



Photo & Video Evidence of AquaBounty Former Worker Testimony

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SUMMARY

This document outlines the photo and video evidence provided by former AquaBounty employee, Braydon Humphrey, and referred to in the [AquaBounty Exposed Report](#). The 113 pieces of evidence provided here are meant to complement and reinforce the testimony provided by Braydon that documents the hazardous, toxicological, and dangerous conditions he witnessed during his employment with AquaBounty at the Indiana farm.

The photo and video evidence is categorized into five sections: (1) Worker Safety Violations, (2) Product Quality & Consumer Health Risks, (3) Containment Breaches & Effluent Water Pollution, (4) Animal Abuse, and (5) Other.

In the Workplace Hazards section, there is overwhelming evidence of Aquabounty's hazardous workplace conditions including photos of improper storage of chemicals, unsafe set-up and usage of equipment, and many more worker safety violations.

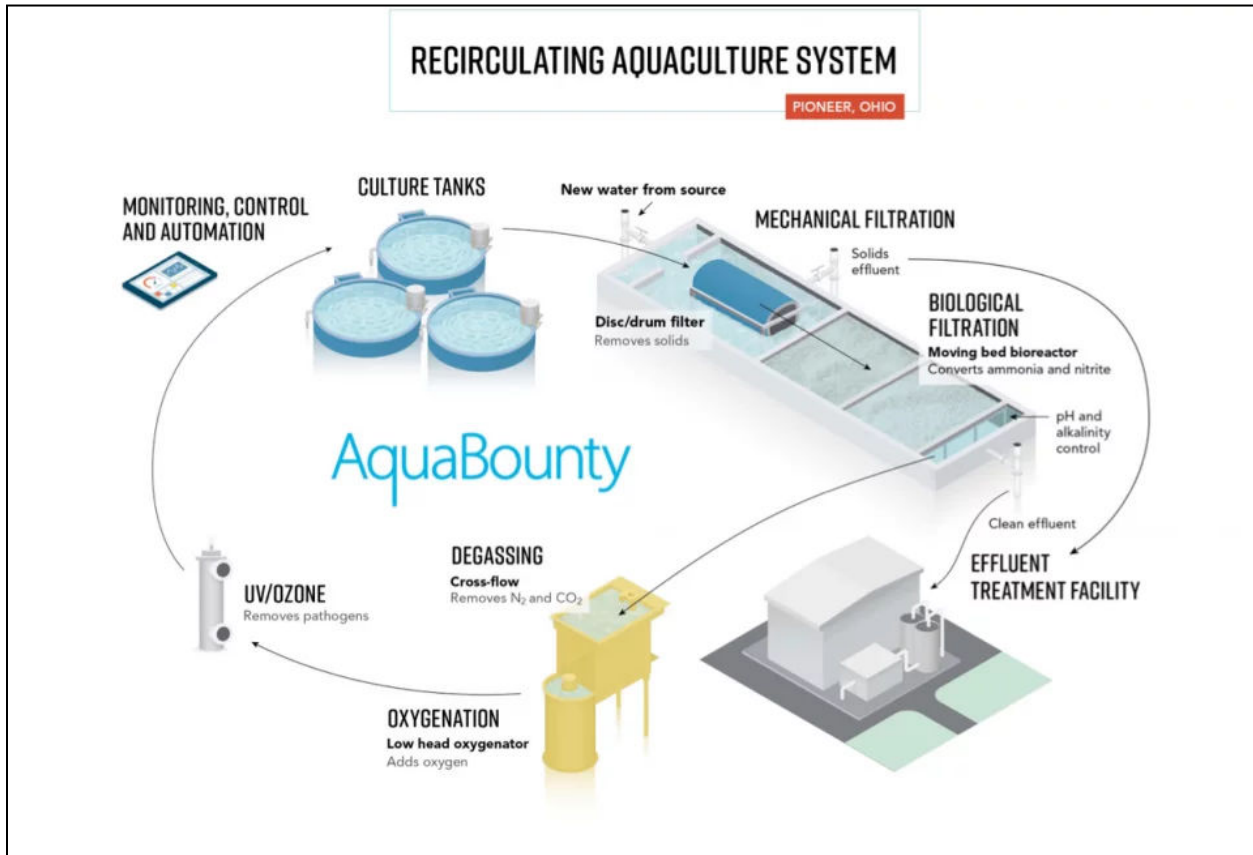
The Product Quality & Consumer Health section displays rampant fiberglass particles, toxicological water conditions, willingness to use antibiotics, mold, and unsanitary practices. It also provides evidence of a manager instructing employees to obscure the truth to visitors around the amount of fish mortalities.

The Containment Breaches & Effluent Water Pollution section reveals the immense amount of leaks and spills of dirty water and feed, numerous violations of containment procedures/regulation and environmental management, and biosecurity issues of pests such as maggots, frogs, rats, etc.

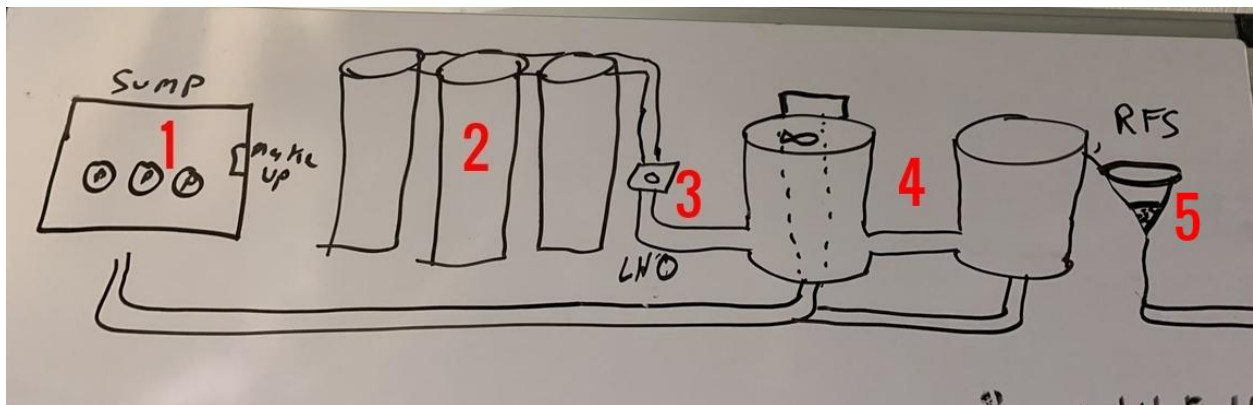
The Animal Abuse section displays the inhumane conditions within Aquabounty's facility with the countless photos of high mortalities, fish lesions, injuries, and physiological deformities.

The Other section displays a page from the spiral-bound notebook that included questionable handwritten notes about the former worker that were felt as retaliatory.

Background on AquaBounty's Recirculating Aquaculture System (RAS)



Graphic from AquaBounty's website



Drawing by Braydon describing process of water recirculating through the system at the Indiana farm

1. Sump - a reservoir of water with three pumps, which houses one large drum filter. Also has a section of replenishing inlet of clean water ("makeup" water) to clear out foul water and help flush tanks.
2. Three towers that are roughly three stories tall in size where biological chemical treatment of water happens. Lots of delamination of fiberglass from these vessels causes contamination in the tanks. Degassing of CO₂ happens here as well.


3. Low Head Oxygenator (LHO) - Uses physics to get the most efficient use of liquid oxygen mixing driven by gravity. There are emergency backup oxygen systems in tanks but LHO is the main source.
4. Fish Tanks with a Side/Overflow box that would eventually return back to Sump. There is a mortality lift (pneumatics to lift the grate and create suction) at the bottom that would allow removing mortalities, but FDA said it cannot be used because of containment risks because fish could go through the side box. However, it was used on occasion to remove morts, as pulling out large numbers of morts with nets was difficult.
5. Radial Flow Settler (RFS) - cone shaped, removes contaminated solids (fish excrement). Some water also exits the system through here. Otherwise, all water from the tanks returns to the Sump. Some were tilted off their originally installed axis, the full water weight of one of these is a huge accident waiting to happen.

Names & Roles of Managers from Staff Chat at AquaBounty Farms Indiana


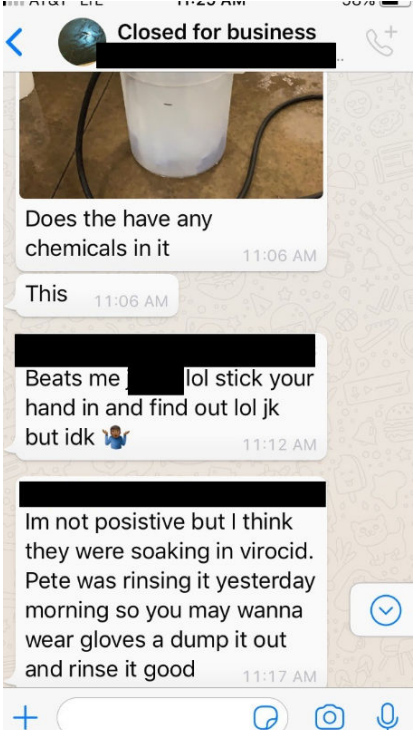
The following list of people were managers and held the following Roles during the former workers employment. They can be identified within the images of staff chats and documents included below.

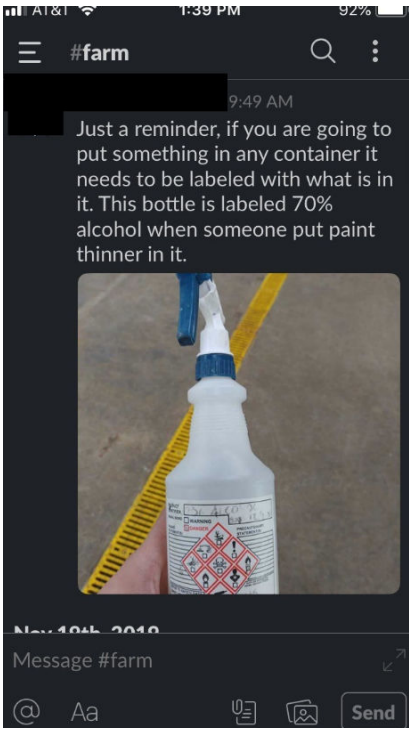

- Alejandro Rojas - Chief Operating Officer, AquaBounty Technologies
- Pete Bowyer - Farm Manager, AquaBounty Farms Indiana
- Tess E. Bowyer - Hatcheries and Fingerling Manager, AquaBounty Farms Indiana
- Javier - Main Production Manager, AquaBounty Farms Indiana
- Jimmy - Main Production Manager, AquaBounty Farms Indiana
- Joseph - Shift Lead Supervisor, AquaBounty Farms Indiana
- Jake Clawson - Shift Lead Supervisor, AquaBounty Farms Indiana
- Lucas (Luke) Bradburn - Shift Lead Supervisor, AquaBounty Farms Indiana

WORKER SAFETY VIOLATIONS




#	Image/Video	Description
1		<p>Improper hydrochloric acid (HCl) storage. Leakage. Barrels cannot be repurposed and must be returned to the supplier when used. Some barrels were repurposed to store nets.</p>

<p>2</p>		<p>Hydrochloric acid barrels not stored safely, leaking of chemicals. Yellow/green puddle of acid near the barrel openings. Pictures were taken in April 2019. Staff not properly trained in safety procedures and no SDS was on site until after Dec. 2019</p> <p>Hydrochloric acid is highly corrosive and may result in severe burns/ulcers if in contact with skin or ingested. Short-term inhalation of HCl may cause inflammation and irritation in the respiratory tract, and lead to pulmonary edema, swelling and spasm of the throat, and suffocation. Material is extremely destructive to tissue of the mucous membranes.</p> <p>(Hydrochloric acid leak incidents documented here occurred in December 2019)</p>
<p>3</p>	 <p>AT&T 93% 08:50</p> <p>AF AquaBounty Farms In... Q</p> <p>Pete B</p> <p>You both joined</p> <p>December 30th, 2019</p> <p>[Redacted] 7:55 PM</p> <p>Hello, I was asked to come look at the hcl vapor in grow out due to my classes in air quality. I will say that the fogging could be extremely bad to human health being inhaled depending on the ppm and exposure duration. I attached a file with some of the risk and law requirements. I mainly am bring it up due to if someone was to be affected by the vapor it could cause life long affects as well as a major issue for the company if someone got ill due to it. With that said we may need to look into air quality equipment for future utilisation of HCL or other chemicals as well as to give people peace of mind.</p> <p>File from Android 221KB pdf</p> <p>Pete B 8:29 PM Hello [Redacted]</p> <p>Message Pete B</p>	<p>This is the 2nd consecutive night where we had concentrated hydrochloric acid become aerosolized. My coworker decided to make the event more official by communicating with my boss directly in writing.</p>

<p>4</p>		<p>Improper chemical storage. Land-based Indiana labor included mostly people coming from retail or food service, so emphasis on safety was never there or people would be unaware of the kind of dangers of this kind of working environment. College students who worked there for 90 days became managers. Managers severely lacked training and were also cheated out of OSHA required training hours.</p>
<p>5</p>		<p>Culture of lack of safety mindfulness. A barrel full of mystery chemicals, no labels. People joke about it.</p>

<p>6</p>		<p>Another example of safety being a lack of priority and not providing proper training of employees. Example: being surprised by paint thinner wrongly labeled as alcohol.</p>
<p>7</p>		<p>Overloaded outlet with multiple extension cords used together. Water in the tank behind and above. Safety is obviously not a priority. Possibly lead to injuries and fire hazard.</p>

8		<p>Main production building on a support beam. No cover on the outlet. The outlet is burnt. Vulnerable to water splashes. Fire hazard</p>
9		<p>Tank of fish on left. Platform on right ad hoc in-house construction mesh metal underfoot that bent, buckled, and rusted. The metal railing was cut and left exposed to some extremely sharp edges. Accessibility issues, hard to walk through. Not safety tested.</p>

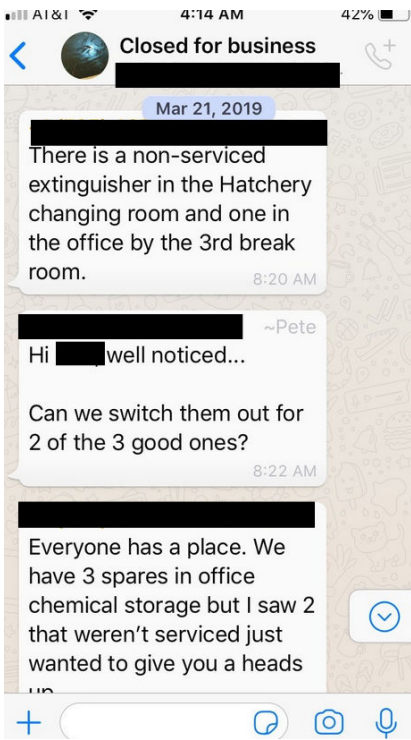
10		<p>Platform (same from photo evidence #9) post unsecured to the floor. Not bolted down on half of the contact plate.</p>
11		<p>Platform post's contact plate bolted over another support beam which held up the walkways around a main production tank..</p>
12		<p>Extremely bald tires on a forklift. No training on forklifts for 10 months+. No servicing of the vehicles. Propane leaks. Videos of spinning tires that could lead to an accident or punctured tank. Forks left high up in the air with no operators behind the wheel.</p>

13

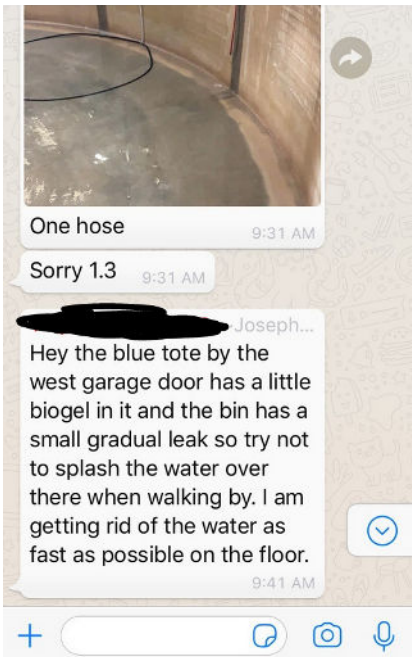



Expired Fire Extinguishers. Picture taken December 2018. Fire Extinguishers not replaced, were left over from purchase of Bell Aquaculture facility. No new ones purchased for budgeting reasons until the following quarter after alerting supervisors.

14



Evidence of non-serviced fire extinguishers (that expired in March 2014). Originally observed by staff in December 2018. Huge fire risk with the type of chemicals, electricals, buildings, and general equipment onsite.

<p>15</p>		<p>Biogel is highly caustic to skin and eyes. Equipment that leaks. No suggestions of using proper PPE or consideration of environmental pollution from rinsing water out of the overhead door.</p>
<p>16</p>		<p>Longstanding rumors about coliforms in the drinking water provided onsite. This is showing there was a time when there wasn't enough potable water for employees. Message sent by Tess Boywer, hatchery manager. Public information later showed Bell aquaculture did not test or report for coliforms in the potable water.</p>

17

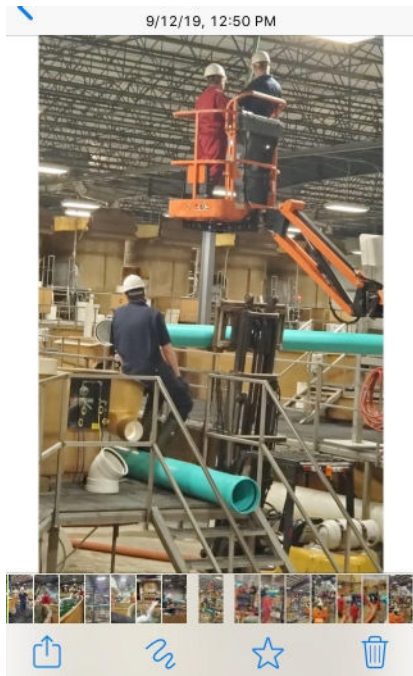


Worker safety/OSHA relevant. People servicing these lift stations without confined space training. Permit required for entry.

A safety manager [from USPS] told me the OSHA regulates 64 hours of training before being expected to work in confined spaces. We did not comply with that requirement as shown in videos of workers cleaning main production tanks.

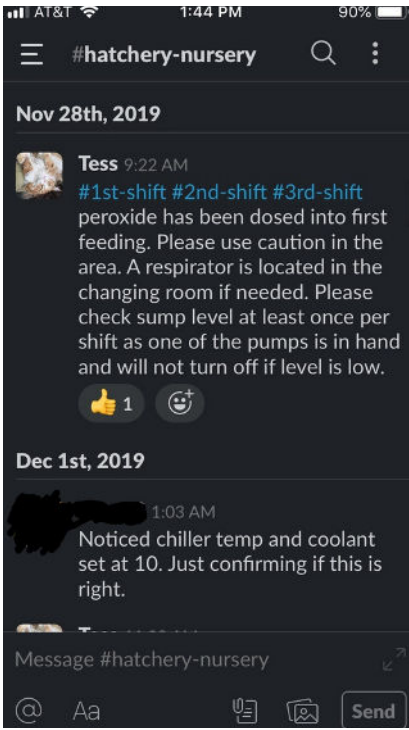
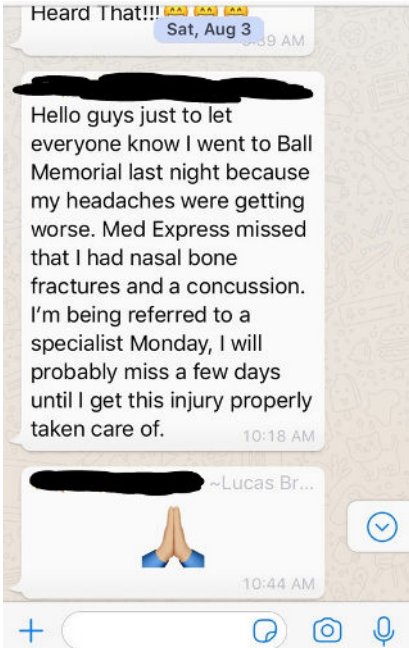
There was no safety manager on site. No OSHA competent person. No spill response task force. No emergency action plan.

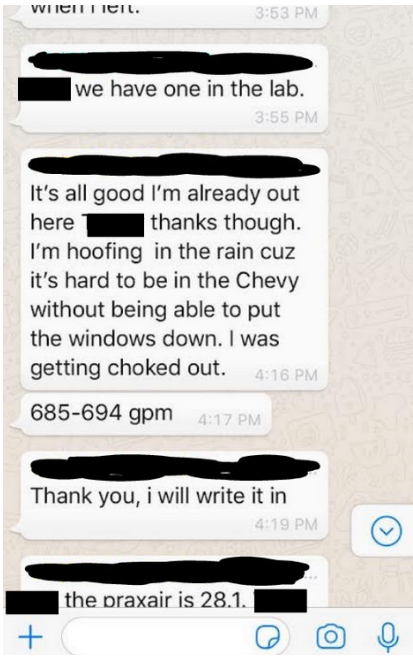
18



OSHA related. Moving platforms for fish transfers. No training for anyone on moving platforms. Hard hats are pictured but no harness or fall arrest systems in place.

<p>19</p>		<p>Poor medical resources. At this time pictured, first aid stations without bandages, antibiotics, or proper supplies were the standard. The “aquabounty bandage” shows how it's accepted amongst staff to expect little when it comes to consideration of health and safety.</p>
<p>20</p>		<p>December 2019 forklift training occurs, only now enforcing certifications required for forklift operation. Training occurred 11-12 months after hire, during which daily use of the heavy machines were required.</p>

<p>21</p>		<p>Just an example of this site being generally hazardous in a highly industrial and scientific sense. No one at the farm received extended chemical training beyond maybe a simple powerpoint-style handout about identifying chemical warning labels.</p>
<p>22</p>		<p>It was a running joke that one employee was dangerous to work for, a hard hat was placed below a note "must wear when working with Joe!" He eventually allowed a 4" wide hose snap back and hit this coworker in the nose. No accident was recorded where we publicly advertised (in the main office on a white board) the number of injuries. Joe was then put into a supervisor position after only working there for 3 months. Most employers even require "near misses" to be reported.</p>

23		<p>The Chevy was a corporate vehicle on site that workers occasionally needed to traverse over the entire property. This worker describes the exhaust from the truck seeping into the interior and causing a fairly severe physical reaction.</p>
24	<p>Video https://drive.google.com/file/d/1F0v276SN-XtdF71FjxE6UW8mBxugFGK/view?usp=sharing</p>	<p>Worker shown spraying caustic chemical BioGel in a tank recently emptied of fish. The tank is considered a confined space and bodily injuries from improper chemical use/storage did occur.</p>
25	<p>Video https://drive.google.com/file/d/1XThflHEHAYG0-M4Fas-F2vKUKNEAlowr/view?usp=sharing</p>	<p>Here we have water from a bio tower in the main production area whose water is falling past an installed curtain and onto concrete and high voltage power outlets colored red and gray.</p>
26	<p>Video https://drive.google.com/file/d/1ODoS_ktmnX4796HtOvNEMbkXtIETP8Qk/view?usp=sharing</p>	<p>This is a viewing window for one of the bio towers in the main production building. The seal of the window against the fiberglass is broken, pressure is forcing a stream of water to jet past a bolt connection. Aging infrastructure, worker safety issue.</p>
27	<p>Video https://drive.google.com/file/d/1UhXqbiQwDEFG-s5O2MEzUOLE4xwiaylw/view?usp=sharing</p>	<p>Another sealing issue of a main production biotower.</p>

28	Video https://drive.google.com/file/d/13W_MmCTaZPC3JKRHWZo2quIvet1Le2qp/view?usp=sharing	Examples of relatively new workers put to work in dangerous confined spaces, with serious threat of engulfment without proper training or oversight. They also crowd the fish to remove from the tank, but in the process some fish die from the stress.
29	Video https://drive.google.com/file/d/1bM3rIOvt3oibMtlI8rp6Ffz2OIIINNN0/view?usp=sharing	Hydrochloric acid incident.
30	Video https://drive.google.com/file/d/1HsN-nHff3NRfLauT_Sgv_XTpT2Ec4WR9/view?usp=sharing	Mechanical integrity. Heavy machinery servicing, bald tires, unsafe connections, employee training.
31	Video https://drive.google.com/file/d/16AW8sPeHgnDLvRYXNMPbQWhdh_LjRRB/view?usp=sharing	This video shows the biotowers for a system in the main production building overflowing. Majority of the rearing hardware for the farm was left over from Bell. Just like the tanks and towers, these specific biotowers were in terrible condition and prone to dangerous malfunctions along with heavy delamination of the fiberglass material it was made out of.

PRODUCT QUALITY & CONSUMER HEALTH RISKS

#	Image/Video	Description
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32








Old Bell Aquaculture hardware. Probably the source of every system's persistent fiberglass contamination. Peter Bowyer was the top farm manager describing the issue.


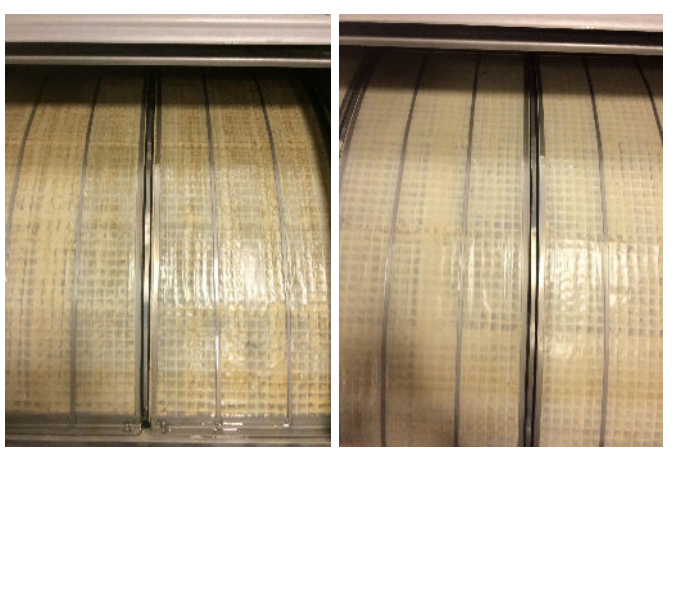
33



Old Bell Aquaculture hardware. Probably the source of every systems' persistent fiberglass contamination.

34		<p>Fiberglass particles have settled down in one of the tanks of the main production building. Persistent contamination due to the fact almost all hardware is the same from Bell Aquaculture. I am not a biologist, but this never sat right with me. I imagine the range of sizes for these particles is small enough to be a constant irritant to fish eyes, gills, intestinal, and skin.</p>
35		<p>Fiberglass contamination and untrained workers in a confined space.</p>
36		<p>Fiberglass contamination at the top of a main production tank's bio tower. Crusted over and required power washing. 'Frowny face' carved out to show clean surface distinction.</p>

37		<p>Largest sized fiberglass (visible white chips on top of center drain) contamination in a main production building tank. Degradation of the tank, spotted dark brown.</p>
38		<p>Conglomerated fiberglass particles forming a crusty paste at the bottom of one of the main production building's tanks.</p>

39		<p>Abrupt change in water clarity from left to right. Fiberglass being the most likely contaminant</p>
40		<p>These are the drum filters of the main production system. They are designed to rotate in the sump water to filter out small particles and are then automatically sprayed down clean. Here we see fiberglass particles have re-conglomerated into a kind of paste that is so sticky that they required pressure washing which inevitably sent some of it back into the sump. Filter film should be translucent enough to see small individual squares, as pictured for some but not the vast majority.</p>

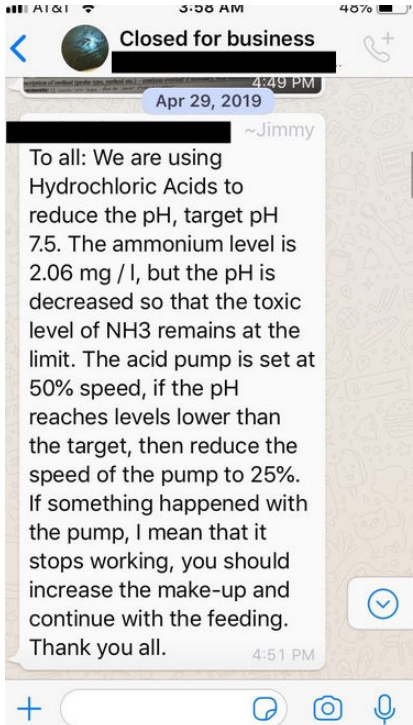

41





Mold on the catwalk. The primary containment system is the net on the tank. Feed was hand scooped and tossed over the nets. Some pellets bounced out onto the floor, grates, and catwalks. There were mounds of wasted feed on the ground.

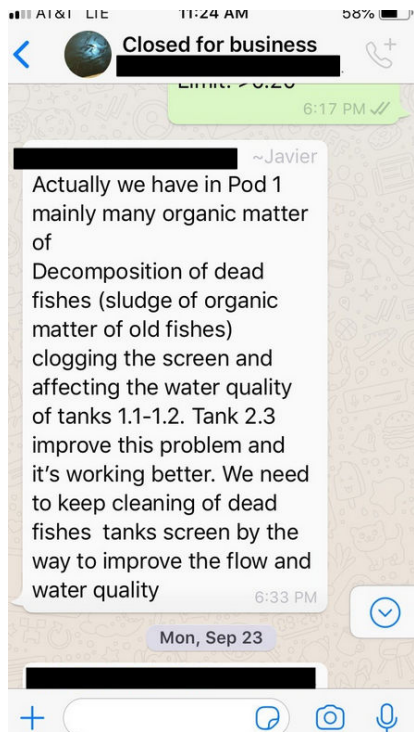
Feed wasted was apparently beneficial for cohort metrics according to bosses, when reviewing food conversion ratios. In a sense, it seemed to me that they were always playing with statistics, because they were also okay with a decent percent of every cohort having underperforming fish and being culled. It was somehow positive in a biomass-sense if fish died.

Aquaculture usually aims to have 1 lb of feed used per 1 lb of fish produced. Their feed conversion ratios might actually be a point of pride, one of the few things that go as well as advertised.

42		<p>April 2019. Showing a manager discussing the use of hydrochloric acid. Evidence of harsh chemicals usage and that water quality demanded a somewhat extreme attempt to avoid toxic conditions for the fish.</p>
43		<p>Near daily occurrence of visibly high iron levels in well water. Toxic to fingerlings and detrimental to younger fish development. Forward-looking statements in press releases mention a lack of heavy metals, iron is a heavy metal. Definitely not "clean enough to drink" as advertised in the press.</p>

<p>44</p>		<p>Another example of high concentrations of iron contamination, was almost a daily occurrence.</p>
<p>45</p>		<p>Video might be included elsewhere, highlighting polluted water conditions most likely iron.</p>

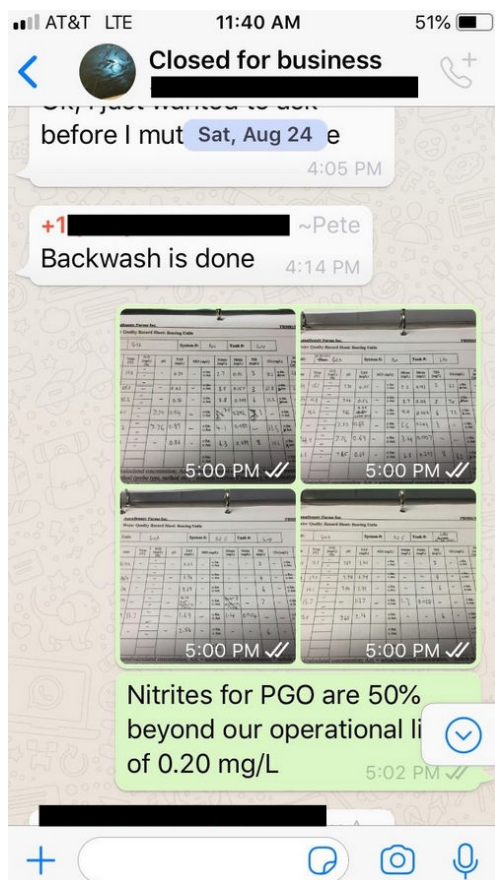
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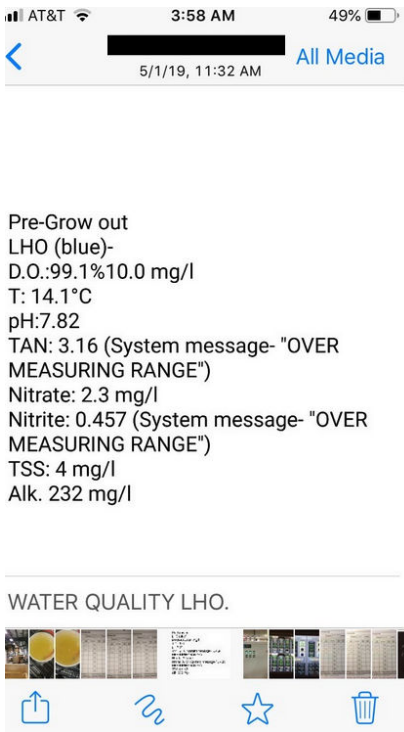
Fish swim around and occasionally dine on the rotting corpses of their relatives. When too much mortality happens, the systems can't handle the bodies and the water quality degrades accordingly.

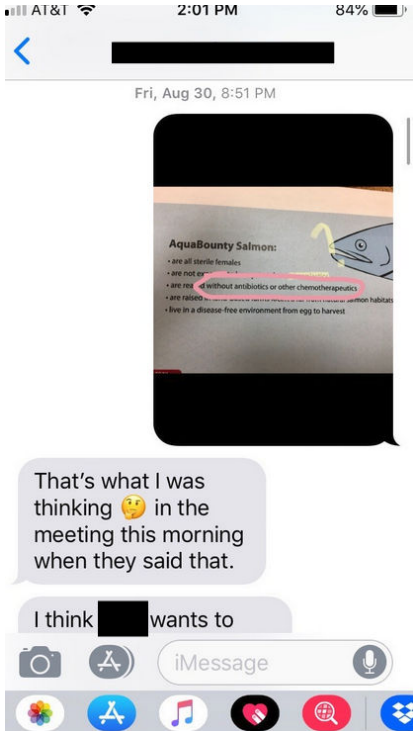

I try to remember that Aquabounty is marketing a consumable, so consumers won't find anything appetizing about 'old dead fish sludge.'


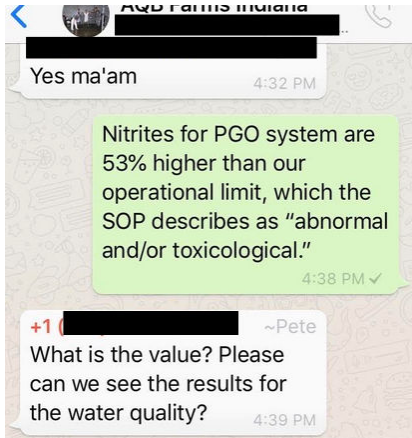
47



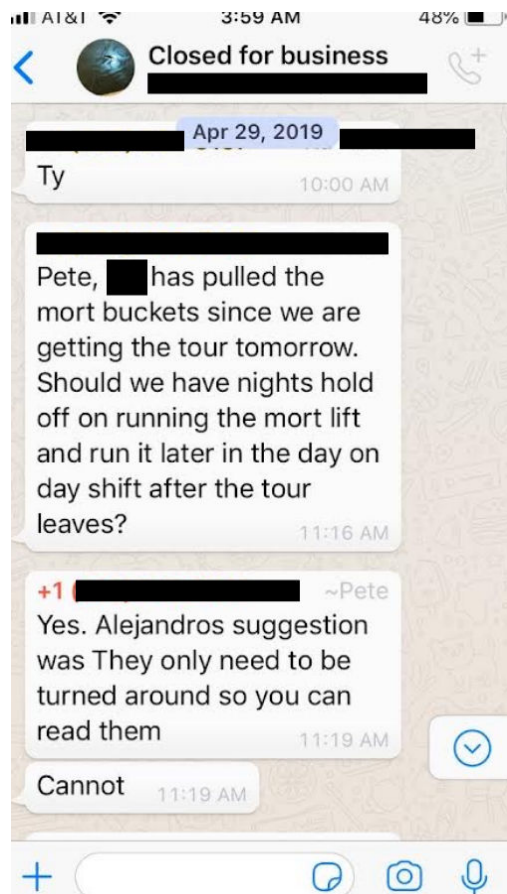
Nitrites are the second of three chemical drivers for the nitrification process, which is important to maintain in a recirculating aquatic system. Fish poop creates total ammonia nitrogen, bacteria break that down into nitrite, and other bacteria break nitrite down to nitrate. Ammonia is the most toxic to fish, nitrite is a little less so, and nitrate is comparatively much more tolerable. We always had issues with nitrite for the year I was onsite and handling the bulk of the water lab work. Here we can see the picture in the top left includes lab results for a system called Pre Grow Out. We were 50% beyond our own operational limit of the chemical, which negatively affected the animals in a number of ways including their respiration. Realize please that this limit is set in-house and we couldn't

		<p>even maintain it.</p> <p>The COO Alejandro Rojas (who had a veterinarian background) once discussed setting up an experiment where we would increase TAN or nitrite in a small system of fish until it purposefully killed them. Then, he said, we would truly know the amount of these noxious chemicals that they could handle.</p>
<p>48</p>	 <p>Pre-Grow out LHO (blue)- D.O.: 99.1% 10.0 mg/l T: 14.1°C pH: 7.82 TAN: 3.16 (System message- "OVER MEASURING RANGE") Nitrate: 2.3 mg/l Nitrite: 0.457 (System message- "OVER MEASURING RANGE") TSS: 4 mg/l Alk. 232 mg/l</p> <p>WATER QUALITY LHO.</p>	<p>Lab results from a coworker. Total ammonia nitrogen and nitrite are not only well above AquaBounty's internal limit, they are above the lab spectrometer's measuring range. Samples would need 50-75% dilution at times which would then affect accuracy.</p>

<p>49</p>		<p>A meeting with high-level corporate employees where I and a coworker left feeling the same thing after they mentioned they would not be afraid of using antibiotics if they needed to. None were used to my knowledge while I was there. Another example of the company acting against the forward-looking press statements they've made.</p>
<p>50</p>		<p>From left to right: Clear distilled water, yellow TAN samples, red Nitrite samples, and brown Nitrate samples.</p> <p>Anyone who has done these standard Hach procedures could tell you these starkly visible concentrations (especially nitrite) are very high without even having the numbers from the spectrometer.</p>

<p>51</p>		<p>Unsanitary practices. This feed scoop was found directly on buckets used for collecting fish mortalities.</p>
<p>52</p>		<p>Another instance of extreme deviance from water quality standards.</p>

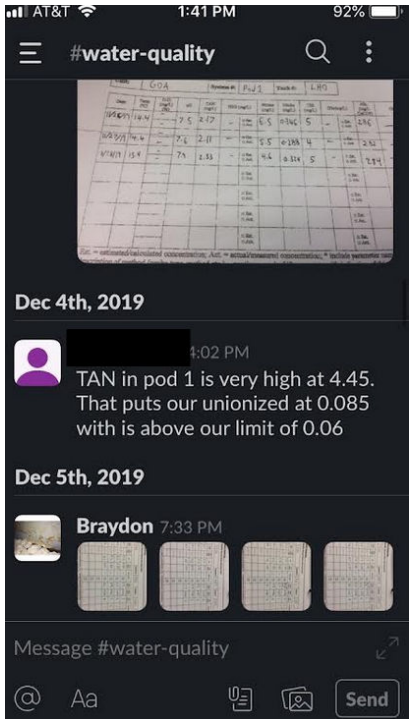

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Peter Bowyer (Pete) was the farm manager during my time at AQB. He always loved to say we displayed “no fakery” at the farm but is shown here taking a cue from the COO (Alejandro Rojas) to obscure the normal conditions workers and animals would be subjected to on days without tours or guests.

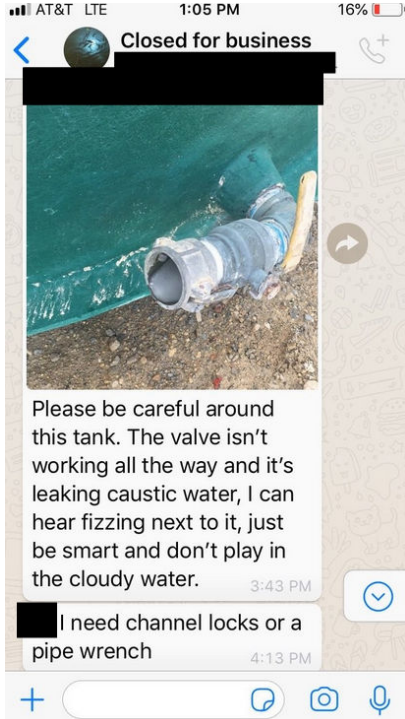
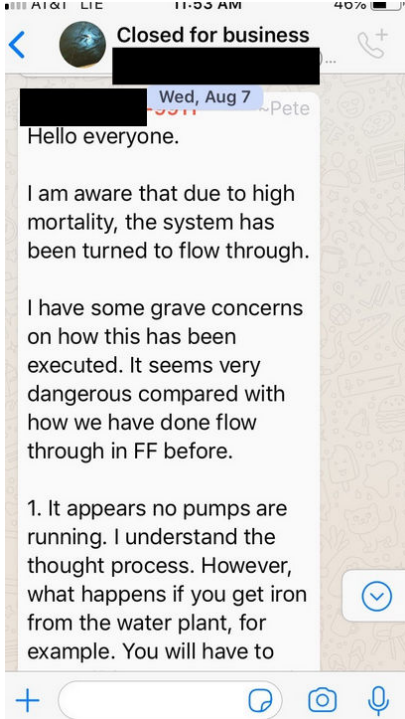
Mort buckets refer to containers we used to keep collected mortalities (dead fish). Workers were told to put the label out of view to remove the possible shame of needing to admit how much death occurs in intensive aquaculture.

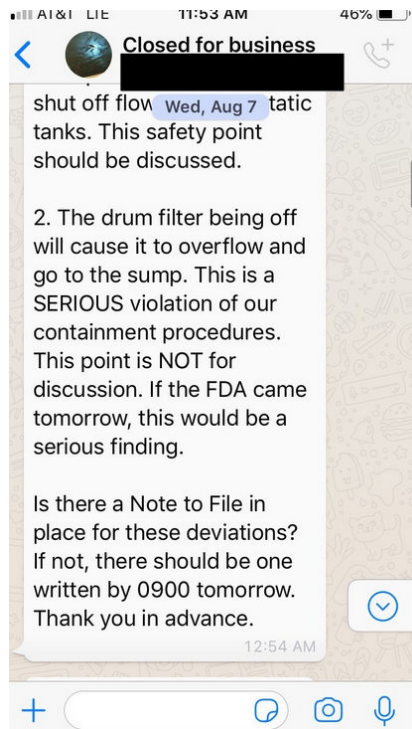
Mortality lift use is mentioned again, which was not approved by FDA regulation. To ask whether they should wait to use it is because they are mostly concerned with affecting water clarity for the tour. When removing morts, some corpses were so decomposed that their skin and meat would cause clouds of organic matter to recirculate through the system.

<p>54</p>		<p>Sourced from the credibility of other workers, we again see lab results that are beyond our in-house limits of total ammonia nitrogen, even going further and contextualizing the specific noxious element of unionized ammonia being higher than ideal.</p>
<p>55</p>		<p>Disgusting conditions like this molded fish feed in a floor drain could be found in every building of the farm.</p>
<p>56</p>	<p>Video https://drive.google.com/file/d/15FZGL3_UdnRDqTOO_Mlayr9TDPgsSMRhL/view?usp=sharing</p>	<p>Horrible water quality for an active fish system. Iron was geographically in over abundance.</p>

57	<p>Video https://drive.google.com/file/d/1deEkAVFRCMd4jPWsCq24GclAZmqF4-Y/view?usp=sharing</p>	<p>Workers sweeping fiberglass particles down into a drain of the main production tank, which due to the nature of recirculation design will still be present in the system after their attempts. No confined space training is given to any employees.</p>
58	<p>Video https://drive.google.com/file/d/1mFsPmMpKytiIdMRgyRiiloOrVDY8C6mi/view?usp=sharing</p>	<p>Rotating drum filter located in main production sump. The small square panels should be somewhat translucent but are instead caked with re-conglomerated fiberglass particles and therefore keep the filter from operating properly. The filter did capture these particles but cleaning them from the filter ultimately led to most of them being put back into the sump.</p>
59	<p>Video https://drive.google.com/file/d/1pccNHewx3EGCRzPICsDHXBLLjof5cXOP/view?usp=sharing</p>	<p>Fiberglass particles floating on the surface of the water in the main production building.</p>
60	<p>Video https://drive.google.com/file/d/1YTska4jD8nWzdGTIPxamrklpEMzCCuXI/view?usp=sharing</p>	<p>The fish aimlessly swirling around a drain plate of a main production building tank are dead, removing the corpses is difficult so the festering meat and organs stay in the water where it is dined on by other fish and negatively impact water quality.</p>
61	<p>Video https://drive.google.com/file/d/1ddCkQnt8s8LVa0HzOu4MbxzZEpDfSOzB/view?usp=sharing</p>	<p>Sump of the main production system is overflowing and the water quality is filled with contaminants.</p>
62	<p>Video https://drive.google.com/file/d/1fG1B-4HXxoNjea9sqVFHJGXG8by6155P/view?usp=sharing</p>	<p>Black mold rests above the water line in the main production sump. This typical water clarity is also in direct contention to what AQB shows on tours of the farm.</p>

CONTAINMENT BREACHES & EFFLUENT WATER POLLUTION

#	Image/Video	Description
63	 <p>AT&T LTE 1:05 PM 16%</p> <p>Closed for business</p> <p>Please be careful around this tank. The valve isn't working all the way and it's leaking caustic water, I can hear fizzing next to it, just be smart and don't play in the cloudy water. 3:43 PM</p> <p>I need channel locks or a pipe wrench 4:13 PM</p>	<p>Tank valve leaking caustic water set outside main production building. This harsh substance was allowed to drain outside. There is a neighbor that grows crops located roughly 30 ft away.</p>
64	 <p>AT&T LTE 11:53 AM 40%</p> <p>Closed for business</p> <p>Wed, Aug 7</p> <p>Hello everyone.</p> <p>I am aware that due to high mortality, the system has been turned to flow through.</p> <p>I have some grave concerns on how this has been executed. It seems very dangerous compared with how we have done flow through in FF before.</p> <p>1. It appears no pumps are running. I understand the thought process. However, what happens if you get iron from the water plant, for example. You will have to</p>	<p>This is Peter Bowyer, the farm manager around the time the first cohort of GMO fish moved from the egg trays into tanks we called first feeding. Begins with an admission of the high mortality rate and the last half of this message (below) mentions the way employees attempted to solve this problem was actually in big violation of FDA containment regulation and that they'd need to file a note of deviation by the beginning of the next day. Chain of accountable command breaking down while the main boss is away. People at the ground level can/will subvert regulations if deemed inconvenient or in the way of meeting</p>

<p>65</p>	 <p>shut off flow Wed, Aug 7 tatic tanks. This safety point should be discussed.</p> <p>2. The drum filter being off will cause it to overflow and go to the sump. This is a SERIOUS violation of our containment procedures. This point is NOT for discussion. If the FDA came tomorrow, this would be a serious finding.</p> <p>Is there a Note to File in place for these deviations? If not, there should be one written by 0900 tomorrow. Thank you in advance.</p>	<p>production goals.</p> <p>This is the second half of Peter Bowyer's message to the staff about how they handled the 30% mortality of the first batch of GMO fish. To me, being uneducated in law feels like an admission of orchestrating a cover-up. No regulator could keep these people in line with just a twice-annual visit, whether unscheduled or not. They should be a daily presence onsite within the normal operating hours.</p>
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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
 100 N. Senate Avenue • Indianapolis, IN 46204
 (800) 451-6027 • (317) 232-8603 • www.idem.in.gov

Eric J. Holcomb
 Governor

Bruce Pigott
 Commissioner

Michael Bracken
 Compliance Manager
 TCFI Bell SPE I, LLC
 9885 West State Road 67
 Redkey, Indiana 47373

May 15, 2017

Dear Mr. Bracken:

Re: Noncompliance Letter
 NPDES Permit No. IN0062669
 TCFI Bell – Delaware Co.

Staff of the Indiana Department of Environmental Management (IDEM), Office of Water Quality, has reviewed the compliance status of the above cited facility for the period of January 2016 through March 2017. This review revealed violations of the facility's permit, as follows:

Part I. A. 1 of the permit sets forth the final effluent limitations and monitoring requirements applicable to the discharge from outfalls 001, 002 and 003.

Specifically, the submitted Discharge Monitoring Report(s) indicate your facility exceeded its limits for the following:

Outfall 001

Ammonia – September and October 2016
 Dissolved Oxygen – May, June, July, September, and October 2016
 Total Suspended Solids – October and November 2016

Outfall 002

BOD – December 2016
 Dissolved Oxygen – June and October 2016

Outfall 003

Dissolved Oxygen – May 2016
 Total Suspended Solids – March 2016

The February 2017 DMR was a month late, and as of May 10, 2017 we have not received the March 2017 DMR which was due no later than April 28, 2017.

An Equal Opportunity Employer



A State That Works

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Under "Alternate Field" select "Agency Interest (AI) ID" and enter 5991 into the agency ID #. Click on document #[80463261](#) to view the file.

This is a paper of noncompliance from the Indiana department of environmental management for **Bell Aquaculture**, the same site and most of the hardware you'll still find that makes up AquaBounty's farm. You can see a whole slew of water quality violations.

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 **NONCOMPLIANCE 24-HOUR NOTIFICATION REPORT**
State Form 52415 (R) 10-13
 Indiana Department of Environmental Management
 Office of Water Quality

INSTRUCTIONS: Complete all sections of this form and email it to Office of Water Quality, Compliance Data Section at owqreports@idem.in.gov. Thorough completion of this report will satisfy the Office of Water Quality (OWQ) telephone and 5-day written noncompliance notification reporting requirements of your NPDES permit. To speak with someone in OWQ, call (317) 232-8670.

Additionally, any noncompliance which may pose a significant danger to human health or the environment (including a fish kill) must be immediately reported to the Emergency Response Section spill response line at: (317) 233-7745 or toll free within Indiana at (888) 233-7745.

FACILITY INFORMATION				
Facility Name	County	NPDES Permit Number:		
Aqua Bounty Farms	Delaware	IN0062669		
Individual Reporting	Telephone Number	Reporting Date (month, day, year)		
Peter Bowyer	919-748-9911	11/21/19		
Email Address				
pbowyer@aquabounty.com				

NONCOMPLIANCE INFORMATION				
Date (month, day, year)	Outfall	Parameter	Permit Limit (Units/Daily/Weekly/Ave/Max/Min)	Monitored Value
10/10/19	001	Ammonia	1.7 mg/L permit average	1.78 mg/L
Date (month, day, year)	Outfall	Parameter	Permit Limit (Units/Daily/Weekly/Ave/Max/Min)	Monitored Value

Description of the Noncompliance and its Cause:
 The ammonia concentration was 0.08 mg/L over the 1.7 mg/L permit average.

Description of the Period of Noncompliance, Including Exact Dates and Time, and if the Noncompliance has not been Corrected, the Anticipated Time it is Expected to Continue:
 The period of noncompliance is believed to have been caused by temperature changes in the lagoons and inadequate aeration in the lagoons for nitrification to properly occur.

Steps Taken or Planned to Reduce, Eliminate, and Prevent Recurrence of the Noncompliance:
 Investigate aeration of the lagoons to ensure proper nitrification is occurring.


CERTIFICATION AND SIGNATURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE: Peter Bowyer DATE (month, day, year): 11/21/19

These are issues of noncompliance from the Indiana department of environmental management for **AquaBounty** from October and November of 2019. Only 5-7% over the permitted limit but the important context is the date of October/November 2019. The farm was nowhere near full capacity and still couldn't handle the amount of toxins created by the fish. Being at least 1/3 of the water quality lab staff, it was surprising I wasn't immediately made aware of this situation.

Source:
https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=82904064&dDocName=82903469&Rendition=web&allowInterrupt=1&noSaveAs=1
 From: <https://vfc.idem.in.gov/DocumentSearch.aspx>
 Under "Alternate Field" select "Agency Interest (AI) ID" and enter 5991 into the agency ID #. Click on document #82903469 to view the file.

 **NONCOMPLIANCE 24-HOUR NOTIFICATION REPORT**
 State Form 52415 (R 10-13)
 Indiana Department of Environmental Management
 Office of Water Quality

INSTRUCTIONS: Complete all sections of this form and email it to Office of Water Quality, Compliance Data Section at owq@idem.in.gov. Thorough completion of this report will satisfy the Office of Water Quality (OWQ) telephone and 5-day written noncompliance notification reporting requirements of your NPDES permit. To speak with someone in OWQ, call (317) 232-8870.

Additionally, any noncompliance which may pose a significant danger to human health or the environment (including a fish kill) must be immediately reported to the Contingency Response Decision alert response line at: (317) 232-7742 or toll free within Indiana at: (800) 232-7742.

FACILITY INFORMATION				
Facility Name	County		NPDES Permit Number	
Aqua Bounty Farms	Delaware		IN0062669	
Individual Reporting	Telephone Number		Reporting Date (month, day, year)	
Peter Bowyer	919-748-9911		12/18/19	
Email Address pbowyer@aquabounty.com				
NONCOMPLIANCE INFORMATION				
Date (month, day, year)	Outfall	Parameter	Permit Limit (Units/Daily/Weekly/Ave/Max/Mn)	Monitored Value
11/7/19	001	Ammonia	1.7 mg/L permit average	1.82 mg/L
Date (month, day, year)	Outfall	Parameter	Permit Limit (Units/Daily/Weekly/Ave/Max/Mn)	Monitored Value

Description of the Noncompliance and its Cause:
 The ammonia concentration was 0.12 mg/L over the 1.7 mg/L permit average.

Description of the Period of Noncompliance, including Exact Dates and Time, and if the Noncompliance has not been Corrected, the Anticipated Time it is Expected to Continue:
 The period of noncompliance is believed to have been caused by temperature changes in the lagoons and inadequate aeration in the lagoons for nitrification to properly occur. It is thought that biofiltration is continuing to mature inside the fish rearing units and is expected to improve.

Steps Taken or Planned to Reduce, Eliminate, and Prevent Recurrence of the Noncompliance:
 Investigate aeration of the lagoons to ensure proper nitrification is occurring. Also, continue to monitor the maturity of the bio-media.

CERTIFICATION AND SIGNATURE
 I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE: Peter Bowyer DATE (month, day, year): 12/18/19

Source: https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=82916768&dDocName=82916171&Rendition=web&allowInterrupt=1&noSaveAs=1
 From: <https://vfc.idem.in.gov/DocumentSearch.aspx>
 Under "Alternate Field" select "Agency Interest (AI) ID" and enter 5991 into the agency ID #. Click on document #82916171 to view the file.

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BYPASS / OVERFLOW INCIDENT REPORT

State Form 48373 (08 / 2-19)
Indiana Department of Environmental Management
Office of Water Quality

Follow-up to Bypass report previously sent on: _____

INSTRUCTIONS: Complete all parts of this form and e-mail signed copies to waterreports@idem.in.gov. Submittal of this report will satisfy the Office of Water Quality (OWQ) skipphone and written bypass/overflow reporting requirements of your NPDES permit. Please use and the second page of this form as necessary to identify separate locations caused by the same event. If you have any questions while filling out this form, please call (317) 232-6770.

To report a spill or if the release is resulting in a fish kill or other severe environmental damage, immediately report the release to the Emergency Response Section spill response line at: (317) 233-7745 or toll free within Indiana at (888) 233-7745.

GENERAL INFORMATION					
(1) Facility Name (Organization)	(2) Mailing Address (reporting organization)	(3) County	(4) NPDES Permit		
AquaBounty Farms Indiana LLC	11550 E Gregory, Albany, IN 47320	Delaware	IN0062669		
RELEASE INFORMATION (Location 1)					
(5) Outfall Release Number	(6) Date (mm/dd/yyyy) and Time Release Began	(7) Date (mm/dd/yyyy) and Time Release Stopped	(8) Location of Release (street address or Milenote, Lift Station, Force Main etc.)	(9) Latitude (Deg Min Sec)	(10) Longitude (Deg Min Sec)
N/A	3/18/21 12:15 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	3/18/21 1:00 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	Lift Station	40°08'11"	-85°25'24"
(11) Amount of Flow Released Check one: <input checked="" type="checkbox"/> Estimated <input type="checkbox"/> Actual		(Always provide a volume.) 15,000 Gallons	(11) WWTP Flow During Release 1.2 MGD	(12) WWTP Peak Design Flow Rate 1.45 MGD	
(13) Overflow Type (Select one.) <input type="checkbox"/> Sanitary Sewer Overflow <input checked="" type="checkbox"/> Treatment Bypass (at wastewater plant) <input type="checkbox"/> Prohibited Combined Sewer Overflow <input type="checkbox"/> Dry Weather Combined Sewer Overflow <input type="checkbox"/> Combined Sewer System Release			(14) Describe any damage to aquatic life or receiving stream:		
(15) Reason for Bypass / Overflow (Select one or more.) <input type="checkbox"/> Construction Related <input checked="" type="checkbox"/> Power Failure <input checked="" type="checkbox"/> Equipment Failure <input type="checkbox"/> Unknown <input type="checkbox"/> Exceeded Max Capacity <input type="checkbox"/> Precipitation Inches					
(16) System Component(s) (Select one or more.) <input type="checkbox"/> Manhole <input type="checkbox"/> House Lateral <input type="checkbox"/> Pipe Failure <input type="checkbox"/> Pump Station Failure <input checked="" type="checkbox"/> Treatment Bypassed <input type="checkbox"/> Other <input type="checkbox"/> Influent Structure <input type="checkbox"/> Air Relief Valve <input type="checkbox"/> Sewer Clean Out		(17) Additional Description of the Bypass / Overflow Event Power outage at the location. Automatic transfer of power from emergency backup occurred. However, 4 out of 9 fish-rearing systems in the Grow Out Area suffered recirculation pump control faults. These control faults caused water to back up into the tanks, and water levels to rise, causing extra volume and head pressure on the Lift Station. This caused the locked lift station access hatches to be pushed up and water to flow out of the seams onto the ground. The Lift Station pumps did not suffer any faults themselves, but they could not keep up with the sudden increase of extra water volume.		(18) Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Occurred at Treatment Plant <input type="checkbox"/> Reached Public Land <input checked="" type="checkbox"/> Reached Receiving Water Name of Receiving Water Impacted: Riley Stafford Ditch via a drain collected rainwater from the roof	
Describe Other: (in the box below) Recirculation pumps					
(19) Additional organizations notified by facility, if necessary (Select one or more.) <input type="checkbox"/> IDEM Emergency Response <input type="checkbox"/> Health Department <input type="checkbox"/> DNR Fish and Wildlife <input type="checkbox"/> Local Emergency Management <input type="checkbox"/> Other:					
(20) Actions Taken to Prevent, Minimize, or Mitigate Damage including Clean-up and Treatment of Affected Area (Select one or more of the following, then add a written description.) <input type="checkbox"/> Removed Blockage <input type="checkbox"/> Repaired Pipe <input type="checkbox"/> Repaired Pump Station <input checked="" type="checkbox"/> Other <input type="checkbox"/> Lime <input type="checkbox"/> Clean-Up Debris Turned off all incoming freshwater supply. Reset three of 3 of the faulty panels. Connected remaining faulty pumps into drives on functioning panels using emergency extension power chords.					
(21) Resolution: Actions Taken or Planned to Prevent Recurrence Replace faulty electrical components in one of the panels that was immediately identified. Electrical review of the remaining 3 control panels to determine why the pump drives faulted and needed reset.					
(22) CERTIFICATION AND SIGNATURE					
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (The area below is for a handwritten signature or an electronic substitute. Scan the completed form to PDF and e-mail to waterreports@idem.in.gov)					
SIGNATURE: <i>Peter Bowyer</i>	Telephone Number 7656251690	Contact E-mail pbowyer@aquabounty.com	DATE (month, day, year): 03/16/21	Date (month, day, year) / Time IDEM Notified 03.16.21 11:00	<input checked="" type="checkbox"/> AM <input type="checkbox"/> PM

Source:
https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83132698&dDocName=83133103&Rendition=web&allowInterrupt=1&noSaveAs=1
From: <https://vfc.idem.in.gov/DocumentSearch.aspx>
Under "Alternate Field" select "Agency Interest (AI) ID" and enter 5991 into the agency ID #. Click on document #83133103 to view the file.

This is a serious containment violation around the property's lift stations. 15,000 gallons of tank water backflow on the ground near the indoor rearing areas.
March 2021

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NONCOMPLIANCE 24-HOUR NOTIFICATION REPORT

State Form 32416 (1 / 10-13)
Indiana Department of Environmental Management
Office of Water Quality

INSTRUCTIONS: Complete all sections of this form and email it to Office of Water Quality, Compliance Data Section at wreports@icem.IN.gov. Thorough completion of this report will satisfy the Office of Water Quality (OWQ) telephone and 5-day written noncompliance notification reporting requirements of your NPDES permit. To speak with someone in OWQ, call (317) 252-8670.

Additionally, any noncompliance which may pose a significant danger to human health or the environment (including a fish kill) must be immediately reported to the Emergency Response Section spill response line at: (317) 233-7745 or toll free within Indiana at (888) 233-7745.

FACILITY INFORMATION		
Facility Name	County	NPDES Permit Number
Aqua Bounty Farms	Delaware	IN0062669
Individual Reporting	Telephone Number	Reporting Date (month, day, year)
Peter Bowyer	919-748-9911	7/8/2020
Email Address		
pbowyer@aquabounty.com		

NONCOMPLIANCE INFORMATION				
Date (month, day, year)	Outfall	Parameter	Permit Limit (Units/Daily/Weekly/Ave/Max/Mn)	Monitored Value
7/8/2020	001	Ammonia	1.7 mg/L monthly permit average	2.32 mg/L
Date (month, day, year)	Outfall	Parameter	Permit Limit (Units/Daily/Weekly/Ave/Max/Mn)	Monitored Value
7/30/2020	001	Ammonia	1.7 mg/L monthly permit average	2.00 mg/l

Description of the Noncompliance and its Cause:
The ammonia concentration was 0.62 mg/L over the 1.7 mg/L monthly permit average on 7/8/20, 0.30 mg/l over the 1.7 mg/L monthly permit average on 7/30/20, and 0.46 mg/l over the 2.16 mg/l average of the two samples collected during July 2020.

Description of the Period of Noncompliance, Including Exact Dates and Time, and if the Noncompliance has not been Corrected, the Anticipated Time it is Expected to Continue:
This non-compliance was for the reporting period that included the month of July 2020. Monthly average effluent limits for ammonia are 3.3 mg/L during winter months, however, the limits for ammonia change to Summer limits of 1.7 mg/L monthly average during the period of May 1st through November 30th. The higher ammonia concentrations are a recent development within the facility, however, the primary reason for the increase is still under investigation. Prior to the seasonal change from Winter to Summer limits, the facility discharge was generally in compliance for all parameters. Aquabounty is considering various options to control and reduce the ammonia in the discharge, however, since ammonia removal is impacted by physical, chemical and biological processes both within the fish rearing system as well as the actual wastewater treatment system, the system may not respond to adjustments rapidly.

Steps Taken or Planned to Reduce, Eliminate, and Prevent Recurrence of the Noncompliance:
Investigate various sources of ammonia generation and removal in the fish rearing system as well as the discharge from the treatment system. Determine alternative methods of reducing the ammonia in the fish rearing area as well as in the discharge from the treatment system, wetlands ponds and discharge area.

CERTIFICATION AND SIGNATURE
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE: Peter Bowyer DATE (month, day, year): 8/27/2020

Source:
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From: <https://vfc.idem.in.gov/DocumentSearch.aspx>
Under "Alternate Field" select "Agency Interest (AI) ID" and enter 5991 into the agency ID #. Click on document #83060709 to view the file.

This is a notice of a whole month of noncompliance in July 2020 for significant % over the daily limit of ammonia for the property's effluent.

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NONCOMPLIANCE 24-HOUR NOTIFICATION REPORT

 State Form 62016 (01/16-19)
 Indiana Department of Environmental Management
 Office of Water Quality

INSTRUCTIONS: Complete all sections of this form and email it to Office of Water Quality, Compliance Data Section at owrreports@idem.IN.gov.
 Thorough completion of this report will satisfy the Office of Water Quality (OWQ) telephone and 5-day written noncompliance notification reporting requirements of your NPDES permit. To speak with someone in OWQ, call (317) 232-8670.

Additionally, any noncompliance which may pose a significant danger to human health or the environment (including a fish kill) must be immediately reported to the Emergency Response Section spill response line at: (317) 233-7745 or toll free within Indiana at (888) 233-7745.

FACILITY INFORMATION				
Facility Name	County	NPDES Permit Number		
Aqua Bounty Farms	Delaware	IN0062669		
Individual Reporting	Telephone Number	Reporting Date (month, day, year)		
Peter Bowyer	765-625-1690	6/29/2021		
Email Address				
pbowyer@aquabounty.com				
NONCOMPLIANCE INFORMATION				
Date (month, day, year)	Outfall	Parameter	Permit Limit (Units/Daily/Weekly/Ave/Max/Mtn)	Monitored Value
6/9/2021	001	Ammonia	1.7 mg/L monthly permit average	3.64 mg/L
Date (month, day, year)	Outfall	Parameter	Permit Limit (Units/Daily/Weekly/Ave/Max/Mtn)	Monitored Value
6/25/2021	001	Dissolved Oxygen	6.0 mg/L monthly permit average	5.09 mg/L
Description of the Noncompliance and its Cause: The ammonia concentration was 1.94 mg/L over the 1.7 mg/L monthly permit average. Dissolved Oxygen sample collected on 6/9/2021 was 4.33 mg/L, resample collected on 6/25/2021 was 5.85 mg/L. Dissolved Oxygen is 5.09 mg/L after averaging the two samples the results are 0.91 mg/L below permit limits				
Description of the Period of Noncompliance, Including Exact Dates and Time, and if the Noncompliance has not been Corrected, the Anticipated Time it is Expected to Continue: This non-compliance was for the reporting period that included the month of June 2021. Monthly average effluent limits for ammonia are 3.3 mg/L during winter months, however, the limits for ammonia change to Summer limits of 1.7 mg/L monthly average during the period of May 1st through November 30 th . Prior to the seasonal change from Winter to Summer limits, the facility discharge was in compliance for all parameters. Aquabounty is considering various options to control and reduce the ammonia in the discharge, however, since ammonia removal is impacted by physical, chemical and biological processes both within the fish rearing system as well as the actual wastewater treatment system, the system may not respond to adjustments rapidly. Dissolved Oxygen concentration is low due to the increase of TAN and Phosphorus concentrations as well as dense aquatic plant growth in lagoons.				
Steps Taken or Planned to Reduce, Eliminate, and Prevent Recurrence of the Noncompliance: Investigate various sources of ammonia generation and removal in the fish rearing system as well as the discharge from the treatment system. Determine alternative methods of reducing the ammonia in the fish rearing area as well as in the discharge from the treatment system, wetlands ponds and discharge area. Additional drum filters will be added to effluent plant to remove additional suspended solids that are linked to the increased TAN levels. Investigating addition of ammonia control bacterial supplement to effluent plant / lagoons. Increase the performance of aerator blower and diffuser at outfall 001.				
CERTIFICATION AND SIGNATURE				

Source:

https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83174638&dDocName=83175443&Rendition=web&allowInterrupt=1&nqSaveAs=1

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Under "Alternate Field" select "Agency Interest (AI) ID" and enter 5991 into the agency ID #. Click on document #83175443 to view the file.

This is a notice of a whole month of noncompliance in June 2021 for over double the daily limit of ammonia for the property's effluent and a noticeable amount below the requirement for dissolved oxygen levels.



NONCOMPLIANCE 24-HOUR NOTIFICATION REPORT

State Form 52415 (5/1/10-13)
Indiana Department of Environmental Management
Office of Water Quality

INSTRUCTIONS: Complete all sections of this form and email it to Office of Water Quality, Compliance Data Section at compcrds@dem.in.gov. Thorough completion of this report will satisfy the Office of Water Quality (OWQ) telephone and 5-day written noncompliance notification reporting requirements of your NPDES permit. To speak with someone in OWQ, call (317) 232-8670.

Additionally, any noncompliance which may pose a significant danger to human health or the environment (including a fish kill) must be immediately reported to the Emergency Response Section spill response line at: (317) 233-7745 or toll free within Indiana at: (888) 233-7745.

FACILITY INFORMATION				
Facility Name	County	NPDES Permit Number		
Aqua Bounty Farms	Delaware	IN0062669		
Individual Reporting	Telephone Number	Reporting Date (month, day, year)		
Peter Bowyer	765-625-1690	6/7/2021		
Email Address				
pbowyer@aquabounty.com				
NONCOMPLIANCE INFORMATION				
Date (month, day, year)	Outfall	Parameter	Permit Limit (Units/Daily/Weekly/Ave./Max/Min)	Monitored Value
5/4/2021	001	Ammonia	1.7 mg/L monthly permit average	2.44 mg/L
Date (month, day, year)	Outfall	Parameter	Permit Limit (Units/Daily/Weekly/Ave./Max/Min)	Monitored Value
5/20/2021	001	Ammonia	1.7 mg/L monthly permit average	2.20 mg/L
Description of the Noncompliance and its Cause: The ammonia concentration was 0.62 mg/L over the 1.7 mg/L monthly permit average after resampling on 5/20/2021.				
Description of the Period of Noncompliance, Including Exact Dates and Time, and if the Noncompliance has not been Corrected, the Anticipated Time it is Expected to Continue: This non-compliance was for the reporting period that included the month of May 2021. Monthly average effluent limits for ammonia are 3.3 mg/L during winter months, however, the limits for ammonia change to Summer limits of 1.7 mg/L monthly average during the period of May 1st through November 30 th . Prior to the seasonal change from Winter to Summer limits, the facility discharge was generally in compliance for all parameters. Aquabounty is considering various options to control and reduce the ammonia in the discharge, however, since ammonia removal is impacted by physical, chemical and biological processes both within the fish rearing system as well as the actual wastewater treatment system, the system may not respond to adjustments rapidly. Resampling for ammonia was conducted on May 20, 2021.				
Steps Taken or Planned to Reduce, Eliminate, and Prevent Recurrence of the Noncompliance: Investigate various sources of ammonia generation and removal in the fish rearing system as well as the discharge from the treatment system. Determine alternative methods of reducing the ammonia in the fish rearing area as well as in the discharge from the treatment system, wetlands ponds and discharge area.				
CERTIFICATION AND SIGNATURE				
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.				
SIGNATURE: Peter Bowyer			DATE (month, day, year): 6-8-2021	

Source:

https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83201365&dDocName=83202771&Rendition=web&allowInterrupt=1&noSaveAs=1

From: <https://vc.idem.in.gov/DocumentSearch.aspx>

Under "Alternate Field" select "Agency Interest (AI) ID" and enter 5991 into the agency ID #. Click on document #83202771 to view the file.

This is a notice of a whole month of noncompliance in May 2021 for significant % over the daily limit of ammonia for the property's effluent



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue • Indianapolis, IN 46204
(317) 451-8027 • (317) 232-8603 • www.idem.in.gov

Eric J. Matcobb
Director

Bruce Pigott
Commissioner

April 27, 2017

66-34
Andrew Frank
Bell Aquaculture, LLC
200 Crescent Street, Suite 1040
Dallas, TX 75201

Re: Monitoring and Reporting Noncompliance
Drinking Water Branch - Compliance
PWSID #2180014
Albany, Delaware County

Dear Andrew Frank:

As required by 327 IAC 8-2-13, a public water supply system must complete and submit results of bacteriological monitoring to the Indiana Department of Environmental Management (IDEM). This is to inform you that as of April 27, 2017, our office has not received the following:

Contaminant	Date	Violation
Total Coliform	1 st Quarter of 2017 (January, February, and March)	Monitoring and Reporting

If you have already collected the required samples, please submit the results to IDEM within ten (10) days of receipt of this letter. If you failed to collect the required samples during that quarter, you are required to public notice per the attached instructions. Submit this information to:

Mr. Will De La Rosa, Drinking Water Branch – Mail Code 66-34
Indiana Department of Environmental Management
100 North Senate Avenue, Room N1201
Indianapolis, IN 46204-2251
Fax: 317/234-7436 Email: wdejaros@idem.in.gov

If you fail to sample during the next monitoring period or in any future monitoring period, you will be referred for formal enforcement.

Thank you for your attention to this matter. If you have any questions, please contact Mr. Will De La Rosa at 317/234-7445.

Sincerely,

Sara Pierson, Chief
Total Coliform & Compliance Support Section
Drinking Water Branch
Office of Water Quality

Enclosed – Public Notice & Certification Form
cc: Carolyn Chappell, Field Inspection Section



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A State that Works

Recycled Paper

This is an issue of noncompliance for the Albany property when it was **Bell Aquaculture** regarding monitoring and reporting of coliforms in the drinking water on site. In Jan-March 2017.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
 100 N. Senate Avenue • Indianapolis, IN 46204
 (800) 451-6027 • (317) 232-8603 • www.idem.in.gov

Eric J. Holcomb
 Governor

Bruno Pigott
 Commissioner

October 4, 2017

66-34
 Bell Aquaculture, Llc
 Attn: Andrew Frank
 P.O. Box 85
 Redkey, IN 47373

Re: Monitoring and Reporting Noncompliance
 Drinking Water Branch – Compliance
 PWSID #2180014
 Redkey, Delaware County

Dear Andrew Frank:

The Indiana Department of Environmental Management (IDEM) staff of the Office of Water Quality has conducted a review of your drinking water monitoring and reporting requirements in order to determine compliance with the Revised Total Coliform Rule (RTCR).

This review noted the following violations:

Contaminant	Date	Violation	Corrective Action
Total Coliform	August 2017	40 CFR 141.860(c)(1) 40 CFR 141.860(d)(1) Monitoring & Reporting Violations Failure to collect and submit routine distribution sample result(s) for Total Coliform <i>Rules cited have been incorporated by reference at 327 IAC 8-2.4-1</i>	Submit report(s) OR Public Notice per the attached instructions and send a copy to IDEM

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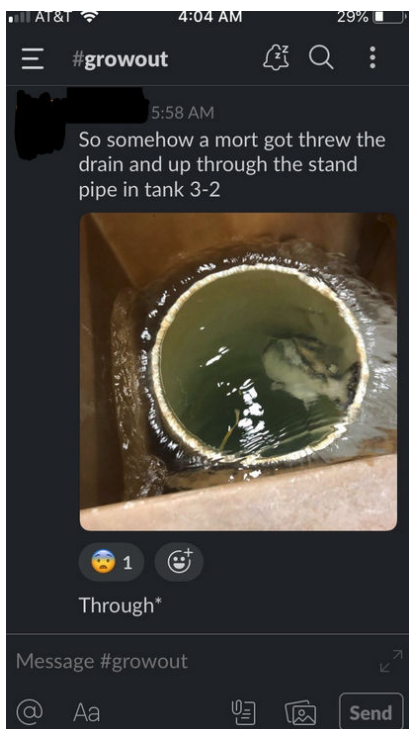
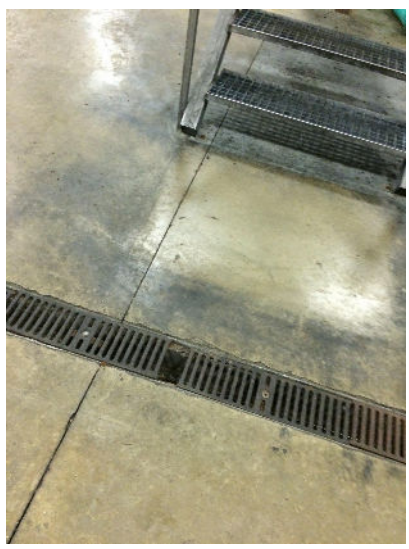
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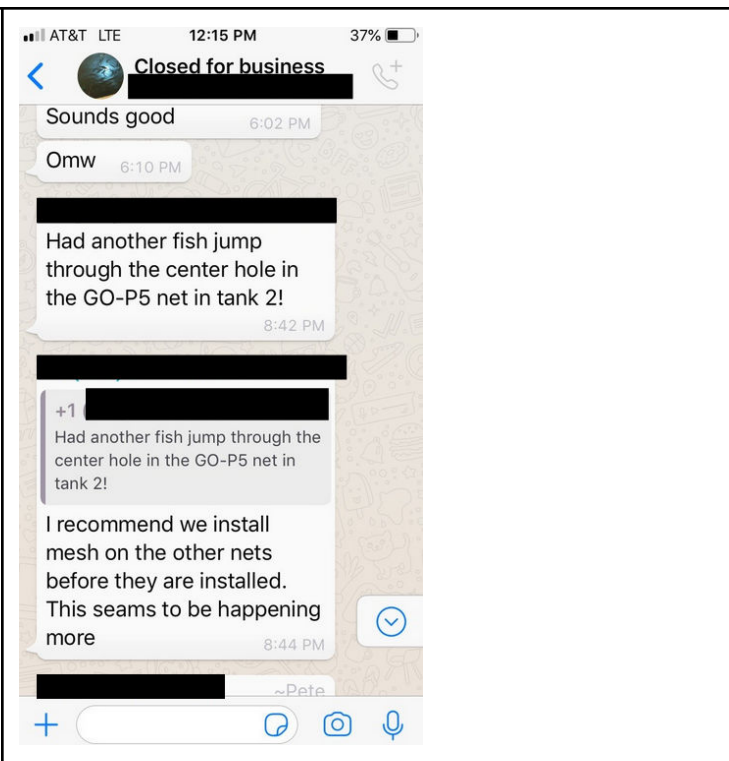
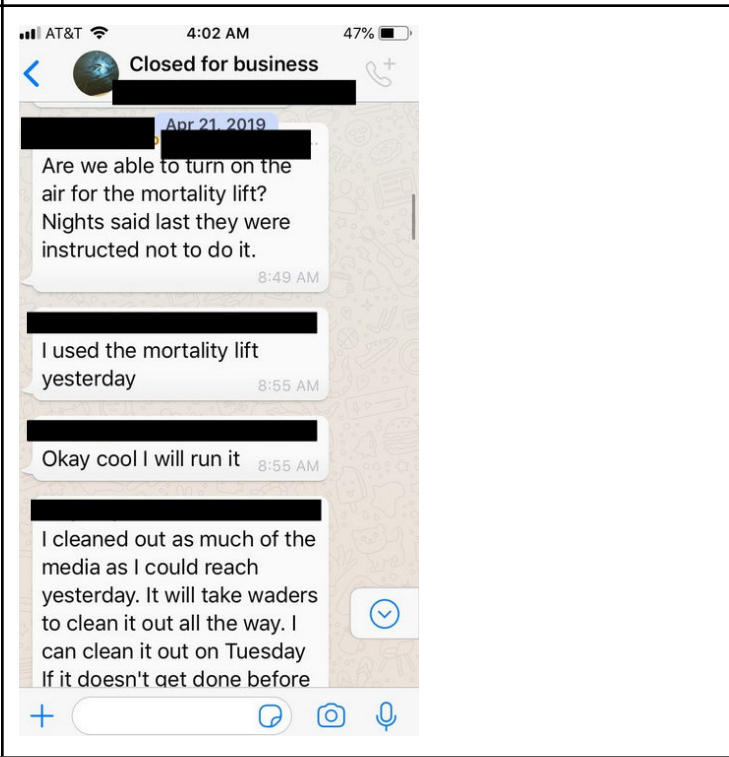
Within ten (10) days of receipt of this letter, you must submit the required sampling results to IDEM. If you failed to collect the required samples, you are required to public notice per the attached instructions. Community water systems may public notice in their annual Consumer Confidence Report (CCR) as long as the timing, content, and delivery requirements for Tier 3 notification are met. If you choose to public notice now, you are still required to public notice for this violation in your annual CCR. Submit this information to:

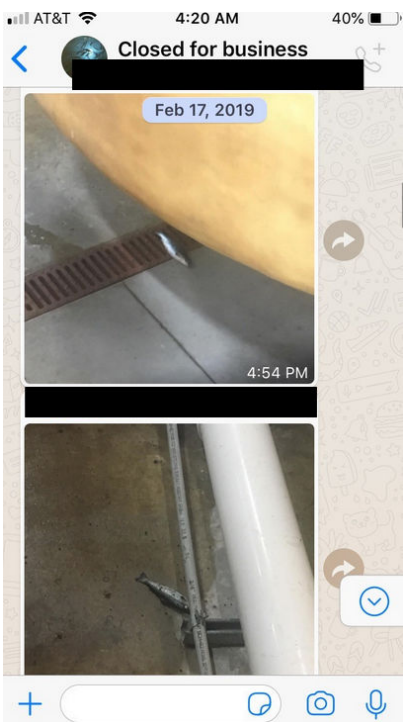
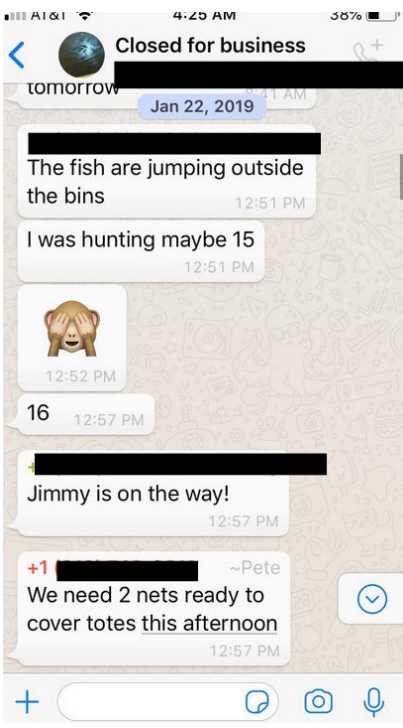
Indiana Department of Environmental Management (IDEM)
 OWQ Drinking Water – Mail Code 66-34
 Attn: Ceazar Natividad
 100 N. Senate Avenue
 Indianapolis, IN 46204-2251
 Fax: 317/234-7436 or Email: cnativid@idem.in.gov

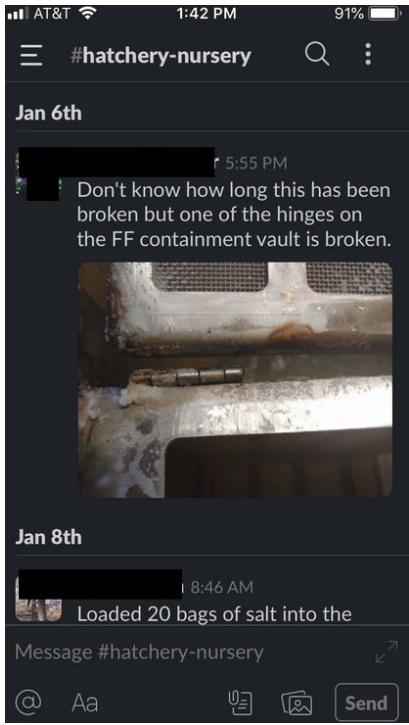
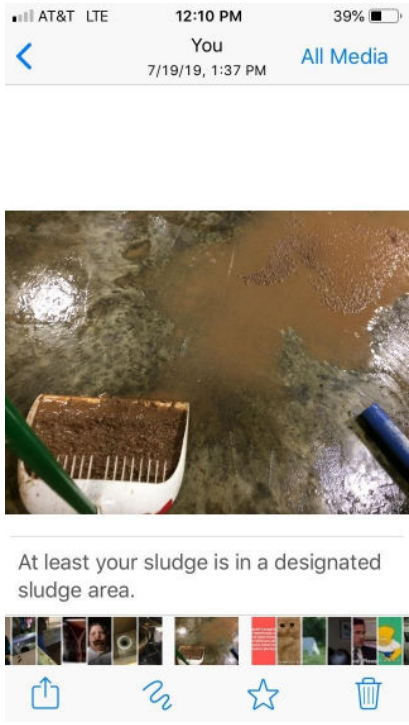
Failure to submit the required information may result in a referral to IDEM's

These are issues of noncompliance for the Albany property when it was **Bell Aquaculture** regarding monitoring of coliforms in the drinking water on site. In August 2017.

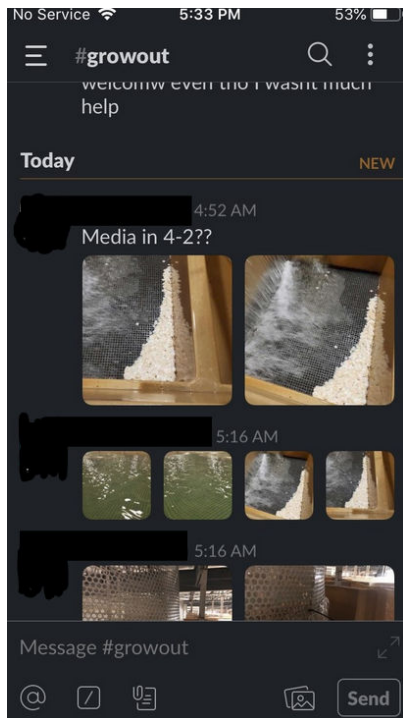
<p>74</p>	 <p>A screenshot of a social media post from a user with a blacked-out profile picture. The post is titled "#growout" and has a timestamp of "5:58 AM". The text of the post reads: "So somehow a mort got threw the drain and up through the stand pipe in tank 3-2". Below the text is a photograph showing a circular drain opening in a concrete floor, partially covered with a clear plastic cap. Inside the drain, there is a greenish liquid. The post has one reply and a "Through*" label. At the bottom of the screenshot, there is a "Message #growout" button and a "Send" button.</p>	<p>Containment breach. Containment regulations are either not being followed or not properly installed here to conform to FDA standards. Specifically the drain and mortality lift.</p> <p>Animal welfare, you can see at the top of the body where scales were ripped away from suction forces.</p>
<p>75</p>	 <p>A photograph of a floor drain in a concrete floor. The drain is covered with a metal grate. There is a visible gap between the grate and the drain opening, indicating a containment breach.</p>	<p>Gap in containment. The floor grate didn't completely cover the floor drain.</p>

<p>76</p>		<p>Containment breaches. Many primary contaminants regularly fail or are regularly required to remove in order to service the system.</p>
<p>77</p>		<p>I was told the automatic mortality lifts located in the main production tanks were not cleared by the FDA because it bypassed a containment measure or two. This is showing employees going around the regulations in place and in plain view of management.</p>

<p>78</p>		<p>Containment breaches in the nursery. Dozens of fish escape from tanks daily all around the farm.</p>
<p>79</p>		<p>Containment breaches. This is during the sorting of fish by weight/size in the nursery. These fish are considered drugs that have explicit instructions on where they can be at all times.</p>

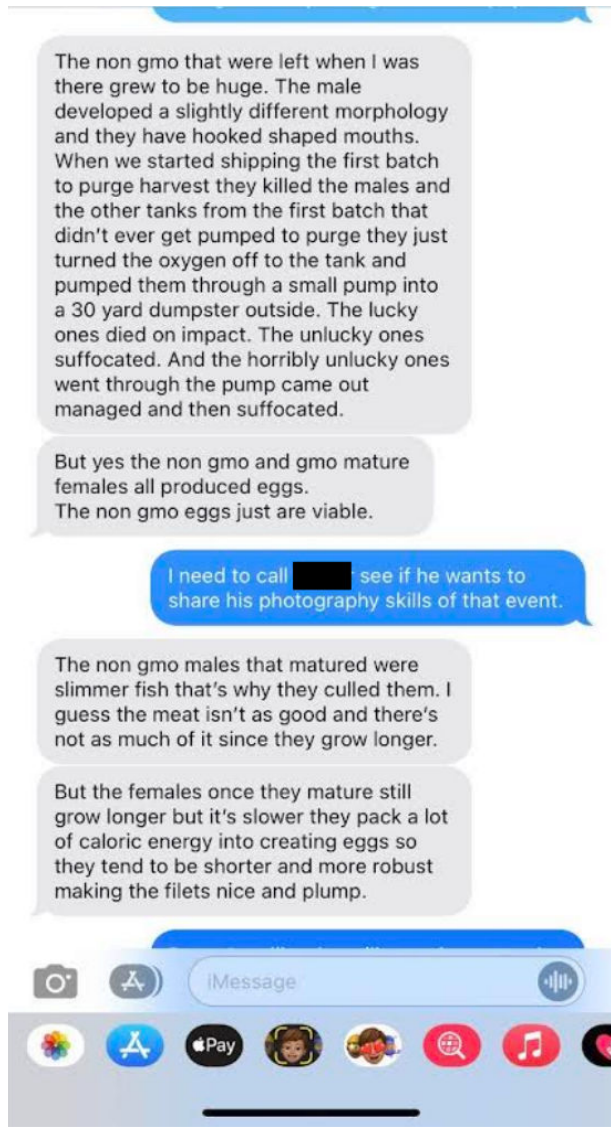
<p>80</p>		<p>This is a new installation that happened after Bell Aquaculture. Less than two-year-old equipment coming apart at the seams. "Don't know how long..." potentially many containment checks done without noticing this containment failure.</p>
<p>81</p>		<p>Feed spilled on the ground and left to liquefy.</p> <p>So much wasted feed that I couldn't keep the melancholy out of my message.</p> <p>I saw a recent video where automatic feeders were installed after I left so it may no longer get as bad as this picture showcases.</p>

82





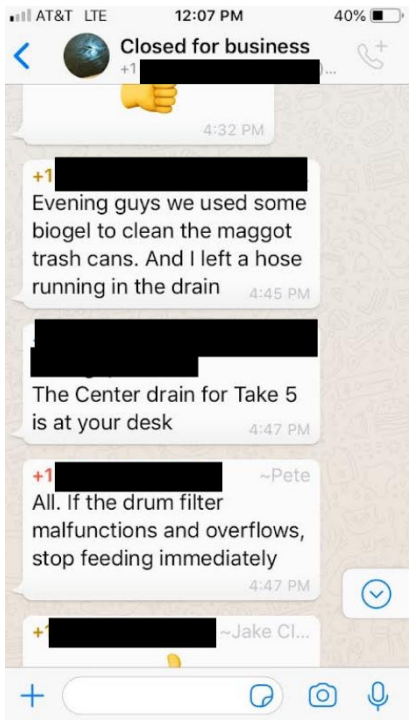

These small white disks, used for bacteria cultivation, escaped their original position in the bio towers and made their way to the sidebox of the main production tank. I was told that these technically counted as containment violations when they showed up away from their intended location.

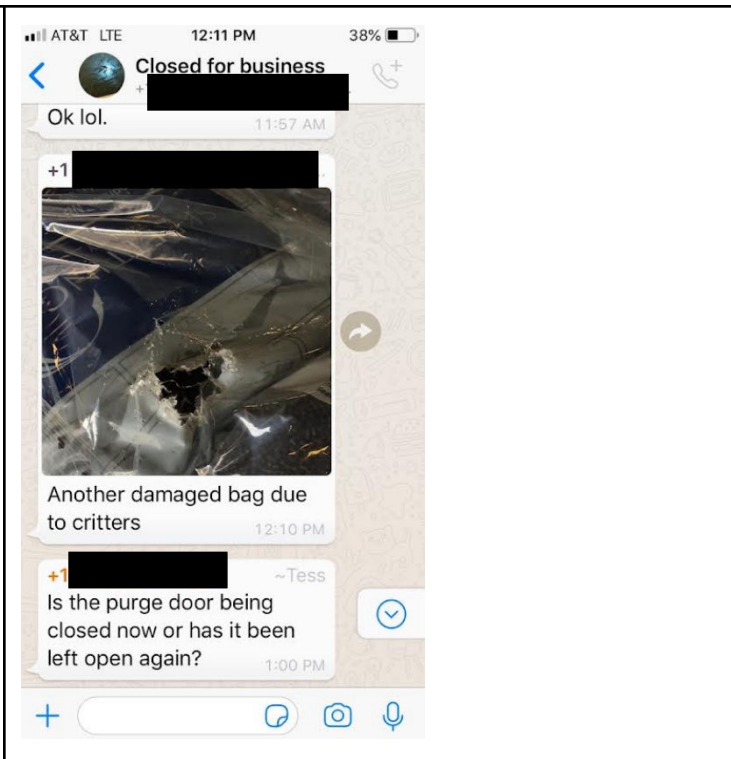
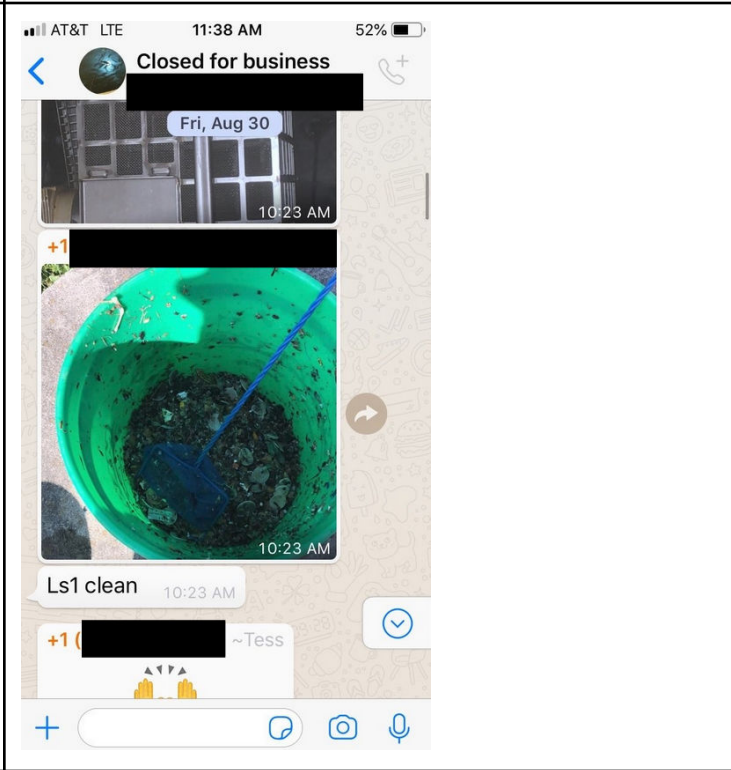
83

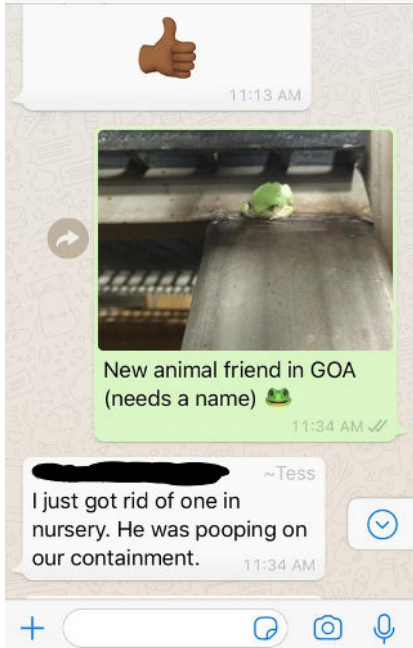



A former worker's description of what happened to the first group of non-gmo fish that was under the care of AQB in Albany showing animal welfare and containment issues.

<p>84</p>		<p>Containment issue. If wild animals can get in, reared animals can get out. Biosecurity breached.</p>
<p>85</p>		<p>Containment issues and gross conditions are highlighted here. Buildings were not adequately sealed against pests, which is not expressly a containment violation but if animals can get in, then animals can get out.</p>

<p>86</p>	 <p>AT&T LTE 12:07 PM 40%</p> <p>Closed for business</p> <p>4:32 PM</p> <p>Evening guys we used some biogel to clean the maggot trash cans. And I left a hose running in the drain 4:45 PM</p> <p>The Center drain for Take 5 is at your desk 4:47 PM</p> <p>~Pete</p> <p>All. If the drum filter malfunctions and overflows, stop feeding immediately 4:47 PM</p> <p>~Jake Cl...</p>	<p>Maggot trash cans is a phrase that accurately encompasses AQB's housekeeping efforts.</p> <p>The farm manager also notes the frequency of drum filters breaking down, which is a containment barrier and directly affects water quality.</p>
<p>87</p>	 <p>AT&T 1:37 PM 93%</p> <p>#farm</p> <p>Jan 10th</p> <p>7:39 AM</p> <p>We have to do better. Dry feed not old should be weighed, counted for and cleaned up 😞</p> <p>Jan 10th</p> <p>Message #farm</p> <p>@ Aa [icons] Send</p>	<p>Hand feeding tanks led to an abundance of waste and gross conditions as seen here. Maggots, flies, and slippery conditions were soon to follow</p>

<p>88</p>		<p>There were contracted pest prevention services that the farm hired, but were obviously unsuccessful in stopping all vermin as shown here. Rats are the most likely culprit in getting into this bag of Skretting fish feed. Many other animals were seen on the property including cats, raccoons, deer, dogs, and possums.</p>
<p>89</p>		<p>Containment breaches that are probably unreported. In that bucket are little plastic discs with a high surface area meant for bacteria cultivation, they are found in the bio towers in rearing areas. To have the discs out in a lift station technically means many levels of containment failure.</p>

<p>90</p>		<p>Containment issue as admitted by hatchery manager Tess Bowyer. Animals can get in, animals can get out.</p>
<p>91</p>		<p>Containment breach. The tank net did not keep this fish from jumping out. Cavalier and joking attitude culture.</p>

ANIMAL ABUSE

#	Image/Video	Description
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93





9/16/19, 10:52 PM All iMedia

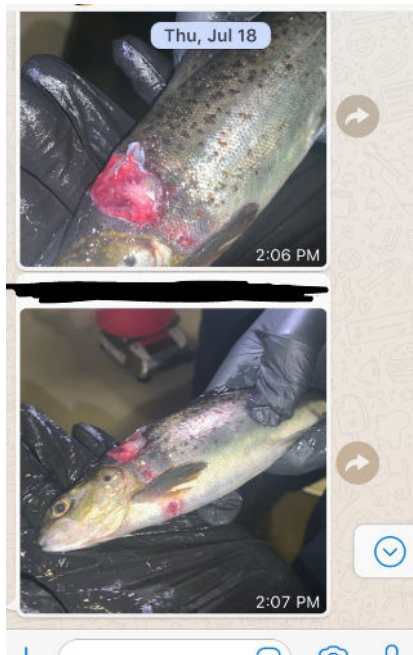


Bottom of 2-3, drain is being clogged by morts

This is an underwater camera that we used to see at the bottom of the main production building tanks. Here we can see dozens of dead fish clogging up the drain, with no easy way of removing them.

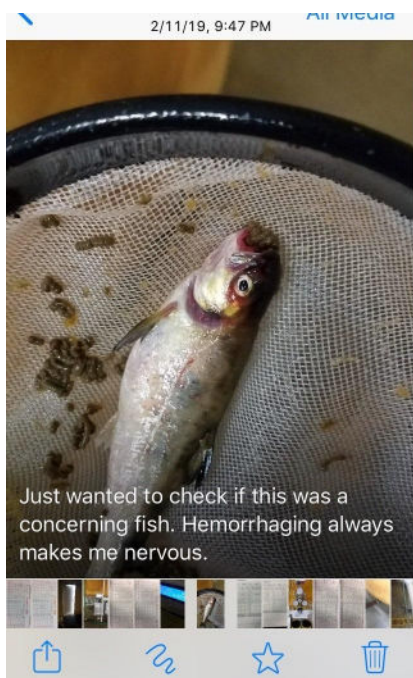
94		<p>This is a fish suffering from a serious physical injury and in all likelihood was forced to continue to swim until succumbing to exhaustion, disease, or starvation. There's no way to track/capture a single live fish in the main production tanks due to tank size, water clarity, and avoidance maneuvers from a live animal</p>
95	 <p>8/2/19, 12:13 PM</p> <p>Only worry about the state of tanks 3 and 5</p> <p>1:10 PM ✓</p> <p>This fish came from tank 3 and there was 14 mortis today in tank 5. Tank 5 is not eating as much as the others</p> <p>1:11 PM</p> <p>Tank 3 is eating a lot</p> <p>1:11 PM</p>	<p>Strange lesions and diseases were commonplace. Sideswimmers were also an issue continued on from as far back as Bell Aquaculture which could be based on stress or bacteria.</p>

96

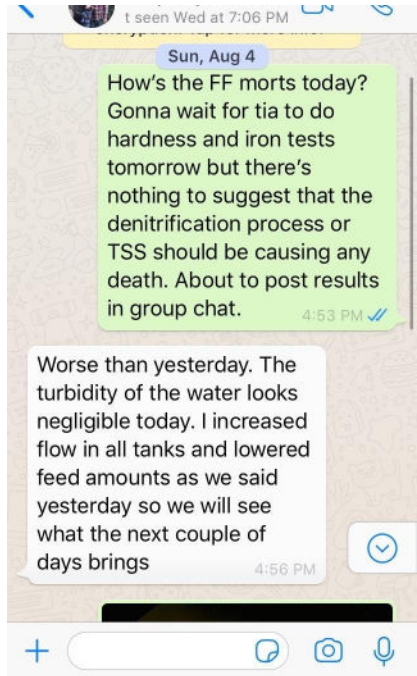




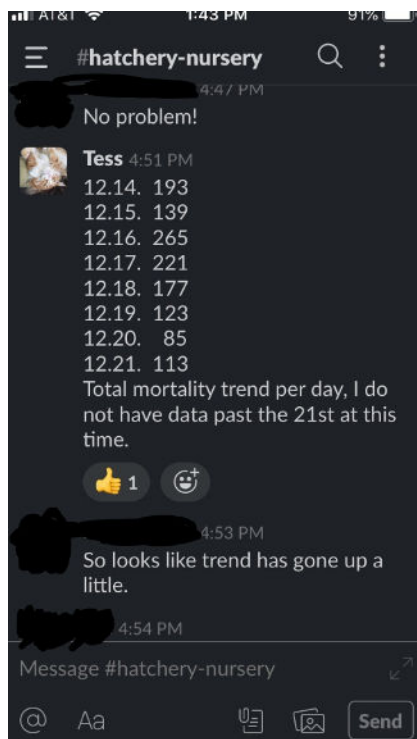

Whether induced by mechanical means or not, this fish likely suffered for hours or days before dying. A single fish (outside of very small systems like the egg trays or first feeding) cannot be tracked and captured to be put out of its misery.

97

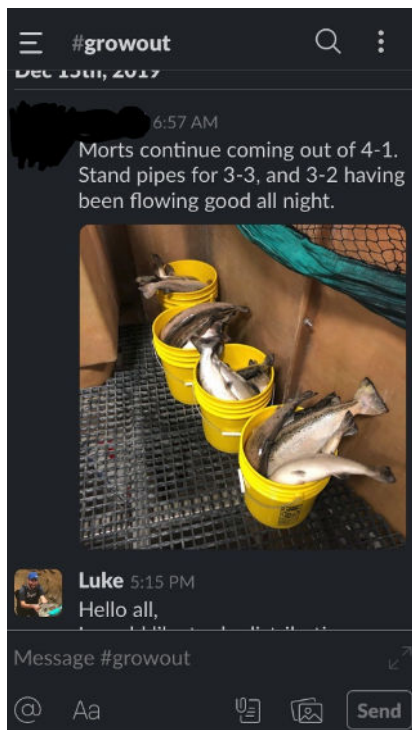


There's a variety of causes of death that could befall the fish. This one was recognized as suffering from some kind of condition involving blood. The fact that this is intensive aquaculture, having tanks with maximum densities of fish, is what sets up the stage for rampant disease to take over and water that is always right up to the point of complete toxicity.

<p>98</p>	 <p>t seen Wed at 7:06 PM</p> <p>Sun, Aug 4</p> <p>How's the FF morts today? Gonna wait for tia to do hardness and iron tests tomorrow but there's nothing to suggest that the denitrification process or TSS should be causing any death. About to post results in group chat. 4:53 PM ✓</p> <p>Worse than yesterday. The turbidity of the water looks negligible today. I increased flow in all tanks and lowered feed amounts as we said yesterday so we will see what the next couple of days brings 4:56 PM</p>	<p>This is me asking a recent hire who eventually became a very company-trusted manager about the deaths of 30% of the first cohort of GMO salmon. He personally broke FDA regulation by making changes to the first feeding system, which didn't even prevent tens of thousands of livestock from dying under his watch but his AQB career quickly advanced.</p>
<p>99</p>	 <p>#farm</p> <p>3:46 AM</p> <p>3/2 lot of morts big ones also 2 buckets so far on 4/1 and 1 bucket on 3/3</p>  <p>Pete B 7:22 AM</p> <p>Hello [redacted]. Thank you for removing these. We had a flow issue</p> <p>Message #farm</p> <p>@ Aa [icons] Send</p>	<p>Rate of mortality highlighted here. Wasteful, disrespectful to living beings, and inefficient work practices.</p>

<p>100</p>		<p>Not sure which batch of fish this is describing exactly. Says December in the nursery so it could be the second cohort of GMOs. Daily deaths numbering in the hundreds.</p> <p>At this stage, growth is actually more than twice as conventional salmon but slows down as they age. This early explosion of growth actually caused many of the fish's stomachs to rupture.</p> <p>Reminds me of french bulldogs since most require a c-section to be born. We as humans have actually manipulated something into being that nature itself tries to demand nonviable.</p>
<p>101</p>		<p>Was told GMO fish actually have fewer genetic abnormalities compared to conventional fish but had no statistics to confirm. Conjoined twins pictured here. The sender of this message is hatchery manager Tess Bowyer</p>

102



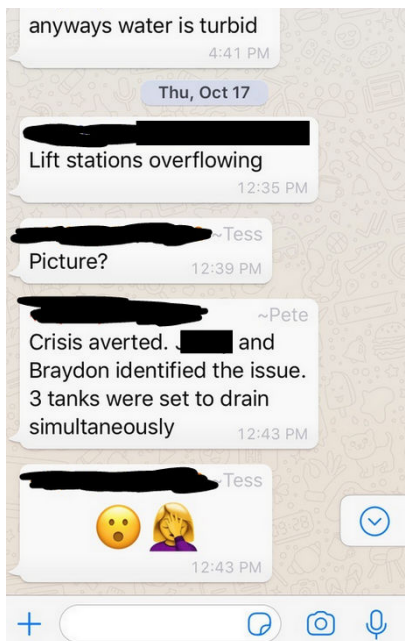
The rate of mortality is highlighted here. Wasteful, disrespectful, cruel, and inefficient work practices.

103



This picture is dated and time-stamped. So it should align with the 2nd big die-off I witnessed. Feed quality was noticeably different by realizing the gloves I used were getting oily. See the glossy palm versus the dull black side of the glove. This die-off was in pre-grow out, the water quality and clarity quickly degraded and wasn't even noticed by a recent fisheries graduate who became a manager after only 90 days. I came on the next shift after her and knew something was immediately wrong when I was able to reach out and touch fishes at the surface of the water.

104



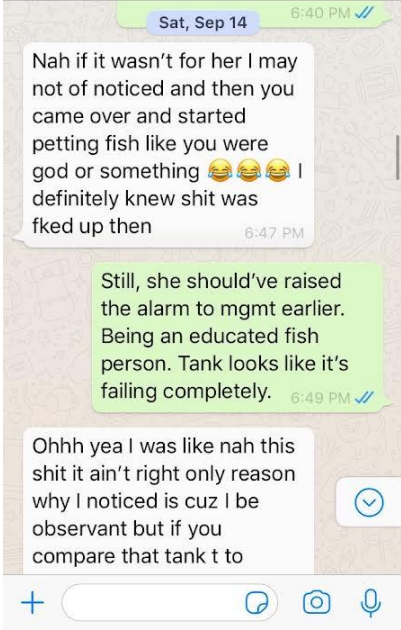
Cronyism and probably an unreported FDA violation. COO kept hiring Chileans as managers with questionable industry skills. I saw this manager draining three 75,000-gallon tanks at once and had to scream at him to stop. That water had to go somewhere and the lift stations could only handle so much at once. The overflowing of lift stations is also a serious containment violation.

That same manager also accidentally sent a pornographic video to the entire staff on our shared phone app within his first month of working. No disciplinary action for doing so, to my knowledge.

105



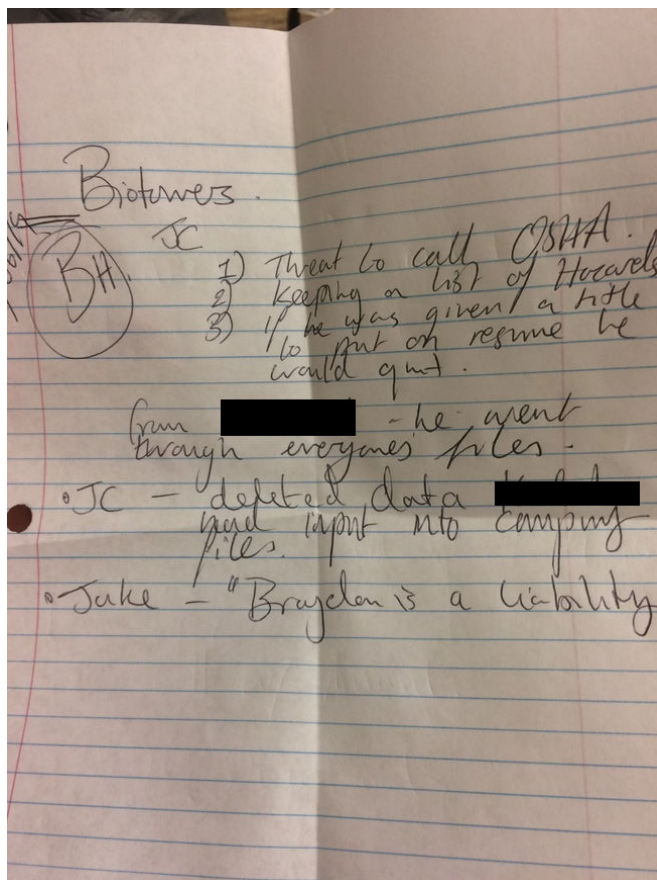
Salmon from a viewing window in a main production tank. Overcrowding of fish was common. The fish at the top has a bright pink spot, which is a flesh wound. Injured or sick fish cannot be easily captured in a 75,000-gallon tank and for that reason, many fish like this one suffered until dying from exhaustion, disease, or inability to feed themselves.

<p>106</p>	 <p>Sat, Sep 14 6:40 PM ✓✓</p> <p>Nah if it wasn't for her I may not of noticed and then you came over and started petting fish like you were god or something 😂😂😂 I definitely knew shit was fked up then 6:47 PM</p> <p>Still, she should've raised the alarm to mgmt earlier. Being an educated fish person. Tank looks like it's failing completely. 6:49 PM ✓✓</p> <p>Ohhh yea I was like nah this shit it ain't right only reason why I noticed is cuz I be observant but if you compare that tank t to</p>	<p>Example of a worker (would later, just past her 90 days, be promoted to a management position) who passed on a failing fish system to the next shift without realizing the precarious situation at all.</p> <p>I was alerted by this coworker shown here, then I came over and realized the fish weren't swimming away from my shadow above the tank, then proceeded to reach out and actually touch the barely living fish with my hand without any reaction from them.</p>
<p>107</p>	<p>Video https://drive.google.com/file/d/1tGsbgrmbygJV-nam p4fTuLFYbxxCeUOo/view?usp=sharing</p>	<p>Twins or deformed genetic features of fish were commonplace.</p>
<p>108</p>	<p>Video https://drive.google.com/file/d/1tgsKLZKgvTFcS5r4cY b0CKXdEOPIX608/view?usp=sharing</p>	<p>Worker conducting an autopsy of a dead salmon. Possibly a mechanical reason for the tearing of flesh on top but on the bottom of the fish there's a small skin blemish that was found on many other fish which might indicate disease.</p>

OTHER

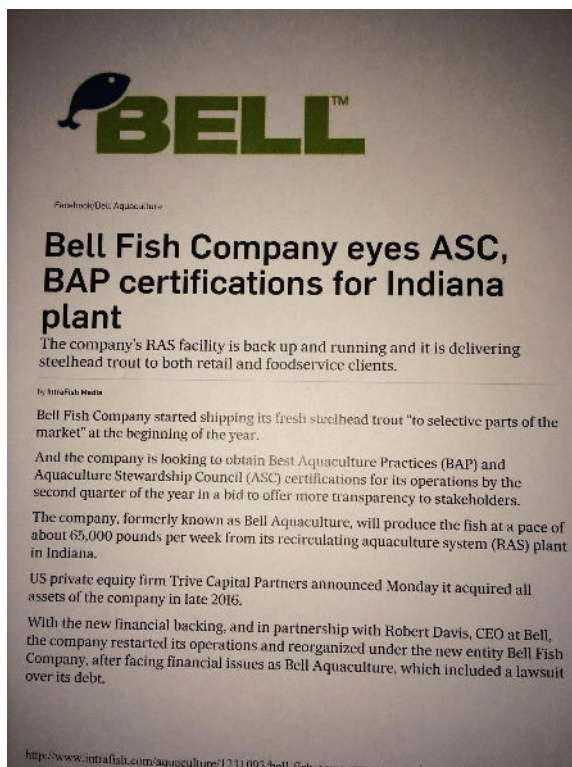
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109



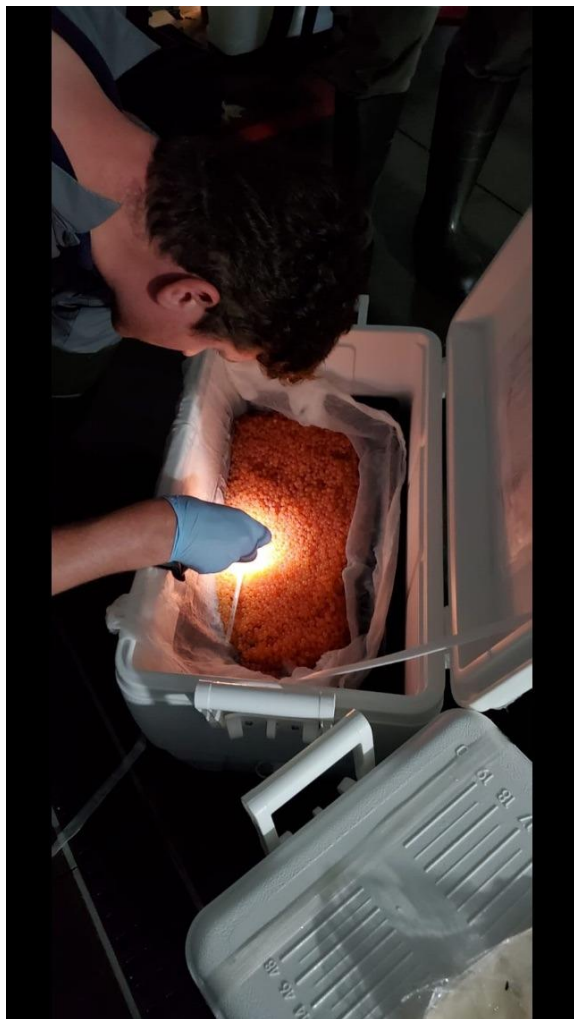
The official reason I was fired was misappropriating company documents. This was the document, which was in a normal, unmarked spiral-bound notebook. It was located in our main office on the main table which is used for general daily meetings and where some people take their lunch hour. I opened it up out of boredom and saw diagrams and information prevalent to me as a technician so kept flipping pages until I saw this as the most recent entry. To me, this was overwhelming evidence of retaliation but OSHA thought otherwise because Indiana is a right-to-work state and AquaBounty falsely claimed this journal was located inside my boss's desk.

110

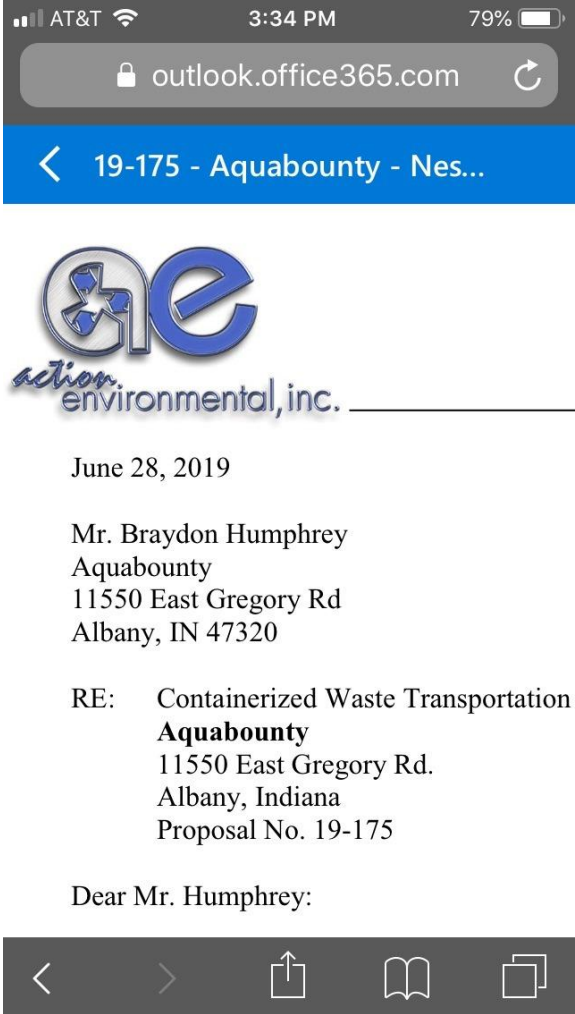



This is to highlight the fact that for how terrible Bell Aquaculture was, they still considered the Best Aquaculture Practices accreditation within their reach. AquaBounty attempted this as well while I was there. The company wanted it as a sticker they could put on the consumer packaging, nothing more.

111



This is Peter Bowyer with the first cohort of GMO salmon eggs on the day they arrived in Indiana. Not included for any evidence's sake, just curiosity.

<p>112</p>	 <p>outlook.office365.com</p> <p>19-175 - Aquabounty - Nes...</p>  <p>action environmental, inc.</p> <p>June 28, 2019</p> <p>Mr. Braydon Humphrey Aquabounty 11550 East Gregory Rd Albany, IN 47320</p> <p>RE: Containerized Waste Transportation Aquabounty 11550 East Gregory Rd. Albany, Indiana Proposal No. 19-175</p> <p>Dear Mr. Humphrey:</p>	<p>Credibility for Braydon. Braydon had risen to the role of lab manager in every aspect except title. Here Braydon was tasked with getting quotes for shipping out the hazardous waste that was accumulating onsite. Biogel, reagents containing mercury and cadmium, hydrochloric acid, virocid, and many more were harsh chemicals in daily use.</p>
<p>113</p>	<p>Video https://drive.google.com/file/d/12kYdkbQW2h8KGzNkgxYF2V5N-ThpSsRk/view?usp=sharing</p>	<p>This is the bottom of a main production tank, mortality lift in operation. The tank is obviously empty but operation was possible and ultimately used while fish were being reared in the tank which was against the regulation of the FDA.</p>