



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 1 <b>N</b> 2 <b>5</b>	Permit # 3 <b>ST0501288</b> 11	yr/mo/day 12 <b>21/09/02</b> 17	Inspection Type 18 <b>C</b>	Inspector 19 <b>S</b>	Facility Type 20 <b>2</b>
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Remarks

Weather was sunny and clear. No operations were occurring at the time of inspection.

Inspection work days 67 <b>1.0</b> 69	Facility Self-Monitoring Evaluation Rating 70 <b>5</b>	BI 71 <b>N</b>	QA 72 <b>N</b>	-----Reserved----- 73 _____ 74 _____ 75 _____ 80
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**Section B: Facility Data**

Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) Pristine Valley Farms Pickle 13381 Dodge Valley Road Mount Vernon, WA 98273	Entry Time/Date 09:00 AM 09/02/21	Permit Effective Date Permit-by-Rule
	Exit Time / Date 10:00 PM 09/02/21	Permit Expiration Date Pending
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Imeldo Suriano, Plant Operator P.O. Box 207 La Conner, WA 98257 360-770-2818	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number. Alfonso Cisneros, President P.O. Box 207 La Conner, WA 98257 Phone Number 360-770-2818		
Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

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

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input checked="" type="checkbox"/> Effluent/Receiving water	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	<input type="checkbox"/> other

**Section D: Summary of Findings/Comments**

**INTRODUCTION**

Pristine Valley Farms Pickle (PVFP) is a new permit applicant on the site previously operated by Cascade Ag Services (CAS). PVFP operates at the previous CAS facility and will process cucumbers, peppers, and cabbage into pickles, pickled peppers, and sauerkraut, respectively. Production of cucumber pickles and sauerkraut began August 11, 2014. PVFP will operate the facility, will discharge process and storm water similar in nature, and apply it to the same land application area as used by CAS.

Treatment consists of storage in a lagoon and land treatment of wastewater generated on-site and storm water from the processing areas. This facility is currently operating under a permit-by-rule. Permit issuance is anticipated by the end of the year.

Wastewater is generated from produce rinsing and wash-down. This water is collected in a trench drain at the edge of the paved area. From there it is discharged to a small holding pond located on the West edge of the property. Wastewater was pumped from this small pond to the large holding pond adjacent to the land treatment area. Currently this small holding pond discharges into the small storm water holding pond. Storm water is collected in a holding pond on the West end of the facility. It then gravity flows through an oil/water separator before discharging to the large holding pond (Figure 1).

## INSPECTION RESULTS

Mr. Christopher Martin, Ecology's Northwest Regional Water Quality Program Hydrogeologist and Facility Permit Manager, arrived on site at 0900 hours September 2, 2021. Mr. Martin was met at the entrance by Craig Staffanson, Alfonso Cisneros, Imeldo Suriano, and Celerino Salgado. I. Suriano has supervision of daily operations.

C. Staffanson asked Mr. Martin what he would like to see. Mr. Martin asked to tour the current operations. Currently all operations (cleaning/sorting equipment and the pickling/sauerkraut vats) are on pavement (Photos 1 thru 3). Mr. Martin asked about packaging of finished product. C. Staffanson stated that size-sorted cucumber, pickles, and sauerkraut are all sent to a facility in Burlington, leased from the Port of Skagit County by Gielow Pickle. When asked about wastewater discharge from that facility C. Staffanson confirmed it discharges to the City of Burlington municipal sewer.

Currently Pristine Valley has between 70 and 80 operational tanks, with about 75 percent in pickles and 25 percent in sauerkraut. Brine in the pickle tanks is circulated with an air bubbler system supplied by an onsite compressor (Photo 4). Sauerkraut is maintained in anaerobic conditions by use of a plastic cover and approximately 1-foot of water. The plastic cover seals the vat while the water provides an air-tight seal. To reduce evaporation the tank has a second cover over the water layer.

Processing begins with belt-bottom unloading trucks loaded with cucumbers or cabbage arriving from the field (Photos 5 and 6). Cucumber loads are emptied onto a conveyor that moves the product across a shaker to remove larger dirt clods and under the first of two spray bars (Photo 7). Potable water is supplied by Skagit PUD. (Aside: the PVFP facility is at the end of the PUD water line.) From the shaker the cucumbers travel up another conveyor and empty onto an open grate belt. This belt is sloped and moves uphill (counter to the slope) (Photo 8). The result of the counter rotation is that the cucumbers roll down the sloped belt while leaves and stems move up with the belt to be deposited in a waste tote. Dirt from the shaker table and waste from the slope belt are returned to local fields. Cucumbers then move under a second spray bar and across a second shaker to remove most of the water and any remaining debris (Photo 8). This table empties onto a sorting area where unusable product and debris (e.g., stems and leaves) are removed (Photo 9). The sorting belt empties onto another conveyor that lift the cucumbers to elevated bins where they are sorted by size into waiting totes (Photo 10). Totes of sized cucumbers are sent to a facility in Burlington for processing or emptied into a fermentation tank to become pickles.

Cabbage is processed in a similar way. Trucks arrive from the field and unload cabbages onto a conveyor that deposits the cabbages onto a belt that takes them through a machine that cores the cabbages. Cored cabbages exit this machine onto a sorting belt where they first pass under a spray bar (Photo 11). Workers remove any blemishes from the cabbage and transfer them to the shredding belt. Removed blemishes, leaves, and other debris are discharged from the end of the sorting belt into a tote. This material is also hauled back to the field. Cabbages drop through a shredder (Photo 12) and onto a double side conveyor belt. Shredded cabbages drops off one end into a waiting tote. When that tote is full the belt direction is reversed and the cabbage drops off the opposite side into another tote, while the first tote is removed and replaced. Full totes of shredded cabbage are placed in fermentation tanks to become sauerkraut. Cabbage processing is done under a series of temporary shelters.

Finished pickles are shipped in totes (Photo 14), while sauerkraut is transported in lined plastic drums to the Burlington facility for final processing and packaging. Plastic drums are returned to the site, rinsed, and reused.

The entire paved area has a slight slope to the West. Process wastewater (wash water) runs off the paved area and is collected by a trench drain. No chemicals of any kind are added to the process wastewater. At the time of inspection the south end of the drain was excavated to replace the plugged perforated pipe. This water from the trench drain is piped to a storage pond on the west edge of the property (Photo 15). Previously this wastewater from this pond was directly pumped to the large storage pond off Dodge Valley Road. Currently this pond gravity drains into the small stormwater storage pond (Photo 16).

Stormwater from the unpaved western half of the site flows directly into a small storage pond. Water gravity flows to an oil-water separator (Photo 17) and then through a 4-inch PVC line to the large storage pond. Process water from the trench drain uses the same drainage system as the storm water. Stormwater from the eastern portion is collected in catch basins and directed to the small storage pond on the west edge of the property. C. Staffanson noted that A. Cisneros has been planting several hundred trees in the west of the site where older trees have died.


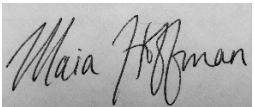
Located at the South end of the large storage pond is an irrigation pump (Photo 18 and 19) used to apply wastewater to the grass field (Photo 20). The irrigation pump is operated by power take-off from a tractor. Wastewater/stormwater from the large storage pond is applied through several fixed hand lines with five sprinkler heads per line (Photo 21). Irrigation is done for 8-hours a day. According to A. Cisneros irrigation is dictated by the level in the large storage pond. Pond levels are lowered before forecasted storm events and before the wet season begins. At the time of this inspection, the grass field was in need of cutting.

The group returned to the facility where Mr. Martin thanked C. Staffanson, A. Cisneros, and the others for their time and help. Mr. Martin further stated that he hoped to have the permit issued by the end of the year. He then departed the site at 1000 hours.

### DISCUSSION and RECOMMENDATIONS

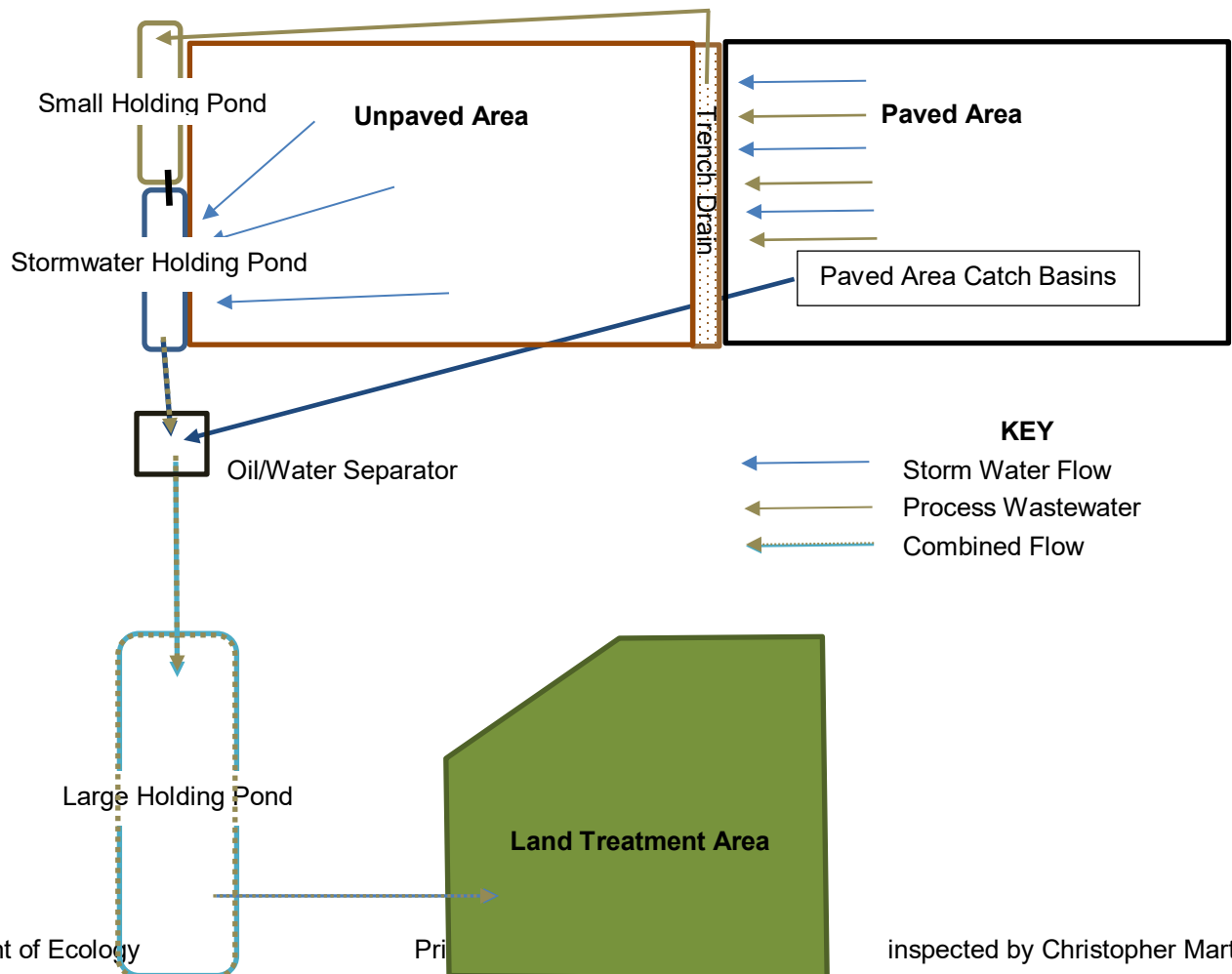
At this time, treatment of stormwater and wastewater appear adequate for the volumes produced. General housekeeping appeared good with empty totes and barrels all stored in designated areas.

**Recommendations:** The only issues noted are areas of petroleum stained pavement and soils. The soils should be dug up and disposed of at a properly licensed facility. Areas of stained pavement should be cleaned (or removed) to avoid introduction of petroleum product to storm and process wastewaters.

Name(s) and Signatures of Inspector(s) Christopher Martin 	Agency/Office/Telephone WA Dept. of Ecology NWRO / (206) 594-0159  PO Box 330316, Shoreline, WA 98133-9716	Date 9/27/2021
Signature of Management Q A Reviewer  Maia Hoffman 	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology  NWRO / (206) 594-0000	Date 9/10/2021

### ANNOUNCED Inspection

**Figure 1** Process water and storm water schematic.



## Appendix E

## Compliance Inspection Report Form

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

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

C – Contractor or Other Inspectors ( <i>Specify in Remarks Columns</i> )	N – NEIC Inspectors
E – Corps of Engineers	R – EPA Regional Inspector
J – Joint EPA/State Inspectors - EPA Lead	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 medium 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.