

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>	State Waste Discharge Permit # 3 <b>ST0501301</b> 11	mo/day/yr 12 <b>9/19/2019</b> 17	Inspection Type 18 <b>3</b>	Inspector 19 <b>S</b>	Fac Type 20 <b>2</b>
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Remarks

Inspection work days 67 <b>1</b> 69	Facility Self-Monitoring Evaluation Rating 70 <b>5</b>	BI 71 <b>N</b>	QA 72 <b>N</b>	-----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) Boundary Fish Co. Inc. 223 Sigurdson Avenue Blaine, WA 98230	Entry Time/Date 1:00 pm 9/19/2019	Permit Effective Date NA
	Exit Time / Date 2:00 pm 9/19/2019	Permit Expiration Date NA

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Arnold Yuki, (360) 332-6715 Jaime Arnett (360) 332-6715	Other Facility Data The facility has a temporary state waste discharge permit, # ST0501301.
Name, Address of Responsible Official/Title/Phone and Fax Number. Arnold Yuki, (360) 332-6715 Email: arnold@boundaryfish.com	
Phone Number (360) 332-6715 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 checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations&Maint.	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input checked="" type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input type="checkbox"/> Effluent/Receiving water	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> other

Section D: Summary of Findings/Comments

Department of Ecology (Ecology) Water Quality Inspectors Biniam Zelelow and Robert Nolan conducted a compliance inspection of Boundary Fish Co. regarding the facility's wastewater discharges to the City of Blaine's Lighthouse Point Water Reclamation Facility (WRF). We met on site with Mr. Arnold Yuki, Director of Boundary Fish Co. and Ms. Jaime Arnett.

Boundary Fish Co. in Blaine cleans, fillets, and freezes salmon. The company also buys and sells live Dungeness crab. The facility employs about seven people and operates seasonally.

Boundary Fish Co. applied for a state waste discharge permit on November 7, 2016 to discharge process water to the City of Blaine's Lighthouse Point Water Reclamation Facility (WRF). Ecology issued a temporary state waste discharge permit to Boundary Fish on April 24, 2017. Ecology now has a draft permit for the facility. Before moving forward, Ecology needed to verify water use information and also production rates and operation dates of the facility. This site visit helped with making appropriate monitoring and reporting requirements. During the site visit, Mr. Yuki stated that the typical salmon processing season is from August until about mid-November. Water usage during the active salmon season is 200 – 300 gpd on the average. Solid waste is put into garbage bags and sent to a rendering facility. Wash water enters floor drains that flow to a wet well outside and across from the facility. The effluent is pumped up from the wet well through a 4-inch PVC piping and allowed to drain through a hydroseive, where fish scales and other solids and organic matters are captured. The tote capturing these materials was full on the day of the inspection, Photo 1, which may indicate that the treatment system is operating well. The treated clear effluent is then sent to the Blaine sanitary sewer system. This year, Mr. Yuki stated, has been a very slow year for salmon and they haven't processed much at all.

Biniam Zelelow advised Mr. Yuki that the permit will require pH monitoring, with a hand held pH meter and probe, twice a month. The permit will also require monitoring and reporting daily discharge flow and twice a month sampling for oil & grease, BOD<sub>5</sub>, and TSS. When there is no operation, hence no discharge, Boundary Fish will indicate as such in the respective DMR for the given monitoring period.

The permit application from November 2016 was discussed with Mr. Yuki. Mr. Yuki indicated that the facility doesn't use 1000 gpd, which was the estimated value entered in the 2016 permit application. Mr. Yuki requested to modify the permit

application to reflect the current water usage and discharge practices at the facility and also to have the City of Blaine sign Section J of the application, which was previously missing. Ecology will include current and up-to-date information in the draft permit and fact sheet and prepare the documents for public notice of draft.

As mentioned above, the company also buys and sells live Dungeness crab. Crab are kept alive in tanks with seawater drawn from Drayton Harbor and allowed to overflow until they are shipped. We observed that some of the sea water was slowly draining down into the wastewater wet well through a small portion of a concrete berm on the side of the wet well, Photo 2. We informed Mr. Yuki that excess saltwater may interfere with the operations of the WRF and may increase discharge rate to sanitary. Mr. Yuki said he will have that fixed as soon as possible.

### PHOTO REPORT – BOUNDARY FISH



PHOTO #1: SOLIDS REJECTED BY THE HYDROSEIVE



PHOTO #2: WET WELL FOR WASTEWATER HOLDING FROM FISH PROCESSING AREAS. SEAWATER OVER FLOW SHOWN FROM CRAB WASHING



PHOTO #3: HYDROSEIVE

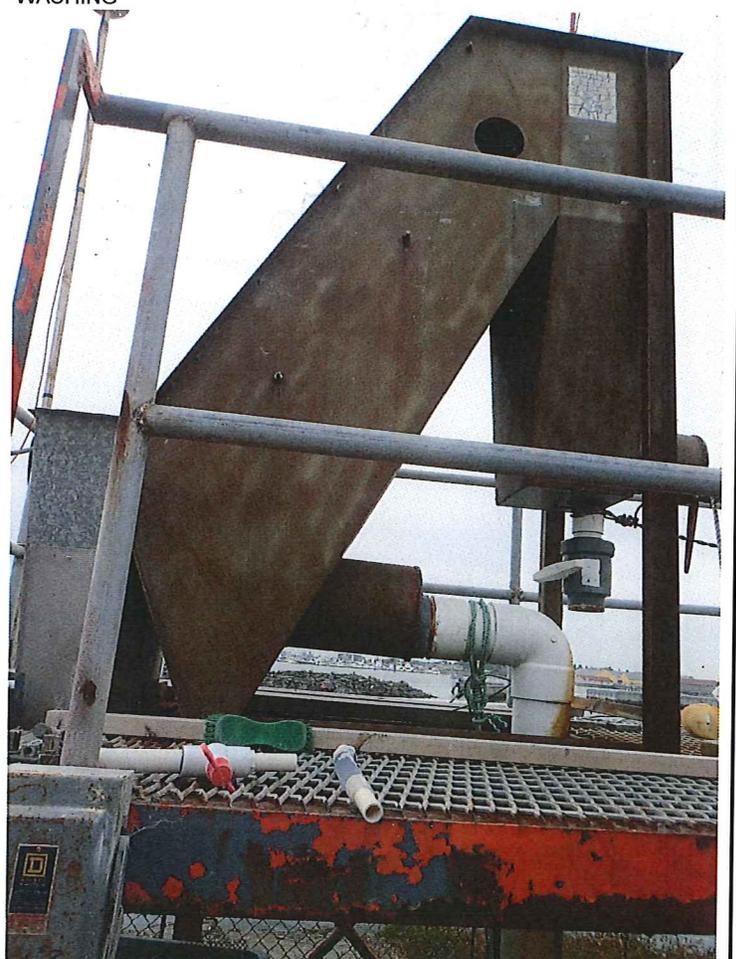


PHOTO #4: ANOTHER VIEW OF THE HYDROSEIVE WITH THE PVC-PIPING FROM THE WET WELL

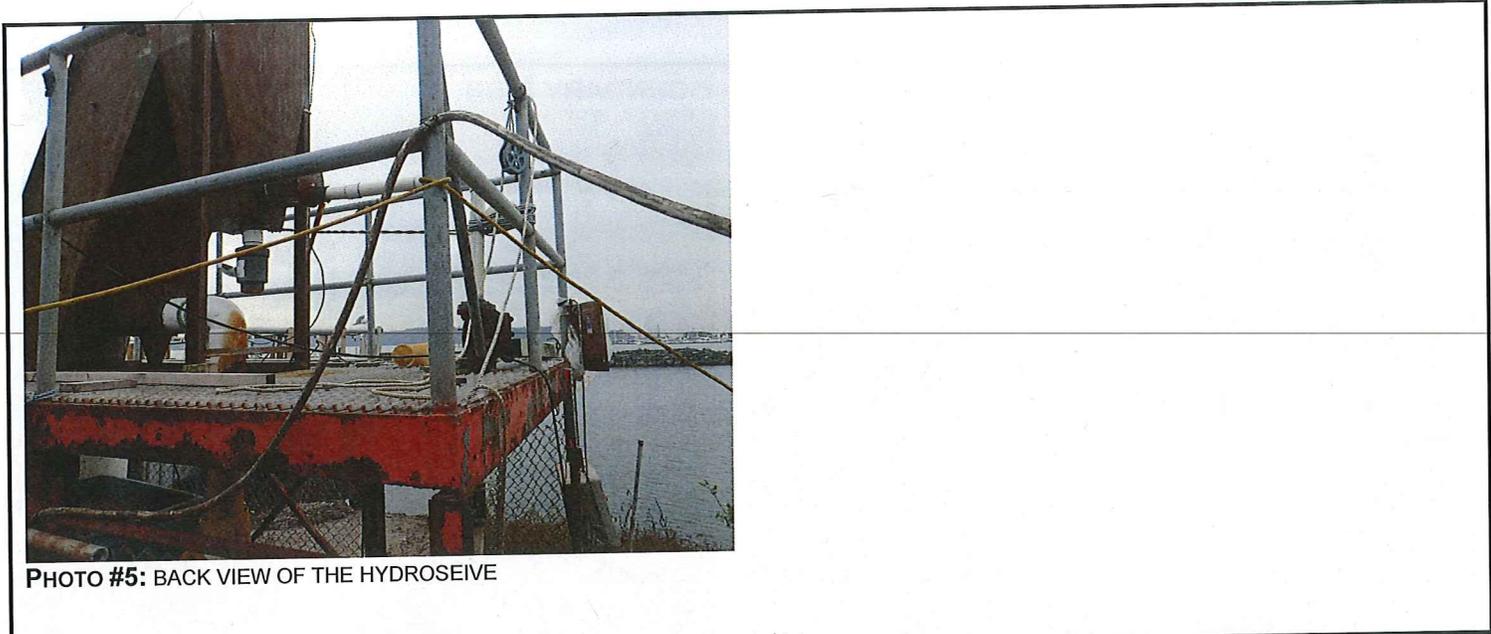


PHOTO #5: BACK VIEW OF THE HYDROSEIVE

Name(s) and Signatures of Inspector(s) Biniam Zelelow <i>Biniam Zelelow</i>	Agency/Office/Telephone WA Dept. of Ecology/NWRO/(425)649-7217 3190 160th SE, Bellevue, WA 98008-5452	Date 9/25/2019
Robert Nolan <i>Robert Nolan</i>	WA Dept. of Ecology/NWRO/(425)649-7197 3190 160th SE, Bellevue, WA 98008-5452	9-25-19
Signature of Management Q A Reviewer <i>Donald Shewey</i>	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/(425)649-7293 fax (425)649-7098	Date 10-4-19

**ANNOUNCED** Inspection

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**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 media 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.