United States Environmental Protection Agency

EPA REGION 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	06/08/2023 09:40 AM (PT)	Announced: No
Inspection Exit Date/Time	06/08/2023 03:10 PM (PT)	Access: Granted
Weather	48°F, Overcast, Misty	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, Industrial	
Type of Inspection	Compliance Evaluation Inspection	
Permittee Name	North Pacific Seafoods, Inc.	
Facility or Site Name	Alaska Pacific Seafoods - Kodiak	
Facility/Site Physical Address	627 Shelikof Street	
City, State, Zip Code	Kodiak, Alaska 99615	
Borough	Kodiak	
Facility GPS Coordinates	57.78526, -152.422192	
Mailing Address	4 Nickerson Street, Suite 400	
City, State, Zip Code	Seattle, Washington 98109	
FRS ID	110000526574	
Permit Number	AKG528434	
SIC	2077 (Animal & marine fats & oils) 2092 (Fresh & frozen seafood processing (pt))	

Lead Inspector:

RAYMOND ANDREWS — Digitally signed by RAYMOND ANDREWS Date: 2023.07.18 11:03:50 -07'00'

Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252

Supervisor Review:

PETER CONTRERAS — Digitally signed by PETER CONTRERAS Date: 2023.07.18 11:06:46 -07'00'

Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Alaska Pacific Seafoods – Kodiak (the "Site" or "Facility"), located at 627 Shelikof Street, Kodiak, Alaska, at 09:40 AM (PT) on 06/08/2023 for an unannounced inspection. I presented my credentials to Mr. Mitch Kilborn and informed him I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA) and the Alaska Pollutant Discharge Elimination System (APDES) general permit for Seafood Processors Operating Onshore Facilities in Kodiak, Alaska ("Permit"), permit # AKG528434. This report is based on information supplied by Alaska Pacific Seafoods representatives, direct observations made by me, and records and reports maintained by the permittee. In addition, information gathered prior to or after the inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
North Pacific Seafoods	Mitch Kilborn	Plant Manager	Yes	Yes
North Pacific Seafoods	Matthew Moir	General Manager	Yes	Yes
North Pacific Seafoods	Veena Salgatar	EHS Coordinator	Yes	Yes

Facility Information

Responsible Official	Margaret de Gravelle; Environmental Compliance Manager, margaretdegravelle@npsi.us
Type of Operation	Seafood processing
What does the facility produce?	The facility produces fresh and frozen processed seafood products, which includes salmon, halibut, cod, rockfish, and crab.
Size of Facility	The facility is approximately19,000 ft^2. All processing is done inside the buildings. The only activities conducted outside is the unloading of raw product and loading of finished products.
Number of employees and hours of operation	The facility employees approximately 220 people. During processing season, the facility operates two shifts, which cover 24-hour a day, 7-day a week operations.
What waste does the facility generate?	The facility generates fish by-products as a processing waste. The waste flows into a hopper. From the hopper, the waste is transferred to a truck which transfers the material to another facility so it can be further processed into fish meal.
How often does the facility discharge?	When processing, the facility continuously discharges approximately 375,000 gallons per day through a single outfall, which is visually inspected daily.
Do you use in-house or contract out for laboratory analyses? Or both?	The facility analyzes total residual chlorine (TRC), pH, and temperature in-house. All other parameters, such as biochemical oxygen demand (BOD), total suspended solids (TSS), total dissolved solids, settleable solids, oil and grease (O&G), and total ammonia are analyzed by a local contract lab. The contract lab used by the facility is: Kodiak Seafood Laboratory, Inc. 301 Research Court Kodiak, Alaska 99615 Phone: (907) 481-1700

SECTION II – Observations

No Areas of Concern were observed during the site tour.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		**AOC:** Yes
Ref #: RA1-RR-012	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 07/14/2023
After the inspection, I reviewed data in EPA's ICIS database from July 1, 2018, through June 30, 2023. The ICIS database showed the facility failed to submit one Discharge Monitoring Report (DMR). The facility failed to submit the DMR for the monitoring period ending June 30, 2022, which was due by July 15, 2022.		
Record: Other - Facility Response to ADERC Noncompliance Letter		**AOC:** No
Ref #: RA1-RR-011	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of inspection, I reviewed facility's response, dated May 29, 2019, to ADEC's Letter of Noncompliance.		
Record: Other - Best Management Practices (BMP) Plan		**AOC:** No
Ref #: RA1-RR-010	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of inspection, I reviewed the facility's BMP Plan, dated January 20, 2022. I did not find any issues.		
Record: Other - Collective Receiving Water Quality Monitoring Study		**AOC:** No
Ref #: RA1-RR-009	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of inspection, I reviewed the facility's Collective Receiving Water Quality Monitoring Study, dated October 2022.		
Record: Other - Alaska Department of Conservation (ADEC) Authorization Letter		**AOC:** No
Ref #: RA1-RR-008	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of inspection, I reviewed ADEC’s letter of authorization to discharge under new permit, dated June 1, 2021.		
Record: Other - Alaska Department of Conservation (ADEC) Noncompliance Letter		**AOC:** No
Ref #: RA1-RR-007	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of inspection, I reviewed a letter Noncompliance sent to the facility from ADEC, dated May 3, 2019, stating the facility was in violation of Permit Part 3.7 because foam was visible on the water surface at the base of the boat dock.		
Record: Other - Seafloor Monitoring Quality Assurance Project Plan (QAPP)		**AOC:** No
Ref #: RA1-RR-006	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of the inspection, I reviewed the Seafloor Monitoring QAPP, dated July 2022. I did not find any issues.		
Record: Other - Seafloor Monitoring Report		**AOC:** No
Ref #: RA1-RR-005	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of inspection, I reviewed the facility’s 2022 Seafloor Monitoring Report.		
Record: Other - pH Meter Calibration Log		**AOC:** No
Ref #: RA1-RR-004	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of inspection, I reviewed the facility’s pH Meter calibration log covering the period January 18, 2023, through June 5, 2023. pH Analysis is required 4 times/month (weekly). The pH meter is calibrated prior to collection of each grab sample.		
Record: Other - Annual Reports		**AOC:** No
Ref #: RA1-RR-003	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of inspection, I reviewed the facility’s 2022 Annual Report, dated March 15, 2023.		

Record: Other - Notice of Intent (NOI)		**AOC:** No
Ref #: RA1-RR-002	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of inspection, I reviewed the facility's most recent NOI, dated May 13, 2021.		

Record: Other - Quality Assurance Project Plan (QAPP)		**AOC:** Yes
Ref #: RA1-RR-001	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/08/2023
At the time of the inspection, I reviewed the facility's Quality Assurance Project Plan (QAPP), dated May 2023. I noted two deficiencies in the QAPP: • The QAPP did not contain the "Qualification and training of monitoring personnel. • The QAPP did not show the number of samples, holding time of pH or the type and number of quality assurance field samples." Table 13 gives the number of QC samples for the parameters analyzed by the facility but not those analyzed by the lab. The Lab's QA/QC plan is referenced but that information should be included in the facility QAPP's table. If the lab's QA/QC plan is referenced, it should be included in the QAPP as an Appendix and the Appendix and page number of the appendix should be specifically referenced.		

SECTION IV – Sampling Activities

No sampling was conducted.

SECTION V – Areas of Concern

Areas of Concern may not be in sequential order.
The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-001	**Records Review: Other - Quality Assurance Project Plan (QAPP)**
Permit Requirement **Permit Part 2.9.9.4**, "At a minimum, the QAPP shall include...Qualification and training of monitoring personnel."	
AOC: The QAPP does not have the "Qualification and training of monitoring personnel."	

AOC Reference #: RA1-RR-001	**Records Review: Other - Quality Assurance Project Plan (QAPP)**
Permit Requirement **Permit Part 2.9.9.1**, "At a minimum, the QAPP shall include...number of samples...holding times...type and number of quality assurance field samples..."	
AOC: The QAPP does not show the number of samples, holding time of pH or the type and number of quality assurance field samples."	

AOC Reference #: RA1-RR-012	**Records Review: Other - EPA's Integrated Compliance Information System (ICIS) Database**
Permit Requirement **Permit Part 2.2.4.11.1**, "E-Reporting Rule - Phase I (DMRs). The permittee must submit a DMR for each month by the 15th day of the following month. DMRs shall be submitted electronically through NetDMR..."	
AOC: The facility failed to submit the DMR for the monitoring period ending June 30, 2022, which was due by July 15, 2022.	

SECTION VI – Closing Conference

I held a closing conference with Facility personnel at 03:10 PM (PT) on 06/08/2023. During the closing conference, I discussed my observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – List of Appendices

1. Photo Log

APPENDIX 1: Photo Log

All photos were taken by Lead EPA Inspector, Ray Andrews, during the inspection.

Photos were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photo.

All photos taken during the inspection are included in the Photo Log; however, only photos that support an Area of Concern are included in the inspection report.

- P1010789 – Quality Assurance Project Plan (QAPP), cover page, dated May 2023
- P1010790 – Quality Assurance Project Plan (QAPP), Title and Approvals page, signed June 2023
- P1010791 – Quality Assurance Project Plan (QAPP), Table 6, Project Measurement Quality Objectives (MQOs)
- P1010792 – Outfall Narrative from NOI, page 1
- P1010793 – Outfall Narrative from NOI, page 2
- P1010794 – pH Meter Calibration Log, dated January 18, 2023, through June 5, 2023
- P1010795 – 2022 Seafloor Monitoring Report, cover page
- P1010796 – 2022 Seafloor Monitoring Report, Table of Contents page
- P1010797 – 2022 Seafloor Monitoring Report, Signatory page
- P1010798 – 2022 Seafloor Monitoring Report, Executive Summary page
- P1010799 – ADEC Noncompliance Letter, dated May 3, 2019, page 1
- P1010800 – ADEC Noncompliance Letter, dated May 3, 2019, page 2
- P1010801 – ADEC Letter of Authorization, dated June 1, 2021
- P1010802 – Best Management Practices (BMP) Plan, cover page, dated January 10, 2022
- P1010803 – Best Management (BMP) Plan, Certification Statement, signed January 13, 2022
- P1010804 – Monthly Outfall Water Temperature Log, dated May 2023
- P1010805 – Waste Conveyance System Monitoring Log, dated June 5, 2023
- P1010806 – Sea Surface and Shoreline Monitoring Observation Log, dated June 5, 2023
- P1010807 – NPDES Effluent Sample Data Sheet Chain of Custody, dated June 6, 2023
- P1010808 – Facility response to ADEC Letter of Noncompliance, dated May 29, 2019