COPPER RIVER SEAFOODS, TOGIAK

Best Management Practices (BMP) Plan

APDES Permit # AKG523035 & AKG523059

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Section 1

FACILTY NAME, LOCATION and DESCRIPTION

Copper River Seafoods (CRS), Togiak is a seafood processing facility located in Togiak, Alaska. It's a seasonal processor, with operations generally starting in June and ending in August.

CRS Togiak primarily processes Salmon, with a small percentage of Halibut production early in the season. The facility receives whole Salmon, then heads and guts (H&G) each fish. Finished Salmon products may be in the form of fresh or frozen H&G or fillet. Halibut is H&G only. Regardless of species/finished form, all products are shipped via Air Freight (fresh) or barge (frozen) to the CRS Anchorage Facility or a CRS Co-packer for further processing and distribution. Roe is extracted from Salmon and used for the production of Sujiko. Salt, Malic Acid and Sodium Nitrite are used for Sujiko production.

The facility has a unique system in place for processing seafood waste. All waste is re-routed from the production line to the grinder and chopped to ≤ 0.5". The grinder chops waste directly into totes that get covered and staged prior to transport.

A gurry vessel is used to haul the waste from the staging area to its outfall location as specified in the APDES permit.

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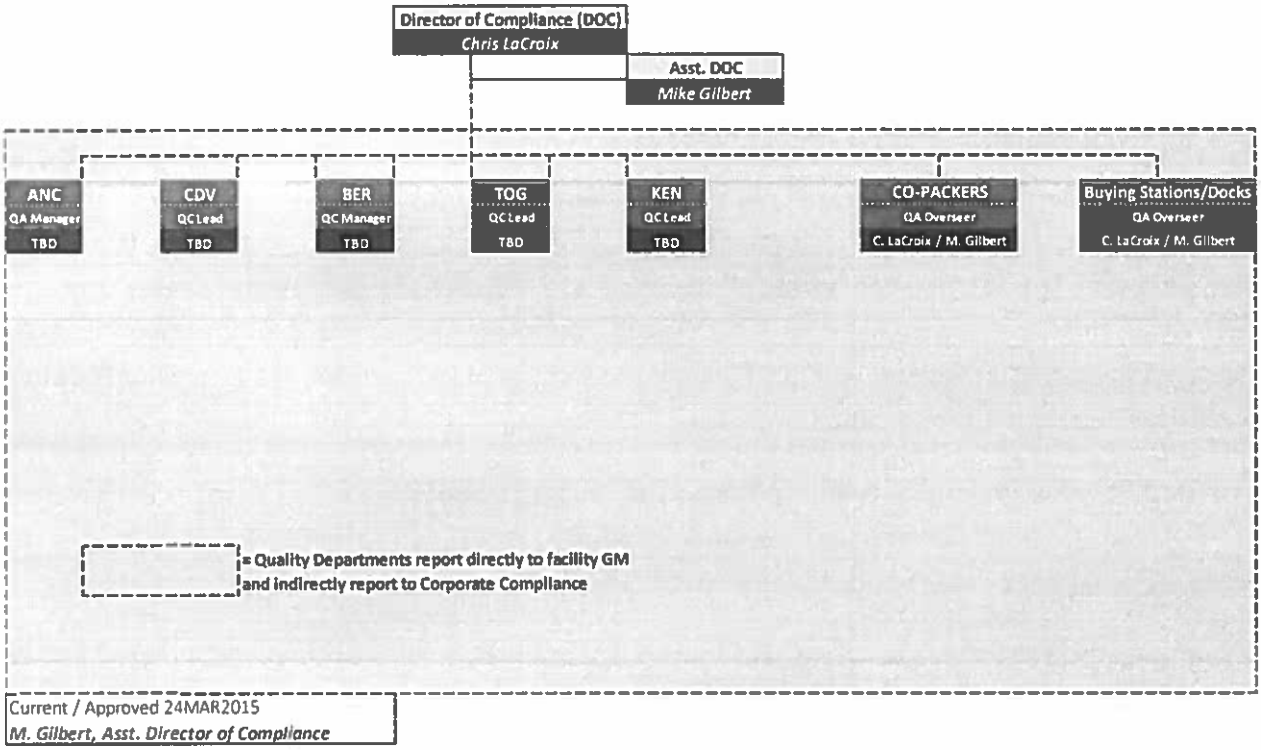
Section 2

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 Togiak 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 an accidental malfunction of the grinding or transport system.

Section 4

PROCESS DESCRIPTIONS

a. Salmon:

The facility processes fresh & frozen H&G, Roe and frozen fillets of all 5 species of Pacific Salmon. Seafood waste, in the form of heads and viscera, is re-routed from the processing line to the grinder and chopped to ≤ 0.5". The grinder chops waste directly into totes that are covered and staged prior to transport. CRS Togiak utilizes a gurry vessel to haul the waste from the staging area to its outfall location as specified in the APDES permit. All final products are fresh/frozen and transported to CRS Anchorage or CRS Co-packer for further processing and distribution.

b. Halibut:

Halibut is primarily processed at the beginning of the season. Finished form is fresh H&G. Grinding operations are identical to Salmon operations. Finished products are transported to CRS Anchorage or CRS Co-packer for further processing and distribution.

c. Salmon Roe (Sujiko)

Roe is re-routed from the main production line, staged in baskets and worked in a separate room from other products. Contracted foreign processors are responsible for processing the roe into Sujiko. Salt, Malic Acid and Sodium Nitrite are used for Sujiko production. All Sujiko is exported (801e letter is on file).

Section 5

EQUIPMENT and PREVENTATIVE MAINTENANCE

CRS Togiak utilizes 1 Autio 801 grinder. Waste is re-routed from the processing line to the grinder. The grinder achieves the desired waste size of ≤ 0.5".

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 and anything that could lead to a possible grinder malfunction.

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.
- Barge/Tender Waste Discharge Log.

Section 7

GOOD HOUSEKEEPING

The plant utilizes food grade petroleum products for lubrication of 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, Togiak.

APDES Permit Number: AKG523035 & AKG523059

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, Site Manager	Print Name	Date
	Jarek Manak	1-25-16

"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/CEO, Copper River Seafoods Inc.
Print Name: Scott Blake	**Date:** Jan 28, 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