State of Washington Department of Ecology
Northwest Regional Office

WATER COMPLIANCE INSPECTION REPORT

substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94) (last file update 12-95.)

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES #	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 WA003157-7 11	12 2015-07-17 17	18 C	19 S	20 2

Remarks

Inspection work days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 1.0 69	70 5	71 N	72 N	73 ____ 74 75 ____ 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Icicle AcquisitionSubsidiary LLC, dba American Gold Seafoods **Site 2, Deepwater Bay** Bellingham Channel, Skagit County	10:35 hrs, 07/17/2015	06/26/07
	Exit Time / Date 11:15 hrs, 07/17/2015	Permit Expiration Date 10/26/2012 Admin. extended

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Shaughn Hollcroft, Site Manager
Sky Guthrie, Asst. Site Manager

Other Facility Data

Seattle Office:
4019 – 21st Ave W.
Seattle, WA 98199

Name, Address of Responsible Official/Title/Phone and Fax Number.
Mr. Kevin Bright, Environmental Manager
PO Box 669
Anacortes, WA 98221

Phone Number 360-391-2409 Contacted? ☒ Yes ☐ No

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

☒	Permit	☐	Flow Measurement	☒	Operations&Maint.	☐	CSO/SSO (Sewer Overflow)
☒	Records/Reports	☒	Self-Monitoring Program	☐	Sludge Handling/Disposal	☒	Pollution Prevention
☒	Facility Site Review	☐	Compliance Schedules	☐	Pretreatment	☐	Multimedia
☐	Effluent/Receiving water	☐	Laboratory	☐	Storm Water	☐	other

Section D: Summary of Findings/Comment

On July 17, 2015, the Department of Ecology (Ecology) employee Lori LeVander conducted a permit compliance inspection at the American Gold Seafoods (AGS) Deepwater Bay Sites 1, 2, and 3 – near Cypress Island marine Atlantic salmon net pens. This report is for Site 2. This was an announced inspection.

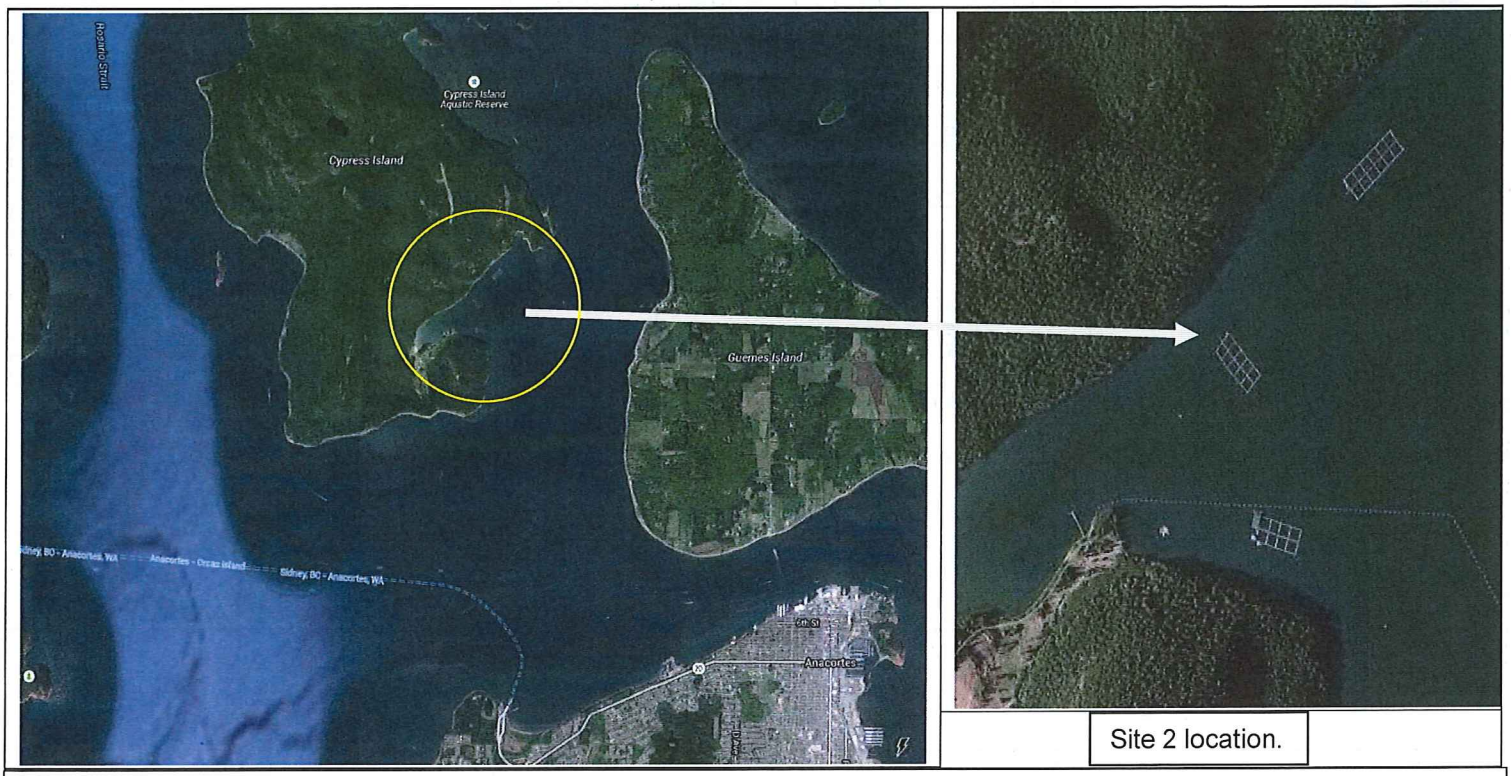
I met with Kevin Bright at the Anacortes dock, and we took the AGS boat to the Site 1 net pen first, then to Site 2. I was required to follow strict disinfection procedures at the net pen site. The purpose of this inspection was to conduct a routine Class 1 inspection; review permit required paperwork and submittals, and a site inspection.

DISCUSSION

American Gold Seafoods Site 2, Cypress Island is located in Bellingham Channel, northwest of the city of Anacortes. This marine salmon net pen facility has been at this location since January, 1987, with a slight relocation in the last 5 years.

Configuration/Operations:
There are 10 cages at the Deepwater Bay Site 2 location with the aggregate length and width of net pens is 440 feet x 190 feet. The minimum depth at the site (at MLLW) 55 feet. Antifoulant chemicals are not used on the nets.

AGS transitioned to single year class facilities for their farming operations at the four geographic regions; Cypress Island, Hope Island, Port Angeles and Bainbridge Island. Smolts from the Scatter Creek upland hatchery enter the pens and are grown for 18 to 24 months to harvest size. Once harvested, the site is fallowed. While the site is fallowed, nets are cleaned and checked, predator barrier nets can be removed and replaced or repaired, cleaned nets are reinstalled and cage mooring systems checked. Copper based antifoulants are not used on any of the nets at the AGS facilities.



Site 2 location.

Total biomass on site for July 2015 was 2,722,826 pounds fish. Total feed fed for the month was 325,794 pounds and no medicated feed. In 2014, the site was fallowed January through March. December was the month of highest biomass for the year, with 1,487,171 pounds of fish on site, and November was the highest feed month with 290,633 pounds of feed.

Feed:
American Gold uses pelleted dry, EWOS and Skretting feed. The feed is delivered weekly by barge to the site in large bags. The feed is stored in a contained building at Site 1, then placed into automatic feeder bins as needed.

Automatic feeders are used at each pen. Underwater cameras are fixed at the bottom of each pen so the workers can monitor the feeding operations (photo #03). When pellets are seen falling to the bottom of the pen, the feeders are shut off. Each pen is fed once or twice a day depending on fish size and age. An uplifting blower system keeps the feed in suspension and available for the fish when they are less than 1,000 grams in weight, reducing the amount of wasted feed.

Solid waste handling:
Divers inspect the pens a few times a week, checking the integrity of the nets and collecting dead fish (photo #02). Any dead or dying fish are brought to the surface, placed in plastic-lined totes with lids. The totes are hauled away weekly by a contracted vessel and taken to a composting facility. The company has an emergency plan in place in the event of catastrophic losses. AGS worked with WDFW to develop and implement a Reportable Finfish Pathogen Plan that outlines a rapid reporting and emergency response strategy in the event there is a positive confirmation for a reportable finfish pathogen on site.

Empty feed bags are recycled.

Generators/aerators/fuel and chemical storage:
Double walled diesel tank is on site for operating the 125 kw generator and for the boats. New, quieter compressors have been installed on the pens to aerate the cages when needed, and with minimal sound impacts (photo #01). The tank is refueled as needed from a mobile contractor. Booms, pads and sorbents are available on site as part of the spill kit. Iodine footbaths use is required when entering and leaving the site.

Permits:
Site 2 has a Shoreline Permit issued by Skagit County, DNR lease, Army Corps of Engineers Section 10 Permit (for cage replacement), USCG PATON permit, and WDFW HPA permit, in addition to their NPDES permit. Line and shackle maintenance occurs yearly, with lines replaced every 5 years.

Paperwork and Submittals:
The permit and related paperwork are kept in the office at Site 1. Kevin and Shaughn had a copy of the current permit, as well as the updated permit required submittals: Monthly Disease Control Chemical Use records, Sea Lice Monitoring Plan, Pollution Prevention Plan, Spill Plan, Annual Fish Release Report, Fish Escape Operational Plan, and Reportable Finfish Pathogen Plan. I checked the Sea Lice Records, and the Daily Water Quality Log, which includes temperature, oxygen, and plankton reports.

All of the Plans were updated, current and available. Emergency call numbers are posted at the office and on the pens. All monthly data and information is submitted to Kevin Bright, American Gold's Environmental Manager. Kevin compiles the information and submits to Ecology monthly, as required by the NPDES permit.

AGS conducted Closure sampling at this site, as required by the permit, when a site changes its footprint. Site 1 and Site 2 exceeded the TOC levels during the past permit cycle so AGS moved and reoriented the pens at each site in 2011. TOC concentrations at the former Site 2 location declined initially then leveled out. The sight is slowly recovering. Site 1 is recovering faster.

The application for permit renewal for this site was submitted April 25, 2012 and was Public Noticed by Ecology. The permit was administratively extended and remains in effect until a new permit is issued.

SUMMARY AND CONCLUSIONS

Staff were very helpful and informative during the inspection. The pens were clean, all spill kits and spill plans accessible and all permit required submittals are up to date. The records were very well organized, easily accessible and available.

AGS has gone through the BAP (Best Aquaculture Practices) Certification for this site. This is an international third-party certification program for the entire aquaculture production chain, including farms, processing plants, hatcheries and feed mills, that verifies environmentally and socially responsible processes under which finfish, crustaceans and mussels are produced.

This facility has been in complete compliance with their NPDES permit during the past permit cycle. A completed application for permit renewal was submitted and accepted by Ecology in April, 2012.

Please call Lori LeVander, NPDES permit manager, at 425-649-7039 or llev461@ecy.wa.gov with any sampling, reporting or permit related questions.

cc: Central Files: Icicle Seafoods Acquisition LLC, Site 2, Cypress Island, Deepwater Bay, WA003157-7, WQ 6.1

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Lori LeVander Lori LeVander	WA Dept. of Ecology/NWRO/(425)649-7039 3190 160th SE, Bellevue, WA 98008-5452	8/31/2015
Signature of Management Q A Reviewer Donald Abney	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/(425)649-7000 fax (425)649-7098	Date 9/3/2015

ANNOUNCED Inspection

Appendix E Compliance Inspection Report Form

INSTRUCTIONS

Section A: National Date System Coding (i.e., PCS)

Column 1: Transaction Code. Use N, C, or D for New Change or Delete. All inspections will be new unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. *(Use the Remarks columns to record State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection:

A Performance Audit
B Compliance Biomonitoring
C Compliance Evaluation (non-sampling)
D Diagnostic
E Corps of Engineers Inspection
F Pretreatment Follow-up
G Pretreatment Audit
I Industrial User (IU) Inspection
L Enforcement Case Support
M Multimedia
P Pretreatment Compliance Inspection
R Reconnaissance
S Compliance Sampling
U IU Inspection with Pretreatment Audit
X Toxics Inspection
Z Sludge
2 IU Sampling Inspection
3 IU Non-Sampling Inspection
4 IU Toxics Inspection
5 IU Sampling Inspection with Pretreatment
6 IU Non-Sampling Inspection with pretreatment
7 IU Toxics with Pretreatment

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

C - Contractor or Other Inspectors (*Specify in Remarks Columns*)
E - Corps of Engineers
J - Joint EPA/State Inspectors - EPA Lead
N - NEIC Inspectors
R - EPA Regional Inspector
S - State Inspector
T - Joint State/EPA Inspectors - State Lead

Column 20: Facility Type. Use of one of the codes below to describe the facility.

1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 - Industrial. Other than municipal, agricultural, and Federal facilities.
3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 - Federal. Facilities identified as Federal by the EPA Regional Office

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

PHOTO ADDENDUM – AMERICAN GOLD SEAFOODS, SITE 2, CYPRESS ISLAND

PHOTO #:01 DATE: 07/17/2015
TAKEN BY: LORI LEVANDER
DESCRIPTION: NEW, QUIETER GENERATOR.

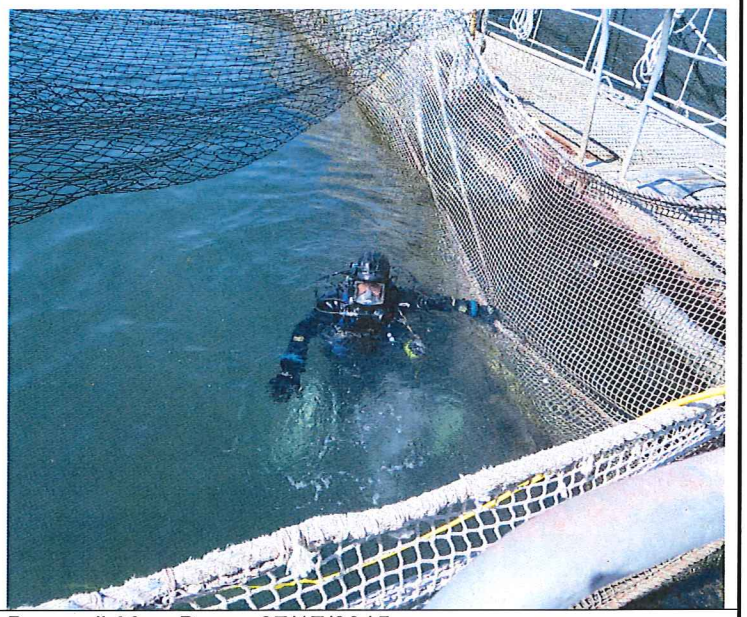


PHOTO #:02 DATE: 07/17/2015
TAKEN BY: LORI LEVANDER
DESCRIPTION: DIVERS ASSESS MORTALITY AND NET PEN INTEGRITY A FEW TIMES A WEEK.

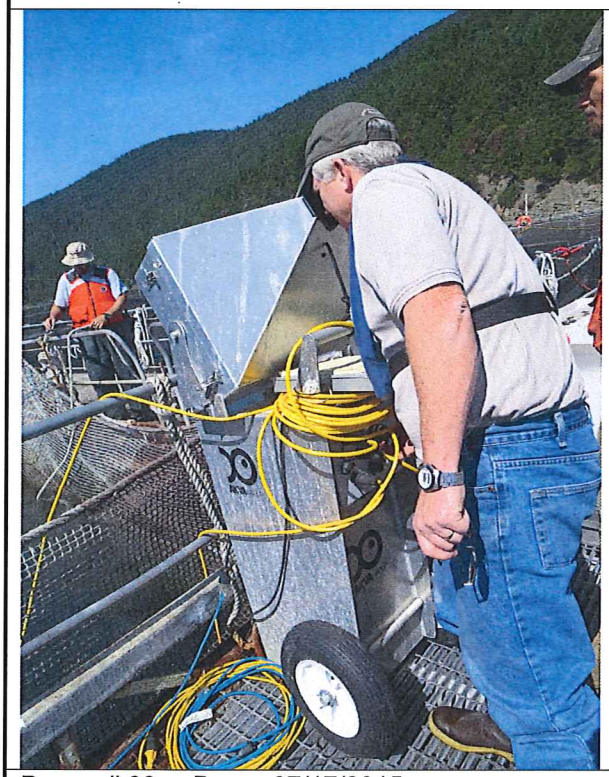


PHOTO #:03 DATE: 07/17/2015
TAKEN BY: LORI LEVANDER
DESCRIPTION: VIEWING FROM UNDERWATER CAMERA FOR FEEDING EFFICIENCY.

PHOTO #:04 DATE: 07/17/2015
TAKEN BY: LORI LEVANDER
DESCRIPTION: NEW CROWDING "NETS" AND SYSTEM FOR HARVESTING AND SIZING FISH.