

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>WA0991008</b>	yr/mo/day 12 <b>16/09/08</b>	Inspection Type 18 <b>S</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 10:45 am 09/08/16	Permit Effective Date
	Exit Time / Date 11:40 am 09/08/16	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 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 type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input 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

INTRODUCTION

The purpose of this inspection was to inspect the newly constructed treatment ponds since the startup in late August 2016. I arrived on-site at approximately 10:45 am, and signed in. Jose Velazquez, plant manager came to meet me in the office, then assisted me with a walkthrough inspection. The draft permit and fact sheet were still being reviewed by Bill Black and Dave Hughes.

FINDINGS

1) Process wastewater from the plant has been routed to the newly constructed lined ponds for treatment since August this year. According to Jose, stormwater runoff has not yet been plumbed to the new ponds, but will be soon. Stormwater runoff is currently draining to the existing shared pond with the neighboring facilities.

2) The facility has been routing wastewater to the new ponds for treatment with a flocculent agent to aid with solids settling. The pretreated water from the first pond enters the second pond for further settling. The total settling time is approximately 13 hours. The treated water has been recycled back to the plant for reuse. No discharge has actually occurred since startup of the new treatment system. The design flow rate of the treatment system is 130 gpm, but the facility has been operating at approximately 42 gpm (60,000gpd). Solids built up in the primary pond has been removed once since the startup of the treatment system in August.


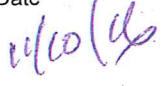


3) Potatoes harvested from the fields were trucked to the plant for processing. The truck was parked inside the building (See photo 11) where potatoes were dropped off onto conveyance belts for sorting, washing, grading, and packaging. Jose indicated that once unloading is done, the staff would hose down the unloading area. The washwater is collected and combined with the potato washwater for treatment and reuse. The quality potatoes are packed into boxes or bags to be stored in the refrigerated cooler awaiting for shipment. The imperfect potatoes are trucked to cattle farms for feed.

4) The soil removed from the potatoes was conveyed out of the building and dropped off onto an awaiting truck which parked outside of the building. Jose informed me that once the truck is full, the soil would then be taken back to the field. I

observed two trucks parked outside the processing building (See photo #8), waiting to be loaded. I observed that most of the facility is paved including this truck loading area. Jose indicated that Hughes Farms has retained a contractor to install a trench in the perimeter of the truck loading area to collect and route the stormwater to the new ponds for treatment. I observed spray painted lines on the pavement for the plumbing work. Jose informed me that the work is expected to be completed by October this year.

5) Potatoes washing and packaging are conducted at the plant, and broccoli is packaged in the field and brought back to the plant. The packaged products would then be stored in the refrigerated cooler, awaiting for shipment.

6) Hughes Farms has a few enclosed storage units in the back of the property. There is no drain in these storage units. Jose gave me a walkthrough of the area. I observed one drum of antifreeze was stored outside of the building. I asked Jose to provide a secondary containment for the drum and store it inside the building. Other than that, I observed no activity in this general area.

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 11/10/16 
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 12/16/16 

UNANNOUNCED 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, WA0991008**

**PHOTO #01** DATE: 09/08/16  
TAKEN BY: JEANNE TRAN  
DESCRIPTION: PICTURE SHOWS AN UNDERGROUND COLLECTION SUMP FOR THE PLANT. THIS SUMP HAS BEEN PLUMBED TO DRAIN TO THE TWO NEWLY CONSTRUCTED LINED PONDS FOR TREATMENT.



**PHOTO #02** DATE: 09/08/16  
TAKEN BY: JEANNE TRAN  
DESCRIPTION: A CLOSED UP PICTURE OF THE UNDERGROUND SUMP, WHICH HAS A MANUAL VALVE TO CONTROL THE DISCHARGE TO THE PONDS.



**PHOTO #03** DATE: 09/08/16  
TAKEN BY: JEANNE TRAN  
DESCRIPTION: A VIEW OF THE TWO NEWLY CONSTRUCTED LINED PONDS CONNECTED IN SERIES. ONE SERVES AS A PRIMARY POND, THE SECOND SERVES AS THE SECONDARY POND TO POLISH THE TREATED WATER FROM THE FIRST POND.



**PHOTO #04** DATE: 09/08/16  
TAKEN BY: JEANNE TRAN  
DESCRIPTION: A CLOSED UP PICTURE OF THE FIRST POND. EACH POND IS DESIGNED TO HANDLE A FLOW RATE OF 130 GPM WITH 13 HOUR SETTLING TIME AFTER DOSING WITH A FLOCCULATING AGENT TO AID IN THE SEDIMENTATION OF THE WASTEWATER.



## PHOTO ADDENDUM – HUGHES FARMS, WA0991008



PHOTO #:05 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: A CLOSED UP PICTURE OF THE PRIMARY POND. BOTH PONDS HAVE BOTTOM DIMENSIONS OF 15x45' WITH INTERIOR AND EXTERIOR 3:1 SIDE SLOPES WITH A 12' WIDE DRIVABLE SURFACE AROUND EACH POND.



PHOTO #:06 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: A VIEW OF THE SECONDARY POND. EACH POND HAS A STORAGE CAPACITY OF 24,000 CFT. CURRENTLY, THE FACILITY IS OPERATING ONLY 1/3 OF THE DESIGN FLOW RATE, AND THE TREATED WATER IS RECYCLED FOR REUSE AT THE PLANT.



PHOTO #:07 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: A VIEW OF THE DISCHARGE PIPE FROM THE SECONDARY POND TO THE DITCH WHICH DRAINS TO LITTLE INDIAN SLOUGH.



PHOTO #:08 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: SOIL REMOVED FROM THE HARVESTED POTATOES WAS COLLECTED AND TRUCKED BACK TO THE FIELDS. STORMWATER FROM THE ACTIVE PAVED AREA WAS CURRENTLY DRAINED INTO THE UNLINED POND WHICH IS SHARED WITH OTHER NEIGHBORING FACILITIES IN THE AREA.



## PHOTO ADDENDUM – HUGHES FARMS, WA0991008



PHOTO #:09 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: A CLOSED UP VIEW OF THE SOIL TRUCK LOADING AREA. JOSE INDICATED THAT THE FACILITY WILL BE INSTALLING A PERIMETER TRENCH ALONG THE TRUCK LOADING AREA, AND THE STORMWATER IN THIS AREA WILL BE ROUTED TO THE NEW PONDS.



PHOTO #:10 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: A VIEW OF THE LAST CATCH BASIN WHICH DRAINS TO THE UNLINED SHARED SETTLING POND. AFTER THE PERIMETER TRENCH IS INSTALLED IN THE SOIL TRUCK LOADING AREA, AND THE LINE IS TIED IN WITH THE UNDERGROUND SUMP, STORMWATER WILL BE DISCHARGED TO THE NEW PONDS.



PHOTO #:11 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: A VIEW OF THE BACK OF THE PROCESSING PLANT BUILDING. NOTE A POTATO TRUCK WAS PARKING INSIDE THE BUILDING TO UNLOAD POTATOES JUST HARVESTED FROM THE FIELDS.



PHOTO #:12 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: BROCCOLI IS CUT AND PACKED IN THE FIELD AND TRANSPORTED TO THE PLANT TO BE STORED IN THE REFRIGERATED STORAGE COOLER. THE COOLED BOXES ARE MAINTAINED IN THE REFRIGERATED STORAGE UNTIL SHIPMENT.



## PHOTO ADDENDUM – HUGHES FARMS, WA0991008



PHOTO #:09 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: WALKING TOWARD THE BACK OF THE FACILITY, I OBSERVED EMPTY DRUMS STACKED UP ON PALLETS. JOSE INDICATED THEY ARE WAITING TO BE SHIPPED OUT.

PHOTO #:10 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: A DRUM WITH ANTIFREEZE PRODUCT WAS STORED ON A PALLET, OUTSIDE OF THE SHOP. I ASKED JOSE TO STORE THE DRUM INSIDE THE BUILDING, WITHIN A SECONDARY CONTAINMENT.



PHOTO #:11 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: MISCELLANEOUS UNUSED EQUIPMENT OR ITEMS WERE FOUND STORED OUTSIDE THE STORAGE BUILDINGS, ALONG THE BACK SIDE OF THE FACILITY.

PHOTO #:12 DATE: 09/08/16

TAKEN BY: JEANNE TRAN

DESCRIPTION: A VIEW FROM THE BACK TO THE PROCESSING PLANT, SEVERAL IRRIGATION FIELD EQUIPMENT WERE FOUND TEMPORARILY STORED OUTSIDE OF THE BACK AREA OF THE FACILITY.