

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 N 2 5	NPDES # WA0501489	yr/mo/day 12 14/06/09	Inspection Type 18 C	Inspector 19 S	Fac Type 20 1
Remarks					
Inspection work days 67 1.0 69	Facility Self-Monitoring Evaluation Rating 70 3	BI 71 N	QA 72 N	Reserved 73 _____ 74 _____ 75 _____ 80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Hughes Farms 1325 Farm to Market Road Mount Vernon, WA 98273	Entry Time/Date 10:10 am 06/09/14	Permit Effective Date
	Exit Time / Date 12:50 pm 06/09/14	Permit Expiration Date
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jose Velazquez Plant Manager 360-424-3772	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number. David Hughes Owner		
Phone Number: (360) 424-3772 Fax: 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 checked="" type="checkbox"/> Operations & Maint.	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input 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 checked="" type="checkbox"/> Storm Water	<input checked="" type="checkbox"/> other

Section D: Summary of Findings/Comments

INTRODUCTION

This inspection was prompted by a complaint received from Skagit County Public Works Department regarding discharge from the settling pond shared by Hughes Farms, Chemtrade Sulex, and other nearby facilities. Cheryl Thompson and Jeanne Tran met with Pat Murphy, Renee Westlund, and Lisa Trevino from Chemtrade Sulex, and Steve Kramar and Lori Wight from Skagit County Department of Public Works at 10:10 am in Chemtrade's conference room. Steve and Lori expressed concerns regarding the discoloration and the odor of the water in the settling pond and in the field ditch (See photos 13 through 17).

SUMMARY OF INVESTIGATION

The majority of the flow comes from Hughes Farms' potato washing operation. Occasionally, other facilities discharge stormwater runoff into the settling pond. At the time of the inspection, Hughes Farms was pumping water from the ditch to the farm field for irrigation. Water is applied to the farm field during the potato season, from March to the end of August or early September. The field ditch is located across the street from the plant, on Farm to Market Road. Each end of the branches of the field ditch was blocked off with a piece of plywood covered with plastic material to prevent the water from flowing off site. The goal was to contain the water and apply it to the farm field. However, the containment was not a 100% seal and some of the discolored water traveled around the plastic covered plywood (See photo 22) and through the soil column to the other side of the plywood and ultimately drained to Little Indian Slough. The dark colored water had been noticed since Memorial Day in May 2014. Steve posed the question of whether the discoloration was caused by sulfur product contained in Chemtrade's discharge. Pat and Renee informed us during the meeting that even though Chemtrade has an NPDES permit to discharge wastewater to the settling pond, they have not discharged to the settling point since 2012. They have been collecting and treating and continue to treat, all the water, including stormwater from the site for reuse.

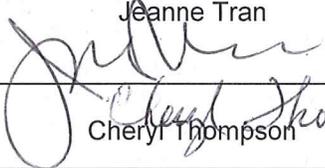
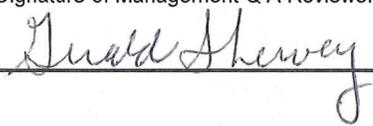
Hughes Farms submitted a state waste discharge permit application in July 2009, and an NPDES permit application, to Ecology in May 2011. An NPDES permit application was submitted due to the fact that the facility was not able to secure a long term lease to use the farm field. As of today, a permit has not yet been issued to Hughes Farms because the facility has not yet made a decision on the specific treatment to employ and a discharge method to pursue. Based on the recent

communication with the facility, the facility has decided to treat the washwater with flocculation and sedimentation, and to either recycle the treated water for reuse or discharge it to Little Indian Slough. Water samples were collected on June 12, 2014, and sample for BOD, DO, pH, fecal coliforms, ammonia, nitrate/nitrite, TPN, sulfur, sulfide, sulfite, and sulfate. The analytical results indicate that these parameters were within the range they should be in, except for DO. The measured DO concentration was very low compared to the surface water standard. See the June 12, 2014 inspection report for more details.

Inspection at Chemtrade Sulex: At approximately 10:55 am, Chemtrade's staff assisted us in a walk through inspection of their plant. The plant was generally clean with little yellow sulfur dust on the ground. We walked through the back of the plant and looked at their concrete catch basin and water storage water tanks (See photos 3,4, and 5). We continued on and walked around the back of the roofed prilled sulfur storage shed. This area was generally clean. At this roofed sulfur storage shed, we observed some sulfur dust in the truck loading area immediately adjacent to the shed. This area is approximately 350 feet away from the settling pond. Pat informed us that the truck loading area is swept frequently. Then, we walked to the settling pond. The water in the pond was black with bubbles rising to the surface of the pond. We observed the discharge from Hughes Farms, and the discharge has a brown color. We also detected a sewage odor like, but not a rotten egg odor. Next, we walked to the new roofed storage shed, north of the site. In this area, we observed sulfur product on the truck loading area, outside of the storage shed (see photo #7). Jeanne encouraged the facility to increase housekeeping frequency in this area. Stormwater from this site is collected and it does not drain to the settling pond. We also noticed a muddy draining path coming from the neighboring facility to Chemtrade's storm drain (See photo 8), since the land is slightly sloped toward Chemtrade's premises. This suggested that stormwater draining from the neighboring facility to this storm drain was somewhat muddy, leaving a muddy draining path in the area. Jeanne encouraged Chemtrade's staff to work with the neighboring facility to keep the area clean.

Inspection at Hughes Farms' Farm Field: We drove to the farm field where Hughes Farms uses it as their land application site. This field is located across the street from the plant, on Farm to Market Road (See photos 19 through 21). The water from the settling pond is routed to the field ditch. The water in the ditch was then withdrawn (See photo 18) and applied to the farm field through an irrigation system. The field ditch was long and it branched off and divided. Each end except for the receiving end was blocked off with a plywood covered with plastic material. Since the plywood does not provide a 100% seal, water travels around the plastic covered plywood and through the soil column to the other side. We noticed the water on the other side of the plastic covered plywood had a brownish color rather than black. After a short distance, the water was cleared up and the odor disappeared. Jeanne informed Steve and Lori that she will follow up with sampling to investigate the source of the discoloration.

Inspection at Hughes Farms: After the field inspection, Cheryl and I drove back to Hughes Farms at approximately 12:20 pm. Dave Hughes was not present at the plant. Jose Velazquez, the superintendent, met with us and informed us that the potato processing season would be ending soon, possibly two days from now. He didn't know why the water in the settling pond had turned black. He pointed out that Hughes Farms is not the only facility which discharges to the settling pond. He confirmed that the wash water might contain small pieces of potato and potato skin from the washing, and that the pond is dredged annually, at the end of the potato season, typically in July or early August. Potato washing completed for the day during our inspection. We walked to the processing line, and observed that the floor had been washed and clean (See photos 23 and 24). All water had been collected in the underground vault and discharged to the settling pond. The flow going into the settling pond had a brownish color.

Name(s) and Signatures of Inspector(s) Jeanne Tran 	Agency/Office/Telephone WA State Dept. of Ecology/NWRO/(425)649-7078 3190 160th SE Ave, Bellevue, WA 98008-5452	Date 10/08/14
 Cheryl Thompson	WA State Dept. of Ecology/NWRO/(425)649-7001 3190 160th SE Ave, Bellevue, WA 98008-5452	10-15-14
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 10/13/2014

UNANNOUNCED Inspection



PHOTO #:01 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: A VIEW OF THE SETTLING POND THAT IS SHARED BY MULTIPLE NEARBY FACILITIES. HUGHES FARMS IS THE MAIN DISCHARGER TO THIS POND.

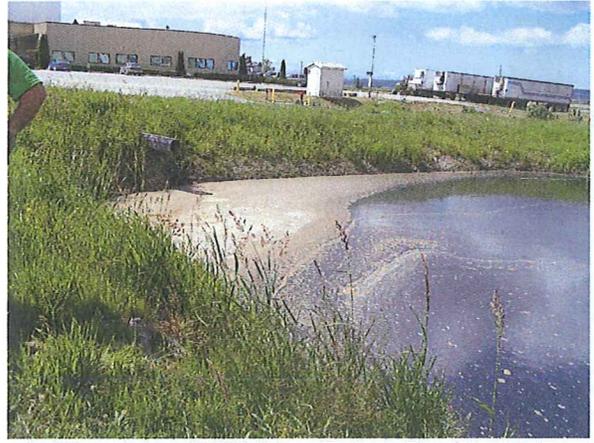


PHOTO #: 02 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: THIS PICTURE SHOWS HUGHES FARMS' OUTFALL PIPE. THE DISCHARGE COMING FROM HUGHES FARMS HAD A SLIGHT BROWN COLOR.



PHOTO #: 03 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: A VIEW OF THE CONCRETE TROUGH LOCATED IN THE BACK OF CHEMTRADE SULEX'S PLANT. THIS TROUGH IS USED FOR COLLECTING PRILLED SULFUR CONTACT WATER FOR REUSE.



PHOTO #: 04 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: ANOTHER VIEW OF THE CONCRETE TROUGH AND WATER STORAGE TANK AND A COOLING TOWER.



PHOTO #: 05 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: SIX NEW STORAGE TANKS WERE RECENTLY INSTALLED TO HOLD ALL WATER COLLECTED FROM THE SITE, INCLUDING STORMWATER, FOR REUSE PURPOSES.



PHOTO #:06 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: A VIEW OF THE BACK OF THE SULFUR STORAGE SHED. THE GROUND APPEARED TO BE CLEAN WITH NO NOTICEABLE SULFUR DUST.



PHOTO #:07 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: CHEMTRADE'S SECOND LOADING RACK. SULFUR WAS FOUND OUTSIDE THE STORAGE SHED AND ON THE LOADING AREA. JEANNE SUGGESTED THE FACILITY TO INCREASE THE SWEEPING FREQUENCY TO REDUCE AND PREVENT TRACK OUT.

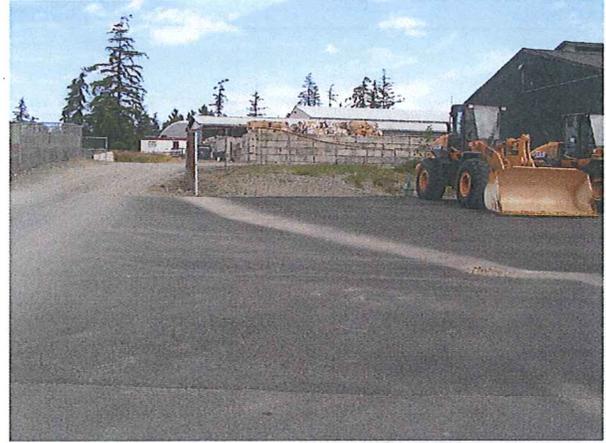


PHOTO #:08 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: THIS PICTURE SHOWS A PATH OF MUDDY STORMWATER FROM THE NEIGHBORING FACILITY WHICH HAD BEEN FLOWING TO CHEMTRADE'S STORMWATER DRAIN.



PHOTO #:09 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: HUGHES FARMS PIPED THE WATER FROM THE SETTLING POND TO THE FARM FIELD LOCATED ACROSS THE STREET FROM THEIR PLANT.



PHOTO #:10 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: ANOTHER VIEW OF THE SETTLING POND'S OUTLET PIPE CONNECTING TO A HOSE WHICH CARRIES THE WATER TO THE FARM FIELD.

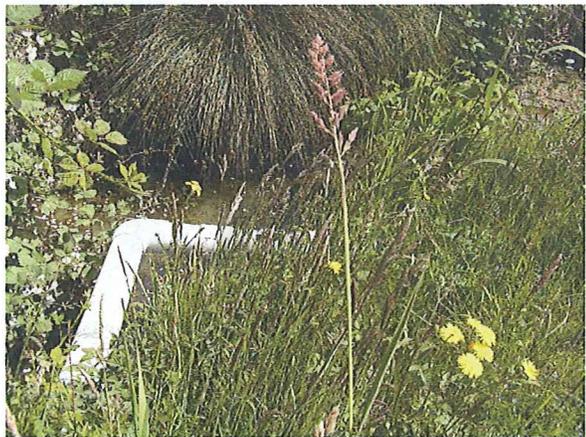


PHOTO #:11 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: A VIEW OF THE PVC PIPE TRANSPORTING THE WATER TO THE FARM FIELD. THE PVC PIPE RUNS UNDERNEATH THE ROAD, ACROSS THE STREET TO THE FARM FIELD.



PHOTO #:12 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
 DESCRIPTION: THE PVC PIPE WAS TRACED TO THE FARM FIELD.



PHOTO #:13 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: WATER IN THE FIELD DITCH WAS BLACK.



PHOTO #:14 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: BUBBLES WERE OBSERVED RISING TO THE SURFACE OF DITCH.

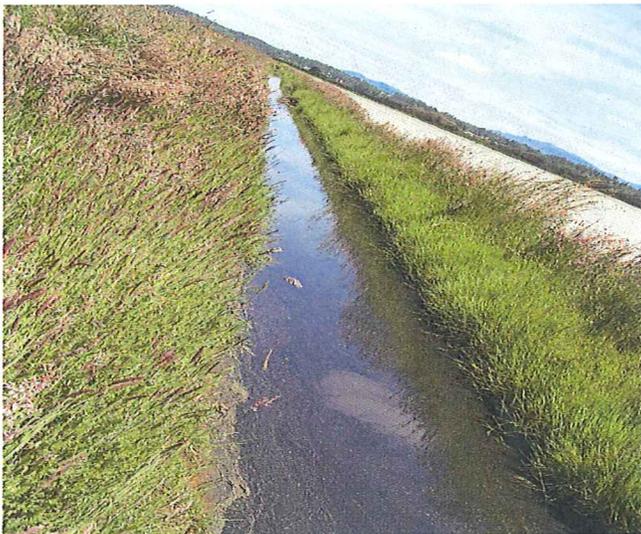


PHOTO #:15 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: THE FIELD DITCH WAS LONG.



PHOTO #:16 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: ANOTHER VIEW OF THE FIELD DITCH.



PHOTO #:17 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: A CLOSE UP VIEW OF THE WATER.



PHOTO #:18 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: WATER FROM THE DITCH WAS WITHDRAWN BY THE FIELD PUMP FOR IRRIGATION.



PHOTO #:19 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: A VIEW OF THE IRRIGATION SYSTEM AND FARM FIELD.



PHOTO #:20 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: ANOTHER VIEW OF THE FARM FIELD.



PHOTO #:21 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: A VIEW OF THE FARM FIELD TAKEN ACROSS THE STREET.



PHOTO #:22 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: A MAN-MADE PLYWOOD COVERED WITH PLASTIC TO ISOLATE THE WATER IN THE FIELD DITCH.



PHOTO #:23 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: A VIEW AT THE POTATO OFF-LOADING AREA. FLOOR WASH WATER IS DRAINED TO THE UNDERGROUND VAULT.



PHOTO #:24 DATE: 06/09/14 TAKEN BY: JEANNE TRAN
DESCRIPTION: THE POTATO WASHER LINES. THE SHIFT WAS OVER WHEN WE INSPECTED PLANT.

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 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.