

Alaska Department of Environmental Conservation
Division of Water



Module 7

Compliance Inspections and Other Issues

2012 SEAFOOD PROCESSING WASTE PERMITTING & COMPLIANCE WORKSHOP

Anchorage, Alaska • February 28-29, 2012

Module 7 – Compliance Inspections & Other Issues

MODULE 7



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Module 7 – OBJECTIVES

MODULE 7



- Waste Treatment BMP
- Training & Implementation
- Records & Required Paperwork

Module 7 – OBJECTIVES *cont.*

MODULE 7



- Reporting Violations
 - Daily / Annual
- Corrective Action & Response
- Monitoring & Processing Location Logs

Module 7 – OBJECTIVES *cont.*

MODULE 7



- Sample Ports & Outfall System Requirements
- Shorebased Facilities Compliance
- Annual Reports

Module 7 – What You Will Learn

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- What are the requirements for your Best Management Practices Plan?
- What areas in your QAPP will be reviewed onsite
- What will inspectors want to see when they inspect your facility?
- What will DEC inspectors be looking for?
- Reporting requirements – annual, violations, etc.

What will inspectors want to see? - Quality Assurance Project Plan (QAPP)

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- **5.1.5 Quality Assurance Project Plan**
 - 5.1.5.6 - A copy of the QAPP (must be kept on site and made available to DEC upon request)
 - designed to assist in planning for the collection and analysis of effluent and receiving water samples
 - either an ADEC approved generic Seafood Processing Facility QAPP (if available) or
 - a facility-specific QAPP
 - an operator shall use DEC-approved QA/QC and chain-of-custody procedures, as described in the *Requirements for Quality Assurance Project Plans (EPA/QA/R-5)* and *Guidance for Quality Assurance Project Plans (EPA/QA/G-5)*. The QAPP shall be prepared in the format specified in these documents.

What will inspectors want to see?

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- 5.1.5.5.1 - Details on number of samples, type of sample containers, preservation of samples, holding times, etc.
- 5.1.5.5.2 - Maps indicating the location of each sampling point
- 5.1.5.5.3 - Qualification and training of personnel

What will inspectors want to see?

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- 5.1.5.5.4 - Name, address, and telephone number of all laboratories used by or proposed to be used
- Your sampling equipment
- Your refrigerator with a thermometer



6.1 Best Management Practices Plan (BMP)

BMP Requirements

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- Prevent or minimize the generation and discharge of wastes and pollutants.
- Develop and implement a BMP Plan that satisfies the requirements of this Part within 60 days of the effective date of authorization to discharge .
- Inspectors will be looking for a dated signature (see above).

BMP Requirements

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- Consistent with “*Guidance Manual for Developing Best Management Practices*” (USEPA 1993) guidance, or
- “*Seafood Processing Handbook for Materials Accounting Audits and Best Management Practices Plans, EPA and Bottomline Performance*” (1995).

The screenshot shows the EPA's National Service Center for Environmental Publications (NSCEP) website. The page is titled "Document Display" and shows the cover of the "Guidance Manual for Developing Best Management Practices (BMP)". The cover features a black and white photograph of an industrial facility with smokestacks and buildings, with white arrows forming a circular path around the text. The page includes a navigation menu on the left, a search bar at the top, and a footer with various links and a "GET A COPY" button.

BMP Requirements

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- Shall include any necessary plot plans, drawings, or maps and shall be developed in accordance with good engineering practices
- Materials accounting of the inputs, processes, and outputs of the facility.

Material Accounting

Inflow = Outflow + Accumulation

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Example 1: For the entire seafood processing facility

- Inflow = Seafood catch, fresh water, salt water, cleaning chemicals, processing additives, boiler and cook water.
- Accumulation = Product
- Outflow = Inflow minus product

Example 2: Process Step of Head-and-Gut

- Inflow = Whole seafood, cleaning water
- Accumulation = Headed and gutted seafood (to next process step)
- Outflow = Heads, guts, blood, slime, scales, trimmings, unusable seafood, water.

BMP Requirements

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- 6.1.5.2.4 Risk Identification and Assessment
- 6.1.5.2.5 Specific management practices and standard operating procedures including but not limited to:
 - Reducing or eliminating any discharge of wastes that have the potential to collect and foul set or drift nets used in subsistence or commercial fisheries in nearby traditional use areas.
 - Chlorine, other disinfectants

BMP Requirements

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- Select chemical cleaning compounds and disinfectants
- Apply chemical cleaning compounds and disinfectants in accordance with manufacturer instructions and suggested application rates.
- Practices for the proper operation of marine sanitation devices
- Practices to avoid creating attractive nuisance situations

BMP Requirements

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- Must include Standard Operating Procedures for conducting:
 - Grinder system inspections. Include how you take a “representative” sample and measure to ensure pieces less than ½”. (Who, where, when, how?)
 - Sea surface / shoreline monitoring. Who, where, when, how?
- Include a maintenance schedule for grinder system.
- Good house keeping practices.

Seagull Concentration by Outfall

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Incidental Foam and Scum

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Practices to minimize incidental foam and scum produced by the discharge of seafood catch transfer water to the extent practicable



BMP Requirement

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- Good housekeeping
- Preventative maintenance
 - periodically inspecting, maintaining, and testing seafood processing facility equipment and systems
- Inspection and records
- Employee Training

Example of a BMP



ALASKA'S TOP NOTCH SEAFOOD PLANT, LLC

Best Management Practices Plan

Permit # AK-G52-0000

08/02/2009
Revision 2

Alaska's Top Notch Seafood Plant, LLC

Best Management Practices Plan

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Last Revised: 08/02/09 E:\Alaska Top Notch Seafood Plant\BMP\Alaska Top Notch Seafood BMP Plan.doc 2

6.1.4 BMP Objectives

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- Address the number and quantity of pollutants and the toxicity of the effluents
- 6.1.4.2.1 Each facility component or system shall be examined for its pollutant minimization opportunities.
 - must include all normal operations, including raw material and product storage areas, in-plant conveyance of product, processing and product handling areas, loading or unloading operations, wastewater treatment areas, sludge and waste disposal areas, scuppers, floor drains, and refueling areas.

BMP Objectives

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- 6.1.4.2.2 Equipment shall be examined for potential failure and any resulting release of pollutants

BMPs

MODULE 7



BMPs



BMPs



- Waste is ground and goes down the left shoot.
- Unground waste falls down shoot on right and goes out the outfall thus bypassing the waste treatment system.

What will DEC inspectors be looking for?

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- A current BMP plan with a copy of the certification letter.
- Line drawings
- All potential discharge locations addressed
- Inspection logs
- Equipment maintenance logs
- Signatures of the facility manager and appropriate staff

Records and Required Paperwork

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1. Copy of Permit
2. ADEC authorization
3. BMP Plan
4. Monitoring Logs
5. Lab QAPP
6. Effluent sample analysis results
7. MSD US Coast Guard certification
8. A copy of the most recent NOI

Reporting Violations and Upsets

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- 24-hour reporting is required for a violation of a maximum daily discharge limitation for any of the pollutants listed in the permit as requiring 24-hour reporting.
 - None are listed in the offshore GP as requiring 24-hour reporting
- Administratively extended AKG52000 is less clear

Offshore GP Annual Report – Much More Detailed (Section 6.2)

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- Requires both a certified original report and an electronic copy in Word or Adobe.
- No later than February 14th.
- Includes (see Form E):
 - Number of processing days
 - Total amount raw product (pounds)
 - Total amount of finished product (pounds)
 - Total amount of discharged waste (pounds)
 - A large number of attachments

Required Attachments – Form E



SECTION 3- REQUIRED SUBMITTALS (ATTACHMENTS)	
	Daily production/discharge reports for each month (Part 6.2.2.3)
	Bathymetric chart of each processing location or area or operation (Part 6.2.2.4)
	Area maps of each processing location or area of operation (Part 6.2.2.5)
	Summary of noncompliance (Part 6.2.2.6)
	Report of volume of water lost through water vapor and calculations used to determine (Part 6.2.2.7)
	Report of any incidents of injured or dead Steller's eider (Part 6.2.2.8)
	Report of pounds of ammonia or Freon used and summary of the occurrence of leaks (Part 6.2.2.9)
	Updated NOI (if required) (Part 6.2.2.10.1)
	Seafood processing waste outfall monitoring report (Part 6.2.2.10.2)
	Marine sanitation device effluent monitoring report (Part 6.2.2.10.2)
	Graywater effluent monitoring report (Part 6.2.2.10.2)
	Receiving water monitoring report (Part 6.2.2.10.3)
	Summary report and certified copies of the waste conveyance and grinder system logs (Part 6.2.2.10.4)
	Outfall system pre-operational check log (Part 6.2.2.10.5)
	Summary report and certified copies of sea surface monitoring logs (Part 6.2.2.10.6)
	Digital pictures on CD or DVD (Parts 6.2.2.10.7)
	Other (Please specify)
	Other (Please specify)
	Other (Please specify)

Annual Report – Offshore GP Grinder Logs

MODULE 7



ATTACHMENT B - GRINDER AND WASTE CONVEYANCE INSPECTION LOG

For the grinder system inspection: Conduct a daily inspection of the grinder system during the processing season to confirm that grinders are operating and reducing the size of seafood waste to 0.5 inches or smaller in any dimension. If not, report the percentage that does not meet 0.5 inch and include the length of the largest piece.

For the waste conveyance system inspection: Conduct a daily visual inspection of the waste conveyance system, including the sump or other places of effluent collection for removal of gloves, earplugs, rubber bands or other items that may be entrained in the wastewater. Discharge of such items is prohibited.

AKG52 _____	GRINDER SYSTEM		WASTE CONVEYANCE SYSTEM
DATE/TIME/INITIALS	Grinders Operating Y/N	Size reduced to 0.5 inch or smaller? Y/N	Report observations on foreign objects found and disposal location.

Annual Report – Offshore GP

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- A report of all on-site incidents of injured and dead Steller's eider(s), including petroleum-related and collision-related incidents.
- One daily location determination of the processor in decimal degrees while processing.
- Digital photos
- **STILL NEED TO REPORT EVEN IF YOU DIDN'T PROCESS FISH!!!!!!**

Annual Report – Offshore GP Sea Surface Monitoring Logs

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ATTACHMENT C- SEA SURFACE VISUAL MONITORING LOG

An operator shall conduct daily sea surface monitoring while discharging to determine compliance with WQS, the permit conditions, and to document observations of, or incidents involving, threatened or endangered species.

PERMIT Number AKG52				
DATE/TIME	Estimate the area (feet) of continuous films, sheens, or mats of foam and the probable cause.	Tide cycle	Number of Steller sea lion, Steller's eider, spectacled eider, northern sea otter, and short-tailed albatross. Note if injured or dead and probable cause.	Initials of Observer

Annual Report Requirement

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- A summary of noncompliance and Corrective Actions taken, i.e., 1/2 " grind
- Effluent monitoring results (MSD, graywater, seafood waste outfall(s))
- Outfall system pre-operational check results

Outfall Sampling

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- The department may authorize a mixing zone for each authorized outfall(s) or discharge pipe(s) (1.2.1)
- Each authorized outfall will require a sample port
- Part of SOPs in BMP

Shorebased Facility Compliance

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- What will inspectors want to see in your BMP Plan?
 - A current BMP plan with a copy of the certification letter.
 - Line drawings
 - All potential discharge locations addressed
 - Inspection logs
 - Equipment maintenance logs

Shorebased Facility Compliance

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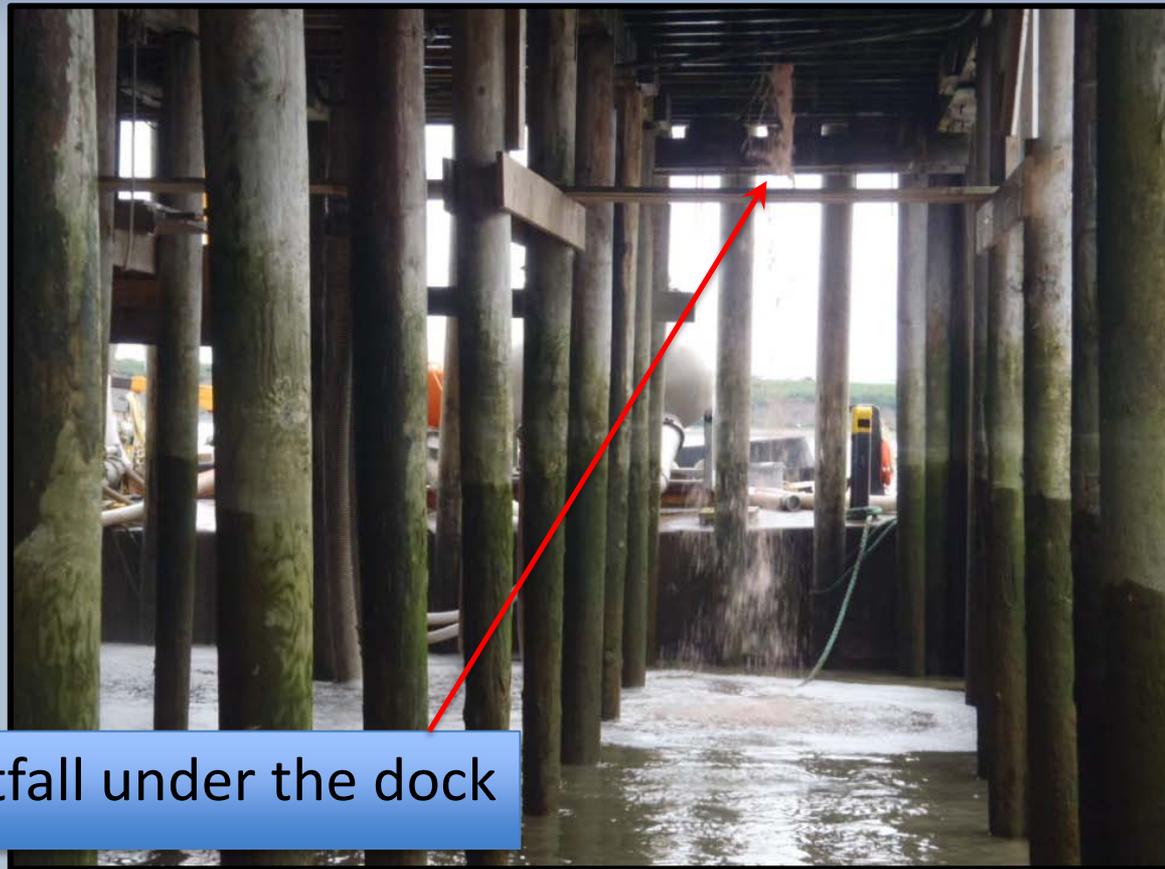
- Records and Required Paperwork
 1. Copy of Permit
 2. Copy of your NOI
 3. ADEC authorization
 4. BMP Plan
 5. Monitoring Logs
 6. Annual Reports and Seafloor Monitoring Reports
 7. No Exposure Certification (Industrial Stormwater Permit)

Shorebased Facility Compliance

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- What will inspectors want to see:
 - Your facility:
 - Process lines
 - Sample ports and sample event
 - Waste treatment system
 - Under your dock
 - Unauthorized outfalls
 - Treated and untreated seafood waste
 - Oil, fuel and chemical storage sites



Outfall under the dock

End of Module 7

MODULE 7

