

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>WA002926-2</b> 11	yr/mo/day 12 <b>05/05/15</b> 17	Inspection Type 18 <b>C</b>	Inspector 19 <b>S</b>	Fac Type 20 <b>1</b>
Remarks 5					
Inspection work days 67 <b>3.0</b> 69	Facility Self-Monitoring Evaluation Rating 70 <b>4</b>	BI 71 <b>N</b>	QA 72 <b>N</b>	-----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) <b>BLAU OYSTER COMPANY, INC.</b> <b>11321 Blue Heron Road</b> <b>Bow, WA 98232</b> <b>Skagit County</b>	Entry Time/Date <b>11:20 AM 05/05/15</b>	Permit Effective Date <b>07/01/07</b>
	Exit Time / Date <b>12:15 PM 05/05/15</b>	Permit Expiration Date <b>06/28/12</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Jediah Schimke, Head Administrative Coordinator</b> <b>Steven Blau,</b> <b>360-766-6171</b>		Other Facility Data Permit was administratively extended, based on completed application, on June 29, 2012.
Name, Address of Responsible Official/Title/Phone and Fax Number. <b>Paul Blau, President</b> <b>11321 Blue Heron Road</b> <b>Bow, WA 98232</b> Phone Number <b>360-766-6171</b> Fax ~ Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

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

<input checked="" type="checkbox"/> Permit	<input 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 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 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

A Class I water quality permit compliance inspection was conducted at Blau Oyster Co. Inc, on May 5, 2015. This was a routine inspection including checking records and a facility site tour. The inspection was conducted by Lori LeVander, WA Department of Ecology Northwest Regional Office (NWRO) Permit Manager and Shawanna Tufono, Ecology NWRO Administrative Assistant. Tufono and LeVander met with Steven Blau and Jed Schimke to discuss the permit sampling and submittal requirements and to conduct a routine permit compliance inspection. This was an announced inspection.

**SITE INSPECTION**

**Facility:**

Blau Oyster operates a shellfish processing operation on Samish Bay. Product (oysters in the shells and clams) arrive on barges and boats from the shellfish farm. The shells are washed on the receiving pad (photo #04) with salt water from Samish Bay, iced in bushels or totes, and taken into the shucking room. The oysters are shucked, meat is removed and placed in stainless steel containers and the shells are put back into totes for hauling to the shell piles (photo #12). The shells are stored there for at least a year and are reused for larvae reseeding or sale.

The oyster meat is taken to the second washing room where air is used to remove sand and grit. The cleaned oyster meat is taken to the packing room where it is graded and packed for sale.

The permit lists two washwater discharge outfalls to surface water; #001 and #002.

1) #001 – Wash water from the shucking room and meat cleaning room is screened, (photo #08-10) flows to a sump in the gravel drive (photo #07), and discharges to the beach through an 8" pipe (photo #01-02).

2) #002 – receives salt wash water from the incoming shellstock, and discharges overland and mostly infiltrates into the sand (photo #03-04)

Effluent sample locations were identified. Samples are taken to Edge Analytical for analysis.

The incoming flow meter is read every 2 months. This is the only flow measurement the facility has. Wastewater discharge amounts are estimated by production, operations and the incoming flow meter.

**Records and Permit Review:**

A review of the permit and DMR submittals was completed prior to the inspection. We discuss permit compliance issues, sampling, permit Plan preparation and submittals.

DMR Summary review: A file review of the past 3 years of submitted data indicates poor permit compliance, based primarily on lack of submittals or late submittals. A recent Notice of Violation and Penalty was settled, with timely submittal of DMRs as the focus.

**Solid waste:**

The conveyor belt that usually takes the shells from the shucking table, to a truck that then drives to the shell piles is not operational. Until the belt is replaced, shells are placed into baskets and manually put in trucks and taken to the piles.

Solids cleaned out of the sump leading to outfall #001 and the shucking room are put in totes and taken to the shell pile. Solids from the cleaning room are bagged and picked with other garbage by a contract hauler for disposal.

The rooms are cleaned daily. The facility is operating 5 days a week at the maximum. In April, the facility is open 7 days a week for retail sales.


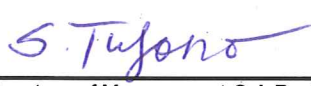
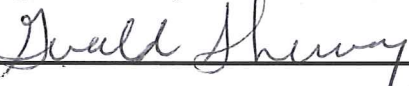
**Oil and Chemical Storage:**

We reviewed gas and oil storage and chemical storage. Blau will put containment under the small gas cans for the boats or relocate to the workshop. We discussed spill response. Blau had sorbent materials and pads onsite in the event of a spill.

**CONCLUSION**

LeVander sent copies of documents to Blau for their records. Blau is working on electronic DMR submittals. The Notice of Penalty was settled and Blau is under agreement to submit timely DMRs.

Please contact Lori LeVander at 425-649-7039 or [llev461@ecy.wa.gov](mailto:llev461@ecy.wa.gov) if you have any questions.

Name(s) and Signatures of Inspector(s) Lori LeVander 	Agency/Office/Telephone WA Dept. of Ecology/NWRO//425-649-7039 3190-160 <sup>th</sup> Ave SE, Bellevue WA 98008	Date 5/26/2015
Shawanna Tufono 	425-649-7105	
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 7/2/2015

**ANNOUNCED** Inspection



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INSTRUCTIONS

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**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.



**PHOTO ADDENDUM – BLAU OYSTER CO., INC. WA002926-2**

PHOTO #:01 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: SAMISH BAY, OUTFALL #001 DISCHARGES OUT PIPE TO BEACH.



PHOTO #:02 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: CLOSE UP OF OUTFALL #001. SAMPLE TAKEN HERE.



PHOTO #:03 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: OUTFALL #002, COMPOSED PRIMARILY OF SHELL WASHWATER PRIOR TO ENTERING FACILITY.



PHOTO #:04 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: SOURCE OF DISCHARGE TO OUTFALL #002 IS WASH WATER FROM INCOMING SHELLFISH FROM BAY.



**PHOTO ADDENDUM – BLAU OYSTER CO., INC. WA002926-2**

PHOTO #:05 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: BATTERY, NEEDS TO BE STORED IN SHED.



PHOTO #:06 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: SOLIDS FROM SHELL TABLE CONVEYED TO THIS OUTSIDE SUMP THEN TO TRUCK FOR LAND DISPOSAL, WHEN CONVEYOR WORKING. WATER DISCHARGES OUT #002.



PHOTO #:07 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: GRATED SUMP IN DRIVEWAY, FLOWS TO OUTFALL #001. SOLIDS CLEANED OUT WEEKLY AND SENT TO SHELL PILE.



PHOTO #:08 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: SHUCKING TABLE. WASHED SHELLS DROPPED ON TABLE FROM UPPER HOPPER. SOLIDS CONVEYED OUTSIDE AND TRUCKED TO SHELL PILE. WASHWATER FLOWS OUT #001.



**PHOTO ADDENDUM – BLAU OYSTER Co., INC. WA002926-2**

PHOTO #:09 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: SCREENED OUTFALL BY SHUCKING TABLE. FLOW GOES TO OUTSIDE SUMP THEN OUT OUTFALL #001.

PHOTO #:10 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: OYSTER MEAT WASH TABLE. BUCKET UNDER TABLE COLLECTS SOLIDS, WHICH ARE DEWATERED AND PUT INTO DUMPSTER FOR REMOVAL.

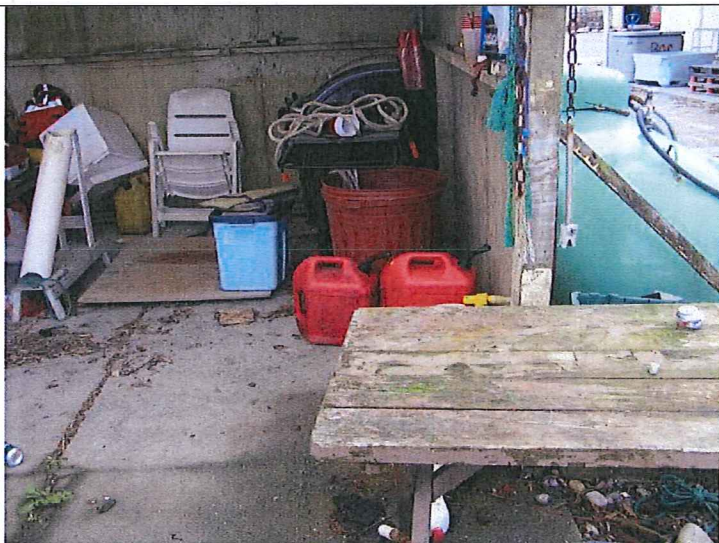


PHOTO #:11 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: FUEL AND STORAGE IN OUTSIDE SHED, FOR BOAT MOTORS.

PHOTO #:12 DATE: 05/05/2015  
TAKEN BY: SHAWANNA TUFONO  
DESCRIPTION: UPLAND SHELL PILE STORAGE.