Bering Pacific Seafoods
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BEST MANAGEMENT PLAN

Facility Name: Bering Pacific Seafoods
N 54° 51.907' /W 163° 24.704'
P.O. Box 87
False Pass, Alaska 99583

Statement of Policy: At Bering Pacific Seafoods (BPS), management is committed to conveying the importance of pollution prevention to all employees. Upon hire each employee receives training for minimizing impacts to the environment and for what constitutes an approved discharge versus a noncompliant discharge. Oversight by management ensures that all waste discharges are in compliance under the National pollutant Discharge Elimination System (NPDES) for Seafood Processors in Alaska Department of Environmental Conservation (ADEC) for monitoring and reporting of waste discharges.

Materials Accounting: Daily records accounting for the input of raw materials and the output of finished products generated by BPS. The difference between the two constitutes the amount of process waste produced and recorded.

Risk Identification and Assessment of Pollutant Discharges:

A. Fish Process waste ending up on the floor: All exit points are protected with ½-inch filter steel (grating) screens. Wastes are removed from filter (grating) screens manually and placed on the conveyer that delivers the waste to the grinder.
B. Petrochemicals: Two potential sources of petrochemical spills have been identified.
    a. Forklifts: two forklifts at BPS are propane-fueled, and the other forklift operates on diesel fuel outside. In the event of a potential discharge (hydraulic and crankcase oil), appropriate oil absorbent materials are readily at hand to prevent pollutants from reaching exit points or grounds outside plant.
C. Refrigerants: All refrigeration systems are charged with ammonia or freon. BPS, state of the art ammonia refrigerant systems, with audible alarms.
D. Other chemicals: All cleaning agents and sanitizers meet FDA approval for use in the food industry; all employees are trained in their proper application. Process water input is from the City of False Pass ADEC approved public water system and permitted wells.

Scientific Management Practices:

A. BPS has upgraded equipment and modifies the facility for efficiency and economy in handling of all waste discharges.
B. General Operation Procedures/Phases
    a. Process waste products are loaded onto a conveyor that feeds the grinding shed and ground to less than ½-inch through a JWV Muffin Monster; then discharged by a Vaughn chopper pump to the waste outfall line, before grinding begins.

b. Operators inspect the grinding equipment to ensure the sump overflow protectors are functioning and grinder blades are not dull. Inspection of the entire waste conveyance system is conducted on a daily basis, checking for leaks, valve operation, etc.
c. Process waste water is collected through a series of drains, fitted with ½-inch filter screens and piped to the outfall line.
d. BPS does not produce transfer water. All fishing vessels are required to discard fish hold ice at sea, not at the city dock. All raw materials offloaded across the city dock are transported in totes; nearly all fluids are contained. Totes are cleaned of slime and blood inside the plant; wastewater is piped to the outfall.
e. No Hazardous materials are stored in process area. A locked area, the shop building 75 ft. for the processing area, is designated for their storage. Access to any hazardous material is under strict control of trained individuals and management.
f. In the event of a non-compliant pollutant discharge, personnel are directed to immediately close the shut-off valve on the outfall line above the mean higher water (MHHW). This isolates any pollutant in a concrete vault and prevents discharge through the outfall.
g. All used oil is delivered to the City of False Pass disposal program.

C. Subsistence nets in traditional use areas are not affected by the outfall discharge. No commercial net fishing occurs near the outfall discharge.

D. Should any noncompliant discharge take place, management will notify the EPA and ADEC within 24-hours. A written description of the noncompliance shall be submitted within allowable time of reporting of the event.
   a. A spill response and prevention plan is currently in place and utilized by all persons involved in the handling, transport, and uses of petroleum products. This is reviewed yearly to all applicable persons along with onsite review, on the job training and when/where deficiencies are noted.

Good Housekeeping:

BPS operates with good housekeeping practices. Cleanup and sanitation is done, not only on a daily basis, but as needed throughout each processing day. All other procedures attendant to raw material processing, such as box building, pallet making, etc., are segregated from the main processing area.

Preventative Maintenance:

BPS has a rigorous inspection and maintenance schedule for all of its machinery and equipment. Repair parts for the Muffin Monster Grinder, Vaughn Pump, outfall valves, piping, and exit point screens are stocked on-site. All monitored by year-round engineer on-site.

Inspections and Records:

BPS maintains a daily record of process waste amounts; daily inspection log of the grinder and waste conveyance system; and, sea surface and shoreline monitoring logs. The logs are kept together with a copy of the Best Management Plan (BMP), a copy of the NPDES permit and permit authorization. The annual report and seafloor survey are submitted as required by EPA.

Employee Training:

Management requires that all equipment operators, processors, and maintenance personnel are trained and understand the preventative practices described herein. Periodic visual reviews are conducted to ensure that BPS remains compliant and for the safety of employees.

Certification:

The Plant Manager, Chief Engineer, and Production Foreman have reviewed this BMP, which fulfills the requirements set forth in the permit.

Covered and understanding of the Following:

Statement of Policy
Material accounting reading
Risk Identification and Assessment
Potential Discharge (A, B, C, D).
Specific Management Practices – A/sub., B/sub., a, b, c, d, e, f, g, h.
C/sub., D/sub.
Good housekeeping
Preventative maintenance
Inspections and Records
Employee Training
Certification on file

Revisions to this plan must be signed by all parties to be in compliance.

_____ Date: 06/06/14

BPS Plant Manager

_____ Date: 6/6/14

Chief Engineer

_____ Date: 6/6/14

Production Forman