

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 N 2 5	NPDES # WA0991008	yr/mo/day 12 19/01/16	Inspection Type 18 C	Inspector 19 S	Fac Type 20 2
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Remarks

Pending Application

Inspection work days 67 1.0 69	Facility Self-Monitoring Evaluation Rating 70 4	BI 71 N	QA 72 N	-----Reserved----- 73 _____ 74 75 _____ 80
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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 10:48 am 01/16/19	Permit Effective Date 01/01/2017
	Exit Time / Date 12:00 pm 01/16/19	Permit Expiration Date 12/31/2021

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 checked="" 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 checked="" type="checkbox"/> Storm Water	<input checked="" type="checkbox"/> other

Section D: Summary of Findings/Comments

INTRODUCTION

This inspection was prompted by a complaint received from a local citizen indicating a milky/turbid water was observed in the upper reaches of Little Indian Slough. The milky/turbid discharge was traced back to the general area where Hughes Farms and Chemtrade Sulex are located. I arrived at Hughes Farms at approximately 10:48 am, and signed in at the front desk. I then met with Jose Velazquez, Plant Manager. I informed Jose that I'm investigating a complaint regarding a milky/turbid discharge in the area. He assisted me with a walk-through inspection at the plant.

FINDINGS

1) Hughes Farms was not discharging during the inspection. However, both lagoons were 3/4 full (See Photos #11 and #12). Mr. Jose Velazquez indicated that they will be discharging soon. The water in the lagoons was fairly clear with some floating material on the water. The white PVC discharge pipe appeared to be approximately 6" in diameter (See photos #13 and #14) with a flow meter mounted on the elevated section of the pipe to monitor the flow rate, date and time. Hughes Farms discharges to an existing man-made ditch which flows northwest through a culvert, under and across the Farm to Market Road and ultimately to Little Indian Slough. Water in the existing ditch and coming out from the culvert look clear (See photos # 15 and 16).

2) Next, I walked over to the shared pond that Hughes Farms shares with the neighboring facilities, Chemtrade Sulex, Lantenbauch Recycling, and Tri-County Recycling. Hughes Farms discharges stormwater runoff from their driveway to this shared pond. I observed that the water in the shared pond was turbid (see photo #4), and two dump trucks from Hughes Farms were parked adjacent to the pond. One of the two dump trucks was loaded with dirt and rotten or off-spec potatoes to be hauled back to the field. There are at least two drain sumps with grate at Hughes Farms' drive way draining to the shared pond (see photos #1-3). I explained it to Jose that Hughes Farms should not park loaded truck or any vehicles in that location because rain water will come in contact with the dirt and vehicles before draining to the shared pond. Hughes Farms should change this practice and park all vehicles in their designated parking lot within its property where the stormwater

runoff drains to the facility's lagoons for treatment. I requested Jose to move both of the two trucks currently parked by the shared pond to the designated parking area. Jose gave an order to his staff to move the trucks.

3), Then Jose and I walked down the shared access road to look at the shared pond's outlet pipe. I observed two 8" PVC white pipes downstream from the pond (see photos # 4-6), one was capped and one was discharging turbid water to the existing man-made ditch which flows north and across under the road to the Little Indian Slough. These two outlet pipes travel underground, approximately 150 feet from the pond to the existing man-made ditch. Between the pond and the outlet pipes is a pasture area, I observed cars, a trailer and two white vans parked in this area, on the west side of the pond. I informed Jose that the vehicles should be moved and not parked there because the area is so close to the shared pond.

4) Next, we walked toward Hughes Farms' processing buildings. I noticed soil and off-spec potatoes were conveyed through a conveyor belt from the wash plant to the truck (see photos #7 and #8), to be taken back to the field. As can be seen on photos #7 and #8 where the potato truck was parked and being loaded with soil, this area is part of the drive way and stormwater runoff from this area drains to the shared pond.

5) As we walked further, behind the processing buildings, behind the wash plant and storage buildings, I observed more employees' cars parked there, wooden pallets and miscellaneous items stored outside the buildings (see photos #9 and #10).

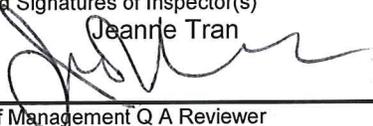
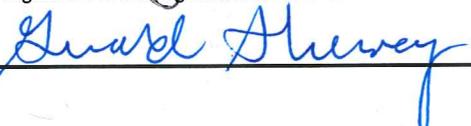
6) I observed a box of spent sand blasting grit stored outside the maintenance shop with no cover. The box was full with sand blasting grit which had spilled over onto the ground (see photo #11). I informed Jose that the spent sand blasting grit should be stored undercover to prevent rain water from coming in contact with it or hauled off-site for disposal. The sand blasting grit on the ground should be scooped up and disposed of properly.

7) As we proceeded to the south end of the property, southwest of the facility boundary, I observed sand blasting grit and tire skid marks with dark greasy soil in this area (see photo #12). It appeared that car repair had been conducted in this area. The nearby storm drain was only a few feet away (see photo #13). Looking into this storm drain, I observed a substantial amount of sediment build-up in the drain. Even though this drain is draining to the lagoons for treatment, with this amount of sediment build-up, stormwater would most likely not able to drain well and might flood the area. I informed Jose that the storm drain needs to be cleaned out, and car repair cannot be conducted without tarping the area first. Car repairs should be conducted in an enclosed shop. I expressed my concerns to Jose that bad management practices can lead to polluting state water, and that housekeeping needs to be improved at the site.

8) Southeast of the facility property boundary was used to store miscellaneous equipment (see photo #14). This area is paved.

CONCLUSION

In general, housekeeping needs to be improved at this site. Vehicles should not be parked nearby the unlined shared pond. I pointed out each problem area to Jose during the inspection as we walked through the site. A follow up inspection is needed to ensure best management practices have been implemented.

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 4/1/19
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 4-4-19

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 (<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 – HUGHES FARMS, WA0991008



PHOTO #:01 DATE: 01/16/19
 TAKEN BY: JEANNE TRAN
 DESCRIPTION: TWO POTATO TRUCKS, ONE FILLED WITH DIRT AND OFF-SPEC POTATOES WAITING TO BE TRUCKED BACK TO THE FIELD, AND ONE WAS EMPTY WAITING TO BE FILLED. THEY WERE FOUND PARKED ADJACENT TO THE UNLINED SHARED POND. TWO STORM DRAINS IN THIS DRIVEWAY WHICH IS USED MOSTLY BY HUGHES FARMS ARE DRAINED DIRECTLY TO THE UNLINED SHARED POND.

PHOTO # 2 DATE: 01/16/19
 TAKEN BY: JEANNE TRAN
 DESCRIPTION: A CLOSE UP PICTURE OF PHOTO #1 WHICH SHOWS THE TRUCKS PARKED NEXT TO THE STORM DRAIN. I TOLD JOSE TO MOVE THE TRUCKS AND THAT THEY CANNOT PARK THERE. IF IT RAINS, STORMWATER COMING IN CONTACT WITH THE SOIL WILL DRAIN DIRECTLY TO THE POND THROUGH THE STORM DRAINS.



PHOTO #:03 DATE: 01/16/19
 TAKEN BY: JEANNE TRAN
 DESCRIPTION: ANOTHER VIEW OF THE TRUCKS PARKED NEXT TO THE UNLINED SHARED POND.

PHOTO #:04 DATE: 01/16/19
 TAKEN BY: JEANNE TRAN
 DESCRIPTION: THE WATER IN THE UNLINED SHARED POND WAS TURBID.

PHOTO ADDENDUM – HUGHES FARMS, WA0991008



PHOTO #:05 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: TWO WHITE 8" PVC PIPES DRAINING THE UNLINED SHARED POND, ONE WAS CAPPED BUT THE OTHER WAS DISCHARGING. THE DISCHARGE WAS TURBID LOOKING.

PHOTO #:06 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: A CLOSE UP PICTURE OF PHOTO #5, WHICH SHOWS ONE PIPE WAS CAPPED AND THE OTHER WAS DISCHARGING TURBID WATER.



PHOTO #:07 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: THIS PICTURE SHOWS PART OF HUGHES FARMS' DRIVEWAY. DIRT AND OFF-SPEC POTATOES WERE CONVEYED FROM THE WASH BUILDING TO THE TRUCK. THE FULLY LOADED TRUCK WILL THEN BE TAKEN BACK TO FIELD.

PHOTO #:08 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: ANOTHER VIEW OF HUGHES FARMS' DRIVE WAY.

PHOTO ADDENDUM – HUGHES FARMS, WA0991008



PHOTO #:9 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: ENTERING THE FACILITY, THE WASH PROCESSING OPERATION IS LOCATED IN A BUILDING ON THE RIGHT. THE LEFT SIDE ALONG THE FENCE LINE WAS USED FOR EMPLOYEE PARKING. ACCORDING TO JOSE, ALL THE STORMWATER DRAINS IN THIS AREA ARE CONNECTED TO THE LAGOONS.

PHOTO #:10 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: ALONG THE BACK OF THE PROCESSING BUILDINGS, I OBSERVED MORE CARS PARKING AND STORAGE OF PALLETS, CONTAINER BINS, AND MISCELLANEOUS ITEMS.



PHOTO #:11 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: A BOX OF SAND BLASTING GRIT FOUND OUTSIDE OF THE MAINTENANCE SHOP, AND BLASTING GRIT FOUND ON THE GROUND. I INFORMED JOSE TO UTILIZE BETTER BEST MANAGEMENT PRACTICE BY STORING THE FRESH SAND BLASTING GRIT IN A CONTAINER, AND INDOOR IN ORDER TO PREVENT RAIN WATER FROM COMING IN CONTACT WITH THE GRIT. THE BLASTING GRIT ON THE GROUND SHOULD BE SCOOPED UP AND DISPOSED OF PROPERLY.

PHOTO #:12 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: AS I WALKED FURTHER ALONG THE BACK BUILDINGS, ALONG SOUTHWEST AREA OF THE FACILITY PROPERTY BOUNDARY, MORE SAND BLASTING GRIT, TIRE SKID MARKS, AND DARK GREASY SOIL WERE FOUND IN THIS UNPAVED AREA. JOSE HAS ACKNOWLEDGED THAT CAR MAINTENANCE WAS PERFORMED THERE RECENTLY, AND TARPING WAS NOT USED. A NEARBY STORM DRAIN WAS ALSO FOUND IN THIS AREA. I INFORMED JOSE THAT CAR/TRUCK MAINTENANCE CANNOT BE PERFORMED ON AN UNPAVED AREA WITHOUT TARPING.

PHOTO ADDENDUM – HUGHES FARMS, WA0991008



PHOTO #:13 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: A CLOSE UP PICTURE OF THE NEARBY STORM DRAIN MENTIONED IN PHOTO# 12. THIS DRAIN WAS PLUGGED WITH SEDIMENT, AND THE AREA WAS MUDDY AS CAN BE SEEN ON THE PHOTO. ACCORDING TO JOSE, THIS DRAIN IS CONNECTED TO THE LAGOONS.



PHOTO # 14: DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: SOUTH EAST OF THE FACILITY PROPERTY BOUNDARY IS PAVED AND IS USED FOR STORING MISCELLANEOUS EQUIPMENT.



PHOTO #:15 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: HUGHES FARMS'S TWO LAGOONS.



PHOTO #:16 DATE: 01/16/19
TAKEN BY: JEANNE TRAN
DESCRIPTION: A CLOSE UP PICTURE OF THE LAGOON SHOWING THE WATER IN THE LAGOON WAS 3/4 FULL. THE WATER WAS CLEAR WITH SOME FLOATING MATERIAL ON TOP. JOSE MENTIONED THEY WILL NEED TO DISCHARGE SOON.

PHOTO ADDENDUM – HUGHES FARMS, WA0991008



PHOTO #:17 DATE: 01/16/19
 TAKEN BY: JEANNE TRAN
 DESCRIPTION: THIS PICTURE SHOWS THE WHITE PVC DISCHARGE PIPE WITH A FLOW METER MOUNTED ON THE ELEVATED PIPE AND DISCHARGED TO THE EXISTING DITCH WHICH FLOWS NORTHWEST UNDER ACROSS FARM TO MARKET ROAD TO LITTLE INDIAN SLOUGH.

PHOTO #:18 DATE: 01/16/19
 TAKEN BY: JEANNE TRAN
 DESCRIPTION: ANOTHER VIEW OF THE EXISTING DITCH WHICH FLOWS NORTHWEST AND ULTIMATELY TO LITTLE INDIAN SLOUGH.



PHOTO #:19 DATE: 01/16/19
 TAKEN BY: JEANNE TRAN
 DESCRIPTION: A CLOSE UP PICTURE OF THE WATER IN THE DITCH. THE WATER LOOKED CLEAR.

PHOTO #:20 DATE: 01/16/19
 TAKEN BY: JEANNE TRAN
 DESCRIPTION: WATER FROM THE MAN-MADE DITCH FLOWS TO A LARGE CULVERT (BLACK PLASTIC PIPE) WHICH ROUTES THE WATER THROUGH, UNDER AND ACROSS THE FARM TO MARKET ROAD AND TO THE LITTLE INDIAN SLOUGH.