



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

September 12, 2023

Daniel Cerda
Safety and Compliance Manager
PO Box 1104
Westport, WA 98595

Re: National Pollutant Discharge Elimination System (NPDES) Class Compliance
Inspection, NPDES Permit Number WA0041971

Dear Daniel Cerda:

On August 8, 2023, the Department of Ecology conducted an inspection of the facility Ocean Gold and Clear Ocean. No process water violations were observed at the time of inspection. Enclosed you will find a copy of our inspection report for your records. We would like to express our thanks to Daniel Cerda, Greg Shaughenassy, and Brian Blake for the courtesy extended during the inspection.

If you have any other questions, please contact me at annw461@ecy.wa.gov or (360)522-6216.

Sincerely,

Anna R. Wallace-Ph.D.
Permit Manager
Southwest Region Office
Water Quality Program

Enclosures: Ocean Companies National Pollution Discharge Elimination System Permit No.
WA0041971 Inspection Report August 8, 2023
Inspection Photo Log

cc: Greg Shaughenassy, Ocean Gold
Brian Blake, Ocean Companies



Transaction Code		NPDES										yr/mo/dy						Inspection Type		Inspector		Facility Type	
1	N	5	W	A	0	0	4	1	9	7	1	2	0	2	3	08	01	A	A	2			
Remarks																							
21																							
66																							
Inspection Work Days				Facility Self-Monitoring Evaluation Rating										B1		QA		-----Reserved-----					
67	1	1	69	70	5	71	N	72	N	73		74		75									
80																							

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>)		Entry Time/Date 10:06 08/01/2023	Permit Effective Date 01/01/2022
<u>Ocean Companies:</u> Ocean Gold 1804 Nyhus Street Westport, WA 98595			
Clear Ocean 1601 Yearout Drive Westport, WA 98595		Exit Time/Date 11:52 08/01/2023	Permit Expiration Date 12/31/2026
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number Greg Shaughnessy, General Manager: 360-310-0662 Brian Blake, Government Affairs: 360-589-0123 Daniel Cerda, Safety and Compliance Manager: 360-268-2510 Ext. 239		Other Facility Data (<i>e.g., SIC NAICS, and other description information</i>) SIC: 2092 NIACS: 311712	
Name, Address of Responsible Official/Title/Phone and Fax Number Albert Carter PO Box 1104 Westport, WA 98595			
		Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

<input checked="" type="checkbox"/>	Permit	<input checked="" type="checkbox"/>	Self-Monitoring Program	<input checked="" type="checkbox"/>	Pretreatment	<input type="checkbox"/>	MS4
<input checked="" type="checkbox"/>	Records/Reports	<input type="checkbox"/>	Compliance Schedules	<input checked="" type="checkbox"/>	Pollution Prevention		
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Laboratory	<input type="checkbox"/>	Stormwater		
<input type="checkbox"/>	Effluent/Receiving Waters	<input checked="" type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	Combined Sewer Overflow		
<input type="checkbox"/>	Flow Measurement	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Sanitary Sewer Overflow		

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

Ocean Companies has two operations in Westport, Washington, Ocean Gold and Ocean Cold (aka Clear Ocean). Fish are processed and wastewater is produced at the Ocean Gold Seafood facility (1804 Nyhus Street North, Westport, WA 98595) and at the processing section of the cold storage facility (Ocean Cold), which is designated as Clear Ocean (1601 Yearout Drive, Westport, WA 98595). Both facilities are part of the Ocean Gold Seafoods processing system. The plants process primarily Pacific Whiting, Sardines, Dungeness Crab and Shrimp, with smaller amounts of Salmon, Tuna and Squid processed based on seasonal availability.

- Boat hold water (from fish storage on boats);
- Wash water (from fish cleaning);
- Cooking water (shrimp and crab); and
- Mechanized processing of fish (head/gut/tail removal).

Ocean Companies holds a permit for Ocean Gold and Clear Ocean which was effective January 1, 2022, and expires December 31, 2026. The permit places effluent limits on process water: BOD₅, total suspended solids, oil and grease, pH, fecal coliform bacteria.

The treatment of the process water consists of five steps:

1. Screening (Ocean Gold and Clear Ocean);
2. Influent Pumping;
3. Dissolved air flotation;
4. Disinfection; and,
5. Effluent disposal.

In addition to monitoring the above-mentioned effluent limits, the permit also requires Ocean Companies to monitor flow, zinc, arsenic, copper, mercury, temperature and production.

Facility Site Review:

I arrived at the facility at 10:06 AM on August 1st. I met with Daniel Cerda, Brain Blake, and Greg Shaughnessy. We had a congenial chat about rocks, and Greg showed me some of his prized stones. Greg shared a little bit about the permit history. I asked about the BOD₅ exceedances (later discovered that they were fecal coliform exceedances) that occurred in June. Greg explained that this was an outlier, and they were having some trouble with the lab. Ocean Companies uploaded a document to PARIS with their June DMR's with an explanation of the two fecal coliform exceedances. I then went on to check their records, confirming that they had DMR's and lab reports on file. The DMR's and lab reports are kept at the treatment facility at Firecracker Point, and I checked those last. In the office I checked for O&M manual, spill plan etc. All were present. They had a hard copy of permit at the office as well. Greg explained that they have two sites that operate under the umbrella of Ocean Gold. The two areas are the Blue Building and Dock. Ocean Gold was actively processing shrimp at the time of the inspection.

Dock

We started our tour at the Dock. This is the area where product is offloaded from the fishing vessels (Photo 3). Pacific whiting is kept in a refrigerated tank on the ships. The first part of the process is on the dewatering tank/block (Photos 1, 2, and 5). The fish are pumped off the boat through a large tube (Photo 4). The fish must be lubricated with seawater to flow through the tube. It is important that the fish are kept in seawater, so their biology/taste doesn't change. When the fish are separated from the water it generates lots of TSS etc. The fish are separated by size and then sent into respective totes for transportation to the processing building (Photo 6). Most of the water is returned to the boat. Spills are collected on the concrete pad which provides secondary containment for the dewatering process. There are two pumps, East and West. The water that is collected from the dewatering process is sent via sump (Photo 7 and 8) to the hydro-core in the "Goo House".

We then move on to see the Goo House. As we walked from the dewatering block to the Goo House, Greg pointed out a "kicker" that was recently installed (Photo 11). This kicker was a BMP implemented to ensure all water from the dewatering process was collected in the appropriate drain (Photos 9 and 10). Greg informed me that they have a "no drip" policy and work hard to make sure all process water is going to the correct drains. During the walk to the Goo House, I observed two streams of continuously flowing water that was discharging into an orange tote and onto the Dock (Photo 12) Greg explained that they store live crab on the Dock, and they recirculate water from the bay. The water is not altered and thus is safe to flow back into the bay.

We entered the Goo House and Greg showed me the rotary hydro-core (Photo 13). The large hydro-core uses a 10 µm mesh to screen the water from the offloading of fish from the boats and the process water from the dewatering/sorting area. Greg explained that they recently upgraded to the large hydro-core and took 5 screens offline. Greg said that they are working on updating the O&M manual with this change and submitting it to Ecology. We looked at holding tanks T1 and T2 (Photo 14). These tanks hold pretreated water from the hydro-core which is then pumped through two 6-inch pipes to the treatment facility at Firecracker Point.

Blue Building

Process water from the Blue Building (Photo 16) is pretreated through the large outdoor hydro-core (Photo 15). Currently the Blue Building is processing shrimp. The outdoor hydro-core is rated for 1000 gallons per minute (GPM) but they only process about 600 GPM. They have extra capacity to ensure treatment of process water and for potential expansion in the future. Previously they had problems meeting limits due to overcapacity. I asked if the birds were a problem and they said yes, at one point they had to overcome the "Great Pelican Invasion!"

The fish and seafood solid waste is collected in what they call "gut wagons" – large semi-trucks (Photo 18 and 19). Water from the truck pad is collected in the appropriate drain for treatment (Photo 20). The trucks transport the solid waste to Ocean Protein, an Ocean Companies facility in Hoquiam, WA. The French drain water (Photo 26 and 27) from the Blue Building goes to yellow vault (Photo 24) which is then pumped to outdoor hydro-sieve for screening (Photo 15).

They also have a wastewater circuit (Photo 29) for wet tote storage where they implemented a large concrete pad with drains (Photo 30). In summary, the screened water flows to the new pipeline they installed under Dock/new concrete pour which runs to

Nyhus. Since the early 2000's Ocean Companies has spent approximately \$10 Million in upgrades at this facility. Each year they try to make improvements. Greg stated that they are one of the only seafood processing facilities in the US that is meeting new source standards.

Clear Ocean

The Clear Ocean facility is processing pacific whiting. Flat beds bring totes of fish from the Dock to the processing area (Photo 32 and 34). Pacific whiting is the main product at Clear Ocean (Photos 35 and 36). There is a large hydro-core in the Clear Ocean building that screens the process water (Photo 37). The large cement pad in front of the building has drains which are designated wastewater and are collected for treatment (Photo 33). I observed a large gut wagon on site (Photo 39). Greg explained that the first rain is a big problem. To help mitigate the bird guano outside they contract a sweeper to come quarterly. For stormwater, they have another vendor who comes and sucks out the waste vaults, so they do not get overwhelmed. Additionally, after first rain they always have the vaults cleaned. We briefly consulted with Mike who happened to be walking by. Greg called him over and Mike said that the wastewater has enough flow that first rain and bird guano does not cause a problem/upset for treatment.

Firecracker Point

We then drove to Firecracker Point which is the final stage for treating the process water. They have a wash pad at this site for cleaning the gut wagons. The water from the wash pad gets screened. It is the last point of the waste streams. There is a large equalization tank just outside of the treatment building that is buried (Photo 41). The treatment building is built over a 30-foot-deep vault which was constructed in the 1970's to start a fish farm. The fish farm was never completed; however, Ocean Companies was able to acquire the partially completed facility and retrofit it for their outfall. There are four pipelines that lead into the estuary. The buried pipes rise from the sea floor and discharge using diffusers.

We met with Alan Fletcher (Treatment Facility Manager) and Brenda Belgado (Assistant). I chatted with them about the treatment process. They use various polymers and flocculants (Photos 49) to treat the process water, which are aluminum chloral hydrate, starch polymer, and peracetic acid. Greg prefers the starch polymer as it breaks down better in the water creating less secondary contamination. After chemical dosing, the process water goes into the DAF unit (Photo 44) for final treatment and discharge. The DAF unit is rated for 1,200 GPM, and they usually about 600 GPM.

The cement pad covering the 30-foot vault has openings in the floor (Photo 47). It is assumed that any spills will drain into the vault which is equipped with sumps. I asked Alan about the BOD₅ exceedance (which was the fecal coliform exceedance – my mistake). He stated that the lab had some problems with a bad plate. They used to use Dragon Labs, but it closed. They now use Spectra in Tacoma, but it is hard to get samples completed there and he often must drive to Poulsbo and deliver them himself. I mentioned that they need shore up their secondary containment for the chemicals (Photos 49). While the chemicals are on a cement pad that has openings to the vault below, there is no defined sloping for collecting a spill, and there are sections around the building where the berms are missing (Photo 50). The treatment building does not have a unique spill control plan; they use the one for the whole facility.

Compliance with Permit:

Ocean Companies has complied with permit requirements since its issuance on December 3, 2021. They have not had any violations until recently when they exceeded fecal coliform both for daily maximum and monthly geometric mean in June 2023.

Action Items:

- 1) Ecology recommends improving secondary containment BMPs to ensure that all chemicals/other discharge will be captured in case of a spill.
- 2) Submit updated O&M manual reflecting the new hydro-core that replaced 5 screens.

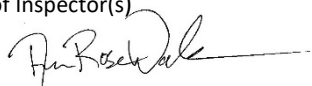
Verify Latitude and Longitude

Ocean Gold. Lat: 46.90546, Long: -124.10847. Clear Ocean. Lat: 46.90216, Long: -124.10429

☒ Announced
☐ Unannounced

Name(s) and Signature(s) of Inspector(s)

Anna R. Wallace Ph.D.



Agency/Office/Phone and Fax Numbers

Ecology/SWRO (360) 522-6216

Date

8/10/22

Signature of Management QA Reviewer



Steve Eberl P.E.

Agency/Office/Phone and Fax numbers

Ecology/SWRO (564) 999-3864

Date

8/12/23

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.

Column 3 - 11: NPDES Permit No.: Enter the facility's NPDES permit number – third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (*Use the Remarks columns to record the 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	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge – Biosolids	{	Stormwater-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Stormwater-Construction-Non-Sampling
F	Pretreatment Follow-up	\$	Combined Sewer Overflow-Non-Sampling	:	Stormwater-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Stormwater-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Stormwater-MS4-Sampling
M	Multimedia	\	CAFO-Sampling	-	Stormwater-MS4-Non-Sampling
N	Spill	=	CAFO-Non-Sampling	>	Stormwater-MS4-Audit
O	Compliance Evaluation (Oversight)	2	IU Sampling Inspection		
P	Pretreatment Compliance Inspection	3	IU Non-Sampling Inspection		
R	Reconnaissance	4	IU Toxics Inspections		
S	Compliance Sampling	5	IU Sampling Inspection With Pretreatment		
		6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics With Pretreatment		

P

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

A - State (Contractor)	O - Other Inspectors, Federal/EPA (Specify in Remarks columns)
B - EPA (Contractor)	P - Other Inspectors, State (Specify in Remarks columns)
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors-EPA Lead	S - State Inspector
L - Local Health Department (State)	T - Joint State/EPA Inspectors-State Lead
N - NEIC Inspectors	

Column 20: Facility Type: Use 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.
- 5 - Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389

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 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.

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.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K-CAFO, V-SSO, Y-COS, W-Stormwater, 9-MS4. States may also use the new wet weather CAFO and MS4 inspection types shown in column 19 of this form. The EPA regions are required to use the new wet weather CAFO and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.



Figure 1. Ariel view of Ocean Companies – Ocean Gold and Clear Ocean

PIMS Photo Export

Description	Photographs	Image Name
Photo 1. Land side of dewatering/sorting pad.	 <p>Ctrl+Click HERE to view full size image</p>	OCEAN COMPANIES
Photo 2. Secondary containment for offloading fish from vessels.	 <p>Ctrl+Click HERE to view full size image</p>	OCEAN COMPANIES

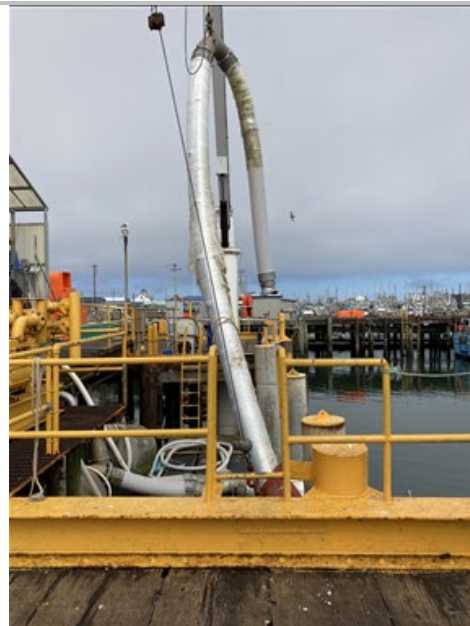
Photo 3. Sea Clipper - One of the vessels that delivers fish.



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Photo 4. Pipe that pumps whole fish into the sorting area.



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Photo 5. Bay-side view of fish sorting area.



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Photo 6. Fish sorting area, chutes that dump sorted fish into respective totes



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Photo 7. Sump in sorting area that sends the process water to the hydro-core for pretreatment.



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Photo 8. Closer look at sump that sends process water to hydro-core.



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Photo 9. Drain in tote washing area that collects water that is sent for treatment.



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Photo 10. Same as previous picture.



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Photo 11. BPM installed to ensure water flows into the drain.



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Photo 12. Seawater circulating from the bay for live crab storage. The water is not contaminated or used for processing, so it recycles continuously without treatment.



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Photo 13. Rotary hydro-core screen. Upgrade that replaced a series of 5 sieves.



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Photo 14. Tank 1 and Tank 2 that hold water after passing through hydro-core. The water is then pumped to the treatment plant at Firecracker Point.



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Photo 15. Second hydro-sieve that treats water from blue building.



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Photo 16. Blue building.



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Photo 17. Secondary containment underneath the blue building's hydro-seive.



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Photo 18. Looking up at the conveyer for solid from underneath the blue building's hydro-seive. Rear of truck that transports solid waste.



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Photo 19. Loading bay for trucks that transport solid waste. Pavement collects water and it is collected in a drain for treatment.



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Photo 20. Drain that collects runoff from solid waste loading bay.



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Photo 21. Silly slide 😊.
Permanently offline.



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Photo 22. Cleaning of totes on
wash pad.



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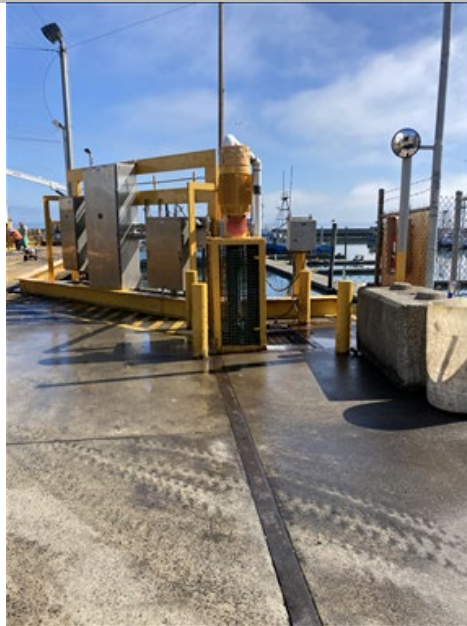
Photo 23. Drain.



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Photo 24. Yellow vault that holds wastewater from hydro-sieve and hydro-core.



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Photo 25. Hydro-sieve instead blue building separating shrimp peelings from process water.



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Photo 26. Drain in blue building collects all runoff from cleaning, spills etc. and is sent for treatment.



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Photo 27. Runoff from shrimp processing.



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Photo 28. Clean tote storage.



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Photo 29. Relatively new cement pad for wet storage of totes. The drains collect runoff for treatment.



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Photo 30. Wet storage of totes on cement pad.



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Photo 31. Blue building. Dry storage of totes off cement pad



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Photo 32. Clear Ocean building



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Photo 33. Drain in Clear Ocean area to collect potential runoff from seafood processing.



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Photo 34. Totes full of pacific whiting.



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Photo 35. Pacific Whiting



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Photo 36. Pacific whiting -
whole, before processing



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Photo 37. Hydro-sieve in Clear Ocean building.



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Photo 38. Buildings not part of fish processing.



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Photo 39. Solid waste collection truck “gut wagon).



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Photo 40. Outdoor hydro-sieve at Clear Ocean



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Photo 41. Firecracker point - Vault that holds incoming process water.



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Photo 42. Intake pipe for process water. Enters chemical treatment then DAF unit.



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Photo 43. Chemical treatment prior to entering DAF.



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Photo 44. DAF Unit.



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Photo 45. More piping for wastewater flow, leaving DAF.



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Photo 46.



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Photo 47. 30' deep vault. No longer holds water. There are sumps to pump water out in case of spills



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Photo 48. Sampling point.



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Photo 49. Chemical storage. May need secondary containment. Building has some cement edges, and the vault could provide a catchment, however the floor is not sloped to provide drainage in any direction.



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Photo 50. Example of section of building that does not have secondary containment edge. There are other sections like this around the building.



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