11/06

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 -N/A-111 (permit may be pending-file under "TG Energy")	11/07/2006 (July 11th 2006)	1M8	19 S	202

Remarks

Inspection work days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 ____ 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
TG Energy, Inc. 4242 Alder Grove Road Ferndale, WA 98248	10: 30AM July 11th, 2006	
	Exit Time / Date 12:30PM July 11th, 2006	Permit Expiration Date

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Mr. John Caleb (360) 332-4031	
1685 H Street, #562 Blaine, WA 98230 Mr. John Caleb TG Energy, Inc. 1685 H Street, #562 Blaine, WA 98230 Phone Number Fax 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/Comments

Purpose

This inspection was conducted as a multimedia inspection at the request of the prospective permit applicant. The purpose of the Department of Ecology Northwest Regional Office Industrial Unit's participation in this inspection was to determine what types of permits may be necessary from the water quality program to dispose of industrial process or cleanup water from this site. A separate report by Mak Kaufman of the Department's Bellingham Field Office contains findings on permits needed for discharge of stormwater.

Participants in Inspection

The inspectors attending the inspection included:

Inspectors attending the inspection from various agencies were:
1) Norm Peck: Lead Inspector: NWRO/TCP
2) Doug Knutson: NWRO/Water Quality Program/Industrial Pretreatment
2) Mark A. "Mak" Kaufman: BFO/Water Quality Program/Stormwater
3) Mary O' Herron: BFO/ Toxics Clean Up Program
4) Victoria Sutton: NWRO/Hazardous Waste and Toxics Reduction

6) Martin Black: Whatcom County Planning and Development Services/SEPA specialist
7) Warner Webb: Whatcom County Planning and Development Services/Fire Marshal
8) Oliver Grah : Whatcom County Planning and Development Services/ Wetland Scientist
9) Charles Sullivan: Whatcom County Health and Human Services/Site Hazard Assessment
10) Annie Naismith: NW Clean Air Agency/Chemical Engineer

Mr. John Caleb, Executive Vice President Operations, represented TG Energy, Inc.

Introductions/Discussion of Plans
Following our arrival on-site and introductions, Mr. Caleb described the history of the site, and TG Energy's plans for developing the site, to the inspectors. TG Energy plans to revitalize the site and portions of the existing tall oil plant on the site, for use for production of biodiesel fuel from plant-based (i.e. non-petroleum) oils. According the Mr. Caleb, no significant construction will be necessary to bring the site into operation. Although there is a nearby railyard/ spur adjacent to the property used by Burlington Santa Fe as a maintenance area, the existing plans are to receive the feedstock (virgin oils) by truck, as opposed to rail.

Nature of Site
The area of the site which was developed as the tall oil plant, and which will be operated as a biodiesel production facility consists of approximately 3.5 acres. The acreage of the entire property is 34.24 acres. The site is owned by Campbell Land Corporation, which is incorporated in Nevada. Campbell Land Company has owned the land since approximately 1985-1986. The site has been inactive from 1992 through the present. The main principal of Campbell Land Corporation is Jagrop Singh Gill, a resident of British Columbia. Mr. Singh Gill is also President of TG Energy. Mr. Gill was also a principal of Treoil Corporation.

Biodiesel Production Plans/ Closed Loop for Water Use
TG Energy plans to place three-each 12,500-gallon biodiesel production reactors in the "swimming pool" area of the site. The "swimming pool" is a containment sump area. TG Energy plans to produce 50,000 gallons per day of biodiesel when the plant becomes operational.

The three reactors will be under a roof, but stormwater will accumulate in the containment area associated with the tanks. TG Energy plans to utilize rainwater captured in the containment area as input to the process. Methanol will be reclaimed in the filter/ drier system associated with the process, according to Mr. Caleb. Mr. Caleb stated that the production process, with respect to water use will be closed-loop. During the inspection oily material was observed in the small deep sump associated with the main containment sump area.

Report on Planned Operation Available in SEPA Submittal
Mr. Caleb told us that a more technical report regarding planned operations has been submitted as part of the documentation submitted as part of the SEPA determination process.

Removal of Boneyard
A large amount of disused industrial/commercial equipment/debris, such as vehicles, tanks, piping, boilers, refrigeration equipment, trailers, sandblast grit, and refractory concrete dust/chunks has been accumulated on the site. Some of the equipment was brought onsite recently by TG Energy for use in the planned biodiesel production operation. Some of the equipment, particularly boilers, in-place piping, and the fractionation tower, is associated with the tall oil plant formerly operated by Treoil. Other material such as the accumulation of yellow grease and black grease is associated, according to Mr. Caleb, with the recently aborted plan by another company (Whole Energy) to start a biodiesel plant on-site. Some material is associated with the incinerator manufacturing business conducted by Enerwaste. Additional structures and material on site, such as the temporary sandblast structure, and equipment shed appear to be associated with business ventures which Mr. Caleb was not familiar with. Other material, including abandoned vehicles, working vehicles, and a container full of equipment appear to be associated with employees or principals of Enerwaste (Tom Dutcher/ David Sullivan). In addition a vehicle and trailer onsite appear to be associated with an acquaintance of principals or employees of either Enerwaste or Whole Energy. Mr. Sullivan was also cited by Mr. Caleb as "working" for TG Energy, although it is not clear whether in the capacity of an employee, or as a contractor. In addition to the tall oil, incinerator manufacture and abortive grease-to-fuel operation, a sandblast operation was conducted under a temporary structure, and a large number of bags of bagged sandblast grit has been accumulated. TG Energy asked the inspectors whether the site would have to have all material removed prior to start-up of production. There appear to be three types of cleanup issues associated with this property, each of which should be addressed separately.

- The first involves the removal of abandoned equipment and non-hazardous materials on-site. My understanding from the discussions was that Whatcom County may authorize startup of operations prior to completion of completion of cleanup operations, provided that the removal of abandoned equipment and materials on-site proceeds in a reasonably expeditious manner, and in accordance with a schedule acceptable to the County. Much of the abandoned material on-site must be removed, not only to provide room to conduct the biodiesel operation, but also to comply with provisions of a Whatcom County ordinance which only allows accumulation of disused equipment if it is associated with the operation of the industrial facility conducted at the site. Mr. Caleb made known his wish that the regulatory agencies issue compliance orders with compliance timelines so that he could use this as a justification to expedite removal of the extraneous materials and equipment by the other parties involved. Mr. Mak Kaufman noted in his separate report that covered the stormwater aspects of the site: *"From the perspective of Ecology's National Pollution Discharge Elimination System (NPDES) construction and industrial stormwater general permit regulations and the Water Pollution Control Act (RCW 90.48) regulations there is nothing that would prohibit TG Energy from producing biodiesel onsite while any potential required clean-up actions are taking place. "*

- The second type of cleanup involves the removal of toxic materials from the surface of the site. Hazardous waste issues are covered in a separate inspection report prepared by the HWTR program.

- The third type of cleanup involves the cleanup of potentially contaminated soils. At this point, it is not clear whether this type of cleanup is required. Toxic cleanup issues are covered in a separate inspection report prepared by members of the toxic cleanup program.

Surface Covered with Refractory Cement
Enerwaste recently employed the property for the manufacture of incinerators using concrete composed of cement and olivine aggregate. The use of the olivine aggregate imparts refractory properties to the concrete. A portion of the ground of the property is covered by fragments and dust composed of this material.

Drums on site Containing Hazardous Waste
Several 55-gallon drums on-site have been characterized as hazardous waste based on fish toxicity.

Injection Well
According to discussions during the inspection. an injection well is located on the site, which was permitted in the past. No further details on the nature of the permit or the nature of the well were available at the time of the inspection.

Property Setbacks Required
Whatcom County inspectors noted that 150 foot setbacks of industrial activity from the property boundary would be required due to the zoning classification of "heavy industrial".

Drums of Grease On-Site
Approximately 150 drums of yellow grease and brown grease have been accumulated onsite, most of which are stored in a trailer. Yellow grease is the term used to describe grease recovered from food preparation areas. Black grease is the term used to describe grease recovered from restaurant grease traps. This grease was accumulated by a previous tenant which planned to employ the grease for biodiesel production. The yellow and black grease cannot be used as feedstock for the biodiesel plant which TG Energy is planning. Therefore, TG Energy is seeking a way to dispose of this grease.

The previous tenant consisted of the firm Whole Energy, Inc., which had interfaced with Campbell Land Company to start a biodiesel operation. However, the business arrangements did not work out, and TG Energy has been left with the accumulated yellow and black grease.

Septic Field On-Site
A septic field is located near the white trailer.

Boilers on Site
There appeared to be at least a half dozen boilers located on the site on the site. The utilization of the tall oil fractionation column required a temperature of 450 degrees Fahrenheit. The production of biodiesel requires much lower temperatures. Therefore most of the existing boilers on-site will probably be disposed of. Some of the boilers included insulation and lagging consisting of material which may possibly contain asbestos, but which has not been tested. TG Energy plans to employ the extra room which will be available in the boiler building for caustic storage.

Pipe Lagging in Fractionation Column Area

Lagging on pipe in the fractionation column area has lagging which has not been characterized for asbestos. Most of this piping will not be needed for production of biodiesel. Therefore, TG Energy plans to dismantle the piping.

Chemicals Stored in Boiler Building
Chemicals stored in the boiler building at the time of the inspection were predominantly Casco resin modifier, monoethanolamine, and ammonium sulfate.

Turn-Around Area
Once the far side (the side opposite the entrance) is cleared, TG energy plans to use this area as a turn-around area for trailers.

Suggestion to Flag Suspected Contaminated Areas
Ms. O'Herron advised Mr. Caleb to flag suspected contaminated areas, prior to moving containers or equipment to another location. This will make identification of contaminated areas easier following cleanup of the extraneous equipment and storage vessels on the site.

Resin Remaining in Some Tanks
Three tanks in the vicinity of the fractionation column are partially full of resin. The tank capacities are approximately 3000 gallons, 8000 gallons, and 5000 gallons (visual estimate by inspector). The resin is associated with the tall-oil plant located at the site. TG Enterprises is looking for a buyer for the resin.

Pitch Remaining in Tank
A tank with a capacity of 425,000 gallons is estimated by Mr. Caleb to hold approximately 50,000 to 75,000 gallons of pitch. The pitch is associated with the tall oil operations formerly conducted at the site. TG Enterprises is looking for a buyer for the pitch.

Tanker Trailers With Grease
There are two tanker trailers on the site. Mr. Caleb told us one truck contains yellow grease and the other is empty.

Dirt Deposited at Back of Site
An area at the back of site (area of the site at the far end from the entrance) is covered with a freshly deposited layer of soil. Mr. Caleb told us that six loads of soil had been recently been deposited there. I believe he told me that they had been deposited there by Enerwaste. He said he did not know why the soil had been hauled in. Mr. Peck and Ms. O'Herron determined that the soil needed to be characterized.

Four Pickups Located at Back of Site
Four-each half or three quarter to pickup trucks were parked toward the rear of the site. These trucks appeared to be not operable and were apparently brought to the site by Enerwaste or Whole Energy employees.

Tanks Salvaged from Rail Tank Cars
At least half a dozen tanks with capacities of 25,000 to 30,000 gallons were located at the back of the property. My understanding was that, although most of the metal items at the back of the site are associated with David Sullivan, the tanks salvaged from the rail cars are owned by TG Energy.

Sandblast Operation Conducted at Site
A sandblast operation was recently conducted at the site, apparently under a temporary roof. There was a significant amount of sandblast grit on the ground in the vicinity of the sandblast structure. However, it appeared that a much larger quantity of sandblast grit had been bagged and was stored in nearby bags. The sandblast grit has not been characterized with respect to hazardous waste designation. It is my understanding that some of the grit was being employed as an admixture for lining of incinerators.

Methyl Ester and Glycerin Storage
A 15,000-gallon capacity insulated tank in the vicinity of the fractionation column contains some methyl ester according to Mr. Caleb. One of the four-each smaller tanks contains glycerin. Mr. Caleb was not sure what comprised the contents of the two larger 40,000-gallon capacity tanks.

Tank Containment Area

The main tank area associated with the fractionation column is surrounded by a berm. As a portion of the bottom is covered by soil, it was not visually ascertainable whether the bottom of the containment area consisted of an impervious surface.

Storage Trailer

A trailer onsite is used by Frank (a TG employee) for storage.

Oily Water in Sumps at Building Containing Two Boilers

Sump at the corners of the north end of this building contained an oily liquid. One of the inspectors recalled an enforcement action by the Department of Ecology which had occurred that site a number of years ago. A penalty of $4000 was levied in 1991 against Treoil, but was not paid. It is unclear whether the oily sumps are connected to the septic drainfield located toward the trailers. It is unclear what the relationship is, if any, of the septic field, the commercial drainage field mentioned during the inspection, and the permitted injection well mentioned during the inspection.

Mobile Homes Located at Western Portion of Site

The West portion of the site contains two mobile homes which TG Energy plans to move to another part of the site. One of the mobile homes is apparently serving as a dwelling, which, according to some of the Whatcom County officials present, is not in accordance with the zoning (heavy industrial) for this property.

Advice to Erect Office Near Entrance

The Whatcom County Fire Marshall, Warner Web, recommended that the office area be positioned near the property access gate to enable ease of evacuation, emergency response, and access control.

Two Additional Mobile Homes

Two mobile homes located at a more northerly portion of the site contained some laboratory equipment, but were not in use as laboratories of office buildings.

Refrigeration Unit/ Mobile Crane

A mobile crane and refrigeration unit were located on the north end of the site. There was no information regarding whether the refrigeration unit contained refrigerant.

Roofed Equipment Storage Shed

Two vehicles were parked on a slab with a roof. There was some discussion whether building permits had been obtained for this structure.

Contaminated Soils

There were a number of areas on the site with soil, the surface of which appeared to be caked with an oily or resinous material. The USEPA collected a number of samples soil and liquid samples at the site on June 6th, 2000. The samples indicated some contamination of soils with TPH (Total Petroleum Hydrocarbons) and PAHs (Poly-aromatic hydrocarbons). USEPA noted in their inspection report for June 2000 inspection, that chemical materials inside the building should be removed and disposed of at a hazardous waste facility, or by means of IMEX, and that excavation in the areas of stained soils should occur until analytical results indicated contamination below the MTCA appropriate MTCA cleanup level.

Request for List of Required Permits

One of Mr. Caleb's main requests was that he receive a list of all permits required from the various agencies present on the inspection. I have forwarded this request to Ms. Sheila Hosner, who is coordinating the Department's response to TG Energy.

The purview of this inspection report mainly involves whether a state waste discharge permit would be required for discharge of industrial process wastewater (as opposed to stormwater) to a POTW, ground, or surface waters. As Mr. Caleb has told us that his process is closed loop, it appears, based on this statement, that TG Energy will not need a state waste discharge permit for discharge to a POTW, a state waste discharge permit for discharge to ground, or an NPDES permit for discharge of industrial process water to surface waters of the state. (note: A state

waste discharge permit for discharge to ground would be required if any contaminated process water is stored in a containment area in which the bottom and sides are not impermeable.)

However, potentially contaminated stormwater will be generated at the site, and my understanding from Mak Kaufman is that the site will probably require an NPDES stormwater permit. Mr. Kaufman's inspection report should be consulted for the determination of whether the operation is likely to require a general industrial NPDES stormwater permit.

During the inspection, the applicant was made aware of the fact that completion of the SEPA process is required before the Water Quality Program issues discharge permits to a new facility. Therefore, although the SEPA process is not a requirement administered by the Water Quality Program, per se, it is a necessary step toward obtaining a water quality permit.

In addition, the site may (or may not) be contaminated to the point of requiring a cleanup. If a soils cleanup is required at the site which results in a wastewater discharge which could include haulage to a POTW, land application, discharge to surface water, or re-injection, the appropriate permit would be required (state to POTW, state to land, NPDES to surface water, and state to ground, respectively) to dispose of any contaminated water resulting from the cleanup activities. On the other hand, if such cleanup activities are authorized under certain types of orders or consent decrees, and if the applicable orders or consent decrees contain the substantive elements of a state waste discharge permit, the state waste discharge permit is normally not required. This exemption does not apply to NPDES permits.

Disposal of wastewaters associated with liquids stored in tanks, vaults, or containment areas to a POTW will require a state waste discharge permit if the Department determines that the discharge is significant with respect to volume, contaminants contained, and duration. If TG Energy wishes to obtain authorization to discharge such material to the sanitary sewer, then TG Energy should characterize the specific nature of the proposed discharge and contact the Department of Ecology to determine if a state waste discharge permit will be required.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Doug Knutson Doug Knutson	WA Dept. of Ecology/NWRO/(425)649-7025 3190 160th SE, Bellevue, WA 98008-5452	August 22nd, 2006
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	WA Dept. of Ecology/NWRO/(425)649-7000 fax (425)649-7098	8/23/06

ANNOUNCED Inspection

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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.