Rocky Pass Seafoods
564 Keku RD
Kake, Alaska 99830

Best Management Practice Plan

Permit # AK-G52-0073

April 26, 2014

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1.

Preface:

This BMP Plan has been reviewed by the General Manager and the BMP Committee. The BMP Plan will be updated as required and reissued.

Date: May 1, 2014

Dennis H. Gray Jr.

Dennis H. Gray Jr., General Manager

I. Facility Name, Location and Description

Rocky Pass Seafoods is located at 564 Keku Road in Kake Alaska. The facility consists of:

icehouse
blast freezers
plate freezer
bait freezer
cold storage area
fish processing line
roe processing line
laundry
QC lab
Office
Shop/Maintenance building

The facility can operate year round but primarily operates March through October. Product mix and tonnage vary from year to year. Finished product is frozen. The maximum throughput per line per day and product from by species is summarized in Table I. However the maximum daily throughput is 180,00 pounds of all products.

Table I.

Species	Landed, lbs	Product
Salmon	2,616,963	Headed & Gutted (H&G) Roe
Halibut	4918.9	Headed & Gutted (H&G)

During the peak summer processing period, the facility may operate 18 hours per day with 20 – 45 seasonal and 6 full time employee's.

II. Chain of Command

Appendix A1 contains an organization chart showing the Chain of Command and BMP Committee members. The responsibilities are as follows:

General Manager – responsible for entire facility

Office/GA Manager – responsible for overseeing daily product quality, sanitation environmental compliances, and all office functions.

Quality Control/Glazing Supervisor – responsible for overseeing daily sanitation and SSOP's are being monitored and logged daily.

Refrigeration/Engineer – responsible for keeping freezing system to include Freezer and Ice making equipment maintained and operationa.

Maintenance Supervisor – responsible for maintaining equipment and monitoring operations during processing.

Production Supervisor – responsible for production and monitoring employee's during process to ensure the quality of product.

III. Statement of Policy

Rocky Pass Seafoods has developed and implemented a Best Management Practices Plan in an effort to control and minimize water use and the generation of wastewater, maximize recovery and discharge waste and wastewater in a manner that complies with regulatory requirements. Employees are trained and equipment is maintained so as to minimize the potential for discharge of other pollutants.

IV. Materials Accounting

A. Solid Waste

Table II summarizes overall waste generation based on 2013 data.

Table II

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Total Raw Product Process	2,616,963	lb's
Total Finished Product Produced	1,831,873	lb's
Waste Generated	785,113	lb's
Waste Percentage	30%	
Product Recovery Percentage	70%	

Table III is a summary of average waste percentages by species based

Salmon	Round to H&G	30 %
Halibut	Gutted to H&G	10%

B. Liquid Waste

During processing we use an average of 10,000 gallons per hour during processing. After processing season is closed we turn our water off.

V. Process Description

A. Overall process Description

Wastewater runoff goes into drains located throughout the processing area, glaze area and also through a dredge drain that runs along the processing line. The guts, skeins and remains are dry collected than put into the grinder which drains into a Vaughn chopper pump and pumped to the Plant Outfall. On a daily basis during production the drains/dredge drains are rinsed thoroughly.

B. Fish Processing

Fish are pumped from the boat holds to the sorting table where they get separated by species into totes and weighed. Fish are than slush iced until they get dumped into the fish hopper, from there they go to the auto header, than to the auto gutter, (roe is extracted at this point and transferred into the roe room); from their they go on a conveyor belt where the blood lines are cleaned. The fish than undergo a final rinse before they are graded. The fish get racked by grade, than put into a blast freezer. Once frozen, the glazing takes place prior to packaging and shipping.

Roe Processing

Roe is extracted at the auto gutter, transferred into the roe room where they graded prior to being run through the auto rubbing machine. The roe then goes through a rinse system to help clean up the product. The roe is then brined in an agitator. After brining the roe is than packaged into 1 kg plastic bentos. Once packaged they are put into a plate freezer until they reach -10 F degree's, they are boxed and palletized for shipping.

VI. Risk Identification and Assesment of Pollutant Discharges

A. Solid Waste Control Points

1. Fish Processing:

a. Fish age/Temperature
Fish age (time from harvesting to processing) and temperature can adversely affect flesh quality and recovery. The fishermen and plant personnel follow company guidelines for acceptable fish and proper procedures for ensuring the fish are maintained below a target temperature on the and through the processing.

b. Fish Heading Machine
The auto header is fed by trained personnel to ensure the heads are cutting properly. The head conveyor goes from the autio grinder straight into the main sump, than to the Vaughan Chopper grinder. All floor drains flow by gravity to the Vaughan Chopper grinder which leads to the outfall line.

c. Hand picking of Roe Skeins
Line speed is maintained and operators are trained so as to maximize the separation and recovery of roe skeins for further processing. The production manager performs periodic checks of the waste viscera and recovered roe skeins.

B. Roe Processing:

a. Time/temperature
Roe is processed in a timely manner and maintained at a target temperature in order to prevent deterioration and the corresponding adverse impact on recovery.

b. Grading/Handling
Operators are trained in the proper manner of handling and grading in order to minimize mechanical damage and the corresponding adverse impact on recovery.

4. Waste Handling System

a. Wastewater:

<u>Floor Drains</u>
The liquid waste from the fish and roe operations flow by gravity through the floor drains into the Vaughan chopper/sump.

<u>Vaughan Chopper Sump Pump</u>
The level in the sump is controlled by a float switch. The operating status of the sump operation is recorded on the daily grinder and conveyance system inspection log. Should sump pump fail to operate and the pump can not be restarted, plant operations are shut down in order to prevent the sump from overflowing.

b. Solid Waste:

Audio Grinder (pre-grinder)
The heading machine operator has a line of sight with the feed hopper for the grinder. If the grinder were to cease operating, the heading machine operator would stop heading fish until the grinder could be restarted. The grinder is serviced as needed in order to ensure the proper operation.

Vaughan Chopper pump
The discharge from the Vaughan chopper pump is sampled daily at the 3: sample port. The contents is poured into a second five gallon pail. Material retained on the screen is inspected and measured with a ruler to ensure that the grind size meets the permit requirements (1/2 inch in all dimensions). The results of the grind inspection and operating status of the sump operation are recorded on the Daily Grinder Inspection and Conveyance System log and a digital photo is taken.

C. Water Use Control Points

1. Fish Processing

Offload water/ice
Product quality dictates the amount of refrigerated water/ice that is used and subsequently offloaded from the vessels.

Glaze Tank
This is a batch operation whereby the tank is filled and dumped once per shift. Tank turnovers are dictated by product quality.

Clean up Water
Operators are trained on clean up procedures to optimize water use while maintaining sanitation requirements.

Hose stations
Hoses have shut off valves at the wall. Operators are trained on water conservation measures such as not leaving hoses running on the floor when not in use.

Breaks/Meals
Non-essential water is turned off during breaks and meals.

2. Roe Processing

Brine Agitator Tank
This is a batch operation whereby the tank is filled and dumped based on poundage of product. Tank turnovers are dictated by quality of product.

Roe Washer

Brine flows continuously from the roe washer. Operators are trained to adjust flow accordingly for optimal use of water without compromising product quality.

Clean up Water

Operators are trained on clean up procedures to optimize water use while maintaining sanitation requirements.

VII. Good Housekeeping

a. Employee training

Employees are instructed on the proper use and disposal of hearing protection, gloves, hair nets, packaging materials and other incidental material used in processing. They are also instructed not to litter to pick up trash and dispose of it properly, not to dump anything into the water, not to clean fish and dump remain in the water and to report anything that would affect compliance with the permits.

b. Vaughn Chopper Pump Sump Cleaning

The float switches in the sump are set to prevent floating trash from entering the sump pump. Regular sump inspections are conducted prior to processing and at the end of processing.

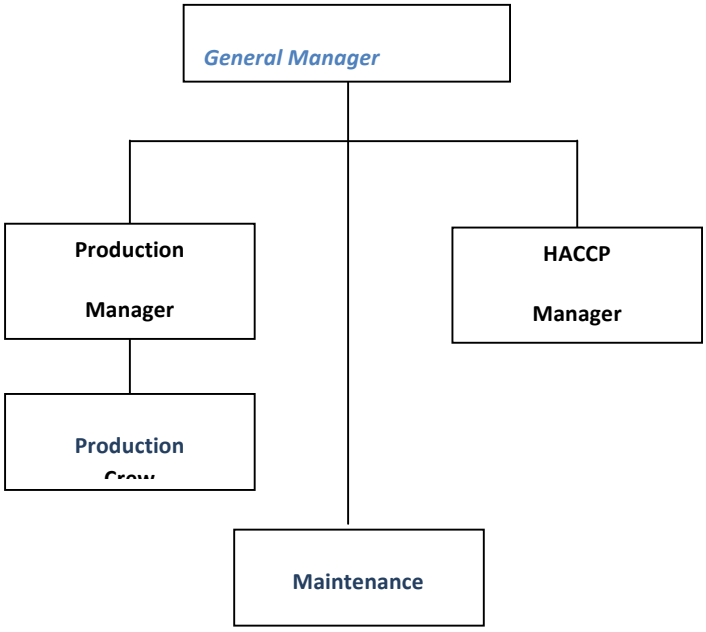
1. Organization Chart Narrative

(Following members constitute the HACCP Team)

General Manager: Responsible for the overall direction of all aspects of the Rocky Pass Seafood. Review the HACCP plan(s) with HACCP manager. Oversee the production, HACCP, procurement, and maintenance departments to ensure that the HACCP program is properly implemented. Ensures the plant and equipment are designed and repaired/maintained in accordance with the HACCP and SSOP requirements.

HACCP Manager: Reviews the HACCP plan with general manager. Coordinate with production, procurement, and maintenance crew to ensure that the HACCP plan is properly implemented. Supervise the crew to ensure that HACCP monitoring data are taken timely and correctly. Review the HACCP records daily. Report to general manager when an HACCP deviation occurs. Supervise the production crew to ensure that the products are processed in according with the GMP, SSOP, and HACCP guidelines. Product recall and product hold/release authority. HACCP team leader.

Maintenance Supervisor: Supervise the maintenance department and is responsible for the repair and maintenance of the plant as well as the design of new production equipment. Maintenance supervisor will also coordinate with the production manager and HACCP manager to ensure that the plant and equipment are design and maintained in accordance with the HACCP and SSOP program requirements.

Production Manager: Oversee daily production activity. Supervise the receiving crew to ensure the raw materials received are free of contamination. Supervise the production crew to ensure that the products are processed in according with the GMP, SSOP, and HACCP guidelines. Inform HACCP manager and report to general manager when a deviation occurs.

Rocky Pass Seafood LLC Organization Chart