations mentioned in AKOSH Inspection Nos. 1679252 and 1760883, Silver Bay has reduced the number of occupants in some bunkhouse units. Silver Bay will also designate certain units for limited occupancy to meet the 60-consecutive-day-vacancy-in-a-year allowance. Finally, Silver Bay will supply rooms with a HEPA air purifier.

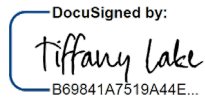
Collectively, the reduced number of occupants and slight differences in floor-space areas should remedy any concerns about the health and safety of Silver Bay's housed employees.

In accordance with 8 AAC 61.340(b)(7), a summary of the application has been properly posted, and the summary specifies where a copy of the application may be obtained and a statement of the employee's right to a hearing on the application. A copy of the posted summary is attached, along with a signed certification.

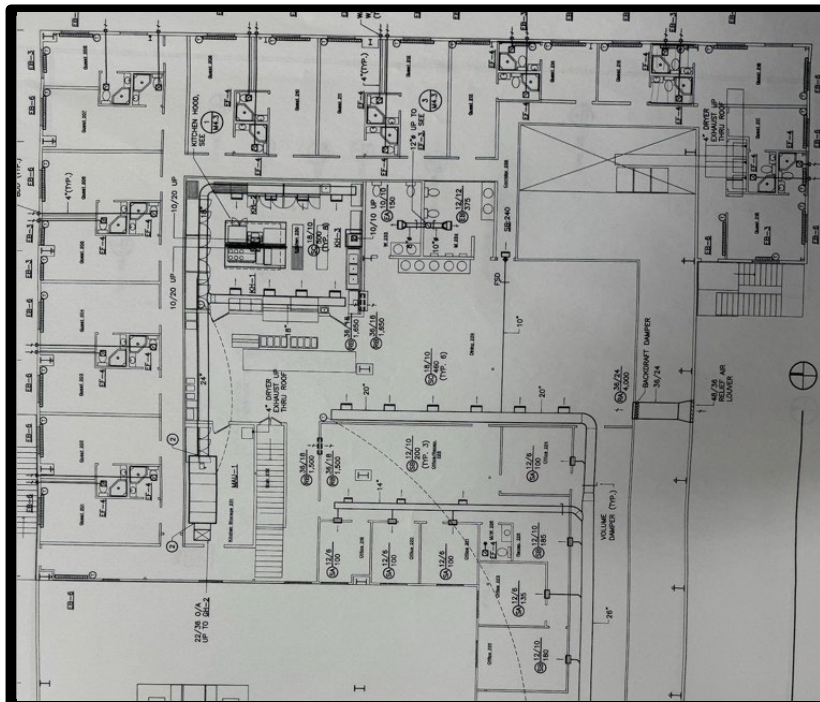
While this application is pending, the Silver Bay requests that an interim order be issued pursuant to 8 AAC 61.340(c).

Should you have any questions regarding the foregoing, please do not hesitate to contact me.

Sincerely,

DocuSigned by:

B69841A7519A44E...

Tiffany Lake, Director of Compliance
Silver Bay Seafoods, LLC
Manager for
Silver Bay Seafoods – LLC

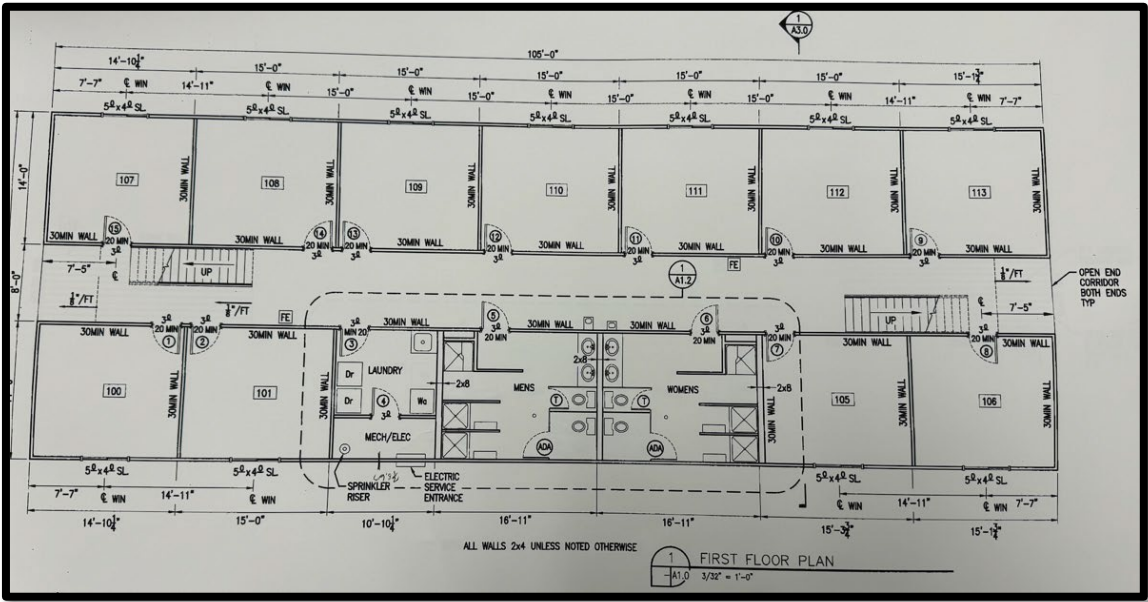


2. Silver Bay Seafoods Craig “Bunkhouse”

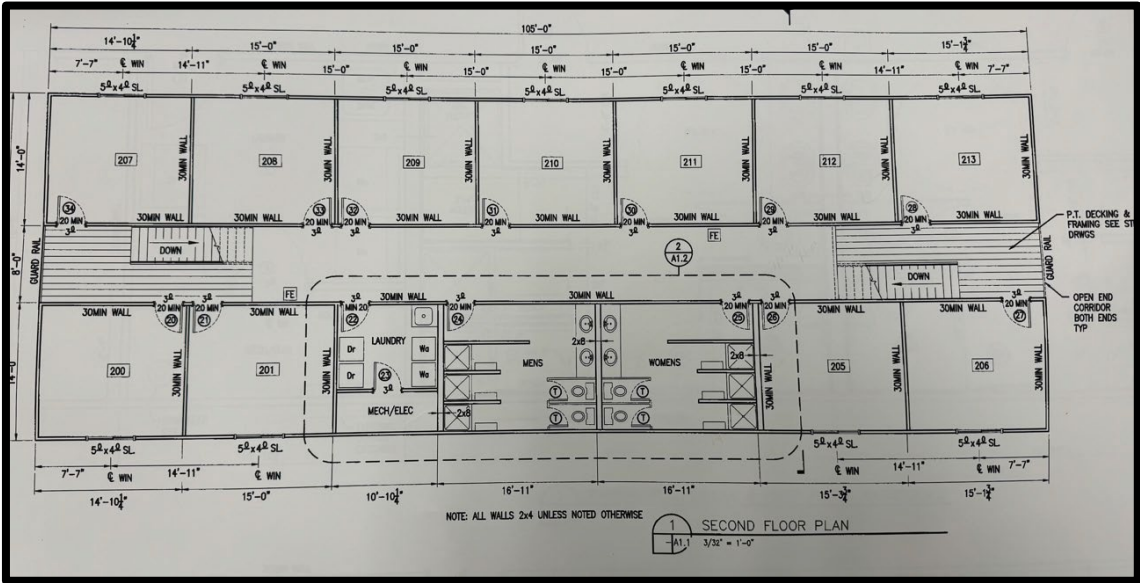
The “Bunkhouse” has 22 rooms on 2 floors, 11 on the first level and 11 on the second. The window size is just at the required area for the rooms. All rooms are equipped with screens.

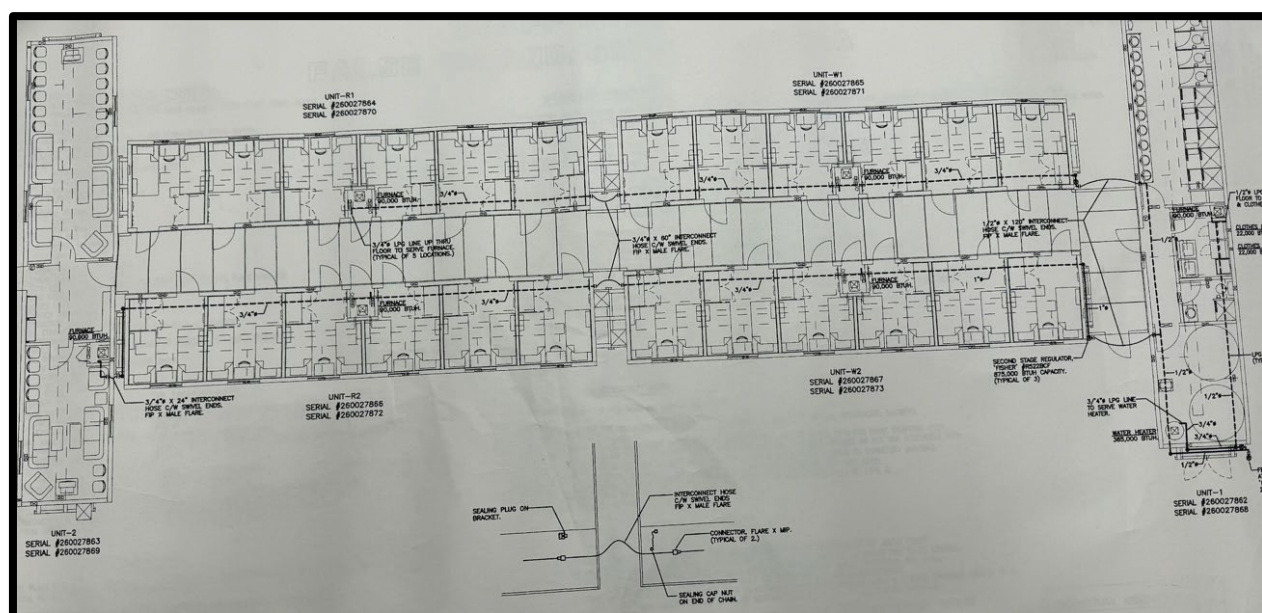
BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL	WINDOW SIZE	% WINDOW SIZE
BUNKHOUSE 2	205	36	4.0	51.3	144	20.14	10%

First Floor:



Second Floor:





Summary of Permanent Variance Request Application – Employee Bunkhouses

This summary is to notify our employees residing in our bunkhouses that the company has submitted a permanent variance request to the State of Alaska, Department of Labor and Workforce Development Occupational Safety and Health (AKOSH) for certain requirements pertaining to our employee housing. The variance request was submitted in response to alleged violations 8 AAC 61.1040(a) that were identified by AKOSH during Inspection Nos. 1679252 and 1760883.

A copy of our application for the permanent variance may be obtained in the administrative office of the facilities.

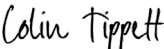
Under 8 AAC 61.370, all employees have a right to request a hearing on our application. No particular form is prescribed for the hearing request. However, any request must contain the following information: (1) a concise statement of facts showing how the employer or employee would be affected by the relief applied for; (2) a specification of any statement or representation in the application which is denied, and a concise summary of the evidence that would be supplied in support of each denial; and (3) any views or arguments on any issue of fact or law presented.

Certification Statement

The applicants for this permanent variance request are: Silver Bay Seafoods – Southeast, LLC and Silver Bay Seafoods, LLC in its capacity as the manager of Silver Bay Seafoods – Southeast, LLC..

Silver Bay Seafoods, L.L.C. certifies that the alleged violations of 8 AAC 61.1040(a) in AKOSH Inspection Nos. 1679252 and 1760883 are presently being contested.

The Silver Bay Seafoods – Southeast, LLC certifies that a summary of its application for permanent variance was posted at or near the condition or practice that would be affected by the variance and at the place or places where notices to employees are customarily posted.

Signed by:

2B8EFB595DD3422...
Signature

5/30/2025
Date

Colin Tippet
Printed Name

VP processing operations
Title

April 21, 2025

Mitch Wallace, Chief of Consultation and Training
Occupational Safety and Health Enforcement
Department of Labor and Workforce Development
1251 Muldoon Road, Suite 109
Anchorage, AK 99504
Email: Mitch.Wallace@Alaska.Gov

Re: Request for Permanent Variance – False Pass Employee Bunkhouses
Request for Interim Order Ex

Parte Dear Chief Wallace:

In accordance with the variance procedures and standards set forth in Alaska OSH Program Directive No. 85-6, 8 AAC 61.340, and 29 CFR 1905.11, please allow these letters to serve as the applicant's request for a permanent variance. The grounds for this request, are set forth in greater detail below.

Applicant Companies and Authorized Representative

Silver Bay Seafoods – False Pass, LLC (“Silver Bay”) respectfully requests a permanent variance from the safety and health standard prescribed in 8 AAC 61.1040(a), regarding the size of rooms used for sleeping purposes in employee bunkhouses.

Tiffany Lake, Director of Compliance for Silver Bay Seafoods, LLC, manager for Silver Bay Seafoods – False Pass, LLC, is headquartered at 208 Lake Street, Suite 2E, Sitka, Alaska 99835. Telephone number: (907-966-3110).

Grounds for Variance Request

Specifically, Silver Bay seeks relief from the 60-feet-per-occupant threshold in 8 AAC 61.1040(a), which in turn relies on 29 C.F.R. 1910.142(b)(2), as amended and revised. Silver Bay is fishermen-owned and built the facility in False Pass in 2019, at which time they also built worker housing. In 2024, the neighboring facility previously owned by Trident Seafoods was purchased with additional housing. To ensure the wellbeing of housed employees, all units have been, and continue to be thoroughly maintained.

As Silver Bay's operations have expanded, Silver Bay has aggressively acquired and built additional bunkhouses to ensure employees have safe and healthy living quarters. With the high cost of living, remote locations, and seasonal nature of salmon processing, housing options are limited and bunkhouses are essential to Silver Bay's employees and operations.

To address the square footage allegations mentioned in AKOSH Inspection Nos. 1679252 and 1760883, Silver Bay has reduced the number of occupants in some bunkhouse units. Silver Bay will also designate certain units for limited occupancy to meet the 60-consecutive-day-

vacancy-in-a-year allowance. Finally, Silver Bay will supply rooms with a HEPA air purifier. Collectively, the reduced number of occupants and slight differences in floor-space areas should remedy any concerns about the health and safety of Silver Bay's housed employees.

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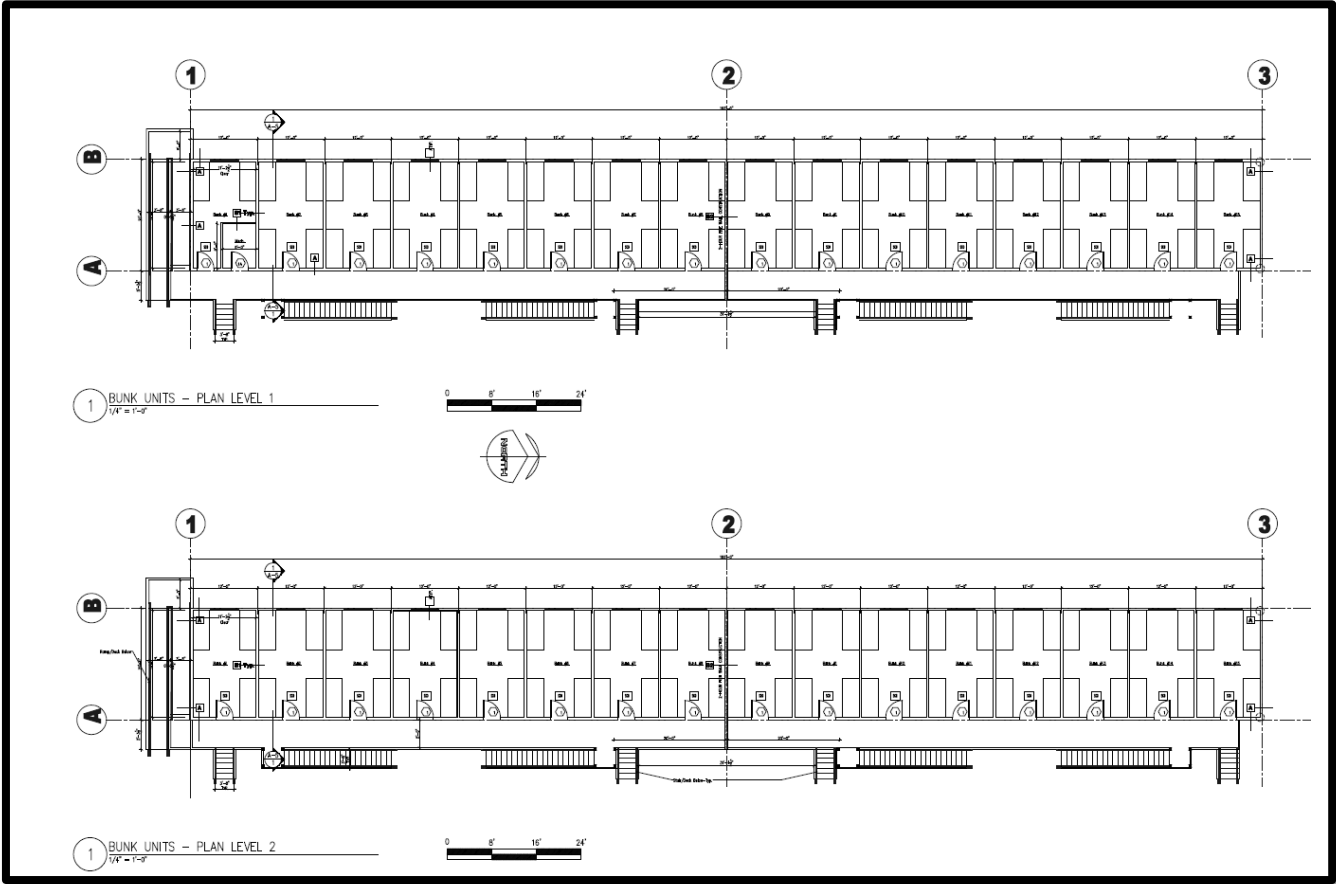
A handwritten signature in black ink that reads "Tiffany Lake". The signature is written in a cursive, flowing style.

Tiffany Lake, Director of Compliance
Silver Bay Seafoods, LLC
Manager for
Silver Bay Seafoods – LLC

1. Silver Bay Seafoods False Pass Mountain View

Bunkhouse “Mountain View” has 32 rooms on 2 floors, 16 on each floor. The window size is above the required area for the rooms. All rooms are equipped with screens.

BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL 60	WINDOW SIZE	% WINDOW SIZE
Mountain View	213	32	4	53.3	128.0	23	11%

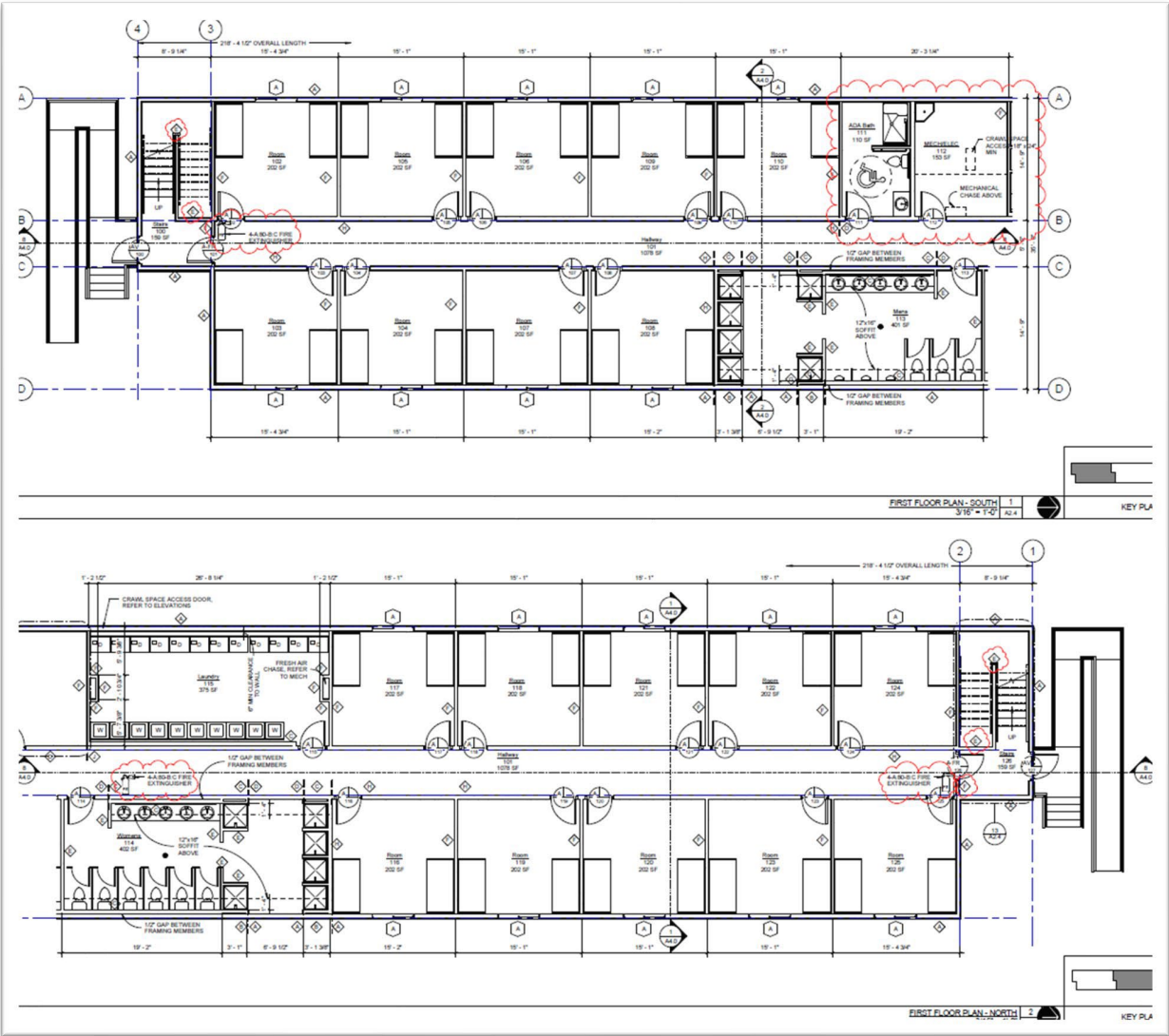


2. Silver Bay Seafoods False Pass “Seaside”

Bunkhouse “Seaside” has 68 rooms on 3 floors, 19 on the first level and 22 on the second and third. The window size meets the required area for the rooms. All rooms are equipped with screens.

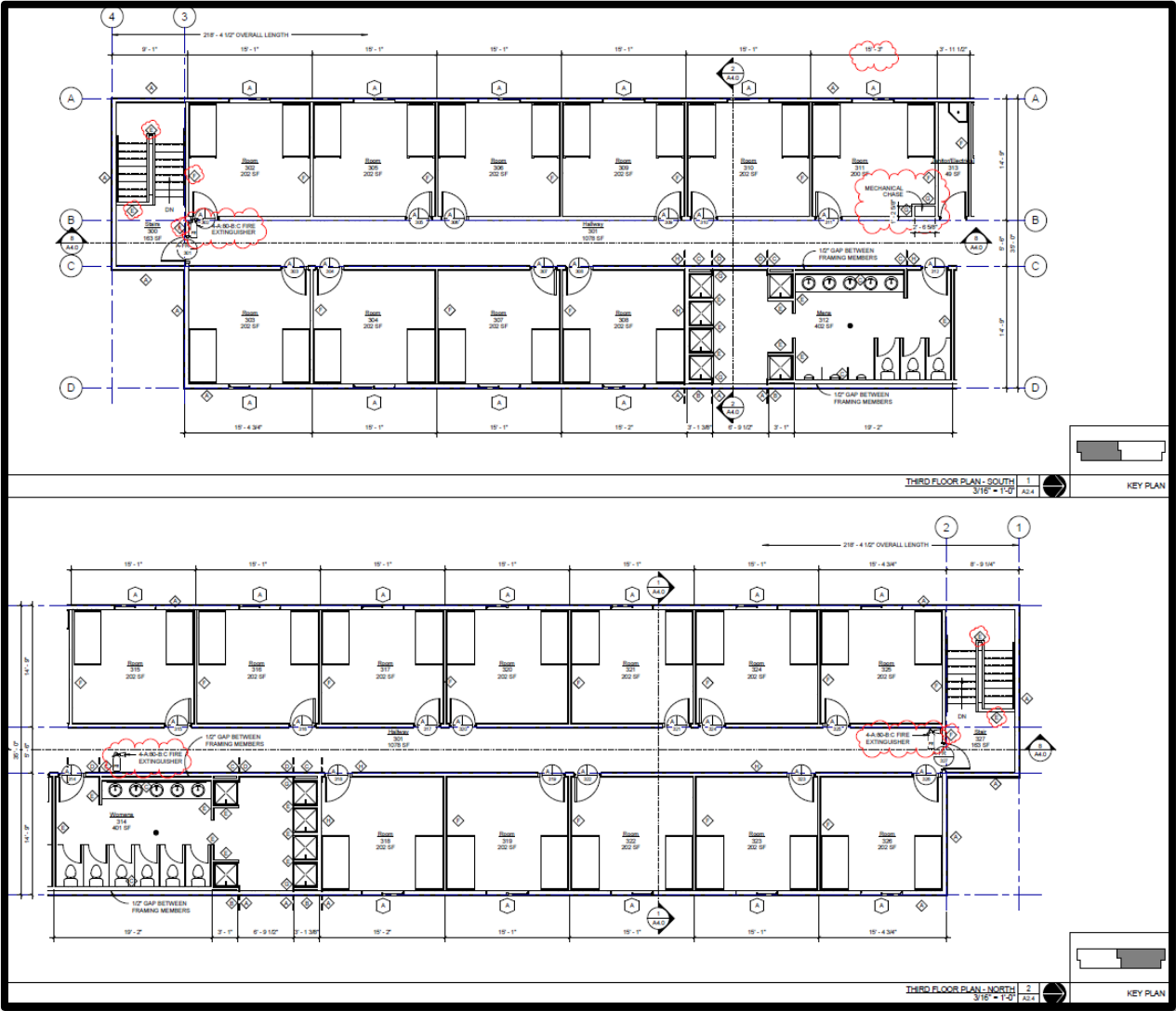
BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL 60	WINDOW SIZE	% WINDOW SIZE
Seaside	202	68	4	50.5	272.0	20	10%

First Floor:



Second Floor:

Third Floor:

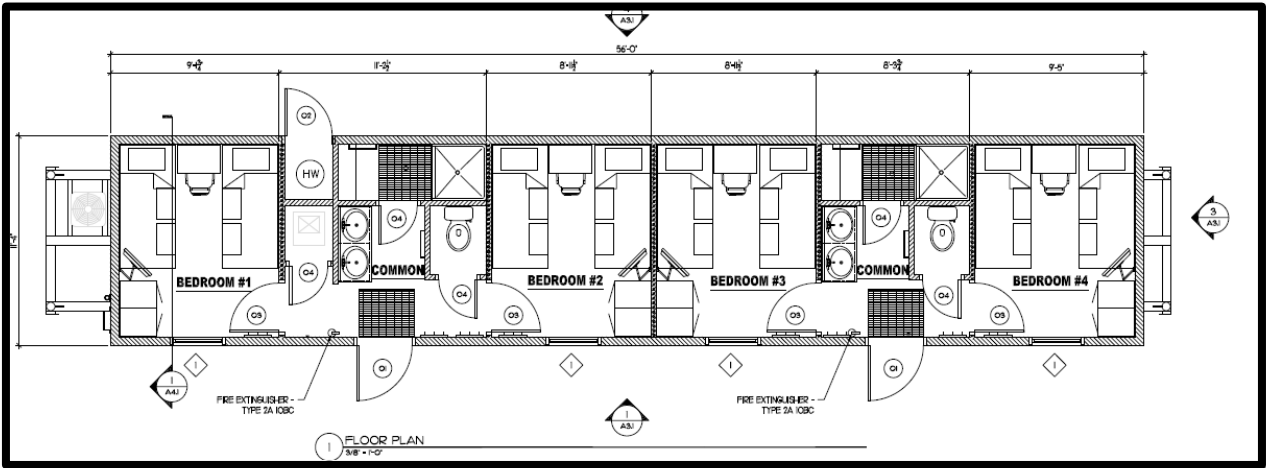


3. Silver Bay Seafoods False Pass “Atcos” & “Mancamp”

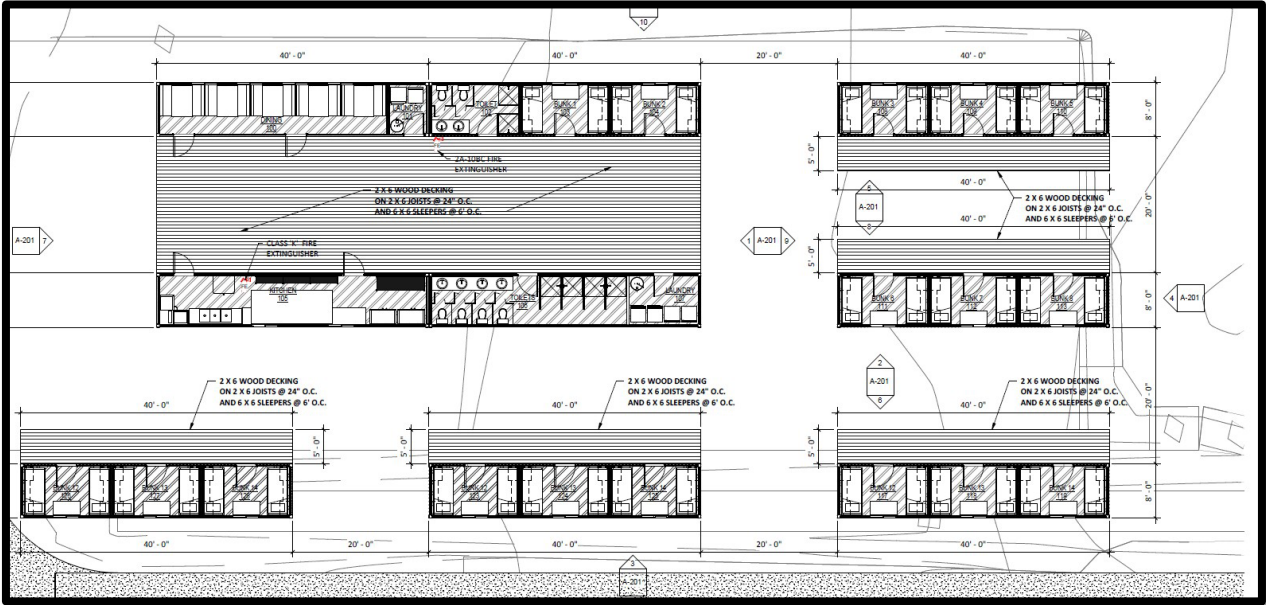
Bunkhouse “Atcos” has 4 units with 4 rooms each, so 16 rooms total and “Mancamp” has 5 units and 15 rooms total. The window size is well above the required area for the rooms. All rooms are equipped with screens.

BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL 60	WINDOW SIZE	% WINDOW SIZE
Atcos	100	16	2	50.0	36.0	15	15%
Mancamp	100	15	2	50.0	34.0	16	16%

Atcos:



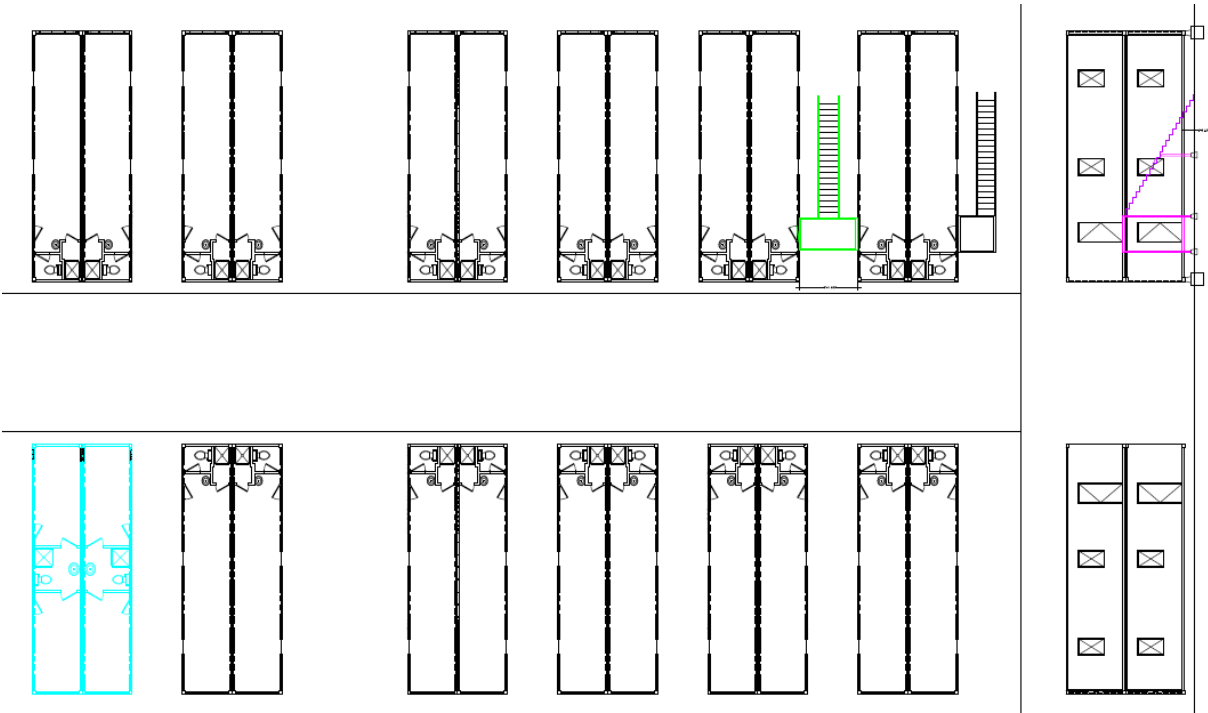
Man Camp:



4. Silver Bay Seafoods False Pass “Legoland”

Bunkhouse “Legoland” has 45 rooms total. The window size is well above the required area for the rooms. All rooms are equipped with screens.

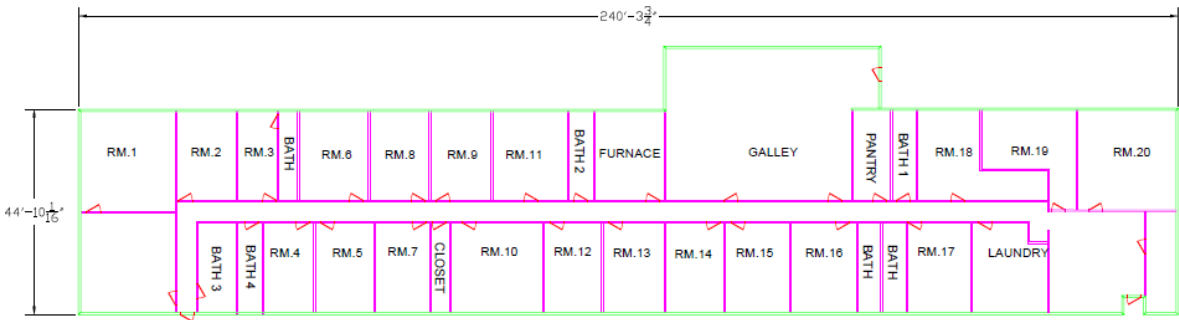
BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL 60	WINDOW SIZE	% WINDOW SIZE
LEGOLAND	248	43	5	49.6	215	32	27%
LEGOLAND	116	2	2	58.3	4	32	27%



5. Silver Bay Seafoods False Pass “Main Galley Bunkhouse”

Bunkhouse “Main Galley” has 20 rooms of various sizes. The window size is well above the required area for the rooms. All rooms are equipped with screens.

BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL 60	WINDOW SIZE	% WINDOW SIZE
MAIN GALLEY	188	1	4	47.0	4.0	23	12%
MAIN GALLEY	120	1	2	60.0	2.0	23	19%
MAIN GALLEY	75	1	1	75.0	1.0	15.6	21%
MAIN GALLEY	120	1	2	60.0	2.0	23	19%
MAIN GALLEY	126	1	2	63.0	2.0	23	18%
MAIN GALLEY	173	1	3	57.7	3.0	23	13%
MAIN GALLEY	80	1	1	80.0	1.0	15.6	20%
MAIN GALLEY	126	1	2	63.0	2.0	23	18%
MAIN GALLEY	120	1	2	60.0	2.0	23	19%
MAIN GALLEY	182	1	3	60.7	3.0	23	13%
MAIN GALLEY	95	1	2	47.5	2.0	15.6	16%
MAIN GALLEY	168	1	3	45.5	2.0	23	14%
MAIN GALLEY	182	1	3	60.7	3.0	23	13%
MAIN GALLEY	126	1	2	63.0	2.0	23	18%
MAIN GALLEY	120	1	2	60.0	2.0	23	19%
MAIN GALLEY	99	1	2	49.5	1.0	15.6	16%
MAIN GALLEY	180	1	3	60.0	3.0	23	13%
MAIN GALLEY	110	1	2	55.0	2.0	15.6	14%
MAIN GALLEY	125	1	2	62.5	2.0	23	18%
MAIN GALLEY	156	1	3	52.0	3.0	23	15%



Summary of Permanent Variance Request Application – Employee Bunkhouses

This summary is to notify our employees residing in our bunkhouses that the company has submitted a permanent variance request to the State of Alaska, Department of Labor and Workforce Development Occupational Safety and Health (AKOSH) for certain requirements pertaining to our employee housing. The variance request was submitted in response to alleged violations 8 AAC 61.1040(a) that were identified by AKOSH during Inspection Nos. 1679252 and 1760883.

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Signed by:

2B8EFB595DD3422...
Signature

4/22/2025
Date

Colin Tippet
Printed Name

VP processing operations
Title

Jude 16, 2025

Mitch Wallace, Chief of Consultation and Training
Occupational Safety and Health Enforcement
Department of Labor and Workforce Development
1251 Muldoon Road, Suite 109
Anchorage, AK 99504
Email: Mitch.Wallace@Alaska.Gov

Re: Request for Permanent Variance -Ketchikan Employee Bunkhouses
Request for Interim Order Ex Parte

Dear Chief Mitch,

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Tiffany Lake, Director of Compliance for Silver Bay Seafoods, LLC, manager for Silver Bay Seafoods – Southeast, LLC, is headquartered at 208 Lake Street, Suite 2E, Sitka, Alaska 99835. Telephone number: (907-966-3110).

Grounds for Variance Request

Specifically, Silver Bay seeks relief from the 60-feet-per-occupant threshold in 8 AAC 61.1040(a), which in turn relies on 29 C.F.R. 1910.142(b)(2), as amended and revised as well as 29 CFR 1910.142(b)(7). Silver Bay Entities are fishermen-owned and bought the facility in Ketchikan in 2024, which had 2 pre-existing bunkhouses.

As Silver Bay's operations have expanded, Silver Bay has aggressively acquired and built additional bunkhouses to ensure employees have safe and healthy living quarters. With the high cost of living, remote locations, and seasonal nature of salmon processing, housing options are limited and bunkhouses are essential to Silver Bay's employees and operations.

To address the square footage allegations mentioned in AKOSH Inspection Nos. 1679252 and 1760883, Silver Bay has reduced the number of occupants in some bunkhouse units. Silver Bay will also designate certain units for limited occupancy to meet the 60-consecutive-day-vacancy-in-a-year allowance. Finally, Silver Bay will supply rooms with a HEPA air purifier. Collectively, the reduced number of occupants and slight differences in floor-space areas should remedy any concerns about the health and safety of Silver Bay's housed employees.

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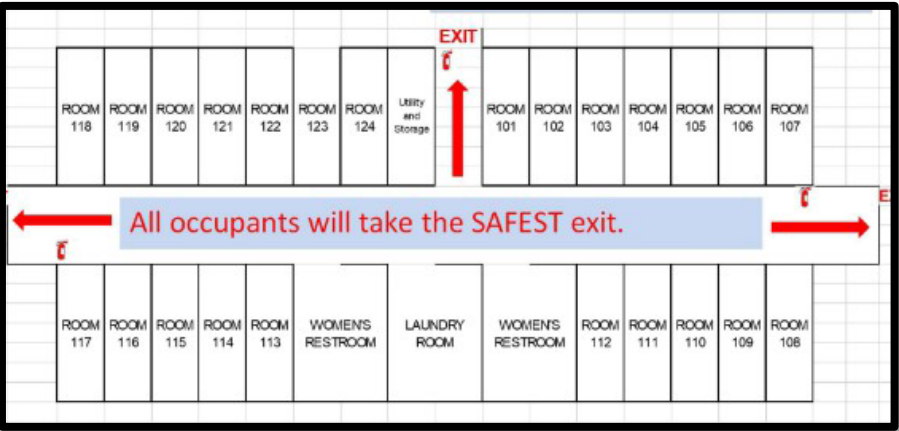
Tiffany Lake, Director of Compliance
Silver Bay Seafoods, LLC
Manager for
Silver Bay Seafoods – LLC

1. Silver Bay Seafoods Ketchikan 3-story Blue Bunkhouse

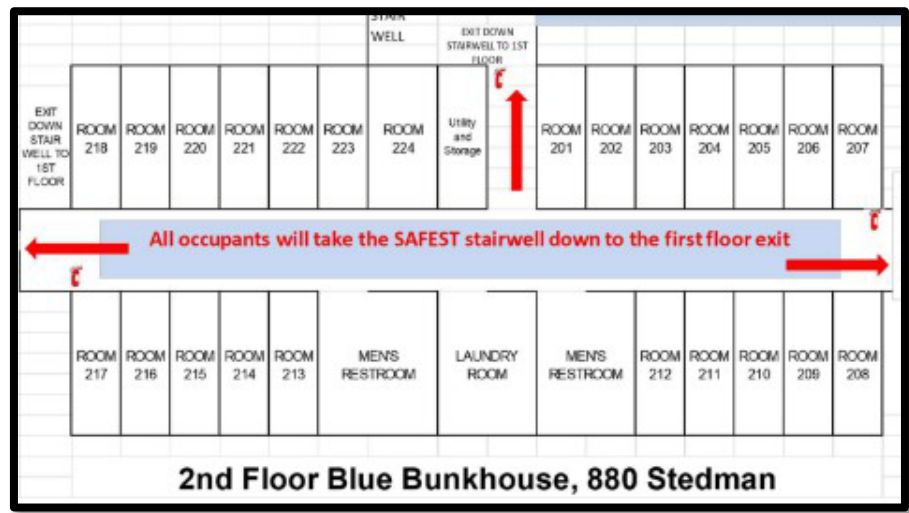
The Ketchikan 3-Story Blue Bunkhouse has 24 rooms on the 1st floor of the facility, 24 rooms on the second and 24 on the 3rd. The window size is normally above the required area for the rooms but two are slightly below. All rooms are equipped with screens.

TYPE	BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	TOTAL	SQ FT PER PERSON	WINDOW SIZE	WINDOW SIZE
PROC	3 STORY BLUE	247	5	5	25	49.4	25.3	10%
PROC	3 STORY BLUE	248	13	5	65	49.6	25.3	10%
PROC	3 STORY BLUE	249	10	5	50	49.8	25.3	10%
PROC	3 STORY BLUE	250	9	5	45	50.0	25.3	10%
PROC	3 STORY BLUE	251	13	5	65	50.2	25.3	10%
PROC	3 STORY BLUE	252	6	5	30	50.4	25.3	10%
PROC	3 STORY BLUE	253	1	5	5	50.6	25.3	10%
PROC	3 STORY BLUE	261	4	5	20	52.2	25.3	10%
PROC	3 STORY BLUE	262	2	5	10	52.4	25.3	10%
PROC	3 STORY BLUE	263	2	5	10	52.6	25.3	10%
PROC	3 STORY BLUE	265	2	5	10	53.0	25.3	10%
PROC	3 STORY BLUE	317	2	5	10	63.4	25.3	8%
PROC	3 STORY BLUE	155	2	3	6	51.7	25.3	16%
PROC	3 STORY BLUE	157	4	3	12	52.3	25.3	16%

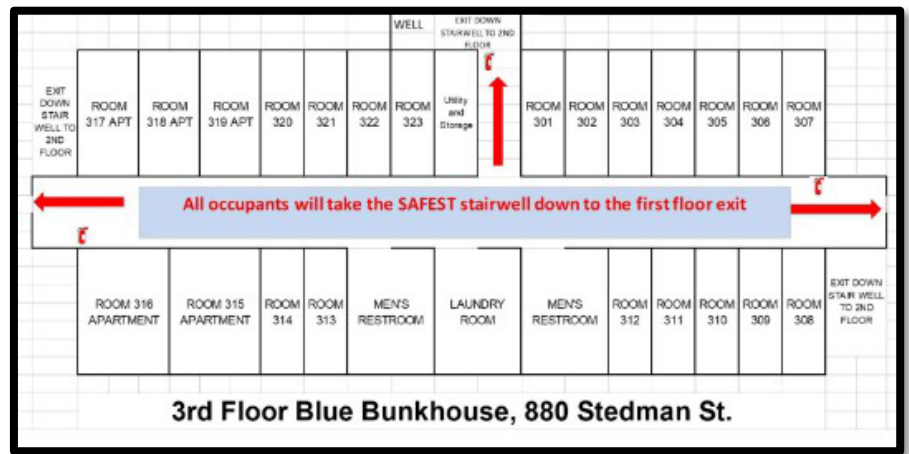
First Floor:



Second Floor:



Third Floor:

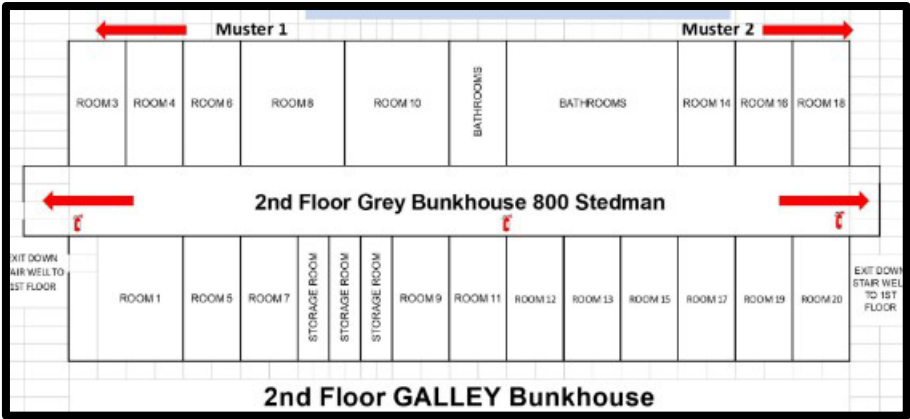


2. Silver Bay Seafoods Ketchikan “Galley”

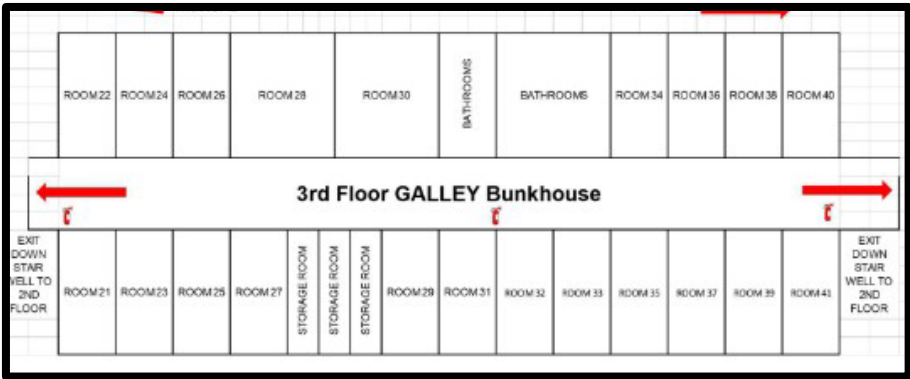
The “Galley” has 40 rooms on 2 floors, 20 on the Second level and 20 on the third. The window size is undersized for some rooms. All rooms are equipped with screens.

TYPE	BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	TOTAL	SQ FT PER PERSON	WINDOW SIZE	WINDOW SIZE
PROC	2 STORY	362.6	1	7	7	51.8	18.53	5%
PROC	2 STORY	155.0	1	3	3	51.7	18.53	12%
PROC	2 STORY	161.1	1	3	3	53.7	18.53	12%
PROC	2 STORY	178.5	1	3	3	59.5	18.53	10%
PROC	2 STORY	156.9	1	3	3	52.3	18.53	12%
PROC	2 STORY	181.6	1	3	3	60.5	18.53	10%
PROC	2 STORY	157.5	2	3	3	52.5	18.53	12%
PROC	2 STORY	181.1	1	3	3	60.4	18.53	10%
PROC	2 STORY	157.1	1	3	3	52.4	18.53	12%
PROC	2 STORY	177.0	3	3	3	59.0	18.53	10%
PROC	2 STORY	200.7	1	4	4	50.2	18.53	9%
PROC	2 STORY	194.6	1	4	4	48.6	18.53	10%
PROC	2 STORY	200.7	1	4	4	50.2	18.53	9%
PROC	2 STORY	195.2	1	4	4	48.8	18.53	9%
PROC	2 STORY	200.8	1	4	4	50.2	18.53	9%
PROC	2 STORY	195.5	1	4	4	48.9	18.53	9%
PROC	2 STORY	201.2	1	4	4	50.3	18.53	9%
PROC	2 STORY	198.6	1	4	4	49.6	18.53	9%
PROC	2 STORY	156.1	1	3	3	52.0	18.53	12%
PROC	2 STORY	199.3	1	4	4	49.8	18.53	9%
PROC	2 STORY	157.1	1	3	3	52.4	18.53	12%
PROC	2 STORY	200.7	2	4	4	50.2	18.53	9%
PROC	2 STORY	182.6	1	3	3	60.9	18.53	10%
PROC	2 STORY	159.0	1	3	3	53.0	16.11	10%
PROC	2 STORY	182.0	1	3	3	60.7	18.53	10%
PROC	2 STORY	157.8	1	3	3	52.6	18.53	12%
PROC	2 STORY	175.8	1	3	3	58.6	18.53	11%
PROC	2 STORY	201.2	1	4	4	50.3	18.53	9%
PROC	2 STORY	158.5	1	3	3	52.8	18.53	12%
PROC	2 STORY	201.0	1	4	4	50.3	18.53	9%
PROC	2 STORY	159.3	1	3	3	53.1	18.53	12%
PROC	2 STORY	200.7	1	4	4	50.2	18.53	9%
PROC	2 STORY	158.3	1	3	3	52.8	18.53	12%
PROC	2 STORY	200.7	1	4	4	50.2	18.53	9%
PROC	2 STORY	158.0	1	3	3	52.7	18.53	12%
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Second Floor:



Third Floor:



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The Silver Bay Seafoods – Southeast, LLC certifies that a summary of its application for permanent variance was posted at or near the condition or practice that would be affected by the variance and at the place or places where notices to employees are customarily posted.

Signed by:

2B8FFB595DD3422...
Signature

6/16/2025

Date

Colin Tippet

Printed Name

VP processing operations

Title

June 20, 2025

Mitch Wallace, Chief of Consultation and Training
Occupational Safety and Health Enforcement
Department of Labor and Workforce Development
1251 Muldoon Road, Suite 109
Anchorage, AK 99504
Email: Mitch.Wallace@Alaska.Gov

Re: Request for Permanent Variance – Petersburg Employee Bunkhouses
Request for Interim Order Ex Parte

Dear Chief Mitch,

In accordance with the variance procedures and standards set forth in Alaska OSH Program Directive No. 85-6, 8 AAC 61.340, and 29 CFR 1905.11, please allow these letters to serve as the applicant's request for a permanent variance. The grounds for this request, are set forth in greater detail below.

Applicant Companies and Authorized Representative

Silver Bay Seafoods – Southeast, LLC (“Silver Bay”) respectfully requests a permanent variance from the safety and health standard prescribed in 8 AAC 61.1040(a), regarding the size of rooms used for sleeping purposes in employee bunkhouses in Petersburg.

Tiffany Lake, VP of Compliance for Silver Bay Seafoods, LLC, manager for Silver Bay Seafoods – Southeast, LLC, is headquartered at 208 Lake Street, Suite 2E, Sitka, Alaska 99835. Telephone number: (907-966-3110).

Grounds for Variance Request

Specifically, Silver Bay seeks relief from the 60-feet-per-occupant threshold in 8 AAC 61.1040(a), which in turn relies on 29 C.F.R. 1910.142(b)(2), as amended and revised as well as 29 CFR 1910.142(b)(7). Silver Bay Entities are fishermen-owned and acquired the facility in Petersburg in 2025.

As Silver Bay's operations have expanded, Silver Bay has aggressively acquired and built additional bunkhouses to ensure employees have safe and healthy living quarters. With the high cost of living, remote locations, and seasonal nature of salmon processing, housing options are limited and bunkhouses are essential to Silver Bay's employees and operations.

To address the square footage allegations mentioned in AKOSH Inspection Nos. 1679252 and 1760883, Silver Bay has reduced the number of occupants in some bunkhouse units. Silver Bay will also designate certain units for limited occupancy to meet the 60-consecutive-day-vacancy-in-a-year allowance. Finally, Silver Bay will supply rooms with a HEPA air purifier.

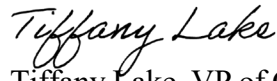
Collectively, the reduced number of occupants and slight differences in floor-space areas should remedy any concerns about the health and safety of Silver Bay's housed employees.

In accordance with 8 AAC 61.340(b)(7), a summary of the application has been properly posted, and the summary specifies where a copy of the application may be obtained and a statement of the employee's right to a hearing on the application. A copy of the posted summary is attached, along with a signed certification.

While this application is pending, the Silver Bay requests that an interim order be issued pursuant to 8 AAC 61.340(c).

Should you have any questions regarding the foregoing, please do not hesitate to contact me.

Sincerely,

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

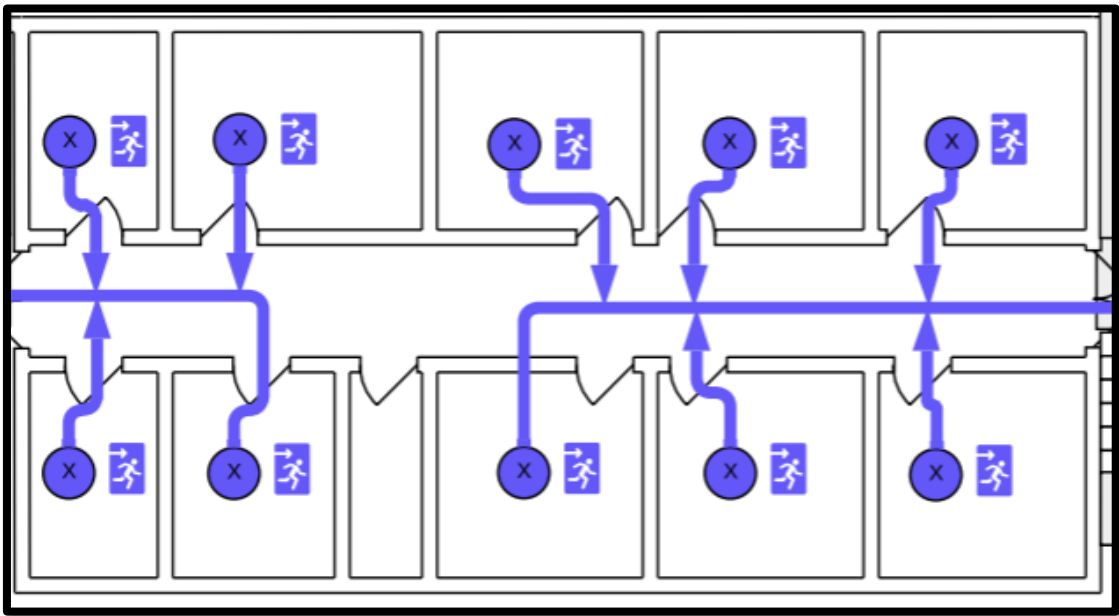
Tiffany Lake, VP of Compliance
Silver Bay Seafoods, LLC
Manager for
Silver Bay Seafoods – LLC

1. Silver Bay Seafoods Petersburg Thorstenson Bunkhouse

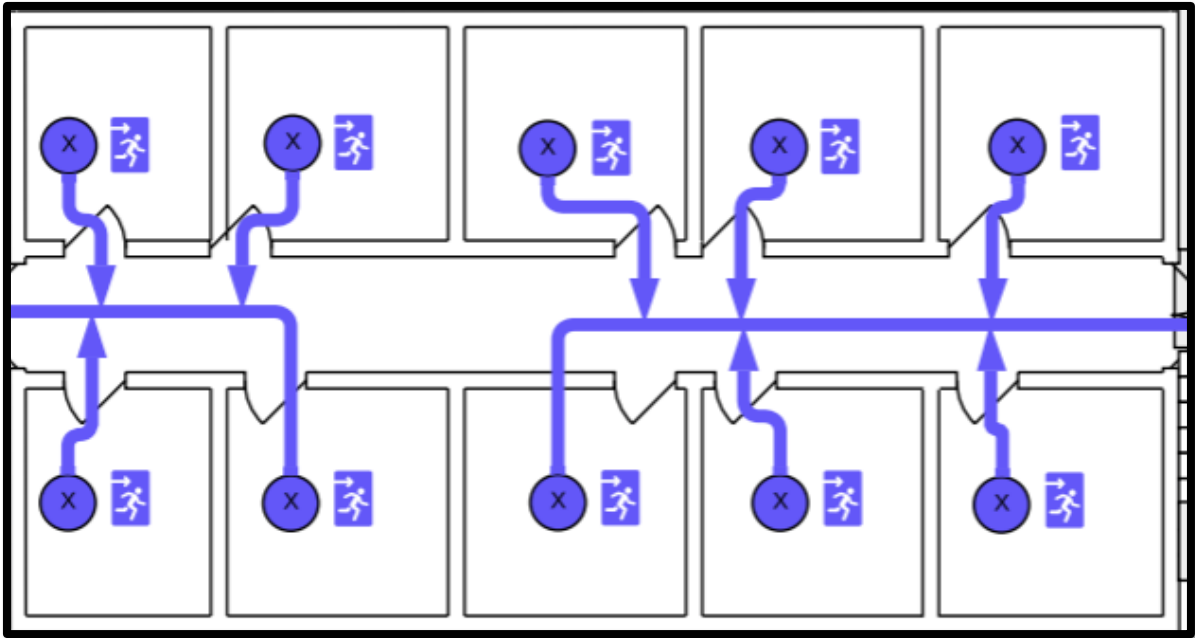
The Petersburg Thorstenson Bunkhouse has 6 rooms on the 2nd floor and 8 on the 3rd floor of the facility. The window size are above the required area for the rooms. All rooms are equipped with screens.

BUNKHOUSE	SQ FT PER	ROOMS	BEDS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL	WINDOW SIZE	WINDOW %
THORSTENSON-2A	763.04	1	16	16	48	16	74.11	10%
THORSTENSON-2B	766.08	1	16	16	48	16	74.11	10%
THORSTENSON-2C	765.78	1	16	16	48	16	74.11	10%
THORSTENSON-2D	763.56	1	16	16	48	16	74.11	10%
THORSTENSON-2E	756	1	16	15	50	15	74.11	10%
THORSTENSON-2F	752.5	1	16	15	50	15	74.11	10%
THORSTENSON-3A	766.08	1	16	16	48	16	74.11	10%
THORSTENSON-3B	766.08	1	16	16	48	16	74.11	10%
THORSTENSON-3C	766.08	1	16	16	48	16	74.11	10%
THORSTENSON-3D	766.08	1	16	16	48	16	74.11	10%
THORSTENSON-3E	766.08	1	16	16	48	16	74.11	10%
THORSTENSON-3F	766.08	1	16	16	48	16	74.11	10%
THORSTENSON-3G	766.08	1	16	16	48	16	74.11	10%
THORSTENSON-3H	766.08	1	16	16	48	16	74.11	10%

Second Floor:



Third Floor



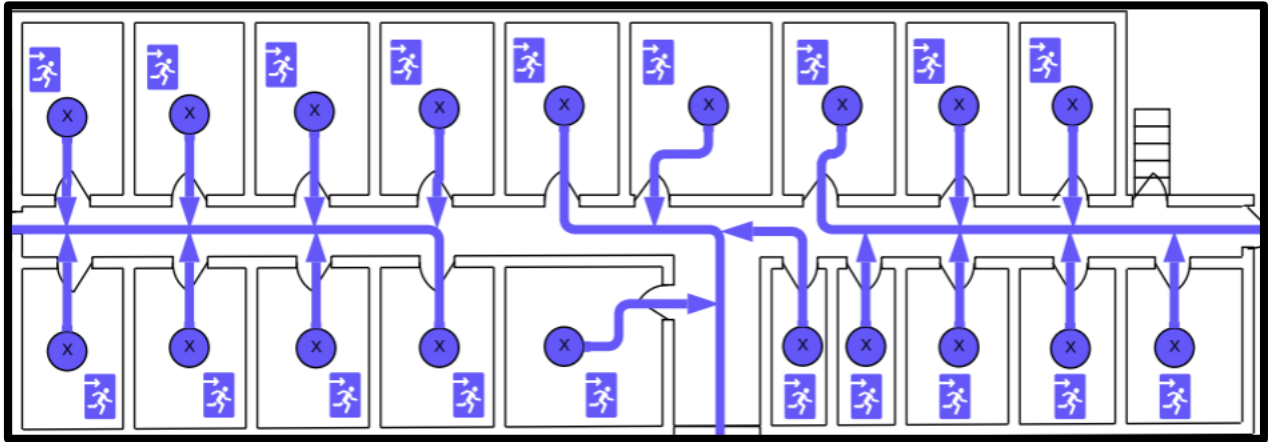
2. Silver Bay Seafoods Petersburg Kuskokwim Bunkhouse

The Kuskokwim Bunkhouse has 29 rooms on 2 floors, 19 on the first level and 10 on the second. The window size is at or just above the required area for the room, with one just below. All rooms are equipped with screens.

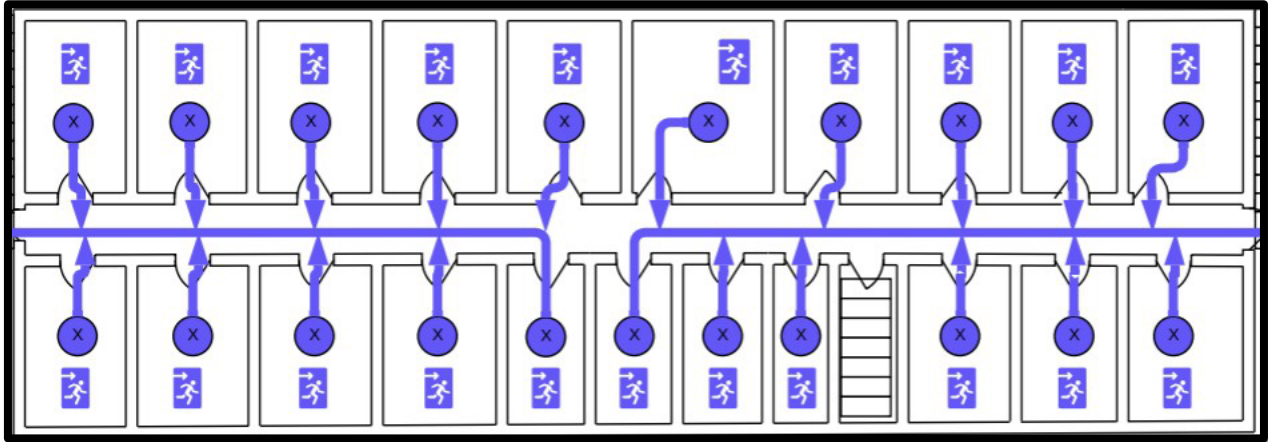
BUNKHOUSE	SQ FT PER	ROOMS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL	WINDOW SIZE	WINDOW %
KUSKOKWIM-K1	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K2-key	120.18	1	2	60	2	11.61	10%
KUSKOKWIM-K3	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K4	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K5	118.25	1	2	59	2	12.78	11%
KUSKOKWIM-K6	125.42	1	2	63	2	11.61	9%
KUSKOKWIM-K7	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K8	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K9	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K10	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K11	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K12	120.9	1	2	60	2	12.78	11%
KUSKOKWIM-K13	120.43	1	2	60	2	12.78	11%
KUSKOKWIM-K14	120.36	1	2	60	2	12.78	11%
KUSKOKWIM-K15	120.43	1	2	60	2	12.78	11%

KUSKOKWIM-K16	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K17	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K18	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K19	120.2	1	2	60	2	12.78	11%
KUSKOKWIM-K20	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K21	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K22	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K23	120.24	1	2	60	2	12.78	11%
KUSKOKWIM-K24	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K25	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K26	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K27	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K28	120.18	1	2	60	2	12.78	11%
KUSKOKWIM-K00	385.88	1	8	48	8	51.11	13%

First Floor:



Second Floor:

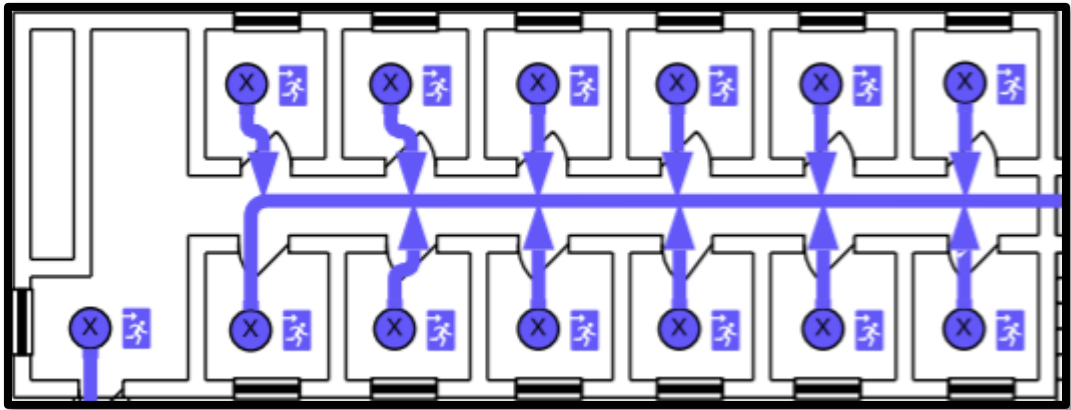


3. Silver Bay Seafoods Petersburg Tanana Bunkhouse

The Tanana Bunkhouse has 11 rooms on 1 floor. The window size is below the required area for the room, with one above. All rooms are equipped with screens.

BUNKHOUSE	SQ FT PER	ROOMS	BEDS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL	WINDOW SIZE	WINDOW %
TANANA-T1	145.64	1	3	3	49	3	11.67	8%
TANANA-T2	146.13	1	3	3	49	3	23.33	16%
TANANA-T3	145.29	1	3	3	48	3	11.67	8%
TANANA-T4	146.01	1	3	3	49	3	11.67	8%
TANANA-T5	145.05	1	3	3	48	3	11.67	8%
TANANA-T6	146.13	1	3	3	49	3	11.67	8%
TANANA-T7	145.17	1	3	3	48	3	11.67	8%
TANANA-T8	151.29	1	3	3	50	3	11.67	8%
TANANA-T9	145.4	1	3	3	48	3	11.67	8%
TANANA-T10	145.29	1	3	3	48	3	11.67	8%
TANANA-T11	145.28	1	3	3	48	3	11.67	8%

First Floor:

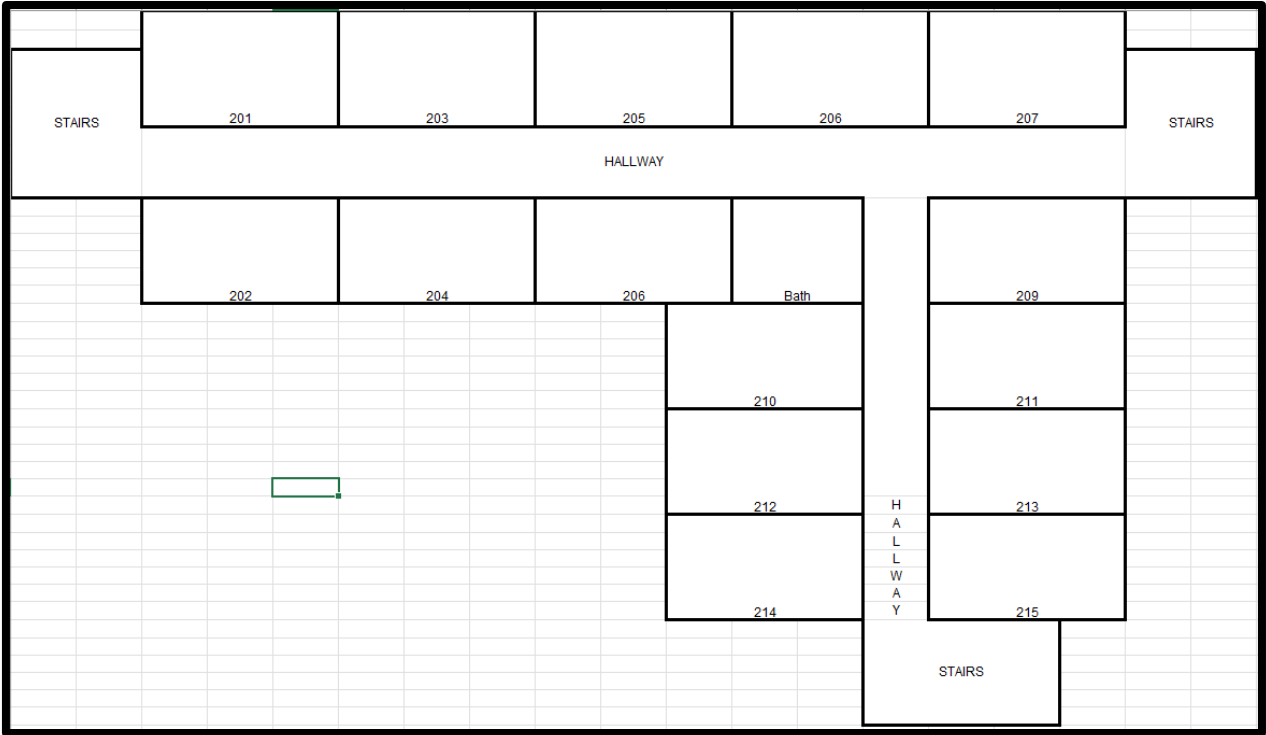


4. Silver Bay Seafoods Petersburg OB Bunkhouse

The OB Bunkhouse has 15 rooms on the 2nd floor and 15 rooms on the 3rd floor. The window size is below the required area for the room. All rooms are equipped with screens.

BUNKHOUSE	SQ FT PER	ROOMS	BEDS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL	WINDOW SIZE	WINDOW %
OB BUNKHOUSE-201	237.5	1	5	5	48	5	14.93	6%
OB BUNKHOUSE-202	237.5	1	5	5	48	5	7.47	3%
OB BUNKHOUSE-203	237.5	1	5	5	48	5	7.47	3%
OB BUNKHOUSE-204	237.5	1	5	5	48	5	7.47	3%
OB BUNKHOUSE-205	237.5	1	5	5	48	5	7.47	3%
OB BUNKHOUSE-206	240	1	5	5	48	5	7.47	3%
OB BUNKHOUSE-207	222.6	1	4	4	56	4	7.47	3%
OB BUNKHOUSE-209	227.4	1	4	4	57	4	7.47	3%
OB BUNKHOUSE-210	173.8	1	3	3	58	3	7.47	4%
OB BUNKHOUSE-211	173.8	1	3	3	58	3	7.47	4%
OB BUNKHOUSE-212	174.9	1	3	3	58	3	7.47	4%
OB BUNKHOUSE-213	172.4	1	3	3	57	3	7.47	4%
OB BUNKHOUSE-214	173.8	1	3	3	58	3	14.93	9%
OB BUNKHOUSE-215	173.5	1	3	3	58	3	7.47	4%
OB BUNKHOUSE-301	237.5	1	5	5	48	5	14.93	6%
OB BUNKHOUSE-302	237.5	1	5	5	48	5	7.47	3%
OB BUNKHOUSE-303	237.5	1	5	5	48	5	7.47	3%
OB BUNKHOUSE-304	237.5	1	5	5	48	5	7.47	3%
OB BUNKHOUSE-305	237.5	1	5	5	48	5	7.47	3%
OB BUNKHOUSE-306	240	1	5	5	48	5	7.47	3%
OB BUNKHOUSE-307	222.6	1	4	4	56	4	7.47	3%
OB BUNKHOUSE-309	227.4	1	4	4	57	4	7.47	3%
OB BUNKHOUSE-310	173.8	1	3	3	58	3	7.47	4%
OB BUNKHOUSE-311	173.8	1	3	3	58	3	7.47	4%
OB BUNKHOUSE-312	174.9	1	3	3	58	3	7.47	4%
OB BUNKHOUSE-313	172.4	1	3	3	57	3	7.47	4%
OB BUNKHOUSE-314	174.2	1	3	3	58	3	14.93	9%
OB BUNKHOUSE-315	173.5	1	3	3	58	3	7.47	4%

Second and Third Floor:



Summary of Permanent Variance Request Application – Employee Bunkhouses

This summary is to notify our employees residing in our bunkhouses that the company has submitted a permanent variance request to the State of Alaska, Department of Labor and Workforce Development Occupational Safety and Health (AKOSH) for certain requirements pertaining to our employee housing. The variance request was submitted in response to alleged violations 8 AAC 61.1040(a) that were identified by AKOSH during Inspection Nos. 1679252 and 1760883.

A copy of our application for the permanent variance may be obtained in the administrative office of the facilities.

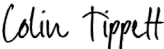
Under 8 AAC 61.370, all employees have a right to request a hearing on our application. No particular form is prescribed for the hearing request. However, any request must contain the following information: (1) a concise statement of facts showing how the employer or employee would be affected by the relief applied for; (2) a specification of any statement or representation in the application which is denied, and a concise summary of the evidence that would be supplied in support of each denial; and (3) any views or arguments on any issue of fact or law presented.

Certification Statement

The applicants for this permanent variance request are: Silver Bay Seafoods – Southeast, LLC and Silver Bay Seafoods, LLC in its capacity as the manager of Silver Bay Seafoods – Southeast, LLC..

Silver Bay Seafoods, L.L.C. certifies that the alleged violations of 8 AAC 61.1040(a) in AKOSH Inspection Nos. 1679252 and 1760883 are presently being contested.

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Signed by:

2B8EFB595DD3422...
Signature

6/20/2025
Date

Colin Tippet
Printed Name

VP processing operations
Title

April 21, 2025

Mitch Wallace, Chief of Consultation and Training
Occupational Safety and Health Enforcement
Department of Labor and Workforce Development
1251 Muldoon Road, Suite 109
Anchorage, AK 99504
Email: Mitch.Wallace@Alaska.Gov

Re: Request for Permanent Variance – Sitka Employee Bunkhouses
Request for Interim Order Ex Parte

Dear Chief Wallace:

In accordance with the variance procedures and standards set forth in Alaska OSH Program Directive No. 85-6, 8 AAC 61.340, and 29 CFR 1905.11, please allow these letters to serve as the applicant's request for a permanent variance. The grounds for this request, are set forth in greater detail below.

Applicant Companies and Authorized Representative

Silver Bay Seafoods – Southeast, LLC (“Silver Bay”) respectfully requests a permanent variance from the safety and health standard prescribed in 8 AAC 61.1040(a), regarding the size of rooms used for sleeping purposes in employee bunkhouses in Sitka.

Tiffany Lake, Director of Compliance for Silver Bay Seafoods, LLC, manager for Silver Bay Seafoods – Southeast, LLC, is headquartered at 208 Lake Street, Suite 2E, Sitka, Alaska 99835. Telephone number: (907-966-3110).

Grounds for Variance Request

Specifically, Silver Bay seeks relief from the 60-feet-per-occupant threshold in 8 AAC 61.1040(a), which in turn relies on 29 C.F.R. 1910.142(b)(2), as amended and revised. Silver Bay Entities are fishermen-owned and bought the facility in Sitka in 2007, at which time they also built worker housing. In 2013, they purchased Baranof Foods next door, which required the addition of another bunkhouse. In 2015, the facility built a new cannery and rented a building in the industrial complex to house workers which was destroyed in a landslide that same year. In 2022 additional cannery lines required worker tents to accommodate additional labor. To ensure the wellbeing of housed employees, those units have been, and continue to be thoroughly maintained.

As Silver Bay's operations have expanded, Silver Bay has aggressively acquired and built additional bunkhouses to ensure employees have safe and healthy living quarters. With the high cost of living, remote locations, and seasonal nature of salmon processing, housing options are limited and bunkhouses are essential to Silver Bay's employees and operations.

To address the square footage allegations mentioned in AKOSH Inspection Nos. 1679252 and 1760883, Silver Bay has reduced the number of occupants in some bunkhouse units. Silver Bay will also designate certain units for limited occupancy to meet the 60-consecutive-day-vacancy-in-a-year allowance. Finally, Silver Bay will supply rooms with a HEPA air purifier. Collectively, the reduced number of occupants and slight differences in floor-space areas should remedy any concerns about the health and safety of Silver Bay's housed employees.

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While this application is pending, the Silver Bay requests that an interim order be issued pursuant to 8 AAC 61.340(c).

Should you have any questions regarding the foregoing, please do not hesitate to contact me.

Sincerely,

DocuSigned by:

Tiffany Lake

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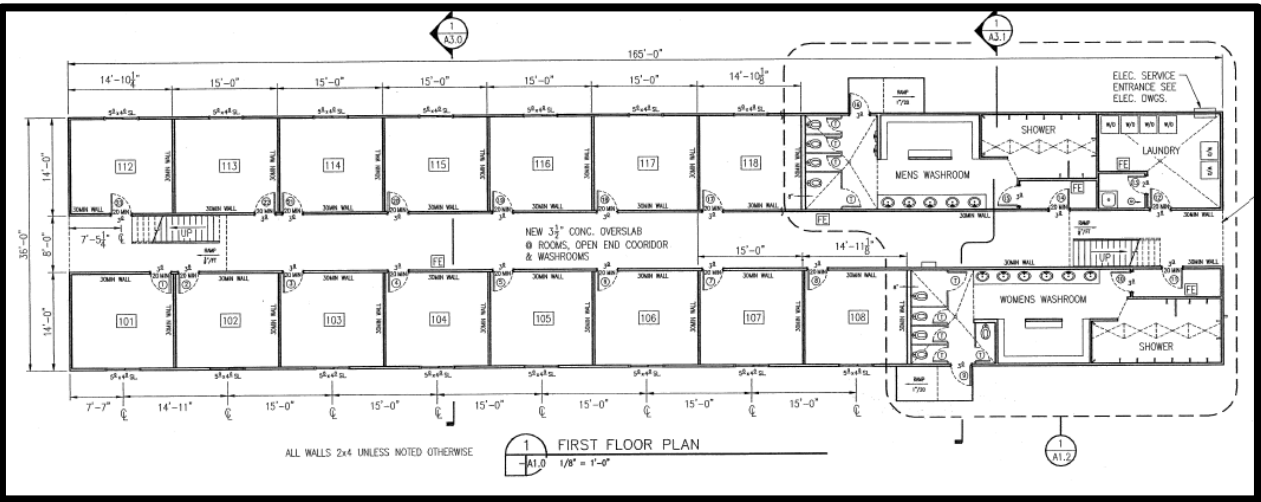
Tiffany Lake, Director of Compliance
Silver Bay Seafoods, LLC
Manager for
Silver Bay Seafoods – LLC

1. Silver Bay Seafoods Sitka Bunkhouse 1

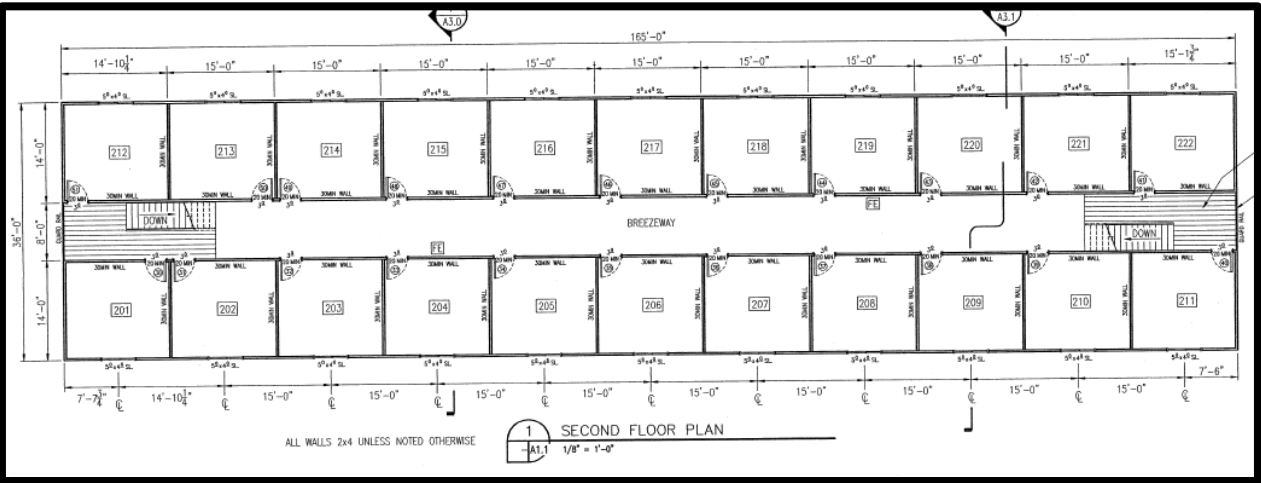
Bunkhouse “Bunkhouse 1” has 37 rooms on 2 floors, 15 on the first on floor, 22 on the second. The window size is just at the required area for the rooms. All rooms are equipped with screens.

BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL 60	WINDOW SIZE	% WINDOW SIZE
BUNKHOUSE 1	196	37	4.0	48.9	140	19.6	10%

First Floor:



Second Floor:

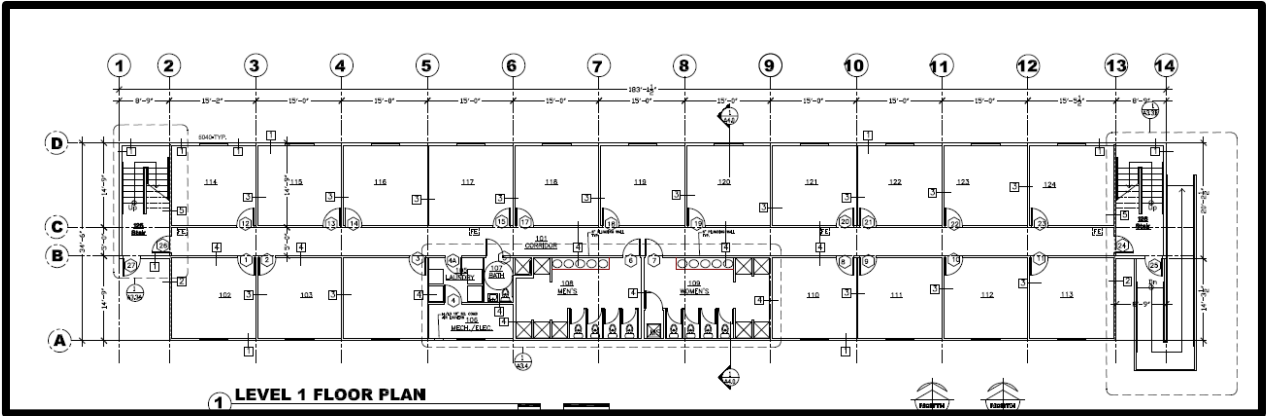


2. Silver Bay Seafoods Sitka “Bunkhouse 2”

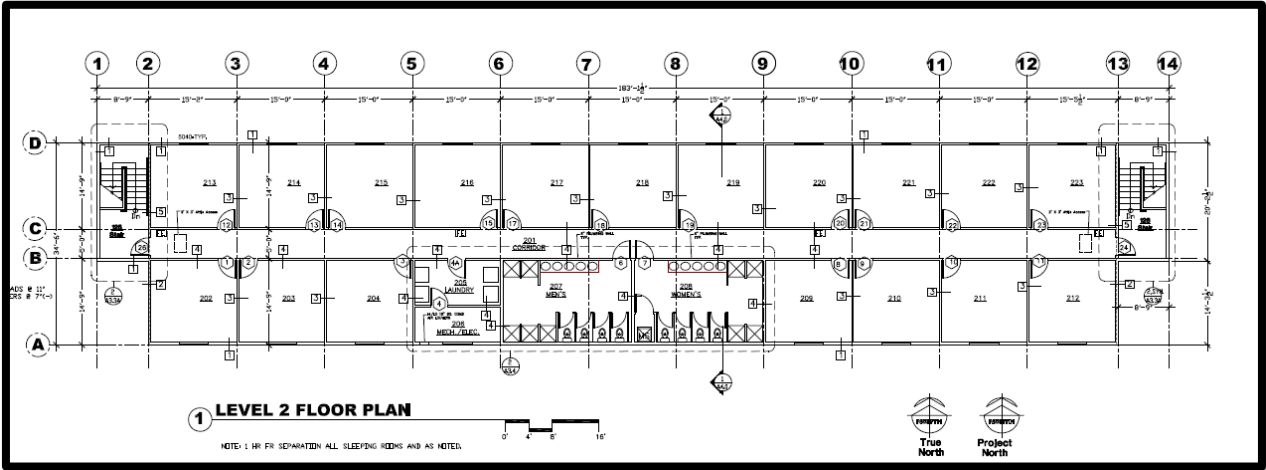
Bunkhouse “Bunkhouse 2” has 36 rooms on 2 floors, 18 on the first level and 18 on the second. The window size is just at the required area for the rooms. All rooms are equipped with screens.

BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL 60	WINDOW SIZE	% WINDOW SIZE
BUNKHOUSE 2	205	36	4.0	51.3	144	20.14	10%

First Floor:



Second Floor:



3. Silver Bay Seafoods Sitka “Tents”

Bunkhouse “Tents” has 4 units total, all rooms are equipped with screens. To meet the requirement.

BUNKHOUSE	SQ FT PER ROOM	ROOMS	PERSON PER ROOM	SQ FT PER PERSON	TOTAL 60	WINDOW SIZE	% WINDOW SIZE
TENTS	840	6	16.0	60.0	96	119.27	14%

Tents:



Summary of Permanent Variance Request Application – Employee Bunkhouses

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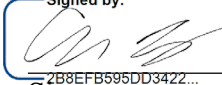
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Signed by:

2B8EFB595DD3422...
Signature

4/22/2025
Date

Colin Tippet
Printed Name

VP processing operations
Title