Best Management Practices Plan
Silver Bay Seafoods
Sitka

Best Management Practices Policy
Silver Bay Seafoods has developed standardized Best Management Practices (BMP) plans for use in all its facilities. This standardization ensures that management, engineering, and process workers have a comprehensive understanding of the corporate BMP plan and are able to immediately transfer this knowledge to other facilities within the company if they are transferred or rotated.

The following are the goals of the Best Management Practices Plan to minimize discharges and protect the environment.

Document raw material input and waste discharges for every production day. Use materials accounting systems to identify losses and correct operations to lower losses and increase recovery.

Educate workers in the reduction of waste. This will include training and supervision in the proper operation of fish butchering equipment. This will decrease damaged fish that reduce recovery rates.

Maintain and upgrade processing and waste handling equipment to minimize upsets and potential for non-compliance.

Materials Accounting
Raw seafood is weighed upon receipt

Sanitizers are inventoried on receipt and used according to label instructions

Finished product which includes various product lines and fish meal is weighed and inventoried.

The amount of Seafood Waste discharged to receiving waters is calculated by subtracting finished product from raw seafood.

A schematic showing the specific process and waste flows at this facility is attached. (Attachment A).

Risk Identification and Assessment of Pollutant Discharges
The facility has only two discharges regulated under the NPDES offshore seafood processing discharge permit. They are seafood waste and sanitizers.

Seafood waste, discharged under the terms of the permit has been found not to be an environmental or health hazard. Seafood waste consists of heads, viscera, skin and blood.

Sanitizers, when used following label requirements, have been found not to pose environmental or health hazards.

Maintenance fluids are stored in areas of the plant where accidental discharge through puncture or leakage would not reach drains that would route the fluids through the discharge system.

Specific Management Practices
Fish Heading Machine
The functioning of the machine and some fish carcasses are frequently monitored to ensure that the machinery is cutting the heads in a manner that optimizes recovery and reduces waste.

Fish Evisceration Machines
The operations of these machines are frequently monitored to ensure that they are functioning properly and adjusted to optimized recovery and reduce waste.

Forklifts and hydraulic equipment are overhauled as needed and regularly inspected for signs of wear or leaks. Unanticipated failures that could result in hydraulic leaks are mitigated by immediately shutting down the piece of equipment and cleaning the spill.

Back-up parts for fish waste grinders are maintained at each facility in the event of grinder failure.

Good Housekeeping
All chemicals, food additives and equipment lubricants are securely stored in specified areas. Use and access to these materials are limited to designated trained personnel. During production, all equipment is cleaned, lubricated and maintained to assure proper handling of fish and to avoid breakdowns and spills.

Preventative Maintenance
Salmon production is largely a seasonal operation. During the off-season each year systems and equipment are overhauled and upgraded as needed or on a scheduled basis. During fishing seasons, equipment is repaired or replaced on an "as needed" basis. During operation, regular maintenance and service inspections

identify worn equipment for refurbishing or replacement at the next downtime. Much of the equipment is standardized to facilitate repair and maintain inventory of replacement parts.

Inspections and Records
The weight of incoming raw product and finished product recovery is recorded and reviewed every shift.

This information is used to track the performance of the plant and minimize waste discharge.

The facility has established target recovery rates to use in these evaluations:

Herring 98%
Salmon 95% on H&G
Crab 65%

When performance falls below the targeted ranges production, mechanical and management staff will analyze the system, identify the cause(s) and take corrective action.

Prior to each season, the waste handling system will be evaluated and a record of this inspection will be kept at the facility.

Daily the grinder size will be sampled and recorded on the daily monitoring report.

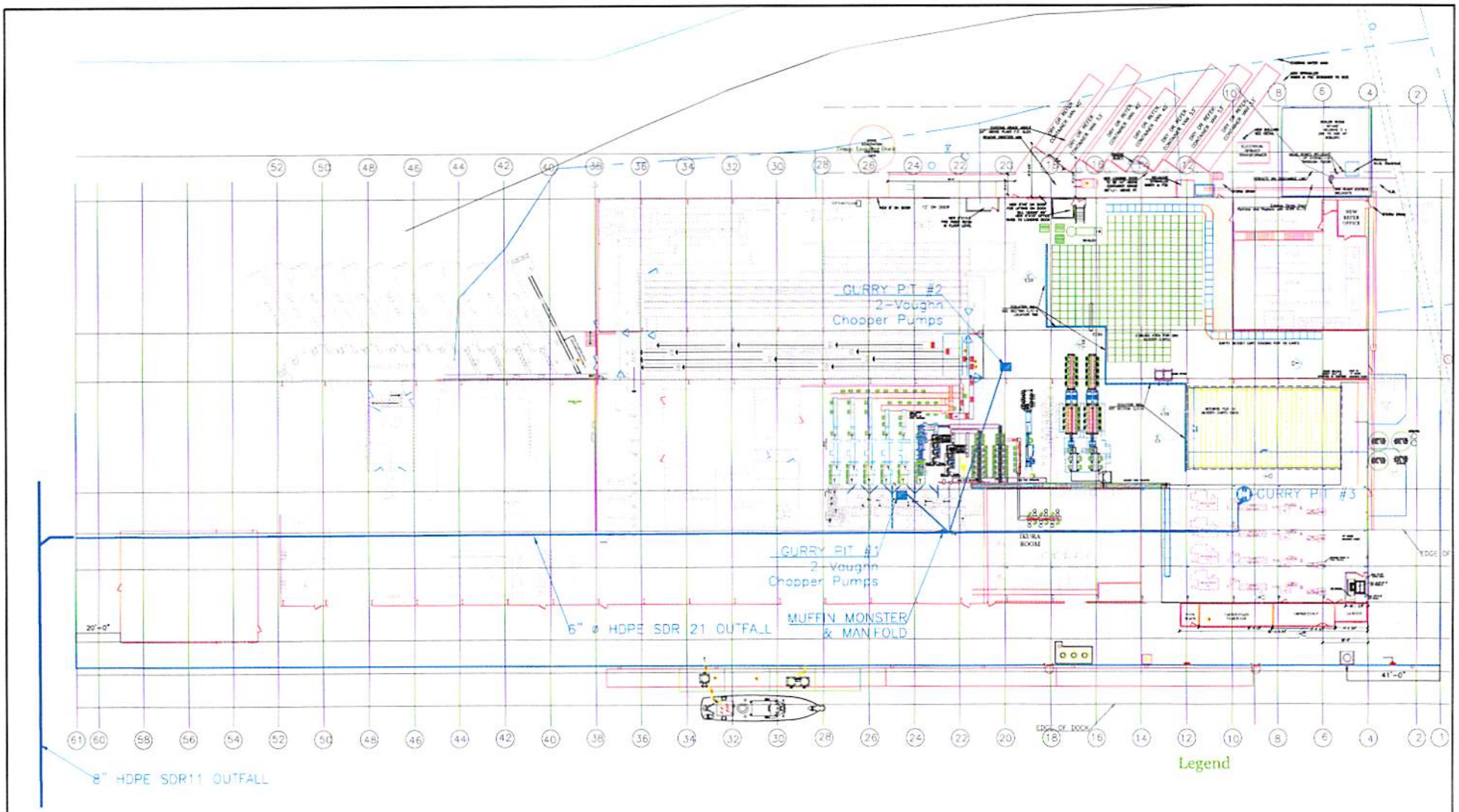
Employee Training
Technicians and mechanics involved in the maintenance and adjustment of processing equipment receive extensive training in each piece of processing machinery that they are responsible for maintaining.

Process workers are trained in the need for proper waste conveyance and handling to maintain a clean safe work environment and proper discharge of waste material.

Many of the process crew are also trained to assist in the periodic cleaning of the processing area to prevent waste build-up.

The Best Management Practices Plans will be reviewed by appropriate staff including representatives from the engineering/mechanical staff, processing staff, and management and a letter of certification that this review has taken place will be filed with the Plan (Attachment B).

Attachment A
Facility Waste Flow Schematic



OVERALL PLAN SCALE 1"=20'

FISH WASTE GRINDING SYSTEM & OUTFALL

2-17-15	2	FISH WASTE & OUTFALL	FDM	Designed FDM	Approved -	Scale AS SHOWN	
11-25-14	1	ADD LOADING DOCK OFFICE	FDM	Drawn FDM	Date 11/8/14	Project -	

MEA INC
MONREAN ENGINEERING, INC

Client: Silver Bay Seafoods

Project: NEW CANNERY LINE
LOT 10, BK 4, SAWMILL COVE I.P. SUBDIVISION 2008-27

Sheet Description: OVERALL PLAN

Sheet No. C-1

STATE OF ALASKA 49th FRED D. MONREAN

Attachment B
Current BMP Certification Letter Signed

Silver Bay SEAFOODS
Sitka, Alaska

4400 Sawmill Creek Rd. Sitka, AK 99835
Phone: 907.747.7996 Fax: 907.747.7998

January 8, 2015

BMP Certification

Facility Name: Silver Bay Seafoods, LLC
APDES Permit Number: AK-G52-0547

The BMP Plan is complete and is available upon request to ADEC.
The BMP Plan is being implemented by trained employees.
The individuals responsible for the implementation of the BMP Plan have been properly trained.
The BMP Plan has been reviewed and endorsed by the facility manager.

"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 of Responsible Official — Date: 1-8-2015

Wayne Unger — Printed Name

Sitka Plant Manager — Title