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	NPDES #	yr/mo/day	Inspection Type	Inspector	Facility Type
1 N 2 5	3 ST0001288 11	12 16/08/12 17	18 C	19 S	20 2

Remarks

Inspection work days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 1.0 69	70 4	71 N	72 N	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)*
Pristine Valley Farms Pickle, LLC.
13381 Dodge Valley Road
Mount Vernon, WA 98273

Entry Time/Date: 1:20 PM 08/12/2016
Permit Effective Date: NA
Exit Time / Date: 2:00 PM 08/12/2016
Permit Expiration Date: NA

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Craig Staffanson, Plant Operator
P.O. Box 207
La Conner, WA 98257
360-770-2818

Other Facility Data
Permit administratively approved.

Name, Address of Responsible Official/Title/Phone and Fax Number.
Alfonso Cisneros, President
P.O. Box 207
La Conner, WA 98257

Phone Number 360-770-2818 Fax Contacted? ☐ Yes ☒ No

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

☐	Permit	☒	Flow Measurement	☐	Operations & Maintenance	☐	CSO/SSO (Sewer Overflow)
☐	Records/Reports	☐	Self-Monitoring Program	☐	Sludge Handling/Disposal	☐	Pollution Prevention
☐	Facility Site Review	☐	Compliance Schedules	☐	Pretreatment	☐	Multimedia
☒	Effluent/Receiving water	☐	Laboratory	☒	Storm Water	☒	other Land Treatment

Section D: Summary of Findings/Comments

INTRODUCTION

Mr. Christopher Martin, Ecology's Northwest Regional Water Quality Program Hydrogeologist, contacted Ms. Jocelyn Staffanson around July 26th to arrange a site inspection. At that time August 12th was selected as a preferred date.

Pristine Valley Farms Pickle, LLC. (Pristine Valley) has been on operation for approximately three years. The facility operates on the western half of the former Cascade Ag Services, Inc. site. Pristine Valley process cucumbers for direct use and for placement into fermentation vats to become pickles. The facility also cleans and shreds cabbage for placement into vats to become sauerkraut. Cleaned cucumbers, pickles, and sauerkraut are shipped in 55-gallon plastic barrels with a plastic liner to a facility in Burlington for further processing (slicing) and packaging.

Pristine Valley discharges process wastewater and stormwater to a storage pond. Water is then sprayed irrigated to approximately 10 acres grass for treatment.

INSPECTION RESULTS

Mr. Martin Arrived on site at 1520 hours August 12, 2016. He was met at the entrance by Mr. Craig Staffanson and Mr. Alfonso Cisneros. They then drove into the facility and parked. The current operation is on the western portion of the former Cascade Ag Services, Inc. facility. A 3-foot soil berm now separates the two areas. Currently only the cleaning/sorting equipment and the sauerkraut vats are on pavement (Photos 1 and 2). The pickle vats are on bare ground (Photos 3 and 4).

Processing begins with trucks loaded with totes (Photo 5) of cucumbers or cabbage arriving from the field. Loads are emptied onto a conveyor that moves the product across a shaker to remove larger dirt clods and into a wash tank (Photos 6 and 7). Raw water is supplied by Skagit PUD by a temporary line from the adjacent property to the North (noted in Photo 6). From the wash tank the product is moved across a second shaker to remove most of the water, through a sorting area where unusable product and materials (e.g., stems and leaves) are removed (Photo 8), and then are sorted by size into elevated bins (Photo 1). Sized cucumbers are then loaded into totes (Photo 5) and sent to a facility in Burlington for processing or emptied into a fermentation tank to become pickles. Cabbage is shredded onsite and placed in fermentation tanks to become sauerkraut. Finished pickles are shipped in totes (Photo 9), while sauerkraut is transported in lined plastic drums (Photo 2) to a facility in Burlington for final processing and packaging.

Currently Pristine Valley has 80 operational tanks, 70 tanks of pickles and 10 tanks of sauerkraut. (Photos 2 – 4). Later in the season 10 of the pickle tanks will be emptied of pickles and be used for sauerkraut.

The current site is still in the early stages of operation as water and power are supplied from temporary sources (see Photo 8). Air for circulating the brine solution in the tanks is supplied by an onsite compressor (Photo 10).

Process wastewater (wash water) runs off the paved area to the west and is collected by a French drain (Photo 3). This water is collected in a sump at the south end of the line pumped through a 4-inch PVC line (Photo 11) under Dodge Valley Road to the storage pond (Photo 12). Stormwater from the paved area also uses this system. Stormwater from the unpaved area is collected in a small pond at the west end of the property (Photo 13). Water pumped is pumped as needed using an irrigation pump (Photo 14) to an oil-water separator (Photo 15) and then through a second 4-inch PVC line to the storage pond.

Located at the South end of the storage pond is a second irrigation pump (Photo 16) used to apply wastewater to the grass field (Photo 17). Both irrigation pumps are operated by power take-offs from a tractor. At the time of this inspection the grass field was in need of cutting.

Mr. Martin inquired about the water in the irrigation ditch along the southern boundary of the treatment area (Photo 18). Mr. Staffanson stated that this was groundwater. Levels in the ditch are controlled by the local irrigation district.

Mr. Martin thanked Mr. Staffanson and Mr. Cisneros for their time and departed the site at 1400 hours.

DISCUSSION

It was noted that all brine is reused, but can be sent to the City of Burlington POTW for disposal if needed. As there was no operation at the time of the visit Mr. Martin asked about inspection. Mr. Cisneros answered that he visits the site daily.

At this time treatment of stormwater and wastewater appear adequate for the volumes produced. The only issues noted are areas of petroleum stained pavement and soils (Photos 10, 16, and 19). The soils should be dug up and disposed of at a properly licensed facility. Areas of stained pavement should be cleaned (or removed) to avoid introduction of petroleum product to storm and process wastewaters.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Christopher Martin	WA Dept. of Ecology NWRO / (425)649-7110 3190 160th SE, Bellevue, WA 98008-5452	8/16/2016 08/16/16
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Jerry Shervey	WA Dept. of Ecology NWRO / (425)649-7000 Fax: (425)649-7098	8/16/16

ANNOUNCED Inspection

Appendix E Compliance Inspection Report Form

INSTRUCTIONS

Section A: National Date 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*)
E – Corps of Engineers
J – Joint EPA/State Inspectors - EPA Lead
N – NEIC Inspectors
R – EPA Regional Inspector
S – State Inspector
T – Joint State/EPA Inspectors - State Lead

Column 20: Facility Type. Use of 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 medium 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 – Pristine Valley Farms Pickle, LLC.

Photo 1 Description: View looking North at cucumber sorting bins.

Photo 2 Description: View of sauerkraut tanks and sauerkraut shipping drums.

Photo 3 Description: Looking West-Northwest at pickle tanks.

Photo 4 Description: Looking North at pickle tanks.

Photo 5 Description: Totes used to bring in cucumber and cabbage from the fields and to ship out sorted fresh cucumbers.

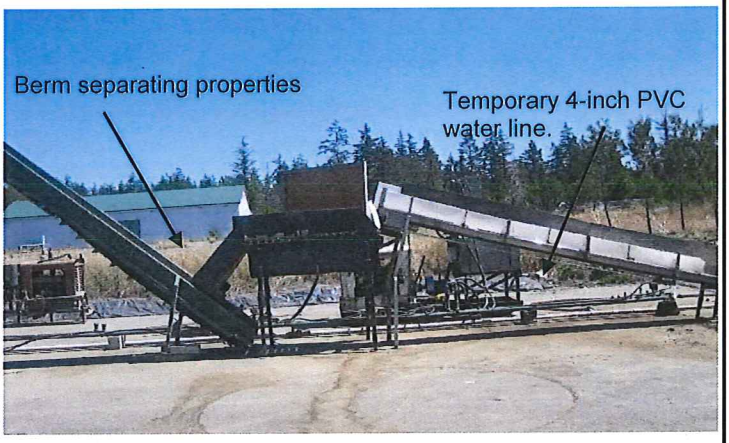

Photo 6 Description: Unloading conveyor and shaker table. Temporary water line noted.

Photo Addendum – Pristine Valley Farms Pickle, LLC.

Photo 7 Description: Wash tank and second shaker table. Conveyor at left is for the cabbage line.

Photo 8 Description: Cucumber sorting area. Not generator for temporary power behind sorting area.

Photo 9 Description: Totes for shipping pickles.

Photo 10 Description: Air compressor for in tank circulation of brine. Note petroleum stained pavement.

Photo Addendum – Pristine Valley Farms Pickle, LLC.

Photo 11 Description: 4-inch PVC lines to storage pond. Process wastewater from French drain is the front pipe, the stormwater line from the oil-water separator in in back.

Photo 12 Description: Wastewater storage pond.

Photo 13 Description: Unpaved area stormwater collection pond, looking North.

Photo 14 Description: Irrigation pump used to remove water from stormwater pond.

Photo Addendum – Pristine Valley Farms Pickle, LLC.

Photo 15 Description: Oil-water separator on stormwater line.

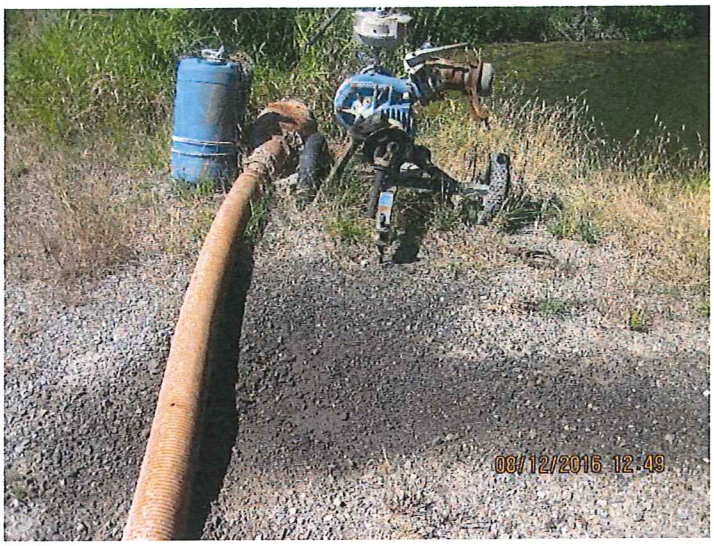

Photo 16 Description: Irrigation pump used to apply wastewater from storage pond to grass field in Photo 17.
Note petroleum stained soils.

Photo 17 Description: Looking East at land treatment area. Storage pond is off to the left.

Photo 18 Description: Looking East at irrigation ditch. Land treatment site is to the left of the ditch.
Note level of water in the ditch. Mr. Staffanson stated this is groundwater, therefore the level in the ditch indicates the water table.

Photo Addendum – Pristine Valley Farms Pickle, LLC.

Photo 19	Description: Petroleum stained soils at land treatment area.	Photo	Description: