

EPA REGION 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	06/09/2023 9:35 AM (PT)	Announced: No	
Inspection Exit Date/Time	06/09/2023 2:50 PM (PT)	Access: Granted	
Weather	46°F, Overcast, Drizzly		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, Industrial		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	Trident Seafoods Corporation		
Facility or Site Name	Trident Seafoods - Pillar Mountain Plant		
Facility/Site Physical Address	521 Shelikof Street		
City, State, Zip Code	Kodiak, AK 99615		
Borough	Kodiak Island		
Facility GPS Coordinates	57.78619, -152.41806		
Mailing Address	5303 Shilshole Avenue NW		
City, State, Zip Code	Seattle, Washington 98107		
FRS ID	110000529599		
Permit Number	AKG528825		
SIC	2092 (Fresh or frozen seafood), 2077 (Animal & marine fats & oils)		
Lead Inspector:			
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Trident Seafoods - Pillar Mountain Plant (the “Site” or “Facility”), located at 521 Shelikof Street, Kodiak, Alaska, at 09:35 AM (PT) on 06/09/2023 for an unannounced inspection. I presented my credentials to Mr. Oscar Mares 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 # AKG528825. This report is based on information supplied by Trident 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.

NOTE: The facility was not processing at the time of the inspection.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
Trident Seafoods	Oscar Mares	EHS Specialist	Yes	Yes

Facility Information

Responsible official?	Shawn Stokes; Director of Environmental Compliance, sstokes@tridentseafoods.com
How many outfalls does the facility have?	The facility discharges through a single outfall.
What is the receiving water?	The facility discharges into Pillar Mountain Bay.
How often do you visually inspect the outfall?	The outfall is inspected daily when discharging.
Are you required to report flow?	The facility is required to report flow and takes meter readings every 24-hours
Size of Facility	The facility encompasses approximately 2.63 acres.
Number of Employees and hours of Operation	The facility employs approximately 200 employees when operating at full capacity. The facility has scaled down operations for 2023. At its current operating capacity, the facility employs 10 individuals on a semi-permanent basis, while operating with no more than 20 employees at peak season (July – September). When at full capacity, the facility operates 24-hours a day, 7-days a week from January through November.
Who analyzes your effluent samples?	The facility analyzes total residual chlorine (TRC), pH, conductivity, and temperature in-house. All other parameters; 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
Type of Operation	When processing, the facility processes whole salmon into salmon filets. The facility is not conducting processing operations this year. At the time of inspection, the facility was being used for storage.

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 - Best Management Practices (BMP) Plan Annual Review		AOC: Yes
Ref #: RA1-RR-010	Reviewed By: Raymond Andrews	Reviewed Date: 06/09/2023
At the time of inspection, I requested to review the Best Management Practices (BMP) Annual Review.		
The BMP Plan had a page at the end stating the plan had been reviewed and it was signed and dated by the plant manager; however, the page did not have the required statement that the plan fulfills the requirements set forth in the permit.		
Record: Spill Prevention Control and Countermeasure (SPCC) Plan		AOC: No
Ref #: RA1-RR-009	Reviewed By: Raymond Andrews	Reviewed Date: 06/09/2023
At the time of the inspection, I reviewed the facility's SPCC Plan, dated January 2018. I did not find any issues.		
Record: Other - Best Management Practices (BMP) Plan		AOC: No
Ref #: RA1-RR-008	Reviewed By: Raymond Andrews	Reviewed Date: 06/09/2023
At the time of the inspection, I reviewed the facility's BMP Plan, dated August 13, 2021. I did not find any issues.		
Record: Other - Seafloor Monitoring Quality Assurance Plan (QAPP)		AOC: Yes
Ref #: RA1-RR-007	Reviewed By: Raymond Andrews	Reviewed Date: 06/09/2023
At the time of inspection, I reviewed the facility's Seafloor Monitoring QAPP, dated July 27, 2021.		
The Seafloor Survey QAPP did not include methods for measuring water depth and tidal stage, and the delivery and archiving of seafloor survey results using field records and notes, survey plans, digital images, and video photography.		
Record: Other - Seafloor Monitoring Report		AOC: No
Ref #: RA1-RR-006	Reviewed By: Raymond Andrews	Reviewed Date: 06/09/2023
At the time of the inspection, I reviewed the facility's annual Seafloor Monitoring report, dated December 2021. I did not find any issues.		
Record: Other - Alaska Department of Environmental Conservation (ADEC) Authorization Letter		AOC: No
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 06/09/2023
At the time of inspection, I reviewed the ADEC Letter of Authorization, dated April 27, 2022.		
Record: Other - Annual Report		AOC: No
Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 06/09/2023
At the time of inspection, I reviewed the facility's 2022 Annual Report, submitted on February 23, 2023.		
Record: Other - Receiving Water Quality Monitoring Study		AOC: No
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 06/09/2023
At the time of inspection, I reviewed the Collective Ambient Receiving Water Quality Monitoring Study, dated April 2022.		
Record: Other - Notice of Intent (NOI) to Discharge		AOC: No
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 06/09/2023
At the time of inspection, I reviewed the facility's NOI, dated March 31, 2022.		

Record: Other - Quality Assurance Project Plan (QAPP)		AOC: Yes
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 06/09/2023
At the time of inspection, I reviewed the facility's QAPP, dated August 13, 2021. It was last reviewed on October 28, 2022.		
The QAPP was not written and formatted according to the prescribed references as evidenced by the concerns listed below.		
At the time of the inspection, the QAPP was missing:		
• The type of sample containers, preservation of samples, and holding times for Total Dissolved Solids; • a map indicating the locations of monitoring points; • the training records were not in the QAPP; and information on the contract lab used for water analysis.		

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 2.9.9.3, " At a minimum, the QAPP shall include...map indicating the location of each sampling point."	
AOC:	
The QAPP did not contain a map indicating the locations of monitoring points.	

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...Details on number...type of sample containers, preservation of samples, holding times..."	
AOC:	
The QAPP did not contain type of sample containers, preservation of samples, and holding times for Total Dissolved Solids.	

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:	
At the time of inspection, the training records were not in the QAPP.	

AOC Reference #: RA1-RR-001	Records Review: Other - Quality Assurance Project Plan (QAPP)
Permit Requirement	
Permit Part 2.9.9.5, " At a minimum, the QAPP shall include...Name, address, and telephone number of all laboratories used by or proposed to be used by the permittee."	
AOC:	
At the time of the inspection, the QAPP did not contain information on the contract lab used for water sample analysis.	

AOC Reference #: RA1-RR-001	Records Review: Other - Quality Assurance Project Plan (QAPP)
Permit Requirement Permit Part 2.9.7, "Throughout all sample collection and analysis activities, the permittee must use DEC-approved Quality Assurance/Quality Control and chain-of-custody procedures, as described in the Requirements for Quality Assurance Project Plans (EPA/QA/R-5, March 2001) at https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf and Guidance for Quality Assurance Project Plans (EPA/QA/G-5, December 2002) at https://www.epa.gov/sites/production/files/2015-06/documents/g5-final.pdf. The QAPP must be prepared in the format specified in these documents."	
AOC: The QAPP was not written and formatted according to the prescribed references as evidenced by the concerns listed below.	

AOC Reference #: RA1-RR-007	Records Review: Other - Seafloor Monitoring QAPP
Permit Requirement Permit Part 2.9.11.1, "At a minimum, the Seafloor Survey QAPP shall include...Delivery and archiving of seafloor survey results using field records and notes, survey plans, digital images, and video photography." Permit Part 2.9.11.6, "At a minimum, the Seafloor Survey QAPP shall include...Measuring water depth and tide stage."	
AOC: The Seafloor Survey QAPP did not include methods for measuring water depth and tidal stage, and the delivery and archiving of seafloor survey results using field records and notes, survey plans, digital images, and video photography.	

AOC Reference #: RA1-RR-010	Records Review: Other - BMP Plan Annual Review
Permit Requirement Permit Part 2.10.5.2, "The BMP Plan shall include the following provisions concerning its review...Include a statement that a review has been completed and that the BMP Plan fulfills the requirements set forth in this permit. The statement shall be signed and dated by the facility manager."	
AOC: The BMP Plan had a page at the end stating the plan had been reviewed and it was signed and dated by the plant manager; however, the page did not have the required statement that the plan fulfills the requirements set forth in the permit.	

SECTION VI – Closing Conference

I held a closing conference with Facility personnel at 02:50 PM (PT) on 06/09/2023. During the 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.

- P1010809 – Quality Assurance Project Plan (QAPP), cover page, dated August 13, 2021
- P1010810 – Quality Assurance Project Plan (QAPP), page 2, dated August 13, 2021
- P1010811 – 2022 Annual Report, cover page
- P1010812 – 2022 Annual Report, page 2
- P1010813 – ADEC Letter of Authorization, page 1, dated April 27, 2022
- P1010814 – ADEC Letter of Authorization, page 2, dated April 27, 2022
- P1010815 – ADEC Letter of Authorization, page 3, dated April 27, 2022
- P1010816 – ADEC Letter of Authorization, page 4, dated April 27, 2022
- P1010817 – Processing Flow Diagram
- P1010818 – Total Residual Chlorine (TRC) Analysis Form, dated March 4, 2023
- P1010819 – pH Analysis Form, dated March 27, 2023
- P1010820 – Spill Prevention Control and Countermeasure Plan (SPCC), cover page, dated January 2018
- P1010821 – Spill Prevention Control and Countermeasure Plan (SPCC), certification page, dated January 2018
- P1010822 – Spill Prevention Control and Countermeasure Plan (SPCC), revisions page, dated January 2018
- P1010823 – Best management Practices (BMP) Plan, cover page, dated August 13, 2021
- P1010824 – Best management Practices (BMP) Plan, table of contents page, dated August 13, 2021
- P1010825 – Best management Practices (BMP) Plan, review and revisions page, dated August 13, 2021