COPPER RIVER SEAFOODS INC.

CORDOVA

Best Management Practices (BMP) Plan

APDES Permit # AK-G52-0524

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Section 1

FACILTY NAME, LOCATION and DESCRIPTION

Copper River Seafoods (CRS), Cordova is a seafood processing facility located at 300 Cannery Row, Cordova Alaska. It's a seasonal processor with operations normally running from early-May to the beginning of October, but may have minor operations starting as early as March.

CRS Cordova processes all five species of Pacific Salmon, as well as their roe. They also process Halibut, Cod, Rockfish, and Skate. In addition, they may process a small amount of Shrimp and Scallops (depending on customer demand). Finished products range from fresh or frozen H&G, fillet, shelf stable and value-added. Food grade ingredients include sugar, salt and various other spices. Natural Alder Wood, used for smoking, as well as a variety of packaging materials are all stored on site.

The facility utilizes 4 grinders for processing seafood waste water. Waste is routed to the grinders and chopped to ≤ 0.5". It is then piped 250 feet from the dock to the outfall location specified in the APDES Permit.

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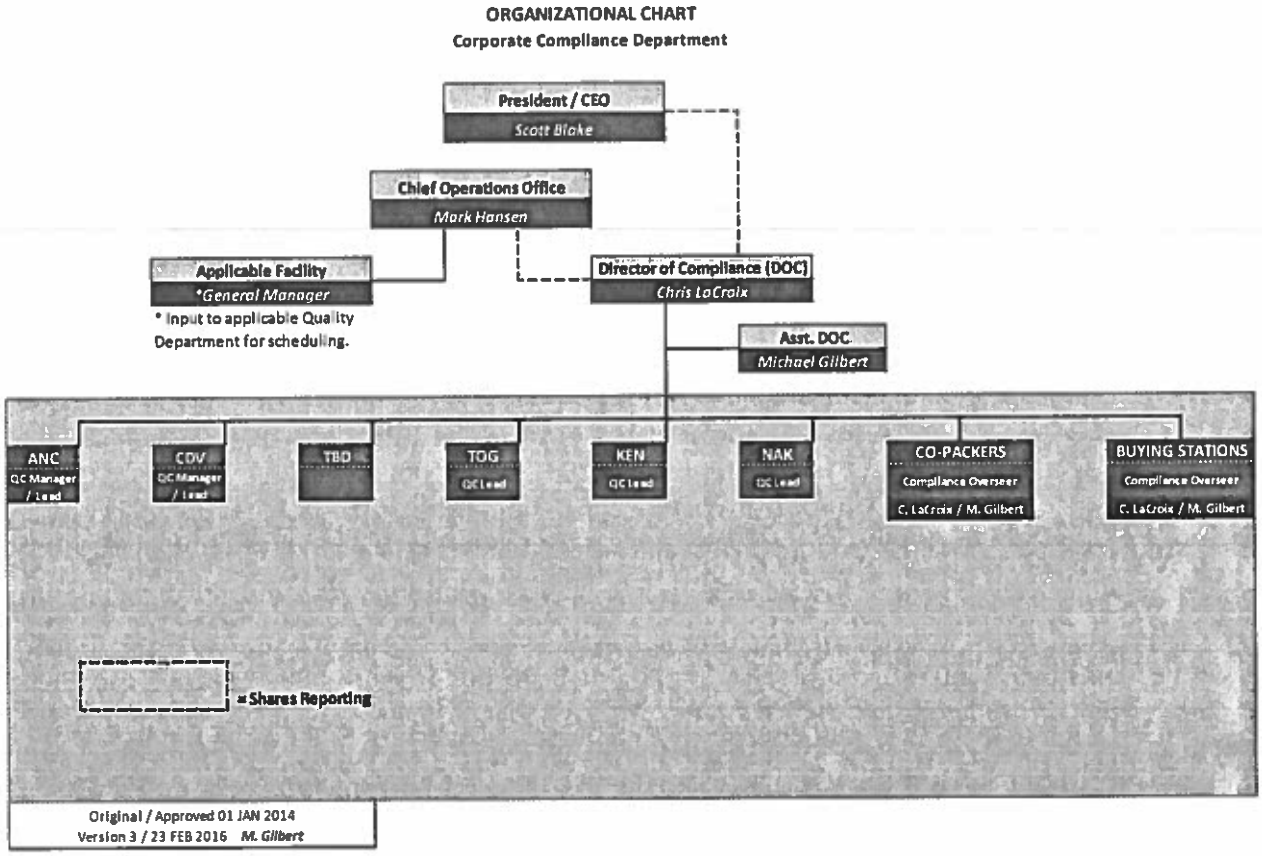
Section 2

COMPLIANCE DEPARTMENT ORG CHART



Section 3

PURPOSE

The purpose of this CRS BMP Plan is to prevent and/or minimize the generation and discharge of wastes and pollutants from its Cordova seafood processing facility, that could be in violation of the APDES permit. To the greatest extent practical, CRS will work to prevent or reduce the discharge of pollution through effective procedures and monitoring. CRS will strive to dispose of any wastes in such a manner as to have a minimal negative environmental impact.

The only major risk of violation of this APDES permit is either a break in the discharge line or malfunction of the grinding system.

Section 4

PROCESS DESCRIPTIONS

a. Salmon:

- The facility processes fresh & frozen H&G, Roe, Princess Cut (head on, guts/gills removed), fillet/portions and value-added (extra trimming) of all 5 species of Pacific Salmon. For 2016, all smoking operations have ceased. All waste is ground to ≤ 0.5" before being discharged to the designated outfall location.

b. Halibut, Cod, Rockfish & Skate:

- All other finfish are processed as either H&G or Princess Cut. All waste is ground to ≤ 0.5" before being discharged to the designated outfall location.

c. Shrimp & Scallops:

- Shrimp and Scallops enter the facility whole and are fresh/frozen in that state. Washing is the only discharge and no waste exists to require any grinding. Receiving Shrimp & Scallops does not happen often and normally depends on special customer demand.

Section 5

EQUIPMENT and PREVENTATIVE MAINTENANCE

CRS Cordova utilizes 2 Vaughn Chopper Pumps, an Autio 1100 Grinder and a Muffin Monster Grinder. This combination guarantees all waste is ground to ≤ 0.5" before being discharged.

Preventative maintenance is monitored by the Engineering Department. Inspections are conducted daily according to the Equipment Preventative Maintenance Schedule and documented on associated forms. The Engineering Department inspects for proper operation, leaks, lubrication, capacity and ice buildup.

Section 6

MONITORING

System monitoring is conducted/verified by the Quality Control (QC) Department. Monitoring is conducted on a daily basis.

The following forms are used:

- Shoreline & Sea Surface Monitoring Log.
- Grinder Sample Log.

Section 7

GOOD HOUSEKEEPING

The plant utilizes food grade petroleum products for maintaining food manufacturing related equipment. The company also utilizes a non-chlorinated alkaline detergent for cleaning equipment, floors, walls and ceilings. After cleaning, a Quat-based sanitizer is sprayed on food contact surfaces and equipment to prevent bacterial contamination (Sodium Hypochlorite may be used as an alternate). When required, the sanitizer is rinsed off with fresh water immediately prior to utilizing the surfaces & equipment for processing seafood. All of the above mentioned products are mixed and utilized according to federal and manufacturers guidelines. MSDS's/SDS's are kept on hand in the facility. QC personnel or properly trained employees routinely test all chemical mixtures to ensure compliance. All tests are documented.

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Section 8

EMPLOYEE TRAINING

Once per year, the personnel responsible for the operation of the waste handling system, as well as those responsible for the daily monitoring, are instructed in the requirements of the APDES permit, including this BMP Plan. An owner of Copper River Seafoods will assure the Facility General Manager follows the requirement of this BMP Plan. The procedures and training will be checked again every six (6) months as needed.

Section 9

REPORTING PROCEDURES

If any failures are found during an inspection, whether in equipment, drains, discharge plumbing or grinder lines, immediate notification of an owner shall occur. If an owner is not present then the most responsible person on the plant premises, either the General Manager or Chief Engineer, and a member of the Compliance Department shall be notified. Leadership will make an immediate decision regarding operations and bring the facility back into full compliance with the APDES permit. Non-compliance or violations must be reported within 24 hours. The BMP Plan and APDES permit shall be reviewed and a proper determination adhered to. All information pertaining to the non-compliance or violation will be documented.

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Best Management Practices Plan Certification

Facility Name: Copper River Seafoods, Cordova

APDES Permit Number: AK-G52-0524

The BMP Plan is complete and is available upon request to ADEC.

The BMP Plan is being implemented by trained employees.

The BMP Plan has been reviewed and endorsed by the facility manager.

The individuals responsible for implementation of the BMP Plan have been properly trained.

Signature, Compliance Dept. Rep.	Print Name	Date
	Michael Gilbert	Mar. 1, 2016

"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:	**Title/Company:** President, Copper River Seafoods Inc.
Print Name: Scott Blake	**Date:** March 1, 2016

A previously authorized operator under AKG520000 or a newly authorized operator under AKG523000 shall develop and implement a BMP Plan that satisfies the requirements of this Part within 60 days of the effective date of authorization to discharge under the permit.

An owner or operator who currently has coverage under AKG523000 shall submit written certification that the BMP Plan has been reviewed and revised to meet the requirements of this Part (6.1) whenever an updated NOI is submitted.

State of Alaska
Department of Environmental Conservation
Division of Water
Wastewater Discharge Authorization Program
555 Cordova Street
Anchorage, AK 99501