WASHINGTON STATE DEPARTMENT OF ECOLOGY

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
CENTRAL 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)

FACILITY NAME: SUNOPTA

FACILITY NUMBER: ST0009253

SECTION 1: INSPECTION INFORMATION

START DATE:

INSPECTION TYPE (CHECK ONE):

- COMPLIANCE INSPECTION W/O SAMPLING ☒
- COMPLIANCE INSPECTION W/ SAMPLING ☐
- COVERAGE INSPECTION ☒
- COMPLIANCE FOLLOW-UP INSPECTION ☐
- TECHNICAL ASSISTANCE VISIT ☐
- OPERATION & MAINTENANCE INSPECTION ☐

PRIMARY INSPECTOR	**Traci Gefre**
PERMIT #	**ST0009253**
COMPLAINT #	**n/a**
LAB PROJECT #	**n/a**
ENFORCEMENT DOCKET #	**n/a**
Y/N:	**Scheduled**
Scheduled	**Announced**
ANNOUNCED	
PART OF A GROUP	

REASON FOR INSPECTION (CHECK ONE)

- ROUTINE ☒
- COMPLAINT ☐
- DRIVE BY ☐
- ENFORCEMENT ☐
- QA ☐
- BIO-MONITORING ☐
- OTHER (SPECIFY) ☐

PARTICIPANTS	AGENCY	TITLE
Traci Gefre	ECY	Facility Manager
Scott Campbell, P.E.	SunOpta	Senior Project Engineer
Jesus Arciniega	City of Omak	Chief Operator, POTW

SECTION 2: FACILITY INFORMATION

FACILITY NAME: SunOpta
ADDRESS: 1124 5th Ave East
Omak, WA 98841

	Date	Time
ENTRY 1	11/19/2019	9:00 a.m.
EXIT 1	11/19/2019	10:30 a.m.
ENTRY 2	N/A	
EXIT 2		
ENTRY 3		
EXIT 3	N/A	

ENTRY TYPE (CHECK ONE)

- DENY ☐
- DELAY ☐
- WARRANT ☐
- REGULAR ☒

SECTION 3: AREAS EVALUATED DURING INSPECTION

N = NOT EVALUATED, S = SATISFACTORY
M = MARGINAL, U = UNSATISFACTORY

INSPECT BENCH SHEETS	N/A
INSPECT PERMIT	S
RECORDS/REPORTS	M
FLOW MEASUREMENTS	S
LABORATORY	N/A
EFFLUENT/RECEIVING WATER	S
PRE-TREATMENT	N/A
COMPLIANCE SCHEDULES	N/A
SELF-MONITORING PROGRAM	N/A
OPERATION & MAINTENANCE	S
SLUDGE DISPOSAL	N/A
FACILITY SITE REVIEW	S
LAB ACCREDITATION	N/A
OTHER (SPECIFY)	N/A

Background

SunOpta operates under State Waste Discharge Permit ST0009253, effective March 1, 2012 with expiration date February 28, 2017. The Department of Ecology issued an administrative extension effective March 1, 2017. The facility produces finished fruit snack products from fruit purees and juices, and pre-dried ingredients. Process wastewater mingles with sanitary wastewater and discharges to the City of Omak publicly owned treatment works (POTW).

On February 25, 2016, SunOpta, Inc.™ Healthy Fruit Snacks division applied for renewal of State Waste Discharge Permit ST0009253 for its Omak facility.

In the months of October, November, and December 2018, SunOpta reported pH values under 5.0 Standard Units for its effluent discharge. In a December 10, 2019 telephone conversation, Scott Campbell P.E., Senior Project Engineer, said that SunOpta began more frequent removal of settled solids from wastewater buffer tanks at this time, and it seems to have mitigated this occurrence of low pH.

The objective of this inspection was to review information submitted in the February 2016 application, and to assess compliance with requirements described in permit ST0009253.

Site Inspection

Jesus Arciniega, Chief Operator for City of Omak POTW, and I, Traci Gefre, arrived at SunOpta at 9:00 a.m. Scott Campbell, P.E., Senior Project Engineer, greeted us as we checked in at the visitor's desk. We were asked to sign a visitor log that incorporated a confidentiality agreement. I explained that I was not authorized to sign the agreement due to Ecology's legal obligation to public disclosure requirements. Campbell asked that I include my printed name but not my signature so that I was logged in as a visitor in case of emergency. He agreed that by not adding my wet signature, and leaving the space blank, I was not agreeing to the confidentiality portion of the log. He asked that I include my signature on a separate safety agreement form. I agreed and I did sign the safety agreement form.

Opening Meeting

Before we toured the facility we met in Campbell's office where Campbell told me the following:

- The Operations and Maintenance (O&M) manual submitted July 2, 2014 is still current.
- SunOpta continues to use a sanitation chemical listed in their permit renewal application. The product has a pH of 1.0. I asked if the sanitation procedures using these products could be imparting a low pH to the wastewater and Campbell said no, the chemicals are used in very low concentrations.
- SunOpta no longer dehydrates fruit on site.
- SunOpta wants to increase its production and is considering the impacts on the current system of wastewater management.
- During production there is continuous flow of wastewater. The pump at the lift station which pumps wastewater to the Omak POTW operates by a float switch.
- Most wastewater is generated from sanitation procedures on the production floor. A smaller amount generates from processing.
- SunOpta uses pH strips to analyze grab samples taken at the wet well at the lift station. He said he has been testing different points in the process and is not able to determine where low pH may occur. The pH value reported on the DMR on the same day as values for biochemical oxygen demand (BOD) and total suspended solids (TSS) is performed by City of Omak's accredited wastewater laboratory on the composite sample.
- Pictures during the inspection were okay if they do not capture proprietary information. (I asked Campbell and he approved each photo taken during the inspection).

During this meeting Campbell and Arciniega discussed the topic of SunOpta's potential need to negotiate adjusted user contract waste loading limits to accommodate future production growth. Arciniega indicated that additional City of Omak officials would be involved in that discussion if it took place. Arciniega also

stated that January 16, 2010 User Contract Local Limits referenced in Ecology's current permit remain current for SunOpta.

Before we began the site tour I explained the following:

- Acceptable analysis of pH should be on a grab sample, and pH strips are not part of regulatory methodology. Regulatory pH analysis implements a proper pH meter that is maintained with regular calibrations.
- Limits for pH in the new permit may be more stringent because Ecology may base them on City of Omak ordinance 9.08.230(f). According to the ordinance "any waters or wastes having a pH lower than 5.5 or higher than 9.0, or having any other corrosive property capable of causing damage or hazard to structures, equipment, and personnel of the sewage works;."

I also asked to see calibration records for the flow meter back to 2017. Campbell sent calibration records for 2019 and 2017 by email that afternoon. In the email Campbell indicated the record for 2018 was not available.

Production Area

Metal grates approximately 8-inches wide and in various lengths, cover drains in production area floors that lead to the wastewater sump system. Tubing connected to processing equipment directs process wastewater to floor drains. When sanitation is performed, sanitation wastewater exits processing equipment through the same tubing. **See Photos 1 through 3.**

Wastewater flows to two individual locations in the sump system. From each location a sump pump sends the wastewater to an approximately 1,000-gallon plastic cylindrical tank. The tank gravity-flows to a second, duplicate tank, and eventually the wastewater gravity-flows to the lift station at the southwest corner of the SunOpta property. **See Photos 4 through 8.**

I observed a small puddle of lightly colored liquid near a floor drain. Campbell said incidental releases along the production line go to the sump system. He said spill containment procedures are in place otherwise, and any solid waste created from clean-up is managed appropriately.

Campbell showed me the main storage area for sanitation chemicals. I did not observe floor drains in the immediate vicinity though a schematic drawing of the process drainage layout indicates a drain/ingress exists in an adjacent area.

Campbell said unusable product is collected and is sent to Gebbers Farm for animal feed. I saw unusable product accumulating in 55-gallon containers.

Campbell also told me that SunOpta is no longer a Kettle Valley affiliate.

Steam Generator Room

The two 1,000-gallon plastic cylindrical tanks that accumulate wastewater are located in the steam generator room. Campbell explained that over time solids settle out in the tanks, and some caking occurs at the highest liquid level on the inside wall of the tanks. The solids are periodically removed by a septic service. The lift station is also pumped out at that time. Arciniega said that when SunOpta began periodic removal of the solids, SunOpta's loadings to Omak POTW decreased. **See Photo 7.**

Lift Station

The wet well and lift station leading to the Omak POTW is at the southwest corner of the SunOpta property. The City's refrigerated composite sampler is stored outside, against the outside of the pump house, behind a locked gate, and under an awning. Arciniega began the sampler while we were there. Campbell showed me the inside of the pump house and lifted the cover from the well. I did not observe any apparent signs of damage or overflow. **See Photo 8.**

After we viewed the lift station we returned to the SunOpta office. I explained to Campbell that SunOpta's draft permit may include new requirements to modify the method of pH analysis used to evaluate wastewater effluent according to permit discharge monitoring requirements.

I thanked Campbell for his time and left SunOpta at 10:30 a.m.

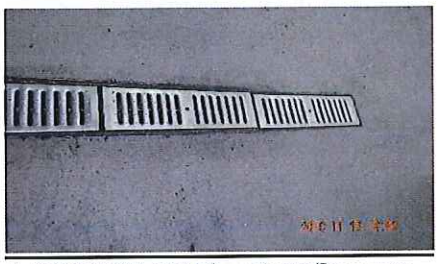
Findings

Based on my observations made during the November 19, 2019 site inspection, the following recommendation is to assist SunOpta with maintaining compliance under Washington State Waste Discharge Permit ST0009253:

ST0009253 Section S3.B. Records Retention:

- Ensure that records of all monitoring information are retained for at least three years. Such information must include all calibration and maintenance records, and all original recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit.

Photos



1. DSCN1097.JPG Floor Drain/Ingress to Wastewater Sump

2. DSCN1098.JPG Process Wastewater Discharge

3. DSCN1099.JPG Process Wastewater Discharge

4. DSCN1100.JPG Sump Pump Station in Main Line Production

5. DSCN1101.JPG Wastewater Flowing in Sump System

6. DSCN1102.JPG Sump Pump Station in Steam Generator Room

7. DSCN1103.JPG Wastewater Buffer Tanks

8. DSCN1104.JPG Lift Station

SECTION 5: FOLLOW-UP (CHECK ALL THAT APPLY)

	TYPE	DETAIL	RESP. PERSON	SCHEDULE	DONE
☐	CONDUCT CLASS II	N/A			
☐	LAB ACCRED MANUAL	N/A			
☐	RE-INSPECT	N/A			
☐	RE-OPEN PERMIT	N/A			
☐	SEND APPLICATION	N/A			
☐	TECH ASSIST-REGULAR	N/A			
☐	TECH ASSIST-OUTREACH	N/A			
☐	MOD PERMIT AT RENEWAL	N/A			
☐	FACILITY ACTION	N/A			
☐	ENFORCEMENT (WARN LET NOV, ORDER, PENALTY)	N/A			
☐	OTHER (SPECIFY)	Draft Permit for Renewal	**Traci Gefre**	Priority	

SECTION 6: ACTIVITIES (CHECK ALL THAT APPLY)

	DESCRIPTION	DATE COMPLETED	TRACKING NUMBER
☐	DATA RECEIVED FROM LAB	N/A	
☐	DRAFT INSPECTION REPORT COMPLETED	12/12/2019	
☐	FINAL INSPECTION REPORT COMPLETED	12/12/2019	
☐	FINAL INSPECTION RPT RCD FROM EILS	N/A	
☐	FORM 3506 SENT TO EPA	N/A	
☐	INSPECTION REPORT REVIEWED	12/12/2019	
☐	SAMPLES TO LAB	N/A	
☐	OTHER	N/A	

SECTION 7: SIGNATURES

	NAME (PRINT)	SIGNATURE	DATE	AGENCY/PH#
INSPECTOR 1	**Traci Gefre**	Traci Gefre	12/12/2019	ECY/509-457-7108
INSPECTOR 2	**N/A**			
REVIEWER	**Jim Leier**	Jim Leier	12-12-19	ECY/509-454-4247