AON's autio grinder uses approximately 50 gallons food grade hydraulic fluid. All of it could be immediately lost in the event of a leak, however there is no potential for contamination due to its food grade quality.

Lift trucks and vehicles operated outside of the plant pose a potential risk of contamination from diesel fuels, gasoline, antifreeze and lubricants. As discussed above, leaks are immediately reported to and repaired by AON's on-site maintenance staff, or the unit is taken out of service until repaired. Vehicles are restricted to short periods of time on the tarmac for loading and discharge of cargo only. Leaks would be easily identified, contained and appropriately cleaned up before posing a threat of contamination. Oil absorbent pads are on hand and easily accessible at all times to clean up any spills.

Operating Procedures

Practices and procedures are already in effect to prevent or minimize the discharge of pollutants through the Nikiski outfall line. These include a combination of good housekeeping measures and preventative maintenance as discussed above.

Inspection and Records

Daily records are to be kept on-site with regard to the autio grinder operation, the pump house and terminus of AON's outfall line. Any interruption or deviation in the grinding operation is be reported in this written record and reviewed by the plant manager. Annual and weekly records are to be kept on-site with regard to the maintenance of AON's processing equipment. Weekly records will only be maintained during periods of operations. A photograph record of the area where the outfall reaches the water will be maintained.

Employee Training

Plant clean-up crews are instructed to properly dispose of items that are not appropriate for discharge through the outfall line. This is accomplished during the employee orientation process. Lift truck operators are instructed to monitor their units for leaks or problems of any kind. This is accomplished during lift truck training and certification process. Full-time and seasonal employees in position of authority related to processing are trained in the proper operation and emergency shutdown of AON's grinding system. This training is to include review of this BMP plan.

BMP Certification Statement

I hereby attest that the appropriate staff and I have reviewed this BMP plan, and we believe that it fulfills the requirements set forth in the NPDES permit regarding discharge through our outfall line.

Signed

Mark Dawkin

President

Alaska Omega Nutrition

Alaska Omega Nutrition Inc

Mile 26.5 Spur Highway

Nikiski, AK 99635

Plant

Outfall Bldg

Office, Cooler, QC

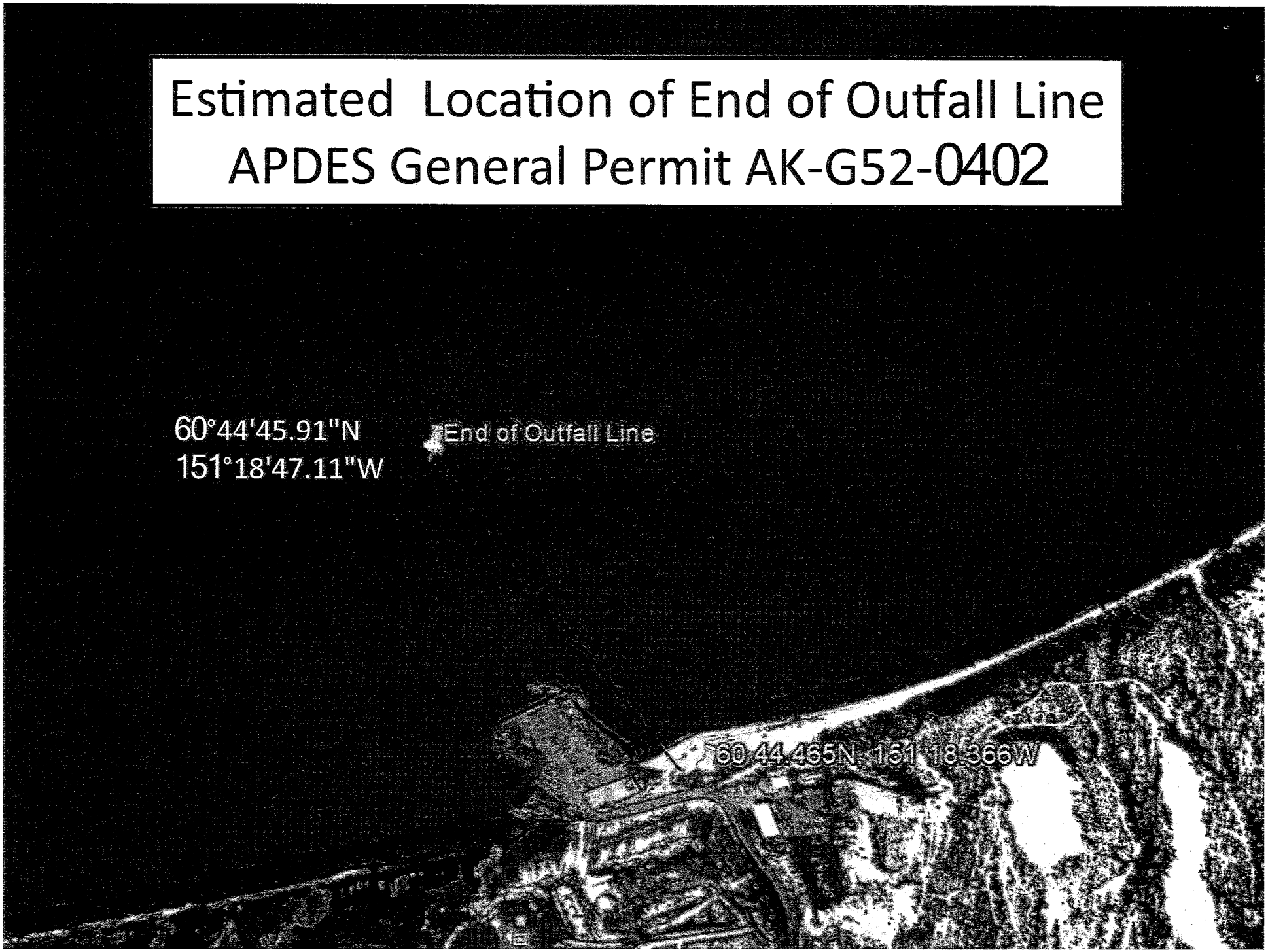
Dry Storage

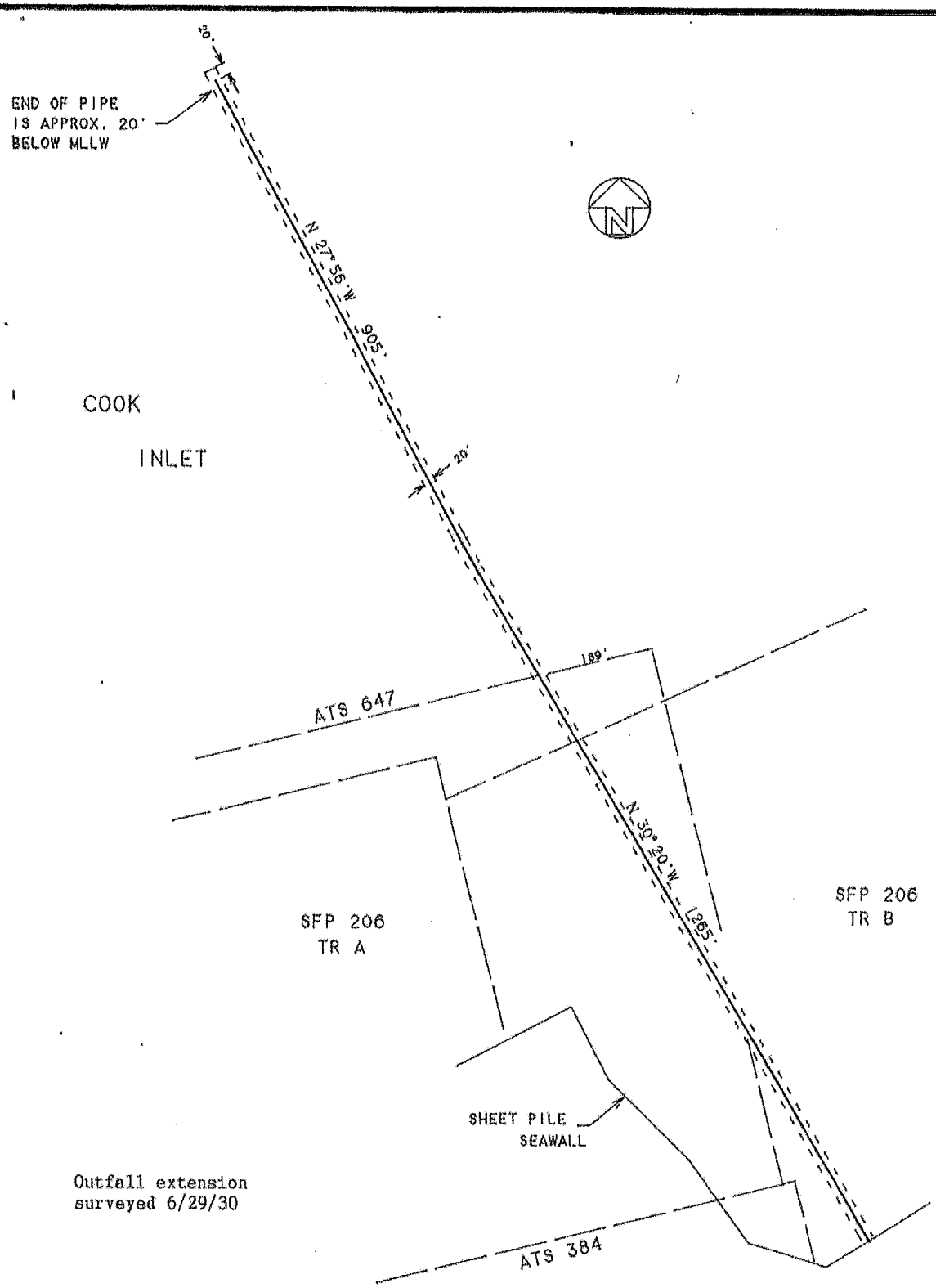
Bunkhouse

Large Shop

Small Shop/Storage

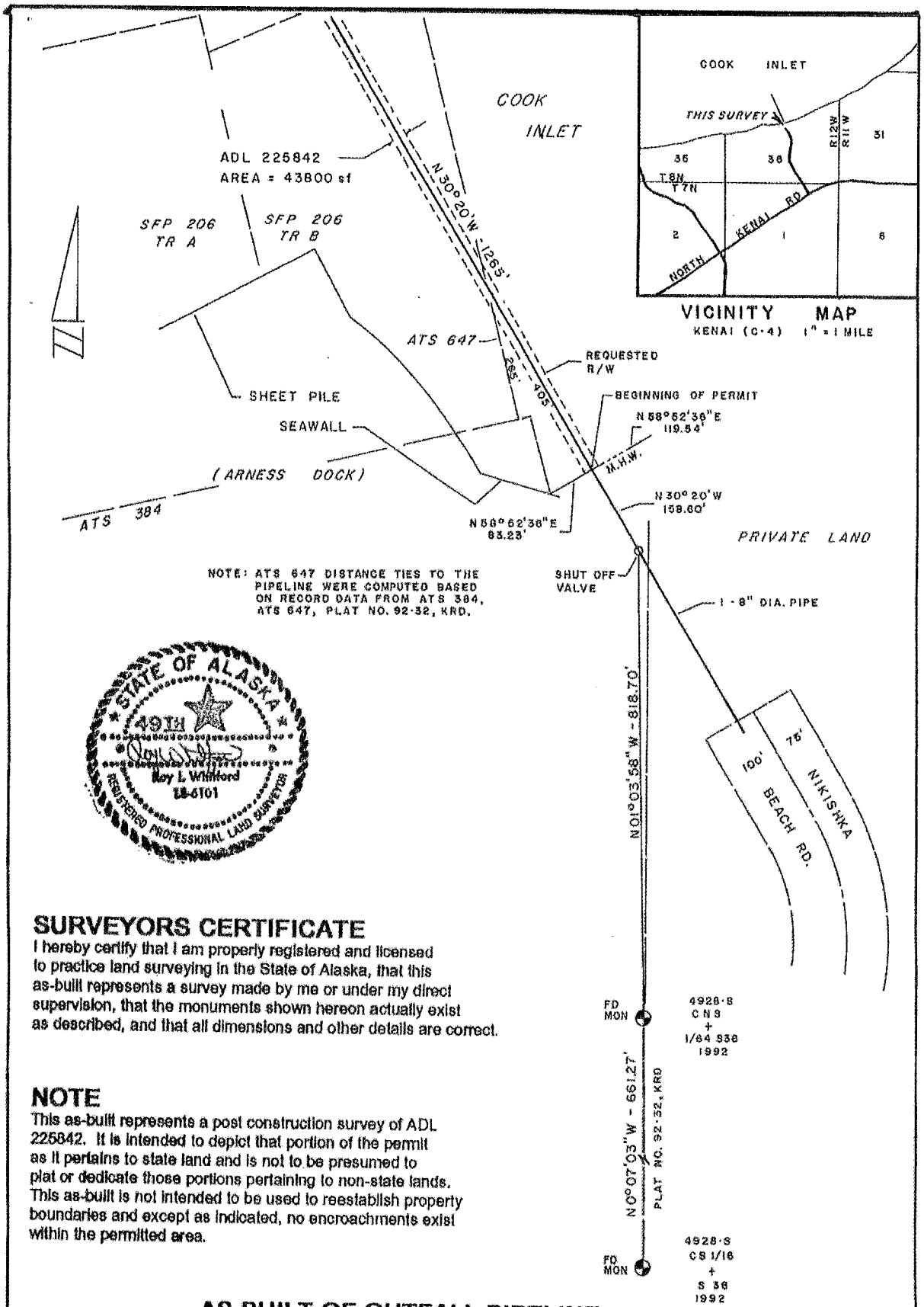
Estimated Location of End of Outfall Line
APDES General Permit AK-G52-0402





AS-BUILT OF OUTFALL PIPELINE

Prepared For: COOK INLET PROCESSING, INC.	Legal Description: SECTION 36, TOWNSHIP 8 NORTH, RANGE 12 WEST SEWARD MERIDIAN, ALASKA		
Prepared By: Whitford Surveying 1902 Wyatt Way Kenai, AK 99611	Date of Survey 8/21/92	Scale 1" = 200'	Project No.
	ADL Number 225842		Sheet 2 of 2



SURVEYORS CERTIFICATE

I hereby certify that I am properly registered and licensed to practice land surveying in the State of Alaska, that this as-built represents a survey made by me or under my direct supervision, that the monuments shown hereon actually exist as described, and that all dimensions and other details are correct.

NOTE

This as-built represents a post construction survey of ADL 225842. It is intended to depict that portion of the permit as it pertains to state land and is not to be presumed to plat or dedicate those portions pertaining to non-state lands. This as-built is not intended to be used to reestablish property boundaries and except as indicated, no encroachments exist within the permitted area.

AS-BUILT OF OUTFALL PIPELINE

EXHIBIT A

Prepared For: COOK INLET PROCESSING, INC.	Legal Description: SECTION 36, TOWNSHIP 8 NORTH, RANGE 12 WEST SEWARD MERIDIAN, ALASKA		
Prepared By: Whitford Surveying, 1902 Wyatt Way, Kenai, AK 99611	Date of Survey 8/21/92	Scale 1" = 200'	Project No.
	ADL Number 225842		Sheet 1 of 2

Best Management Practices Plan

Facility

Alaska Omega Nutrition Inc (AON)

Mile 26.5 Spur Highway

Nikiski, AK 99635

Statement

The objective of this Best Management Practices Plan (BMP) is to prevent or minimize the generation and discharge of wastes and pollutants through the Nikiski outfall line to receiving waters of Cook Inlet and the Gulf of Alaska.

Materials Accounting

The Nikiski facility is a fish oil rendering and refinery plant.

Raw salmon heads are received from several seafood processing plants on the Kenai Peninsula. The heads are toted, covered and stored in a refrigerated holding room, which is separate from the main processing plant. The heads are then rendered to extract crude oil which is filtered repeatedly and refined.

All process drains in the plant lead to drains in the main processing area that ultimately feed the drain leading to the outfall line. Wash down water from the yard area adjacent to the plant also feed the drain leading to the outfall line.

Risk Identification

Fish effluent, seafood wastewater and approved processing detergents and disinfectants are regularly washed down the drains and out the Nikiski outfall line. All items must pass through the autio grinder which cuts them to ½ inch diameter or less and then forces them through ½ inch perf plates. Potential pollutants include seafood processing equipment parts such as nuts, bolts or knives; seafood processing gear such as gloves and ear plugs; and lubricants including those used to maintain processing equipment and pallet jacks.

Processing Equipment

All seafood processing equipment is thoroughly checked for proper condition and operation prior to the start of a processing season, and is inspected weekly thereafter by AON's maintenance department. The equipment is further inspected daily by machine operators and processing foreman for loose parts and pieces and proper operating condition. Processing workers and cleanup crews are instructed to place knives, etc. in sinks rather than on the floor, and to pick up any of these items prior to hosing down equipment or floors in plant.

The likelihood of equipment parts and pieces passing through the grinder and the outfall is slim. These items will normally shut the grinder down, causing processing to cease until the foreign object has been removed and the grinder is again operational. Should they make it through the grinder in ½ inch diameter or smaller pieces, the density of these items would cause them to settle at the bottom of the pit in the pump house, rather than continue on through the outfall line. The pit is drained and freed of contaminants at least twice annually, or after major processing seasons.

Seafood Processing Gear

Processing gear such as gloves and earplugs might pass through the grinder and though the outfall line after having been ground to pieces ½ inch or less in diameter. Processing workers are instructed to keep gear off equipment and the floor. Receptacles are conveniently located for crews to place their soiled gear. Further, all cleanup crews are instructed to pick up these items prior to hosing down equipment or floors in the plant.

Fuels and Lubricants

The potential of contamination from fuels and lubricants within the plant is limited to pallet jacks, lift trucks, tote dumpers and freezer hydraulics. Each pallet jack operated by AON contains less than 1 quart of hydraulic jack oil. If a unit is as much as 4 ounces low, it will not operate properly, necessitating a repair by AON maintenance staff. Due to low volume of contaminates and on site repairs, pallet jacks pose a minimal risk of pollution.

AON's tote dumpers contain non-food grade hydraulic fluids. Each tote dumper contains 2-3 gallons of hydraulic fluid, and will not work properly if ½ gallon or more is lost. Any leak would be easily spotted and cleaned up, necessitating repairs to the unit by AON maintenance staff.

Almost all of AON's equipment in the plant use 90-weight gear lube oil. The quantities are minuscule as is the potential risk of contamination.