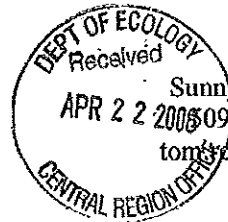




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DEPARTMENT OF ECOLOGY  
APR 23 2008  
WATER QUALITY PROGRAM

April 21, 2008



Tom Rouleau  
Sunnyside Plant Manager  
509-837-8000 ext 106  
tomrouleau@darigold.com

POSTED  
DATE: 4/23/08  
INITIALS: [Signature]

Ray Latham  
Washington State Department of Ecology, Central Region  
15 West Yakima Avenue  
Yakima, Washington 98902

**Re:** Level Two / Level Three Source Control Report, Darigold, Inc., Sunnyside Facility, 400 Alexander Road, Sunnyside, Washington

Dear Mr. Latham,

The zinc concentration in the last four quarterly stormwater samples collected from Outfall 2 at our Sunnyside, Washington, facility has exceeded the 372 µg/L action level. Therefore, a Level Three response is required by the Industrial Stormwater General Permit (ISGP) regulating stormwater discharges from this facility. Similarly, turbidity, nitrate, phosphorus and BOD<sub>5</sub> at Outfall 2 have exceeded action levels in two of the last four samples. Therefore, a Level Two response is required. This letter is intended to address the source control and reporting requirements described in Section S4-C of the ISGP. These problems have been occurring only in Outfall 2; concentrations in samples from Outfall 1 have generally been lower than action levels.

Potential Sources

Potential sources of contaminants identified at the facility include:

Contaminant	Potential Source(s)
BOD <sub>5</sub>	Product spills, dust fallout from dryer exhaust
Nitrate	Fertilizer runoff
Phosphorus	Fertilizer runoff
Turbidity	Product spills, dust fallout from dryer exhaust, windblown dust
Zinc	Tire wear, galvanized surfaces

### Source Mitigation

Measures we have identified as appropriate Best Management Practices (BMPs) to reduce concentrations of the contaminants listed above include:

1. Increased cleaning (including dry sweeping and washing) of parking lots and building roofs. The building roofs will be pressure washed quarterly; all wash water will be contained and discharged to the plant's process wastewater drains. The parking lots and truck loading bays will be dry-swept by a commercial sweeping company on a quarterly basis. These areas will also be wet-swept twice per year.
2. Fertilizer application to the landscaped areas will be done only with a "manure spreader" or similar application device that drops, rather than broadcasts, fertilizer. Our landscaping contractor will be briefed regarding the importance of preventing any fertilizer from escaping the landscaped areas.
3. Our monthly facility inspections will be expanded to include identification of galvanized surfaces that could be contributing zinc to stormwater runoff. These surfaces will be painted with a zinc-free paint.

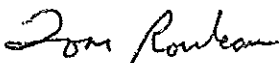
These measures will be implemented immediately.

We are concerned that the location where the Outfall 2 samples are collected, an oil-water separator, may be holding sediments. These sediments may be stirred up during a storm event, leading to higher particulate concentrations in the Outfall 2 samples than would be representative of actual stormwater runoff. Such suspended particulate matter can be a source for many of the contaminants listed above. Therefore, we are considering installing an alternate sampling location that would be less likely to accumulate sediments. Details regarding this project have not yet been finalized.

We have also engaged URS, a consulting company based in Seattle, to update our SWPPP. This work is currently ongoing. We anticipate that they may recommend additional BMPs based on their inspection of the facility.

Please feel free to contact me if I can provide any additional information.

Sincerely,



Tom Rouleau  
Sunnyside Plant Manager

cc: Michael Campbell -- Director of Regulatory Compliance  
Chris Lammer PE -- Environmental Manager