



State of Washington Department of Ecology
Northwest Regional Office

STORMWATER COMPLIANCE INSPECTION REPORT

WADOE Stormwater
Compliance Inspection Form
Last updated (03/05)

Section A: General Data

Inspection Date 10/20/05	NPDES Permit # SO3#- 000552	County Skagit	Receiving Waters Kulshan Creek	Inspector(s) CHRISTOPHER DEW	Facility Type INDUSTRIAL
Weather at time of inspection: Cloudy				UNANNOUNCED Inspection	
Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input type="checkbox"/>					

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Date	Permit Effective Date									
Draper Valley Farms 1000 Jason Lane Mt. Vernon, WA 98273	12:54PM	10/20/05										
	Exit Time	Date	Permit Expiration Date									
	2:40PM	10/20/05	9-20-07									
On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail	Additional Participants:											
Michael A. Pagano / Maintenance Manager / (360) 424-7947	Jaron Smith – Department of Ecology Sally Lawrence – Department of Ecology											
Responsible Official: Name/Title/Address	<table style="width: 100%; border: none;"> <tr> <td style="width: 60%;"></td> <td style="width: 10%; text-align: center;">Yes</td> <td style="width: 10%; text-align: center;">No</td> </tr> <tr> <td>Samples Taken?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>Photos Taken?</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>				Yes	No	Samples Taken?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Photos Taken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Yes	No										
Samples Taken?	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
Photos Taken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>										
Michael A. Pagano Draper Valley Farms PO Box 838 Mount Vernon, WA 98273												
Phone: () Fax: () Email:												

Section C: Areas Evaluated During inspection (Check those that apply)

<input checked="" type="checkbox"/> Permit onsite	<input type="checkbox"/> Visual Monitoring (S.4(d1))	<input checked="" type="checkbox"/> Good Housekeeping (S.9(3ii))	<input checked="" type="checkbox"/> Recordkeeping (S.5)
<input checked="" type="checkbox"/> SWPPP onsite	<input type="checkbox"/> Dry Season Monitoring (S.4(d1))	<input type="checkbox"/> Pollution Prevention Team (S.9(3i))	<input type="checkbox"/> No Vehicle Wash/Fuel onsite (S.9)
<input checked="" type="checkbox"/> DMR Submittals (S.5)	<input type="checkbox"/> Inventory of Materials (S.9(1d))	<input type="checkbox"/> Employee Training (S.9(3v))	<input checked="" type="checkbox"/> Operations and Maintenance (S.8)
<input checked="" type="checkbox"/> Monitoring Plan (S.9(2))	<input checked="" type="checkbox"/> Fuel/Chemical Storage (S.9(1c))	<input checked="" type="checkbox"/> Spill Prevention (S.9(3iv))	<input type="checkbox"/>

Section D: Discharge Monitoring Reports (DMRs)

	Max	2003			2004				2005			
		2 nd	3 rd	4 th	1 st	2 nd	3 rd	4 th	1 st	2 nd	3 rd	4 th
pH	6-9	6.93	NQ	6.79	7.24	NQ	6.67	6.02	6	6.55	NQ	
Zinc (µg/L)	117	77	NQ	91	48	NQ	1230	204	152	370	NQ	
Oil & Grease (µg/L)	15	ND	NQ	3.3	ND	NQ	57	ND	32	6.1	NQ	
Turbidity (NTU)	25	5490	NQ	56	32.2	NQ	600	9	2.18	194	NQ	
BOD 5-Day (mg/L)	30	8.2	NQ	12	6	NQ	28	6	28	26	NQ	
Fecal Coliform (#/100mL)	200	N/A	160,000	>1,600	NQ							
Nitrogen Total (mg/L)	.68	1.33	NQ	.6	.53	NQ	.31	.34	.26	.21	NQ	
Phosphorus (mg/L)	2	.39	NQ	.5	.5	NQ	6.9	ND	.6	1.4	NQ	
Copper (µg/L)	63.6	N/A	M	M	NQ							
Lead (µg/L)	81.6	N/A	M	M	NQ							
Hardness	NA	N/A	M	M	NQ							

M = Missing (not submitted); NQ = No Qualifying Event; N/A = Not Required; ND = No Detect

DMR Summary:

- There are four consecutive exceedances of the Zinc benchmark. After two consecutive exceedances the permittee is required to conduct copper, lead, and hardness sampling. See condition S4.D.3 of the General Permit. Additionally, **a level one response is required for Zinc** per condition S4.C of the General Permit.
- One exceedance of the Oil and Grease benchmark since December 31, 2004. **A level one response is required for Oil and Grease** per condition S4.C of the General Permit.
- One exceedance of the Turbidity benchmark since December 31, 2004. **A level one response is required for Turbidity** per condition S4.C of the General Permit.
- Two consecutive exceedances of 303(d) listed discharge limit for Fecal Coliform Bacteria since December 31, 2004. **A level two response is required for Fecal Coliform Bacteria** per condition S4.C of the General Permit.
- Two consecutive quarters of missing DMRs for Copper, Lead, and Hardness. **Sampling for Copper, Lead and Hardness is required.**

Section E: Summary of Findings/Comments

BACKGROUND

Draper Valley Farms is covered under a General Industrial Stormwater NPDES state waste discharge permit. The purpose of this inspection was to conduct a compliance inspection per the requirement of the Revised Code of Washington (RCW) 90.48.560 and to provide technical assistance as appropriate.

INSPECTION

Upon arrival we met Mr. Michael Pagano the maintenance Manager for the facility. Mr. Pagano provided a copy of the site Stormwater Pollution Prevention Plan (SWPPP) the plan appeared to accurately represent the activities on-site and met the minimum requirements for a SWPPP contained within condition S.9 of the Permit.

Observations:

This facility has three discharge points (PA200005); two points are located at the rear (south) of the facility and discharge directly into Kushlan Creek. The third discharges to the west into a swale that empties into the creek. The facility is sampling at outfall #2.

Outfall #1 (PA200042) discharges water collected from the paved front truck entry route and the paved road to the east of the building. It also collects non-contact cooling water (PA200037) which is periodically discharged from equipment on top of the building. The General Permit prohibits the intentional discharge of non-contact cooling water and all future discharges should be eliminated. Draper Valley Farms does not currently sample at this location, however I expect there to be elevated fecal coliform levels in this discharge because it follows the same route the haul trucks use.

Outfall #2 (PA200018, PA200049) discharges water that drips off of trucks as they leave the facility (photo PA200021), and is where Draper Valley Farms takes their samples. The trucks are sprayed down on a pad of concrete after unloading. The pad drains most of the water to the facility's pre-treatment works (PA200026). However, this pad is not large enough to collect the contaminated water that drips off the trucks and when the trucks pull off the pad they drip water onto the rest of the pavement. This water is then collected by catch basins and discharges to Kulshan Creek (PA200039, PA200053). The water from this outfall is one of the likely sources for the fecal coliform bacteria discharging from the site. When the facility became aware of their problems with elevated fecal coliform discharges via DMRs, they began implementing a plan to reduce the pollution by pumping the outfall #2 discharge to their treatment works during the day. Additionally the pavement that drains to outfall #2 is in need of repair. The pavement is largely degraded and causes high turbidity in the discharge.

Although the facility was sending its water from outfall #2 to their treatment works during our inspection, we still observed a visible plume of material entering Kulshan Creek from outfall#2 (PA200018, PA200049). The plume was either caused by a leaky valve that should have been completely sealed or from the creek washing out material from inside the pipe as the creek level changed with precipitation. Neither of these situations are acceptable and must be resolved. Additionally, just prior to the discharge point there are small holding tanks (PA200050) where a pump is installed that routes water to the treatment works during the day. The holding tanks were not clean and will likely contaminate any water they hold. It is not acceptable to discharge this water to the creek until the holding tanks are thoroughly cleaned, well maintained, and do not receive water from the trucks wash down area.

Outfall #3 (PA200062) collects water from the northwest side of the property where the trucks pass by just before unloading their cargo. The discharge goes to a swale adjacent to the railroad. Draper Valley Farms does not sample at this location. I expect some fecal coliform bacteria associated with this discharge because the trucks pass over this location before unloading. I also observed some feathers and fecal material on the pavement near this drain. However, because this discharges into a swale before entering the creek it is of lesser importance than upgrading the treatment for the water entering outfall #2 at this time.

Miscellaneous materials were stored on-site including: liquid chemicals, metals, empty barrels, and car batteries. All of these materials have the potential to contaminate stormwater (for example: car batteries are an excellent source of lead and zinc contamination) and should be stored using appropriate Best Management Practices (BMPs) to prevent stormwater contamination as is required in the General Permit.

COMPLIANCE ISSUES

- For long term compliance with fecal coliform limits in the General Permit this facility will need to upgrade its ability to capture all truck wash water and route it to its treatment facility. The current wash pad is undersized and inadequate, the trucks do not thoroughly dry before leaving the pad and contaminated water is spread by dripping from the truck bed and from truck tires. Kulshan Creek is a Class A waterbody with fecal coliform standards of 100 colonies/100 mL (geometric mean for a number of samples) and 200 colonies/100 mL (not more than 10 percent of samples can exceed this value). Draper Valley Farms has discharged fecal coliform bacteria at levels 800 times higher the allowed average.
- Turbidity will continue to be a problem at this facility until the current lot can be upgraded. Broken pavement and gravels on-site are the contributing factor. During the site visit a discharge in violation of state law was observed at outfall #2, the holding tanks and storm line should be cleaned before discharges from this line resume.
- Discharges of non-contact cooling water are not authorized under this General Permit.
- A level one response is required for Zinc per condition S4.C of the General Permit.
- A level one response is required for Oil and Grease per condition S4.C of the General Permit.
- A level one response is required for Turbidity per condition S4.C of the General Permit.
- A level two response is required for Fecal Coliform Bacteria per condition S4.C of the General Permit.
- Sampling for Copper, Lead and Hardness is required per condition S4.D.3

The Department of Ecology has the authority to issue formal enforcement actions including issuance of orders and civil penalties of up to \$10,000 per day per violation for violations of your NPDES permit and/or state laws and regulations.

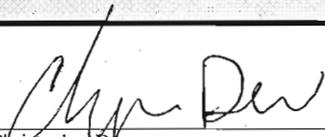
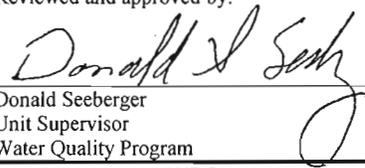
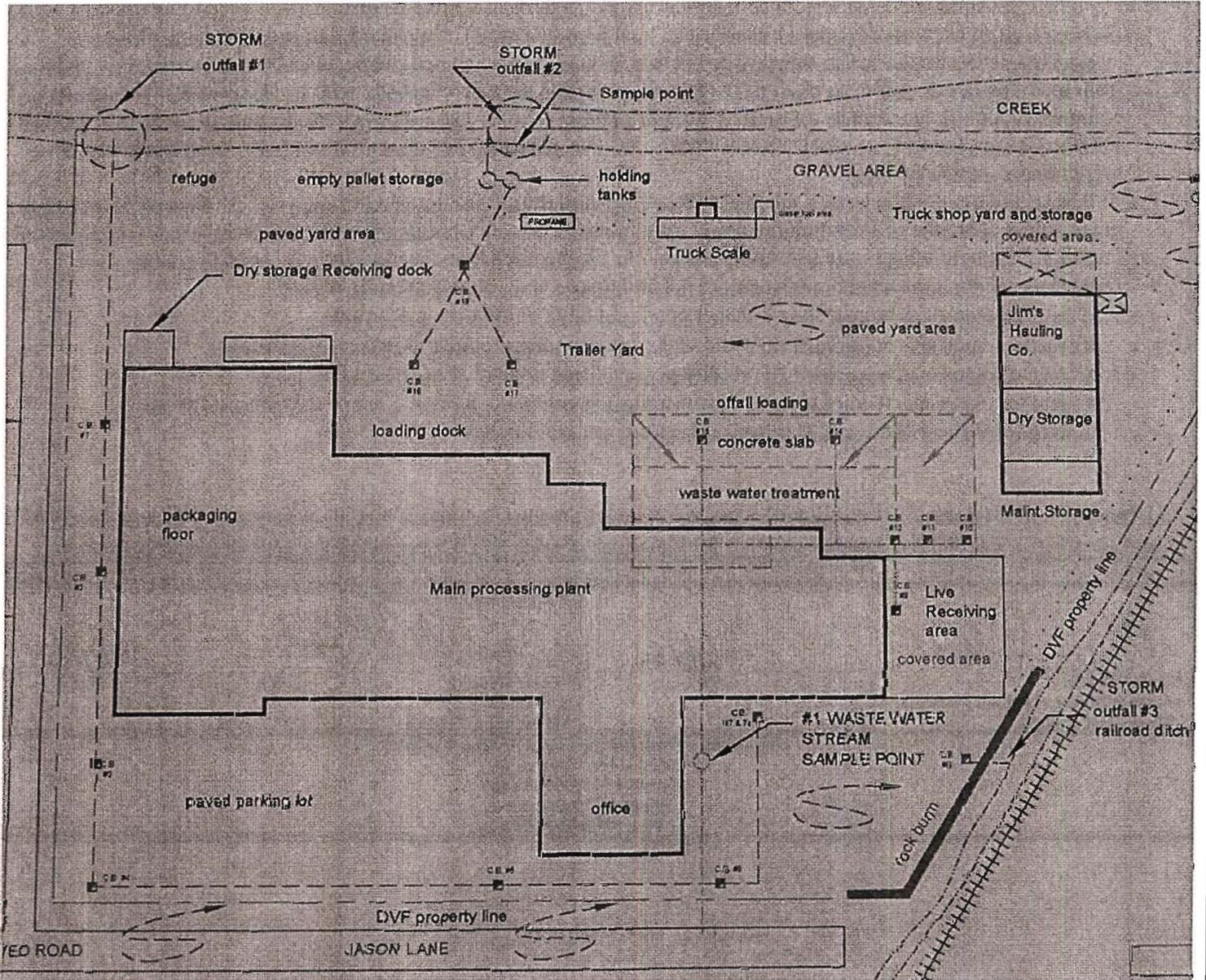
 Christopher Dew Industrial/Construction Stormwater Inspector Water Quality Program		Reviewed and approved by:  Donald Seeberger Unit Supervisor Water Quality Program	
11/16/05 Date		11/16/05 Date	
Washington State Department of Ecology – NWRO 3190 – 160 th Avenue SE Bellevue, WA 98008-5452 Phone: (425) 649-7000 Fax: (425) 649-7098			

PHOTO ADDENDUM – DRAPER VALLEY FARMS / 10-20-05



PA200005

DESCRIPTION: FACILITY SITE MAP, NOTE: SAMPLING POINT AT OUTFALL #2, BLUE INDICATES AREA WHERE WASTE WATER TREATMENT COLLECTION OCCURS.

PHOTO ADDENDUM – DRAPER VALLEY FARMS / 10-20-05



PA200035 DESCRIPTION: FRONT OF BUILDING



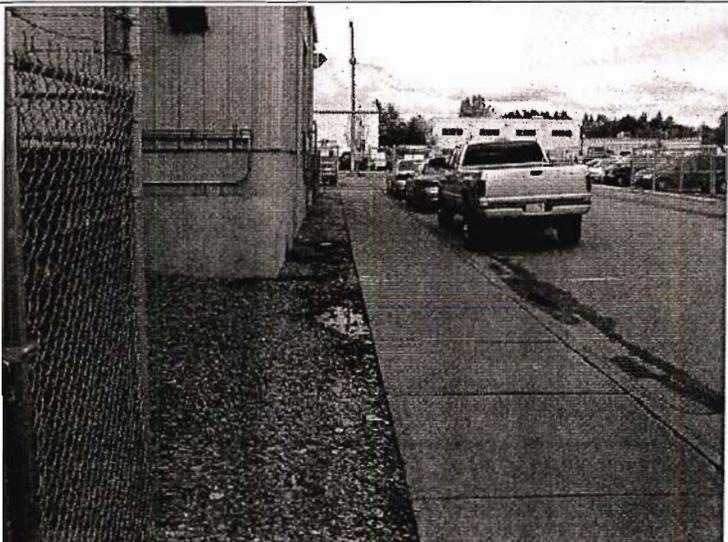
PA200018 DESCRIPTION: OUTFALL #2 TO KULSHAN CREEK. NOTE: TURBIDITY PLUME.



PA200021 DESCRIPTION: HAUL TRUCK PULLING AWAY FROM WASH DOWN PAD. NOTE: GRAVEL LOT AND EXCESS WATER ON LOT FROM DRIPS.



PA200026 DESCRIPTION: HAUL TRUCK PULLING AWAY FROM WASH DOWN PAD. NOTE: EDGE OF CONCRETE PAD: WATER NOT ON THE PAD GOES TO SURFACE WATER DISCHARGE OUTFALL#2.



PA200037 DESCRIPTION: NON-CONTACT COOLING WATER DISCHARGE



PA200039 DESCRIPTION: CONTAMINATED WASH WATER TRACK OUT TO STREET



PA200042 DESCRIPTION: OUTFALL #1 TO KULSHAN CREEK



PA200053 DESCRIPTION: CONTAMINATED WASH WATER TRACK OUT OVER SCALES



PA200049 DESCRIPTION: OUTFALL #2 TO KULSHAN CREEK. NOTE: TURBIDITY PLUME.



PA200050 DESCRIPTION: HOLDING TANK HATCH COVER.



PA200062 DESCRIPTION: OUTFALL #3



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

November 16, 2005

CERTIFIED MAIL

7005 1820 0000 6707 9350

Mr. Michael A. Pagano
Draper Valley Farms
PO Box 838
Mount Vernon, WA 98273

Dear Mr. Pagano:

Re: Warning – Facility out of compliance Stormwater Industrial Permit # SO3-000552

An inspection of your facility on October 20, 2005, revealed that your facility is out of compliance with several conditions of your Stormwater Industrial Permit. To come into compliance please conduct the appropriate action set forth below.

Violation #1:

- Condition S4.C requires adaptive management by the facility when sampling results are above (or outside the range of) benchmark values. This facility is outside the benchmark for zinc, oil & grease, turbidity, & fecal coliform bacteria.

Action required:

- A level one response is required for zinc per condition S4.C of the General Permit.
- A level one response is required for oil and grease per condition S4.C of the General Permit.
- A level one response is required for turbidity per condition S4.C of the General Permit.
- A level two response is required for fecal coliform bacteria per condition S4.C of the General Permit.

Violation #2:

- Condition S4.E requires that a permittee's discharge must not cause or contribute to an excursion of the State's water quality standards, including the State's narrative criteria for water quality. Kulshan Creek is a Class A waterbody with fecal coliform standards of 100 colonies/100 mL (geometric mean for a number of samples) and 200 colonies/100 mL (not more than 10 percent of samples can exceed this value). Draper Valley Farms has discharged fecal coliform bacteria at levels 800 times higher the allowed average.

Action required:

- For long term compliance with fecal coliform limits in the General Permit this facility will need to upgrade its ability to capture the wash water and route it to its treatment facility. The current wash pad is undersized and inadequate, the trucks do not thoroughly dry



Draper Valley Farms
November 16, 2005
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before leaving the pad and contaminated water is spread by dripping from the truck bed and from truck tires.

Violation #3:

- Visible turbidity plume was observed entering Kulshan Creek from outfall #2. This is a violation of the State's water quality standards for turbidity.

Action required:

- Degraded pavement and gravels on-site are the contributing factor for turbidity and should be upgraded. Additionally, the on-site holding tanks and storm line are filled with sediments and should be cleaned before discharges from this line resume. Regular maintenance of the holding tanks and storm system should be established to ensure that sediments are not accumulating in the system.

Violation #4:

- The permittee is required to conduct copper, lead, and hardness sampling after two consecutive exceedances of the zinc benchmark is surpassed per condition S4.D.3 of the General Permit. Draper Valley Farms triggered copper, lead, and hardness sampling following the 4th quarter of 2004 and has two consecutive quarters of missing DMRs for copper, lead, and hardness in 2005.

Action required:

- Begin sampling for the additional parameters of copper, lead, and hardness beginning immediately per condition S4 of the General Permit. I have enclosed a revised DMR for the Draper Valley Farms, Mount Vernon, and Draper Valley Farms, Renton plants.

The Department of Ecology has the authority to issue formal enforcement actions including issuance of orders and civil penalties of up to \$10,000 per day per violation for violations of your NPDES permit and/or state laws and regulations.

I have enclosed a copy of the October 20, 2005, inspection report. If you have any questions concerning this letter, please call me at (425) 649-4484.

Sincerely,



Christopher Dew
Water Quality Program

CD:cg

Enclosures (2)

cc: NWRO Central Files – Draper Valley Farms, #SO3-000552 – WQ 9.4