



NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code: 1N 25 3AIK101023434 11 1281810711817 18C 19R 202

Remarks

Reserved: 67 69 Facility Evaluation Rating: 70 BI: 71 OA: 72 Reserved: 73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected Kodiak Reduction Inc. P. O. Box 169, 911 Gibson Cove Road Kodiak, Alaska 99615		Entry Time 4:45 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	Permit Effective Date 04/18/86
Name(s) of On-Site Representative(s) Dan James		Title(s) General Manager	Phone No(s) (907) 486-3171
Name, Address of Responsible Official John Sullivan		Title President	Phone No.
		Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Exit Time/Date 5:45 p.m. 7/18/88			
Permit Expiration Date 04/17/91			

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit		Flow Measurement	N	Pretreatment		Operations & Maintenance
	Records/Reports	N	Laboratory	N	Compliance Schedules		Sludge Disposal
	Facility Site Review		Effluent/Receiving Waters		Self-Monitoring Program		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

This plant was closed down from April 18, 1988 until today for installation of new dryer. Today is first full day of production since April. A new boiler and new dryer were installed. Today the separator was broken down so the evaporators were not in use. KRI controls whether waste goes to the reduction plant or to Beaver. Randy Mullen usually makes this decision. If he is not in, then Dan James. KRI takes waste from 11 of the 12 processing plants in town. KRI keeps records of quantity received and bills plants twice monthly. Also does this for the Beaver. Bill Weaver, D&D Extinguisher Service, (486-5598) did dive survey on the outfall about a month ago. No written report but did say that the outfall pipe was in good condition, bottom end of pipe much improved since screens installed. During plant shut down, all waste was barged to dump zone. Review of DMRs through last 08/87 showed no period of prolonged closure other than immediately last 3 month period. Dan began his daily log of plant production today as required in the Consent Decree. Daily production report is kept by truck, source, type of fish waste, volume in cubic feet, separate tally for reduction plant vs. Beaver. Seafood plants are billed twice monthly for tonnage and hauling (if KRI hauls the waste). Leakage from raw product hoppers all contained now. New boiler building will keep any waste from bay. Old oil storage tanks on cliff top have been

Name(s) and Signature(s) of Inspector(s) <i>C.D. Robison, Jr.</i> C.D. Robison, Jr., P.E.	Agency/Office/Telephone US Environmental Protection Agency Alaska Operations Office/Anchorage (907) 271-5083	Date 7/18/88
Signature of Reviewer	Agency/Office	Date

Regulatory Office Use Only

Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance
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(continued from front Section D: Summary of Findings/Comments)

removed. Runoff from hopper dump level is piped to plant also. Copies of random production sheets obtained, plus DMRs for April, May, June, 1988. Review billings for 06/30/88, but did not ask for a copy. Photos of fine mesh screen, divers at outfall, hopper drainage pipe, outfall line that has two city water pipes connected to it. No record of daily observations is kept. Dive team present at time of inspection visit. Report forthcoming.

No photos turned out. *Robertson*

STATE OF ALASKA

STEVE COWPER, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

SOUTHCENTRAL REGIONAL OFFICE
3601 C ST., SUITE 1350
ANCHORAGE, AK 99503

Telephone: (907)
Address:

563-6529

RECEIVED

Jamie Sikorski
U.S. EPA
1200 Sixth Ave.
Seattle, WA 98101

JAN 20 1988

EPA-AOO-ANCHORAGE January 14, 1988

Dear Mr. Sikorski:

RE: Kodiak Fish Reduction Facility
AK-002343-4

Thank you for notifying the department of your Administrative Penalty Action against the City of Kodiak. While we agree with your action, we believe there are other violations that have occurred and should be considered in your action. Our record shows the following:

- 1) October 7, 1987 - Record of Communication between D. Robison and R. Parkin identifies Oil and Grease violations, continued discharge of stick water, and evaporators not in operation.
- 2) January 12, 1987 - Letter from EPA to City of Kodiak indicates the outfall line has "failed in several occasions". The letter also reveals a lack of monitoring. Our records do not indicate any follow-up to either issue. Furthermore, the permittee did not notify this Department of these violations as required by the permit. In addition, please refer to the enclosed documents regarding violations indentified by this department.

These incidences appear to be in violation of the Compliance Order issued on October 8, 1986 and the current NPDES Permit. Our record does not contain information that these issues have been resolved. We believe all of these violations should be included in your pending enforcement action.

Sincerely,



Bill H. Lamoreaux
Regional Supervisor

LD:JH:mt
ENCLOSURE

cc: A/W DO
Bruce Duncan, EPA ✓
Everett Stone, Kodiak

CA: J. S. Koroski
ORC

February 25, 1988

Anchor

Mr. Harold Geren, Chief
Water Permits and Compliance Branch
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, WA 98101

RECEIVED
FEB 29 1988

WATER PERMITS & COMPLIANCE BRANCH
EPA-REGION 10

RE: NPDES Inspection of City of Kodiak Fish Waste Reduction Facility on August 27, 1987. RECEIVED

MAR 14 1988

Dear Mr. Geren:

~~CONFIDENTIAL~~

EPA-AOO - ANCHORAGE

This is in response to EPA's NPDES Compliance Inspection Report (EPA Form 3560-3) dated August 27, 1987 covering EPA's inspection of the Fish Waste Reduction Facility owned by the City of Kodiak ("The Facility") and operated by Kodiak Reduction, Inc. ("KRI"). A copy of the latter inspection report was received by KRI on January 13, 1988 as part of a package of materials obtained by KRI under a Freedom of Information Act request KRI made of EPA.

Our comments on each of the EPA Inspector's observations follow:

1. "Plant was operating at the time of my visit, however, the evaporator was not in use so the stick water was being discharged to the harbor. Stick water is the 4-6% solids content flow from the centrifuge. This normally is sent to the evaporator, where it is brought up to 40-50% solids for sale as a product."

This observation was presumably intended only to inform the reader about the operation of the plant at the time of the inspectors visit since discharge of stick water doesn't constitute a violation of the NPDES permit so long as the discharges comply with the specific limitations set forth in the permit.

By way of further explanation, the dryer presently in use at the plant doesn't have the capacity to handle all of the stick water. KRI will soon have under consideration a proposal to install a higher capacity dryer which, among other things, will enable the operation to send a significantly higher percentage of the stick water the the evaporator.

2. "A 3" city water line has been connected directly to the outfall line and from 300,000 to 500,000 gallons per day of city water is injected into the effluent line. Flow records show daily discharge volumes range from 10,000 gallons per day to over 550,000 gallons per day."

This observation, like Item 1, above, is presumably intended only to inform the reader since no permit violation is involved.

It should be noted, however, that the Facility's water usage - on average and at peak - has dropped dramatically as a result of screening all plant effluent due to the need for less flushing action in the effluent line.

3. "The effluent is not yet screened as required in the NPDES permit and the 309 Order."

Since approximately 12:00 p.m. on December 11th, KRI has been screening all of the effluent generated from within the plant. The positive results of this practice have been twofold.

- a. Water usage has dropped down to an average of 83,000 gallons per day.
- b. Effluent sampling has shown that the Facility is within the limitations of its NPDES permit with the exception for one day in January when we were slightly too acidic on our pH reading.

4. "A berm was constructed near the raw waste receiving bins, but about two feet of lineal length was left open so waste can still run around the building foundation and over the cliff face."

KRI will correct this by making improvements that will direct any spillage into the sump from which all effluent is screened. Due to the unpredictability of the weather this time of year (concrete pouring is involved), we cannot commit to an early completion date. We do, however, hereby commit to a completion date of May 15, 1988.

5. "Six bins of reduction plant waste were just sitting outside the building and had considerable fly activity."

Since the time of the inspection KRI has purchased a forklift rotator which is used to dump totes of tainted offal into one of the fish waste hauling trucks from which it is hauled down to F/V Beaver and dumped onto it. This also eliminates the need for storing totes of fish offal down at the Gibson Cove Facility until we can get the Beaver over to dump them on it.

6. "The abandoned storage tank in front of the plant has not been emptied of crab meal from the former owner and is open to insect infestation."

Samuel Gesko, City Manager, City of Kodiak, has verbally promised to handle this problem. We will work the City to resolve this matter and dispose of the crab meal.

7. "Flow is reported using the city water meter which includes the high volumes injected into the outfall. The effluent sample is taken in the collection box on the outside of the building. The outfall valve is closed then the box is allowed to fill and a sample taken. It was not clear whether the city water flow was stopped first or whether this backs up the pipe and dilutes the sample."

KRI's sampling techniques ensure that the water sample is representative of the discharge water. The sample is not diluted.

8. "It was not determined whether there is a backflow preventer on the line or not. If not, then there is a direct connection between the effluent line and the city water main."

Since the time of the inspection, a backflow preventer has been installed.

9. "Kodiak Reduction Inc. (KRI) also contracts the M/V Beaver to haul fish waste to the ocean dump zone. This summer, the ship is docked at the city-owned dock in Gibson Cove. At the time of my visit to this facility, there was spilled waste on the dock and emptied totes were being hosed down and the wastes going into the harbor. The M/V Beaver may be moved to the dock owned by Cook Inlet Processors Inc."

See comments under Item 5, above.

10. "The Second Reading of the ordinance to lease the reduction facility to KRI was before the City Council this evening (8/27/87). It was tabled for two weeks because KRI was not satisfied with the termination clause in the contract."

KRI signed an agreement with the City of Kodiak covering KRI's operation of the Facility on December 23, 1987.

11. "Effluent from KRI is very obvious in the harbor. It was observed entering Gibson Cove at 8:30 p.m. on Wednesday, August 26, 1987. (Photos taken)."

Installation of the screen resulted in a pronounced reduction in the visibility of effluent in the harbor.

12. "The oil storage tanks located outside the building do not have any containment devices. Any spill would go directly into the bay."

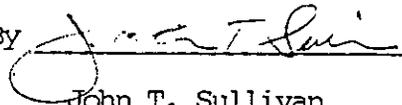
These oil storage tanks are not used by KRI for any purpose and have no connection with operation of the Facility. KRI has pointed out to the City of Kodiak the problem you cite in your inspection report and the City has committed to KRI to solve this problem. We suggest that you take this matter up with the City separately and request that it not be treated in the future as part of your compliance inspections of the Facility operated by KRI.

If you have any questions on any of our comments contained herein, please advise.

Very Truly Yours;

KODIAK REDUCTION, INC.

By



John T. Sullivan

JTS:jmf
cc: Dan James
Mel Morris

MEMORANDUM

State of Alaska

TO: Bruce Erickson
District EQ Supervisor

DATE: September 21, 1987

Through: Jim Allen *JA*
Regional EH Supervisor

FILE NO:

FROM: Arnold Shryock *AS*
Environmental Sanitarian

TELEPHONE NO: 486-3350

SUBJECT: "Biodry" -- Kodiak Fish
Reduction Plant

Enclosed with a copy of a letter sent to the City of Kodiak regarding Biodry is the following documentation:

a) two visible emission observation forms describing the dryer plume. The boiler still has a dark plume exceeding 20% opacity, but they are actively trying to improve that emission.

b) four photos showing visible emissions from Biodry. These were taken with a standard 50 mm lens and show these emissions as less intense than they actually appear.

c) four photos showing gurry spillage in the ramp and hopper area at the SE corner of the plant.

d) ~~two photos showing~~ Biodry wastewater washing into Gibson Cove. These photos were taken while Dan Robison, EPA, was in town. The discoloration is much more intense occasionally (when concentrated wastes are dumped without dilution -- the present dilution approaching 500,000 gallons per day I'm told).

e) thirteen statements from people who find a problem with odors. A number of these statements also describe problems with wastewater, rats, and gurry transport. [I have treated collecting these statements as an investigation and request that these statements be kept confidential as a protection to potential witnesses. Not all complainers had the courage to sign a statement and the City mayor made a general comment in a work session to the effect that Kodiak is an industry town and people who won't accept the smell of rotting fish are full of ----.]

You should know that the "Biodry" issue is controversial. The City has cowered at making an issue because members fear being seen as against the seafood industry. The City, who owns the property has just agreed to a 10 year lease with Kodiak Reduction, Inc., a consortium of the local processors, to allow them control of the plant with minimal owner interference. Both parties were made aware of these problems before agreeing to that lease.

cc: Everett Stone
Bill MacClarence
Manny Soares
Bill Lamoreaux

STATE OF ALASKA

STEVE COWPER, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

Division of Environmental Health
P.O. Box 515, Kodiak, AK 99615

486-3350

September 10, 1987

Sam Gesko
City Manager, City of Kodiak
P.O. Box 1397
Kodiak, AK 99615

re: Kodiak Fish Reduction Plant - "Biodry"

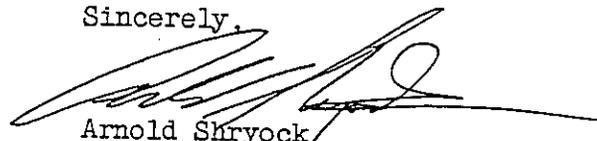
Dear Mr. Gesko:

During the last month we observed the following at the Kodiak fish reduction plant:

- 1) wastewater inside the cove. [This is made obvious by the apparent high solid content in the wastewater that occasionally discolors Gibson Cove. This violates State and federal discharge permits for this facility.]
- 2) fish waste spillage underneath the ramp and alongside the hoppers. [This spilled fish waste provides fly breeding habitat and rat forage in violation of Alaskan solid waste regulations and pollutions statutes -- 18 AAC 60.015 and AS 46.03.710. This area must be improved so that accidental spills can be cleaned up. The method that we suggested some time back is still probably the minimum improvement likely to give satisfactory results.]
- 3) high opacity white smoke from the dryer stack. [You have already received two opacity readings taken on August 20 when the temperatures were high and the humidity low -- conditions favoring minimal interference from the water droplet plume. These opacities far exceed the maximum allowed and violate Alaskan air quality regulations -- 18 AAC 50.050.
- 4) odor from the plant emissions that is pronounced and unpleasant. [Statements from people whose health is affected by these emissions, combined with those who for other well stated reasons find the odor unacceptable for themselves or Kodiak, are a powerful basis for claiming that the reduction plant odors are a public nuisance in violation of 18 AAC 50.110]

Documentation relating to these conditions are being sent to our regional office for evaluation. Statements describing any action to be taken by the City that may forestall any potential enforcement action -- such as a commitment to a rigid voluntary compliance schedule -- should be sent to Bruce Erickson at the regional office (3601 "C" St., Suite 1350, Anch., AK 99503).

Sincerely,



Arnold Shryock
Environmental Sanitarian

cc: Everett Stone, Jim Allen; DEH - ADEC
Bruce Erickson, Bill Lamoreaux; DEQ - ADEC

whether this backs up the pipe and dilutes the sample. It was not determined whether there is a backflow preventer on the line or not. If not, then there is a direct connection between the effluent line and the city water main.

Kodiak Reduction Inc. (KRI) also contracts the M/V Beaver to haul fish waste to the ocean dump zone. This summer, the ship is docked at the city-owned dock in Gibson Cove. At the time of my visit to this facility, there was spilled waste on the dock and emptied totes were being hosed down and the wastes going into the harbor. The M/V Beaver may be moved to the dock owned by Cook Inlet Processors Inc.

The Second Reading of the ordinance to lease the reduction facility to KRI was before the City Council this evening (8/27/87). It was tabled for two weeks because KRI was not satisfied with the termination clause in the contract.

Effluent from KRI is very obvious in the harbor. It was observed entering Gibson Cove at 8:30 p.m. on Wednesday, August 26, 1987. (Photos taken). The oil storage tanks located outside the building do not have any containment devices. Any spill would go directly into the bay.



NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code 1N 25 NPDES 3AK0023434 11 12 870219 17 Inspection Type 18C Inspector 19R Fac Type 202

Remarks

Reserved 67 Facility Evaluation Rating 70 BI 71 QA 72 Reserved 73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected <u>City of Kodiak Fish Waste Reduction Facility</u> <u>Gibson Cove</u> <u>Kodiak, Alaska 99615</u>		Entry Time <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM <u>3:00</u>	Permit Effective Date <u>04/18/86</u>
Name(s) of On-Site Representative(s) <u>Sam Gesko</u> <u>Dan James</u> <u>Dan Mullen</u>		Title(s) <u>City Manager</u> <u>General Manager</u> <u>Plant Manager</u>	Permit Expiration Date <u>04/17/91</u>
Name, Address of Responsible Official <u>Sam Gesko</u> <u>710 Mill Bay Road PO Box 1397</u> <u>Kodiak, Alaska 99615</u>		Title <u>City Manager</u>	Phone No(s) <u>(907) 486-8363</u>
		Phone No. <u>(907) 486-3224</u>	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<u>M</u> Permit / Compliance Order	<u>M</u> Flow Measurement	<u>N</u> Pretreatment	<u>S</u> Operations & Maintenance
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>M</u> Compliance Schedules	<u>N</u> Sludge Disposal
<u>S</u> Facility Site Review	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program	<u>N</u> Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

OUTFALL: Line was dye-tested by Everett Stone of DEC. No problems since December 16th

LAB: BOD, Oil & Grease - run at the STP.

FLOW: Estimated from water use less amounts: (4 gal/min) going to air scrubber; and from washdown (est. as 4 gal/min also). Two City lines. Line 1 - cooling/scrubbing Line 2 - washwater/san.

PERMIT: Discussed compliance order 1086-09-27-309 item 9 under finding of fact with Gesko, James, & Mullen:

- (a) Hopper drainage water - now has a system of troughs to route this to the sump & splash guards
- (b) TSS - a screen basket was installed at the sump to collect solids (coming off from the dewatering conveyor)

[OVER]

Name(s) and Signature(s) of Inspector(s) <u>P. BRUCE DUNCAN</u> <u>P. Bruce Duncan</u>	Agency/Office/Telephone <u>REGION 10 / A00-A / (907) 271-5083</u>	Date <u>03/09/87</u>
Signature of Reviewer	Agency/Office	Date
Regulatory Office Use Only		
Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance

U.S. Department
of Transportation
United States
Coast Guard



Memorandum

Kodiak

Subject Fluorescent green water color in
Gibson Cove on 5 June 1986

Date: 13 June 1986

From Supervisor, Marine Safety Detachment
Kodiak, Ak

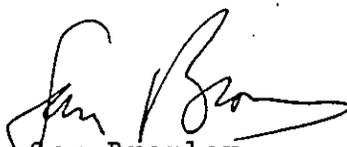
Reply to
Attn of

To Mr. Arnie Shryock, ADEC

At approximately 1900 on 5 June 1986, I received a telephone call from a person inquiring about a large fluorescent green area in the water at Gibson Cove. I went to Gibson Cove and noted that an area of the water approximately 50 to 100 square feet in area was indeed a bright fluorescent green color. This area was near the seaward entrance to the cove and a small buoy was in the immediate area. I noted ~~an outfall coming from the Bio-Dry plant going in the general direction of the green area.~~ I could not see if this outfall terminated in the fluorescent area.

I then went to the Bio Dry plant and talked to two workmen who were attempting to place the plant back in operation. They indicated that a water by product of the fish drying process may have entered Gibson Cove via the Bio Dry outfall during the start up process.

On 6 June, I notified you of the above. I have taken no further action on this matter.


Sam Bromley

REPLY M-MO

State of Alaska

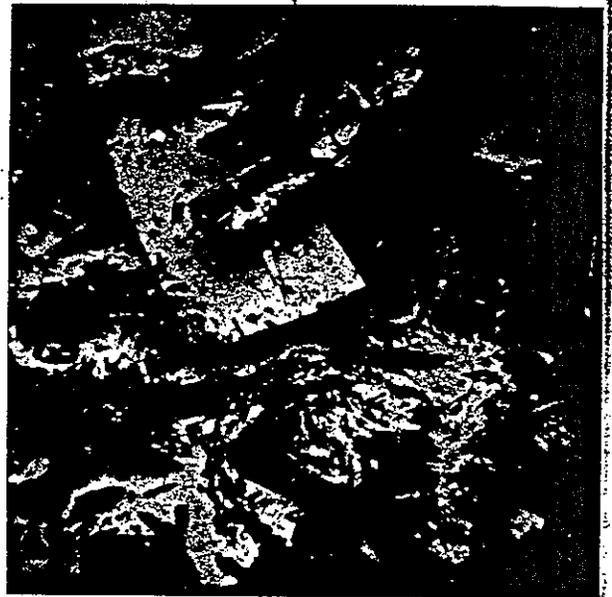
MESSAGE

REPLY

From: *Tom Palmer* DATE: *6/11/87*
 From: *Christ W. Homy*
 Subject: *Crudest Camp*
Could you please confirm
this as fish oil? Have
collected from a suspected
spill @ Gibson Cove Kodiak
Alaska on 6/10/87.

TO

DATE



TANN SUSPECTED FISH OIL POLLUTION ON
 BEACH HEAD OF GIBSON COVE KODIAK, ALASKA
 by *Christ W. Homy* 6/11/87

Thank

Christ W. Homy

Tom Palmer

EP YELLOW COPY.

2. SEND WHITE AND PINK COPIES WITH CARBON INTACT.

1. WRITE REPLY.

2. DETACH STUB, KEEP PINK COPY. RETURN WHITE COPY TO SENDER.

To: Jim Hayden Anch
From: Curtis W. Howe - Kodiok
Subject: Report of Water pollution at Gibson
Cove Kodiok, Alaska.

6/11/87

At 7:15 A of 6/10/87 while at home, I received a phone call from Kodiok State Dept. of Fish and Game Biologist Pat Holmes. Pat said that the evening before he had observed pollution of some type on the sea waters at the head of Gibson Cove between the NMFS HQ and the inoperative ferry the KAIKAIWA. While flying over this area.

I visited the site in question examining the head surroundings, waters and docks. Examination revealed a tan colored, fishy smelling, feeling, viscous liquid which might be fish oil. It was noted on beach + water of this area. Estimated concentration being 50-100 gal. During the inspection wind was blowing briskly toward the head of the Cove from its entrance.

NMFS employee John Cook whom I interviewed said he had first noted this slick on 6/9/87 ~ noon.

Three possible sources of pollution reviewed were BUDRY (Kodiok Reduction, Inc), Old KAIKAIWA Material Plant and The FIV Blower a auto waste

"Hauling vessel" for KRI. The oil 'Kolokole' did not appear to be the pollution source. While the FV Blower was taking a small amount of liquid + solids to the cause at its moorage, it too did not appear to be the source of this particular pollutant. Interview with Fleet Engineer Toby CAVERPISH indicated he had first sighted the slick on 6/9/87 on the left side entrance to the cause. In addition he recalled that he believed Bio-DRY had pumped its waste sump several days ago.

I visited the site of spill with Dan K. JAMES General manager of Kodiak Reduction, Inc. Upon examining the oily substance he said it could have come from the facility's waste sump pumping but was not completely sure. He said the substance was not the same color as waste sump contents. He did admit they had recently pumped their sump. He also said that the city would be installing equipment to treat waste sump liquids in order to completely increase plant efficiency + possibly reducing water pollution.

While returning to Bio-Dry facility from spill site a similar slick was noted down the middle of the cause coming from the general direction of Bio-DRY's waste water outfall discharge point.

I communicated my findings to you on the AM of 6/10/87. My conclusion and suggestions are:

- 1- The Bio-DRY facility appears to be the most likely source of pollution.
- 2- ADEC may wish to require that the city speed up it's installation of Waste Water Treatment, equipment.
- 3- The city to whom I believe the NPDES permit is issued may be in violation of it's permit.
- 4- If ADEC is to permit firm to pump the heavily oil solid foated waste sludge we should require that it be done under wind current conditions which will not force it into Gibson Cove.
- 5- Extending the outfall line past it's present point of discharge at the entrance to Gibson Cove may be of help.

After you have thought on this a while give me a call and we can decide on how we want to follow up on this.

I'll try for a few photos and, no-lye samples
of the suspected fish oil. 4

Please note attached photo of tan suspected oil
on beach of case.

A sample of ~50ml. of the suspected fish oil is
on its way to the Palmer Lab for confirmatory analysis

cc Manuel Soares



NPDES Compliance Inspection Report

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Section A: National Data System Coding

Transaction Code 1 <u>N</u> 2 <u>5</u>	NPDES 3 <u>A</u> <u>K</u> <u>I</u> <u>O</u> <u>0</u> <u>2</u> <u>3</u> <u>4</u> <u>3</u> <u>4</u> 11	yr/mo/day 12 <u>8</u> <u>5</u> <u>0</u> <u>9</u> <u>1</u> <u>9</u> 17	Inspection Type 18 <u>C</u>	Inspector 19 <u>R</u>	Fac Type 20 <u>Z</u>
Remarks					
Reserved 67 <u>↓</u> 69	Facility Evaluation Rating 70 <u> </u>	BI 71 <u> </u>	QA 72 <u> </u>	Reserved 73 <u> </u> 74 <u> </u> 75 <u> </u> 80	

Section B: Facility Data

Name and Location of Facility Inspected <u>CITY OF KODIAK</u> <u>FISH WASTE REDUCTION FACILITY</u> <u>KODIAK, ALASKA 99615</u>		Entry Time <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM <u>1:00</u>	Permit Effective Date <u>BEING WRITTEN</u>
Name(s) of On-Site Representative(s) <u>GENE NORMAN</u>		Exit Time/Date <u>4:15 P / 850919</u>	Permit Expiration Date <u> </u>
Title(s) <u>FOREMAN, MATSU CONSTRUCTION</u>		Phone No(s) <u>907-486-8363</u>	
Name, Address of Responsible Official <u>SAM GESKO</u> <u>CITY OF KODIAK</u> <u>P.O. Box 1397</u> <u>KODIAK, ALASKA 99615</u>		Title <u>CITY MANAGER</u>	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Phone No. <u>907-486-3224</u>	

Section C: Areas Evaluated During Inspection

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Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

This facility is not currently in operation. The facility is under reconstruction for processing machinery. It is anticipated the plant will be operational in November 1985.

The plant was inspected during this time in order to evaluate the fish waste reduction process. A thorough understanding of this process is necessary in order to write the NPDES permit. The permit is currently being written.

The new machinery is "state of the art" for fish-meal processing. The recovery process for solids and oil and grease should allow for a very clean effluent. The permittee will be required to monitor the effluent for BOD, TSS, SS, pH and oil and grease. Wastewater to be discharged through a 600 foot outfall line.

Name(s) and Signature(s) of Inspector(s) <u>Valerie Payne</u> <u>VALERIE PAYNE</u>	Agency/Office/Telephone <u>EPA</u> <u>ALASKA OPERATIONS / 271-5083</u>	Date <u>09/19/85</u>
Signature of Reviewer	Agency/Office	Date
Regulatory Office Use Only		
Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance

MEMORANDUM

State of Alaska

TO: Jim Hayden
Environmental Field Officer
Anchorage

DATE: November 19, 1986

FILE NO:

TELEPHONE NO: 486-3350

FROM: Everett W. Stone jr.
Environmental Sanitarian
Kodiak

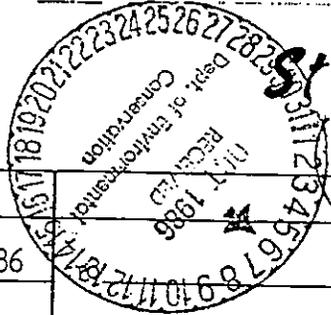
SUBJECT: Kodiak's Bio-Dry waste
reduction facility

I conducted a walk through inspection of this facility this date with city manager Sam Gesko and engineer Larry Monroe at Sam Gesko's request. Observations made by me include:

- 1- Visible black smoke was occasionally being emitted from the boiler smoke stack.
- 2- Waste outfall line to St. Paul harbor was broken at the base of the cliff in Gibson cove, resulting in the discharge of waste waters from this facility into the cove. This was confirmed by the addition of dye to the scrubber waste water sump and it's rapid appearance in the water of Gibson cove as noted above.
- 3- Waste water discharge did not appear to meet EPA permit criteria from a stand point of screening and the fact that it left a visible sheen on the waters of the cove. Examination of the in plant waste water sump revealed that there was no screen over the waste sump pump intake and that a excessive amount of solids appeared to be reaching this sump instead of being handled by the dryer as plant is designed.
- 4- Decomposing seafood waste was noted dripping from a large silver storage tank located in front of the facility on the right hand side as entered. Condition creates insect, rodent and bird attractant, smells bad.

cc Arnold Shryock
Julie Howe

REPLY MEMO



State of Alaska
 File Biodry
 REPLY

MESSAGE

Jim Hayden

DATE 9.30.86

DATE

From: Everett W. Stone jr.

on this as well as the Kodiak city manager.

Subject: Bio-Dry Kodiak facility

The spill had been cleaned up or dissipated

while driving past this reduction facility

by approximately 4:30P.M. of this date.

at the P.M. of 9.29.86 a orange colored oil

A notice of violation was not issued.

lick was noted on the waters of Gibson cove

bordering this facility. Subsequent follow

cc Julie Howe

up revealed that the firm had spilled a small

Manuel Soares

quantity of salmon oil ^(25-50 gal EST) on the grounds in front

of the plant and had washed it down in to the

waters of Gibson cove. The employee in charge

Randy Mullen was told that in the future

oil spills must be contained and cleaned up

and not flushed into the cove.

A USCG marine safety detachment was contacted

YELLOW COPY. 2. SEND WHITE AND PINK COPIES WITH CARBON INTACT.

1. WRITE REPLY. 2. DETACH STUB, KEEP PINK COPY. RETURN WHITE COPY TO SENDER.

STATE OF ALASKA

BILL SHEFFIELD, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

Division of Environmental Health
Box 515, Kodiak, AK 99615

Telephone: (907)
Address:

486-3350

June 2, 1986

Sam Gesko
City Manager, City of Kodiak
P.O. Box 1397
Kodiak, AK 99615

Bio Dry

re: Kodiak Fish Reduction Plant

Dear Mr. Gesko:

Thanks for allowing us to view the rebuilt fish reduction facilities with you last Friday. The new machinery in the plant is certainly very impressive and we're all hoping that it does produce a good product without causing the public nuisance class stench that characterized the former "Biodry" plant.

We did notice some improvements that were not made, however; improvements that are desirable from a public health or environmental health standpoint. Specifically:

a) ~~The wastewater discharge point, as indicated by the bow, is inside of~~ Gibson Cove. Your EPA wastewater permit specifies that wastewater must not even enter this cove. Because there is a sill restricting water movement inside the Cove and because your final discharge is to the cove side of this sill, you can expect nuisance conditions to prevail when the oxygen demand of your wastewater is anomalously high. You mentioned that the line was installed as per drawings that were sent to our department for review -- I have referred that information to our coordinator to EPA, Julie Howe. She will look at the drawings and get back in touch with you.

b) The water from the cleanup of the pad under the hoppers discharges directly to Gibson cove and water still stands along the east side of the building. The area under the hoppers use to have large quantities of spilled gurry; it is obviously inappropriate to discharge that directly to Gibson Cove. Similarly, gurry spillage from the hoppers use to cause that puddled water along the east side of the building to be a teeming with maggots. The drainage there should be yet improved and a catchment for any gurry spilled there should be developed (one that will allow for that spillage to be retrieved for use in the reduction processes).

c) The hoppers have not been upgraded to minimize spillage. Your proposal to install splash guards alongside the hoppers may help. The truck ramp itself proposes a problem. Its wood construction does not allow it to be hosed down. Some Gurry will fall onto this ramp and will either puddle there or drain onto the soil underneath.

d) EPA will certainly expect Kodiak to prevent any routinely high BOD wastewater discharges. The discharge of your "20% concentrate" to the Cove

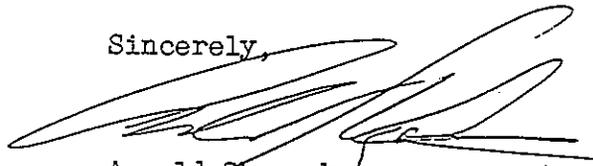
(con't)

following short runs could present a problem that should be discussed with them. If there is a technological problem here, you may wish to ask for advice from our Anchorage engineering staff.

e) You should consider berming the large used oil storage tank that sits near the truck ramp. You'll certainly want to include the reduction plant's oil storage tanks in your EPA Spill Prevention Control and Countermeasure (SPCC) plan. Our State regulations only require that the tanks be "placarded". The information required on the placard is specified in section 120 of the oil pollution regulations (enclosed).

Someone suggested on Friday that care taken when dumping gurry into the hoppers would go a long way towards averting any nuisances alongside the plant. I suspect that superb operational care will not substitute for improvements and hope that upgrades there are given a priority approaching that that must be given to proper wastewater discharge.

Sincerely,



Arnold Shryock
Environmental Sanitarian

enclosure: oil pollution regulations

cc: Jim Allen and Julie Howe, ADEC Regional Office
Manny Soares, ADEC Seafood Office
Valerie Payne, EPA District Office

MEMORANDUM RECEIVED State of Alaska

APR 30 1984

DATE: April 20, 1984

TO: Bob Martin
Deputy Director
ADEC, Anchorage

Everett W. Stone
ALASKA OPERATIONS

NO:
TELEPHONE NO: 486 - 3350



FROM: Everett Stone
Environmental Sanitarian
ADEC, Anchorage

SUBJECT: Bio Dry/Kodiak Reduction
Inc.

On this date, it was noted that a tan/brownish waste fluid was being pumped from a pipe and draining down the rock cliff into Gibson Cove located below this facility.

My inspectional credentials were presented to Wayne Jensen, who was supposed to be hauling waste from this facility to the M/V Penguin, a waste hauling scow operated by Howard Valley. I brought this wastewater discharge violation to the attention of Mr. Jensen, who stated that he had started the pump which was discharging waste liquids into Gibson Cove. Upon informing him of the violative nature of this condition, he stopped the pump. I told him that any further discharge would result in the issuance of a Notice of Violation. He thanked me for the "warning".

These conditions were documented by some 15 or so 35 mm Kodachrome slides taken of this wastewater violation.

Earlier in the day I had contacted Bill Lamoreaux regarding this situation. Bill advised me to return to the facility and further investigate this matter, which I did, as per the above information.

I contacted you on the p.m. of this date after I was not able to reach Bill Lamoreaux. I apprised you of the above referenced findings. According to Mr. Jensen, they were attempting to move the old terribly putrid and rotten seafood waste from this facility's holding hoppers. In order to do so, they had to use water to wash down some of the equipment and loosen the waste. Water from this operation drains into this facility's waste sump. These waste liquids which appear to have a heavy solids loading, were being pumped as referenced above, and draining over the cliff into Gibson Cove at the above referenced location. Mr. Jensen stated they were trying to clean the place up and I believe said something to the effect that it might be back in operation soon.

I contacted City Manager, Sam Gesko who was quite upset to learn waste were being pumped into Gibson Cove. He promised to contact Craig Priebe, Alaska Pacific Seafoods, Kodiak facility Superintendent Olie Olson, Superintendent of King Crab Inc.. Both of these facilities have some type of corporate connection or interest in Kodiak Reduction, which I believe will be operating the Bio Dry facility. I believe Mr. Craig's superior in Seattle, Brian Kelly is the President of Kodiak Waste Reduction Inc.. As per our phone conversation of this date, I suggested to you that phone contact be made with these individuals to inform them of their violation of the law, and to caution them that it must

Bob Martin

-2-

April 20, 1984

not continue.

I will contact you on April 23, 1984 to discuss any followup action we might want to take on the situation.

I thank you for your forbearance in this ongoing situation.

EWS:jh

cc: Jim Allen/ADEC, Anchorage