

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 # <b>WA0501489</b>	yr/mo/day 12 <b>15/11/04</b>	Inspection Type 18 <b>C</b>	Inspector 19 <b>S</b>	Fac Type 20 <b>2</b>
Remarks Pending Application					
Inspection work days 67 <b>1.0</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) Hughes Farms 1325 Farm to Market Road Mount Vernon, WA 98273	Entry Time/Date 11:30 am 11/04/15	Permit Effective Date
	Exit Time / Date 1:00 pm 11/04/15	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 checked="" type="checkbox"/> Yes <input 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 type="checkbox"/> Self-Monitoring Program	<input 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 was a permit compliance inspection conducted by Jeanne Tran, Ecology on November 4, 2015. I arrived on-site at approximately 10:30 am. Dave Hughes came to the door to greet me, and then directed me to the nearest conference room, where I met Pat Severin with Sound Development Group, LLC, Jose Velazquez, Superintendent, and Bill Black, Soil Testing Specialist. We discussed the engineering design documents, and an update of the permit application for all the improvements Hughes Farms has been making to the facility, which needs to be submitted to Ecology. Pat and Bill requested a copy of the previously drafted permit for review, and are familiar with the permit. After discussion, all three assisted me with a walk-through inspection.

### FINDINGS

1) As we walked toward the plant, I observed the washwater collection sump which drains toward the underground vault (See photo 1). The water from the vault is currently discharged to the shared pond, but as soon as the new treatment system is completed, the water will then be pumped to the newly constructed settling pond for treatment. It is anticipated that the treatment system will be started in the next 3 weeks.

2) Stormwater from the plant will continue to discharge to the shared pond (See photo 5). Dave Hughes informed me that the parking area and the access road to the plant will be paved next year (See photos 2 and 3).

3) I observed the soil removed from the potato sorting operation being shoveled back onto the truck, and being delivered back to the field.

4) I observed a temporary storage tank (approximately 6000 gallons in capacity) stored outside of the processing plant (See photo 4). Pat informed me that the storage tank is new and will be used as a holding tank for treated water for reuse.

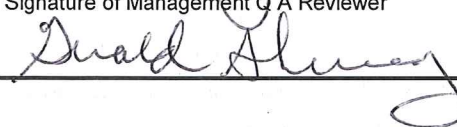
5) The construction work for the two lined settling ponds has been completed. At the time of the inspection, the contractor was doing electrical work for the pumps, and the pH and flocculent injection meters (See photos 6 through 10). Each pond has bottom dimensions of 15'x45' with interior and exterior 3:1 side slopes with a 12' wide drivable surface around each pond. One of the ponds will receive silty water from the potato processing plant and will act as the primary settling pond. A flocculent agent is to be injected into the line that carries the silty water and delivered through a perforated pipe for uniform distribution into the primary pond. The pretreated water from the first pond will then enter the second pond for further settling. The treated water is either recycled back to the plant for reuse or discharged to Little Indian Slough via an existing man made ditch. Bill informed me that Wesmar Chemical Company will be supplying the flocculent agent and conducting water sampling for Hughes Farms. Jose will manage the treatment system once it is in operation.

6) I asked Dave about whether the USDA Food Safety and Inspection Service (FSIS) would have a concern with treated water being recycled back to the plant for reuse after it has been in contact with flocculent agent. Dave informed me that the USDA FSIS is only concerned with the final rinse, and clean well water will be used for final rise. The treated water is to be used for initial wash.

7) Bill informed me that the goal is to recycle water for reuse as much as possible, and the discharge volume would be small in quantity and on an intermittent basis.

11/18/2015

Inspection Report

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 11/16/15
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 11/20/15

**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 – HUGHES FARMS, WA0501489**

PHOTO #:01 DATE: 11/04/15

TAKEN BY: JEANNE TRAN

DESCRIPTION: PICTURE SHOWS AN UNDERGROUND COLLECTION SUMP FOR WASHWATER; THIS SUMP IS DRAINED INTO THE UNDERGROUND VAULT THAT HAS A MANUAL CONTROL VALVE. THE WASH WATER IS CURRENTLY DRAINED TO THE SHARED FILTRATION POND, BUT WILL BE ROUTED TO THE LINED PONDS WHEN CONSTRUCTION IS COMPLETED. IT IS ANTICIPATED TO START OPERATION IN DECEMBER 2015.



PHOTO #:02 DATE: 11/04/15

TAKEN BY: JEANNE TRAN

DESCRIPTION: PICTURE SHOWS THE TRUCK ENTRANCE ROAD IS PARTIALLY PAVED. DAVE HUGHES INFORMED JEANNE THAT THEY HAVE PLANS TO PAVE IT BY NEXT SUMMER.



PHOTO #:03 DATE: 11/04/15

TAKEN BY: JEANNE TRAN

DESCRIPTION: ANOTHER VIEW OF THE YARD, SHOWING THAT A PORTION OF THE YARD HAS BEEN PAVED.



PHOTO #:04 DATE: 11/04/15

TAKEN BY: JEANNE TRAN

DESCRIPTION: A POLYETHYLENE STORAGE TANK HAS BEEN ADDED AS PART OF THE TREATMENT SYSTEM TO STORE TREATED WATER FOR REUSE.



## PHOTO ADDENDUM – HUGHES FARMS, WA0501489



PHOTO #:05 DATE: 11/04/15  
 TAKEN BY: JEANNE TRAN  
 DESCRIPTION: PICTURE SHOWS THE SHARED INFILTRATION POND. NO DISCHARGE WAS GOING TO THE POND DURING THE INSPECTION. THE COLOR OF THE WATER WAS LIGHT BROWN.



PHOTO #:06 DATE: 11/04/15  
 TAKEN BY: JEANNE TRAN  
 DESCRIPTION: PICTURE SHOWS TWO NEWLY CONSTRUCTED LINED PONDS, AND AN EQUIPMENT CONTROL SHED.



PHOTO #:07 DATE: 11/04/15  
 TAKEN BY: JEANNE TRAN  
 DESCRIPTION: CONTROL PANEL FOR FLOW AND PH METERS IN THE SHED.



PHOTO #:08 DATE: 11/04/15  
 TAKEN BY: JEANNE TRAN  
 DESCRIPTION: WASHWATER WILL ENTER THE PRIMARY SETTLING POND THROUGH THE PERFORATED PIPE. FLOCCULENT AGENT WILL BE INTRODUCED INTO THE INCOMING LINE BEFORE ENTERING THE POND.



**PHOTO ADDENDUM – HUGHES FARMS, WA0501489**

PHOTO #:09 DATE: 11/04/15

TAKEN BY: JEANNE TRAN

DESCRIPTION: PRETREATED WATER FROM THE FIRST POND IS THEN PUMPED TO THE SECONDARY POND FOR FURTHER SETTLING. THE WATER IS THEN EITHER PUMPED BACK TO THE PLANT FOR REUSE OR DISCHARGED TO THE DITCH.

PHOTO #:10 DATE: 11/04/15

TAKEN BY: JEANNE TRAN

DESCRIPTION: A VIEW SHOWING BOTH PONDS.



PHOTO #:11 DATE: 11/04/15

TAKEN BY: JEANNE TRAN

DESCRIPTION: EXISTING DITCH ADJACENT TO THE PLANT, IS DRAINED TO LITTLE INDIAN SLOUGH.

PHOTO #:12 DATE: 11/04/15

TAKEN BY: JEANNE TRAN

DESCRIPTION: PICTURE SHOWS AN UNDERGROUND PUMP CHAMBER WITH DISCHARGE METER. THE WHITE PIPE SHOWN IN THE GRASSY AREA IS THE DISCHARGE PIPE INTO THE DITCH WHICH DRAINS INTO LITTLE INDIAN SLOUGH.