

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>	NPDES # 3 <b>WA003172-1</b> 11	yr/mo/day 12 <b>10/11/04</b> 17	Inspection Type 18 <b>C</b>	Inspector 19 <b>S</b>	Fac Type 20 <b>2</b>
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Remarks

Inspection work days 67 <b>2.0</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 (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>WASHINGTON BULB COMPANY, INC.</b> 16031 Beaver Marsh Road Mt. Vernon, WA 98273 Skagit County	Entry Time/Date 10:20 AM 11/04/10	Permit Effective Date 07/01/03
	Exit Time / Date 1:10 PM 11/04/10	Permit Expiration Date 06/30/08

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  
John F. Roozen, Vice President  
360-424-5533  
john@wabulb.com

Other Facility Data  
Permit administratively extended June 20, 2008.

Name, Address of Responsible Official/Title/Phone and Fax Number.  
same

Phone Number 360-424-5533 Fax 360-424-3113 Contacted?  Yes  No

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

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Operations&Maint.	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input checked="" 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 checked="" type="checkbox"/> Effluent/Receiving water	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> other

Section D: Summary of Findings/Comments

On November 4, 2010, Gerry Shervey, Ecology Northwest Regional Office (NWRO) facility manager and Lori LeVander, NWRO, conducted a water quality permit compliance inspection at the Washington Bulb Company, Inc. (WA Bulb) facility located in the Skagit Valley near Mt. Vernon, Washington. We met with John Roozen, Vice President. The purpose of this inspection was to view the facility and investigate sampling methods.

We arrived at 10:20 am and checked in at the main office. We went to a conference room to discuss the history of the facility and the valley then toured the fields, drainage ditches, focusing specifically on the settling ponds and the discharge from the WA Bulb ponds to the ditches.

This was an announced inspection.

DISCUSSION

Washington Bulb grows flowering bulbs for dry sell trade and for the "force to flower" market. They also grow about 600 acres of wheat on their land.

The practice of conducting the initial bulbs wash in the field began in 2002. The bulbs are then rinsed at the WA Bulb facility. The source of water is well water. The washwater flows to a series of dug out lagoons for solids settling. The dirt is separated from the bulbs using an ionic floc system. The water in this area has a high iron content. The discharge to Sullivan Slough is via pump, to the Swinomish Channel by gravity. The pond is cleaned out every 2-3 years, with the accumulated solids being hauled back to the growing fields. The pond #2 was drained last year and yielded no solids. Clean water from the lower pond is mixed with well water to use in the bulb washing process.

Samples are pulled from the ditch, upstream of the next discharge, twice a month when the facility is operating, usually May through August. Permit required sampling is analyzed by Avocet in Bellingham. Bulbs are replanted from August through October.

The decanted water flows to Jungquist Shields Ditch, which flows about 10 to 12 miles to reach the Swinomish Channel. The Jungquist Ditch is part of the 12,000 acre Drainage District 15, established in 1995.

We discussed the triple walled fuel storage tank and containment. A spill kit is located on site.

The facility recycles as much water as they can.

#### SUMMARY AND CONCLUSIONS

The records of wastewater sampling and flow monitoring show effluent discharge increases downstream turbidity above permit limits. John showed us where the effluent discharges into the ditch and the sampling locations above and below the discharge pipe. The discharge velocity, shallowness of the ditch, and dirt in the channel bottom all show this sampling process is inherently flawed. The downstream sample measures eroded sediment in the ditch in addition to any turbidity in the effluent. J. Roozen attributed the sampling process to directive from ex Ecology employee John Drabek. The sampling results are not representative of the effluent and the ditch is manmade conveyance for field draining at this location.

Need containment for waste oil storage area. (Evidence of stained soil) The fueling area has a curtain drain around the pad, which drains to an oil/water separator. John stated that the tank is cleaned several times a year.

Inspection write up was drafted 11/16/2010 and not printed and signed until May 8, 2014 due to a record keeping error.

Attachments: Photographs

cc: Central Files: Washington Bulb, Inc., WA003172-1, WQ 6.1

Name(s) and Signatures of Inspector(s) Gerald Shervey, PE 	Agency/Office/Telephone WA Dept. of Ecology/NWRO/(425)649-7293 3190 160th SE, Bellevue, WA 98008-5452	Date 5/8/2014
Signature of Management Q A Reviewer 	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/(425)649-7000 fax (425)649-7098	Date 5-8-2014

**ANNOUNCED** Inspection

## 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 (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

**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

**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.

**PHOTO ADDENDUM – WASHINGTON BULB, INC. WA 003172-1**



PHOTO #:01 DATE: 11/04/2010  
TAKEN BY: DESCRIPTION: SOLIDS SETTLING POND #1.

PHOTO #:02 DATE: 11/04/2010  
TAKEN BY: LORI LEVANDER  
DESCRIPTION: SOLIDS BUILD-UP AT HEAD END OF POND #1.  
DRIED UP POND (NO LONGER USED) IN BACKGROUND.

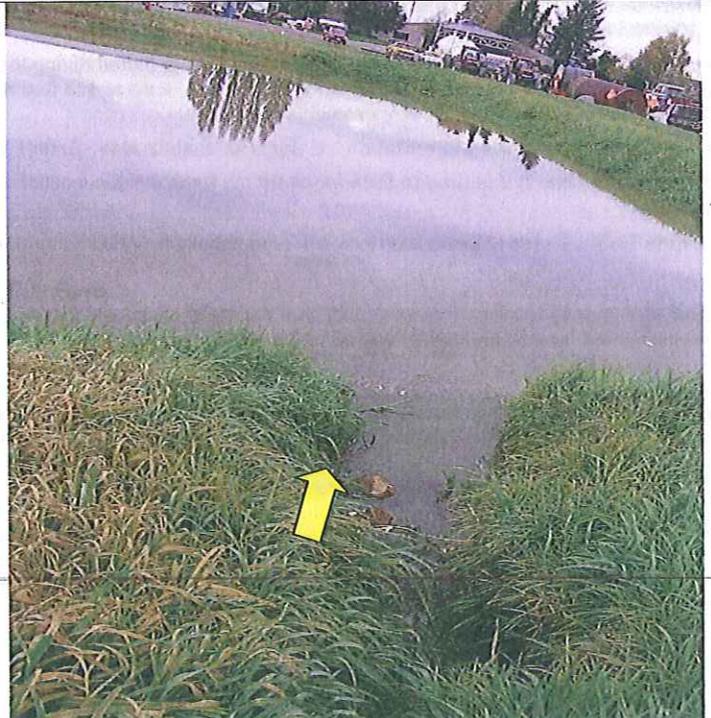
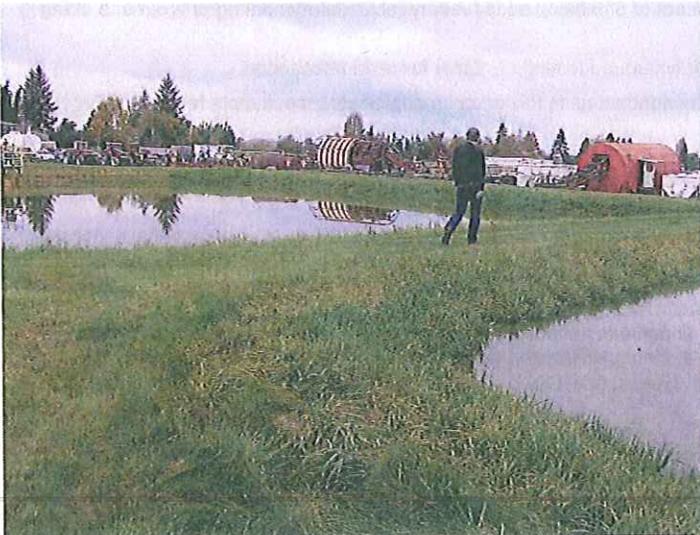


PHOTO #:03 DATE: 11/04/2010  
TAKEN BY: LORI LEVANDER  
DESCRIPTION: BERM BETWEEN PONDS.

PHOTO #:04 DATE: 11/04/2010  
TAKEN BY: LORI LEVANDER  
DESCRIPTION: DISCHARGE FROM POND #1 TO POND #2.

**PHOTO ADDENDUM – WASHINGTON BULB, INC. WA 003172-1**



PHOTO #:05 DATE: 11/04/2010  
 TAKEN BY: LORI LEVANDER  
 DESCRIPTION: INLET TO POND #2. RUST COLOR FROM IRON IN WATER.



PHOTO #:06 DATE: 11/04/2010  
 TAKEN BY: : LORI LEVANDER  
 DESCRIPTION:



PHOTO #:07 DATE: 11/04/2010  
 TAKEN BY: : LORI LEVANDER  
 DESCRIPTION: DISCHARGE PIPE FROM SECOND POND.



PHOTO #:08 DATE: 11/04/2010  
 TAKEN BY: : LORI LEVANDER  
 DESCRIPTION: SAMPLE LOCATION ABOVE THIS POINT.

## PHOTO ADDENDUM – WASHINGTON BULB, INC. WA 003172-1



PHOTO #:09 DATE: 11/04/2010  
 TAKEN BY: LORI LEVANDER  
 DESCRIPTION: LOOKING DOWNSTREAM FROM OUTFALL PIPE.



PHOTO #:10 DATE: 11/04/2010  
 TAKEN BY: : LORI LEVANDER  
 DESCRIPTION: LOOKING UPSTREAM FROM OUTFALL PIPE. NOTE IRON BACTERIA IN WATER.

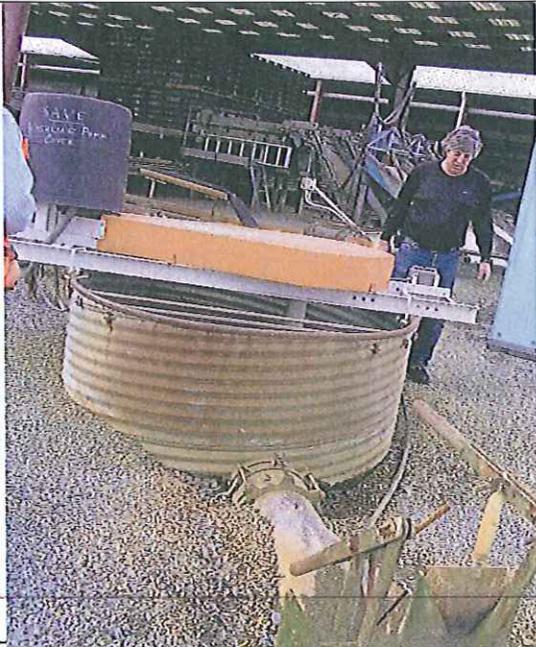


PHOTO #:11 DATE: 11/04/2010  
 TAKEN BY: : LORI LEVANDER  
 DESCRIPTION: FLOC TANK.



PHOTO #:12 DATE: 11/04/2010  
 TAKEN BY: : LORI LEVANDER  
 DESCRIPTION: TANK WHERE FLOCCULATION AGENT IS ADDED TO WASHWATER PRIOR TO ENTERING POND #1.

### PHOTO ADDENDUM – WASHINGTON BULB, INC. WA 003172-1



PHOTO #:13 DATE: 11/04/2010  
 TAKEN BY: LORI LEVANDER  
 DESCRIPTION: WASTE OIL STORAGE.

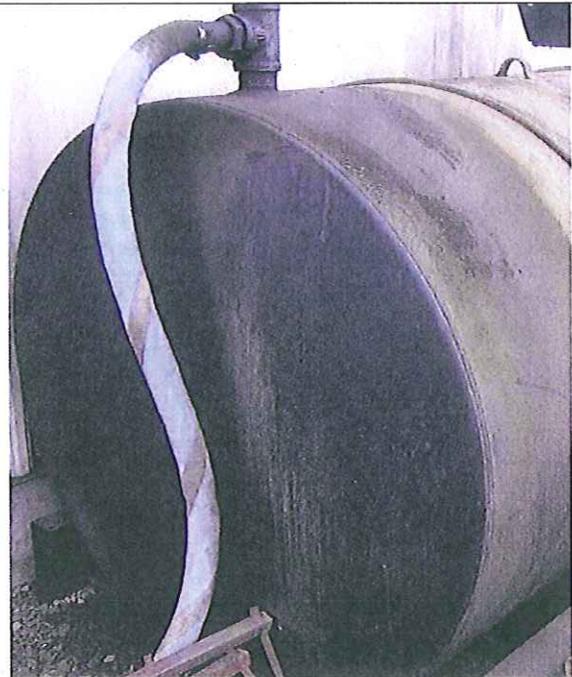


PHOTO #:14 DATE: 11/04/2010  
 TAKEN BY: : LORI LEVANDER  
 DESCRIPTION: NOTE STAINING ON GRAVEL UNDER WASTE OIL TANK. NEEDS CONTAINMENT.

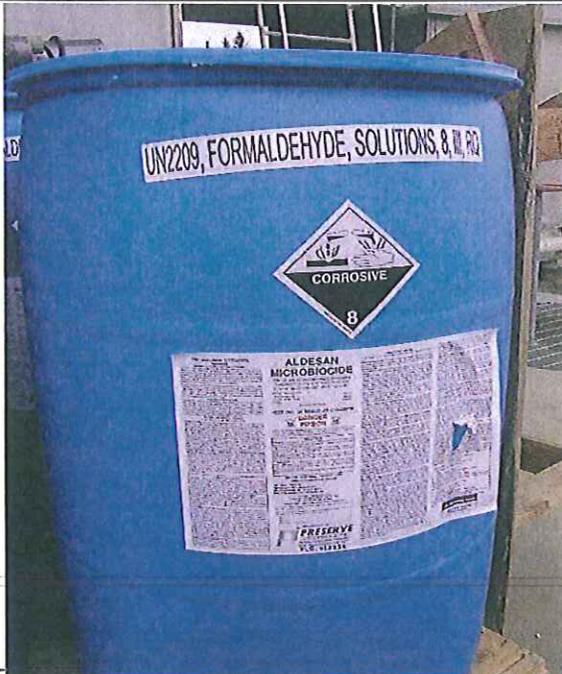


PHOTO #:15 DATE: 11/04/2010  
 TAKEN BY: : LORI LEVANDER  
 DESCRIPTION: FORMALDEHYDE SOLUTION FOR USE ON BULBS.



PHOTO #:16 DATE: 11/04/2010  
 TAKEN BY: : LORI LEVANDER  
 DESCRIPTION: FLOCKING AGENT USED.