PRODUCERS AND WHOLESALERS

E.C. PHILLIPS & SON, INC.

Fresh-Frozen Alaska Seafood

P.O. BOX 7095 • KETCHIKAN, ALASKA 99901 • 907-247-7975 • FAX 907-225-7250 • ecphillips@ecphillipsalaska.com

RECEIVED BY:
Division of Water
MAR 30 2016
Department of
Environmental Conservation

March 24, 2016

Alaska Department of Environmental Conservation
Division of Water – WDAP – Seafood Permitting
410 Willoughby Ave, Suite 303
Juneau, AK 99801

RE: E.C. Phillips & Son, Inc.; Seafood General Permit

Dear Sir or Madam;

Enclosed is our Notice of Intent for coverage under the General NPDES Permit for our Ketchikan and Craig facilities. These facilities are currently operating under the existing general permit.

Included with this application is an N.O.I., Best Management Practices Plan certification, location map and bathymetric map for both locations. A copy of our authorization to discharge at a depth of less than 60 ft has also been included.

If you have any questions concerning the operation of this facility, this N.O.I. or accompanying documents, please do not hesitate to contact us at (907) 247-7975.

Sincerely,

Paul Cyr
General Manager
E.C. Phillips & Son, Inc.

NOTICE OF INTENT

to be covered under

APDES GENERAL PERMIT AK-G52-0000

for

SEAFOOD PROCESSORS IN ALASKA

(See Part IV.C. of the Permit, reissued 2001)

Please submit this NOI to:

Department of Environmental Conservation
Division of Water

555 Cordova Street
Anchorage, AK 99501

Submittal of this document constitutes notice that the party identified in Section 1 intends to be covered by the APDES general permit authorizing discharges from seafood processing activities in Alaska and obligates the permittee to comply with the terms and conditions of the permit.

Please fill in all information. Attach supplemental information sheets as appropriate.

SECTION 1 - PERMIT INFORMATION

APDES PERMIT NO. AK-G52 - 0001	ADEC Number (Seafood Processor License) AK73

SECTION 2 - OPERATOR INFORMATION (Part IV.C.2)

Company Name E.C. Phillips & Son, Inc.	
Address P.O. Box 7095	Phone (907) 247-7975
City/State/Zip Ketchikan, AK 99901	FAX (907) 225-7250
Representative/Title Paul Cyr, General Manager	E-mail ecphillips@ecphillipsalaska.com

SECTION 3 - OWNER INFORMATION (Part IV.C.3)

Owner Name E.C. Phillips & Son, Inc.	
Address P.O. Box 7095	Phone (907) 247-7975
City/State/Zip Ketchikan, AK 99901	FAX (907) 225-7250
Representative/Title Paul Cyr, General Manager	E-mail ecphillips@ecphillipsalaska.com

SECTION 4 - FACILITY or VESSEL INFORMATION (Part IV.C.4)

Facility/Vessel Name E.C. Phillips & Son, Inc.		No of Employees 250
Address 1775 Tongass Ave.		Phone (907) 247-7975
City/State/Zip Ketchikan, AK 99901		FAX (907) 225-7250
Latitude and Longitude of Discharge(s) 55° 20' 30" N, 131° 39' 40" W		
Previous facility/vessel name(s)		
Type of vessel	USCG no.	Vessel length

SECTION 5 - FACILITY CLASSIFICATION (Part IV.C.5; Check each that applies)

☐	Offshore floating seafood processor: operating and discharging between 1 and 3 nautical mile from shore at MLLW
☐	Nearshore floating seafood processor: operating and discharging from one (1) to one half (0.5) nautical mile from shore at MLLW
✓	Shore-based seafood processor: operating and discharging less than one half (0.5) nautical mile from shore at MLLW (Includes vessels that meet discharge location criteria)

SECTION 6 - PROJECTED PRODUCTION INFORMATION (Part IV.C.6; Check all that apply)

✓ Whole	✓ Head-on & Gutted	✓ Headed & Gutted	✓ Fillets	✓ Cured, salted or smoked
☐ Canned	☐ Fish meal	☐ Surimi, fish paste	☐ Mince, dry/ washed	✓ Mince, wet/ unwashed
✓ Roe	☐ Crab: whole, pieces	✓ Shrimp scallops, clams, oysters, snails, urchins, cucumbers (circle appropriate items)		✓ Other (identify): Shucked

Catch Processed (by type, e.g., cod, pollock, salmon)	Finished Product (by type, e.g., fillets, surimi, canned)	24-hour Design Capacity in lbs of processing raw product	Location (Lat/Long or ADF&G areas)	Anticipated Processing Activity -- Number of days per month											
				Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Salmon	Whole, Gutted, H/G, Fillets, Roe	400,000	Tongass Narrows	10	10	10	15	15	20	31	31	30	15	15	10
Halibut	Gutted, H/G, Fillets	50,000	Tongass Narrows	0	0	7	6	12	12	15	20	10	3	1	0
Sablefish	H/G, Fillets	25,000	Tongass Narrows	0	0	0	0	3	8	5	3	2	0	0	0
Rockfish/Bottomfish	Whole, H/G, Fillts	35,000	Tongass Narrows	2	5	6	7	14	16	16	12	8	6	3	0
Herring	Whole	950,000	Tongass Narrows	8	0	10	5	5	0	0	0	0	2	2	5
Shrimp	Whole, Headed	10,000	Tongass Narrows	5	5	0	0	0	0	0	0	5	5	10	10
Sea Cucumber	Whole, Meat & Skins	80,000	Tongass Narrows	8	4	4	0	0	0	0	0	0	8	8	8
Geoduck	Whole, shucked	30,000	Tongass Narrows	4	4	4	4	0	0	0	0	0	4	4	4

SECTION 7 - RECEIVING WATER INFORMATION (Part IV.C.7)

Name(s) of waterbody(ies) receiving discharges of the facility Tongass Narrows

Name of any larger, adjacent receiving waterbody(ies) Clarence Strait

List any areas within three (3) nautical miles of operation which are excluded from coverage under the General Permit (e.g., Parks, Preserves, Refuges, Critical Habitats etc.)

None

Nature of Receiving Water: Discharge is to marine water ✓ Discharge is to fresh water ☐ Discharge is to estuary or tidal tributary ☐

Attention: Nearshore and Shore-based Processors must submit a bathymetric map of the receiving water within one (1) nautical mile of the discharge showing the location of the facility and all discharge point(s)

SECTION 8 - DESCRIPTION of DISCHARGES (Part IV.C.8)

Sanitary Wastes

	Package Treatment Plant	X	Municipal System
	On-site septic system		Community Septic system
	USCG Approved System (MSD) Type:		Capacity (gals/day):

Seafood Processing Wastes

Outfall depth: 40 ft.	Outfall distance from shore: 275 ft.	Water depth at outfall: 40 ft.

Vessels indicate the range of water column depths at which vessel discharges processing wastes: to ft.

Grinder - Type/Name: Audio/Muffin Monster Grinds seafood wastes to: 0.5 inch width

Other Wastewaters (Check all that apply)

✓	Process disinfectants	✓	Transfer water
✓	Cooling water		Gray water
	Boiler water		Live tank water
	Cooking water		Air scrubber water
✓	Refrigerated seawater		Other (name):

Projected Maximum Quantity in lbs of Process Waste Solids that are Discharged

Specific Species Processed	TOTAL DAILY Amount of Solids Discharged	TOTAL ANNUAL Amount of Solids Discharged
Salmon	100,000 lbs.	2,500,000 lbs.
Halibut/Cod/Misc Groundfish	40,000 lbs.	200,000 lbs.
Sea Cucumber/Geoducks	40,000 lbs.	500,000 lbs.

SECTION 9 - REFUELING CAPABILITY and PROXIMITY TO FUELING STATIONS (Part VI.C.9)

Does your facility/vessel refuel fishing vessels? Yes ☐ No ✓
If yes, what is the capacity of your refueling tanks?

If no, what is the location and distance to the nearest refueling station? Anderes Oil, 1.7 Miles

SECTION 10 - SUBMITTALS (Part IV.C.10; to be attached to this NOI) * shore-based & near-shore processors only

✓	Letter certifying that the facility has developed and operates in accordance with a Best Management Practices Plan
✓	Location Map showing the location of the facility in the context of the coastal area of Alaska *
✓	Bathymetric Map of Receiving Water showing facility, outfall and water depths within one mile of the discharge *
	Waiver Request (for seafloor survey, discharging to excluded areas (Part III.A,B,C), if applicable

SECTION 11- SIGNATURE and CERTIFICATION (Part IV.C.11)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature Principal or Partner	Title/Company GENERAL MANAGER
Print Name PAUL J CYR	Date 3/25/16

FACILITY CERTIFICATION

PURSUANT TO THE
ENVIROMENTAL PROTECTION AGENCY
NATIONAL POLLUTION ELIMINATION SYSTEM PERMIT
PART VI.A.
BEST MANAGEMENT PRACTICES PLAN

FACILITY NPDES PERMIT NO.....AK-G52-0001
FACILITY OWNER/OPERATOR.....E.C. PHILLIPS & SON, INC.
FACILITY NAME.....E.C. PHILLIPS & SON, INC.
FACILITY ADDRESS.....P.O. BOX 7095
1775 TONGASS AVENUE
KETCHIKAN, ALASKA 99901

THE UNDERSIGNED OWNER OR OPERATOR OF THE ABOVE REFERENCED, WHO IS AUTHORIZED TO SIGN THIS "CERTIFICATION" ON BEHALF OF THIS FACILITY, HAS ENSURED BY INSPECTION OR OTHER MEANS, THE COMPLETION AND IMPLEMENTATION OF A BEST MANAGEMENT PRACTICES PLAN. SAID PLAN IS MAINTAINED AS AN ADDENDUM TO THE N.P.D.E.S. PERMIT AND IS AVAILABLE UPON REQUEST.

PRINT NAME Paul J. CYr

TITLE General Manager

SIGNATURE Paul J. Cyr

DATE 3-25-16

PHONE/FAX 907-247-7975 (FAX) 907-225-7250

THIS COMPLETED "FACILITY CERTIFICATION" HAS BEEN PROVIDED ON (DATE) 10/28/2005 TO:

U.S. ENVIROMENTAL PROTECTION AGENCY
REGION 10
NPDES COMPLIANCE UNIT, OW-133
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

STATEMENT OF CERTIFICATION:

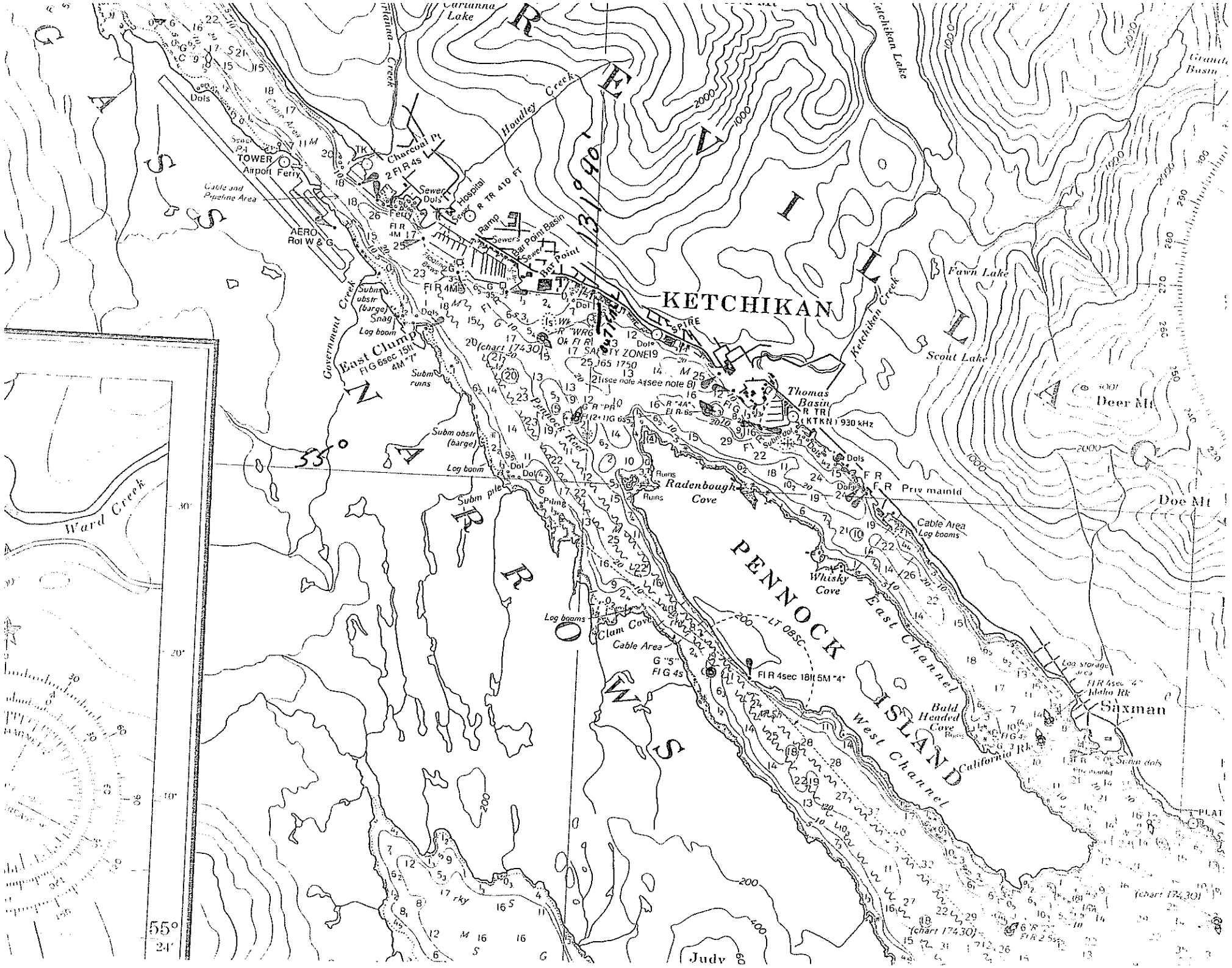
THE ENCLOSED BEST MANAGEMENT PRACTICES PLAN HAS BEEN REVIEWED AND ACCEPTED AS REASONABLE BY COMMITTEE MEMBERS OF BMP COMMITTEE.

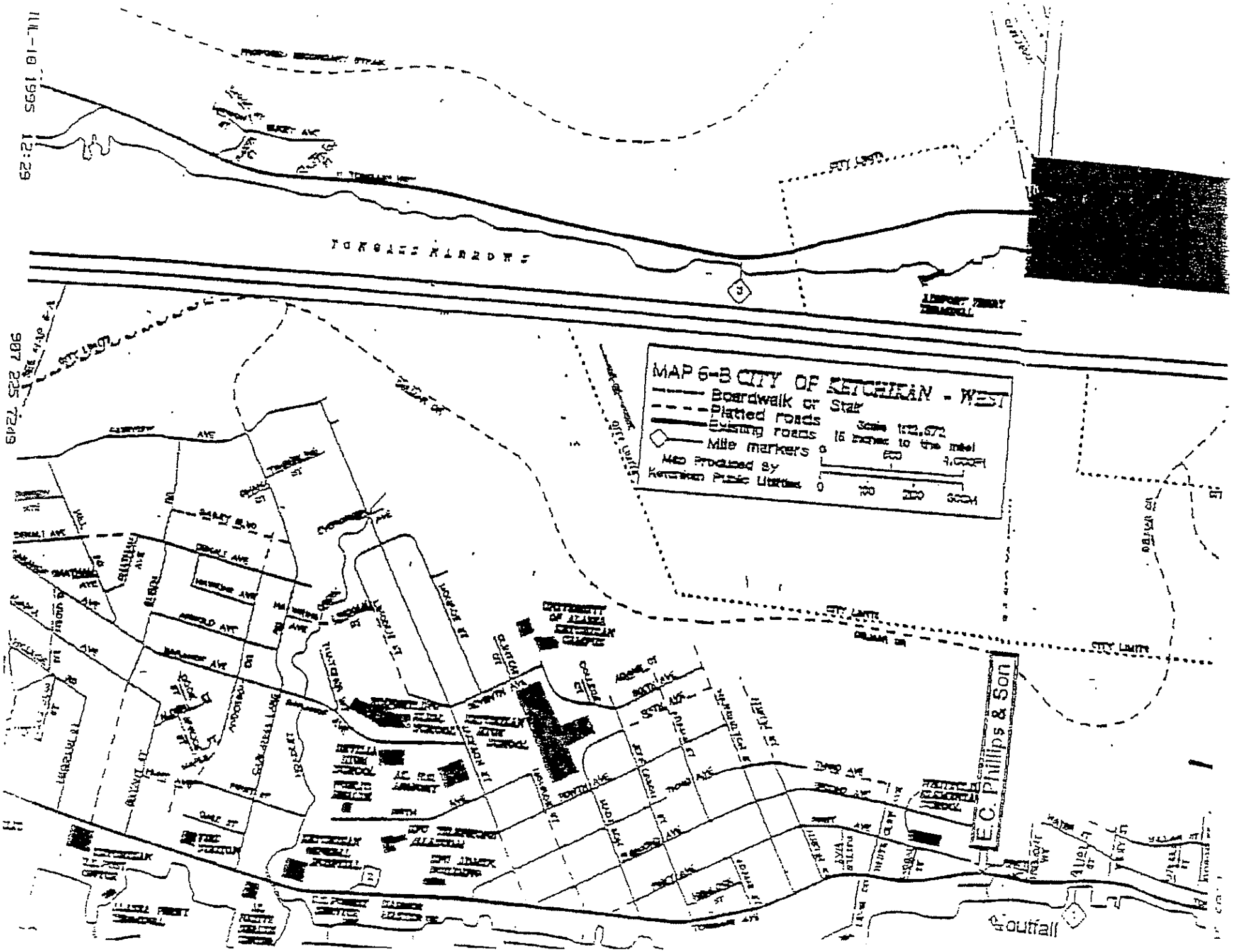
DATE: 3-25-16

General Manager: [signature]

BMP COMMITTEE MEMBERS:

NAME	POSITION	YEARS EXPERIENCE
JEFF GREEN	OPERATIONS MANAGER	30
JON HURLEY	QUALITY CONTROLL PERSON	37


KETCHIKAN
PENNOCK ISLAND
West Channel
East Channel
Tongass Narrows
Ward Cove
Ward Creek
Tongass Ave
Airport Ferry
TOWER
AERO
Cable and Pipeline Area
Charcoal Pt
Hospital
Ramp
Bar Point Basin
Bar Point
Houlley Creek
Government Creek
East Clump
Pennock Reef
Radenbough Cove
Thomas Basin
Whisky Cove
Clam Cove
Bald Headed Cove
California Rk
Saxman
Deer Mt
Doe Mt
Fawn Lake
Scout Lake
Ketchikan Creek
Ketchikan Lake
Grant Basin
Carlanna Lake
Flanna Creek
Judy
Cable Area
Log booms
Log storage area
Priv mainld
Subm ruins
Subm obstr (barge)
Log boom
Subm pile
Piling
Ruins
Dols
Dol
Wk
Rky
Subm dols
LT OBSC
FI R 4sec 18ft 5M "4"
G "5" FI G 4s
FI R 4M
2 FI R 4s
FI G 6sec 15ft 4M "7"
(chart 17430)
(chart 17430)
(chart 17430)
SAFETY ZONE 19
(KTKN) 930 kHz
55°
24'
55°
30'
20'
10'


MAP 6-B CITY OF KETCHIKAN - WEST
Boardwalk or Stair
Platted roads
Existing roads
Mile markers
Map Produced by
Ketchikan Public Utilities
Scale 1:22,572
16 inches to the mile
TONGASS NARROWS
UNIVERSITY OF ALASKA
KETCHIKAN CAMPUS
E.C. Phillips & Son
Outfall
CITY LIMITS
JUL-10 1995 12:29
907 225 7249

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

DEC 2 8 2001

Reply To
Attn Of: **OW-130**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Gordon Williams, President
Ward Cove Packing Company
88 East Hamlin Street
Seattle, WA 98105

Re: NPDES Permit No. **AK-G52-0001,** Notice of Coverage and Authorization to Discharge

Dear Mr. Williams:

The U.S. Environmental Protection Agency (EPA) has received and reviewed your Notice of Intent (NOI) to be covered by the NPDES Permit AK-G52-0000, the general permit for Alaskan seafood processing facilities. This permit was issued and became effective on July 27, 2001. Your unique identifier under this general permit is provided above and on the enclosed title page of the permit. Please use this designated number in any correspondence with or reporting to EPA and the Alaska Department of Environmental Conservation (ADEC).

The permit includes an **effluent treatment requirement** of grinding solid seafood processing wastes to one-half inch in all dimensions before discharge, an **effluent limit** of 10 million pounds of seafood processing waste residues per calendar year, a **prohibition on the discharge of petroleum**, hydrocarbons, oil and grease, and a narrative limit on the violation of Alaska Water Quality Standards (see Part II). The permit requires that you develop and implement a **best management practices plan** that controls and reduces pollutant discharges at your site (see Part VI.A). The permit requires that you submit an **annual report** on seafood processing activity, discharges, noncompliance and process changes (see Part VI.B). The permit requires that you conduct **periodic monitoring of the sea surface, seashore, and seafloor** in accordance with your type of facility (see Parts VI.C and D).

We authorize your discharge to a depth of less than -60 ft MLLW in consideration of the strong currents in Tongass Narrows. However, we encourage you to evaluate the feasibility of extending your outfall line to discharge deeper than -60 ft MLLW and raising the end of your outfall line so as to discharge at least four feet above the sea floor. Both of these should reduce the negative impacts of your discharge of processing waste residues on the bottom

Any report of noncompliance with permit requirements is to be reported by telephone to EPA at (206) 553-1846 and ADEC at (907) 269-7565. A copy of the enclosed title page and this authorization letter together with the entire general NPDES permit no. AK-G52-0000 must be kept at both your operations site and your business office. If you have any questions, please call Burney Hill at (206) 553-1761 or Christina Osborn at (206) 553-6318.

Sincerely,

HB Hill for

Robert R. Robichaud
Manager, NPDES Permits Unit