

	State of Washington Department of Ecology <b>WASTEWATER TREATMENT PLANT COMPLIANCE INSPECTION REPORT</b>	Northwest Regional Office PO Box 330316 Shoreline, WA 98113 ph: (206) 594-0000 (rev. 5-28-21)
	Section A: General Information	

Report Version	PERMIT #	mm/dd/yy	Inspection Type	Inspector Code	Facility Type
<input checked="" type="checkbox"/> New <input type="checkbox"/> Changed <input type="checkbox"/> Deleted	<b><u>No permit</u></b>	08/09/23	<b>I</b>	<b>S</b>	<input checked="" type="checkbox"/> <b>2 Industrial</b>
Remarks					
Inspection work days	Facility Self-Monitoring	Photos Taken	Samples Taken	BI	QA
<b><u>0.5</u></b>	<b><u>N/A</u></b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b><u>N</u></b>	<b><u>N</u></b>

Lead Ecology Inspector(s)  
Maia Hoffman

Section B: Facility Data		
Name, Location, and Phone of Facility Inspected	Entry Time	Permit Effective Date
Syndel 1441 W Smith Rd Ferndale, WA 98248	11:00 am	N/A
Name(s)/Title(s) of On-Site Representative(s)	Exit Time	Permit Expiration Date
Doug Dickinson, CSP, Director of Operations Aaron Becker, Director of Production	12:15 pm	N/A
Name, Title, and Email of Responsible Official	Other Facility Data	
Not identified, no permit yet		
Contacted? <input type="checkbox"/> Yes <input checked="" 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 checked="" type="checkbox"/>	Effluent ○ Receiving Water	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Pollution Prevention
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Compliance Schedules	<input checked="" type="checkbox"/>	Pretreatment	<input type="checkbox"/>	Multimedia
<input type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Laboratory	<input type="checkbox"/>	Storm Water	<input type="checkbox"/>	Other

Section D: Summary of Findings/Comments
<p><b>I. INTRODUCTION and DISCUSSION</b></p> <p>Department of Ecology (Ecology) pretreatment engineer, Maia Hoffman, accompanied City of Ferndale (City) wastewater personnel on a site visit of Syndel. City personnel present included Mike Olinger, Public Utilities Supervisor, and Shawn Avila, WWTP Worker. The inspection was organized by Maia Hoffman and coordinated with Doug Dickinson via email.</p> <p>D. Dickinson contacted Ecology on July 21, 2023 via email to inquire about wastewater discharge requirements for the Syndel facility. Syndel requested communication from Ecology on whether a permit is required or not for discharge of wastewaters generated onsite.</p> <p>Prior to the site visit, M. Hoffman received a copy of the most recent dangerous waste site inspection Ecology conducted, which was in 2019 and the report issued in 2020, as well as the 2022 annual dangerous waste report. Syndel is a large quantity generator. TMS liquer (i.e. the mother liquid) is the main dangerous waste generated. The waste is characterized with waste codes D002, D001, and F005. The dangerous waste site inspection report noted that Syndel should investigate wastewater discharge requirements and contact Ecology.</p> <p>We started off the site visit by touring the main production area. The production building is equipped with its own dedicated wastewater septic tank. All wastewater generated in the production building, aside from restroom wastewater, is routed to this septic tank. The volume of the tank is unknown. D. Dickinson removed the covers from the septic tank. We were able to view</p>

that it was one large tank with a middle wall baffle. The main material of the tank appeared to be metal. Wastewater flows into the first basin and eventually overflows into the second basin. The second basin is equipped with a pump programmed to floats to automatically pump the wastewater to the site's main septic tank. D. Dickinson said the pump can be switched to manual mode to prevent a discharge if necessary. The main septic tank accumulates the production building wastewater as well as all restroom and breakroom wastewater generated at the facility. The main septic tank is pumped to the City sewer system. M. Hoffman inquired if there was any periodic maintenance on the production septic tank. There is no typical maintenance. However, the outflow pipe had to be rebuilt a few years back because it blew out. There was minimal signs of corrosion in the tank. D. Dickinson said the pH of the wastewater was recently tested in the tank and it was 3.78 standard units.

Syndel manufactures Syncaïne® (tricaine methanesulfonate) a fish anesthetic and Ovadine® (PVP Iodine) a fish egg disinfectant. We first viewed the Ovadine® production area. The disinfectant is produced in a large conical tank and is packaged for sale. Citric acid is used in producing Ovadine®. The floors are washed down on a daily basis, as needed, and the tank is washed when a batch is complete. Only water is used for the equipment and facility washdown. We next viewed the Syncaïne® production area. The anesthetic is produced through chemical synthesis. Ethanol is used in the synthesis. Chemicals are synthesized in two reactors. The synthesized slurry is then transferred to a crystalizer to achieve liquid-solid separation. The crystalized slurry is then processed through a centrifuge. The Syncaïne® is the solid produced. The liquid produced from the centrifuge is called the mother liquid and is disposed of as hazardous waste. 100% of the ethanol used in the synthesis is reclaimed in the mother liquid. The hazardous waste is picked up about monthly by Veolia. After a batch is produced, the equipment is washed down with water. A small amount of ethanol is used to ensure the equipment is dry after washing. The floors are washed down daily, as needed, to clean up any minor spills. Both the Ovadine® and Syncaïne® production areas are equipped with floor drains.

Ecology did a quick tour of the hazardous waste storage area, which was empty at the time of this site visit.

We concluded the site visit with a brief discussion of potential permit requirements. D. Dickinson provided an analytical report of the wastewater monitored for the following analyte groups: semivolatle organic compounds, chlorinated organic compounds, inorganic chemistry, and volatile organic compounds. These analyte groups were analyzed primarily using solid waste TCLP methods. pH, oil and grease, and flash point were also monitored for. The pH was 3.78 standard units, the oil and grease was 18.4 mg/L, and the sample does not flash at 99 °C. TCLP analysis results may be equivalent to water samples (i.e. ppm=mg/L=mg/kg) if the aqueous sample analyzed is less than 0.5% solids. The lab report provided with the TCLP results did not specify what the percent solids of the sample were or if there was dilution.

## II. CONCLUSION

40 CFR 403 (the federal pretreatment program) requires significant industrial users (SIUs) to obtain permit coverage for process wastewater discharges to sanitary sewer systems. SIUs are defined as discharging >25,000 gallons per day OR discharging wastewater subject to categorical pretreatment standards under 40 CFR Chapter I, Subchapter N (federal effluent guidelines). Syndel is a pharmaceutical manufacturer that may be subject to effluent guidelines in [40 CFR Part 439 \(Pharmaceutical Manufacturing Point Source Category\)](#). Additionally, Water Pollution Control Law, Chapter 90.48 RCW, requires facilities to obtain a permit for the discharge of non-domestic wastewater to a wastewater treatment plant. The City is not delegated to implement the federal pretreatment program and permit SIUs. Therefore, Ecology makes the final determination of SIU status and issues permits in the City service area.

Ecology requires additional information to determine if Syndel is a SIU subject to 40 CFR 439 and whether an Ecology issued permit is required for process wastewater discharges. The state waste discharge permit application can be found on Ecology's website, [Application for a State Waste Discharge Permit to Discharge Industrial Wastewater to a Publicly - Owned Treatment Works \(POTW\)](#) (Form 040-177). Ecology sent an official letter requiring permit application along with this site visit report.

For any questions related to the wastewater permit application, please contact Maia Hoffman at [mhof461@ecy.wa.gov](mailto:mhof461@ecy.wa.gov) or (425) 507-5681.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Maia Hoffman 	WA Dept. of Ecology, NWRO, (425) 507-5681	8/23/23
Name and Signature of Management QA Reviewer	Agency/Office/Telephone	Date
Monika Kannadaguli 	WA Dept. of Ecology, NWRO, (206) 594-0000	8/23/23

**ANNOUNCED** Inspection

**INSTRUCTIONS**

**Section A: General Information**

**Report Version:** N for 1<sup>st</sup> version, C for Changed or amended, or D for Delete

**NPDES Permit No.:** Enter the facility's NPDES or State permit number.

**Inspection Date:** Insert the date entry was made into the facility. Use the month/day/year format (e.g., 06/30/04 = June 30, 2004).

**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	

**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)	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

**Facility Type:** Use of one of the choices 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

**Remarks:** These columns are reserved for remarks.

**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. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, travel time and preparation time. This estimate does not require detailed documentation.

**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.

**Biomonitoring Information.** Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

**Quality Assurance Data Inspection.** Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

**Photos Taken:** Yes or No

**Samples Taken:** Yes or No

**Lead Ecology Inspector:** Enter lead inspector's name

**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), e-mail addresses...; and "Ecology Staff On-Site", which may include staff names, titles, phone numbers, or e-mail addresses.

**Section C: Areas Evaluated During Inspection**

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary.

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

Support the findings, as necessary, in a narrative report. Use the headings given on the report form (staffing, back-up power) as appropriate. Reference a list of attachments, such as completed checklists, photos, lab reports, etc. Use extra sheets as necessary