

State of Washington Department of Ecology  
Northwest Regional Office

substitute for OMB No. 2040-0057  
and EPA form 3560-3 (Rev. 9-94)  
(last file update 12-95.)

# WATER COMPLIANCE INSPECTION REPORT

**Section A: National Data System Coding (i.e., PCS)**

Transaction Code 1 <b>N</b> 2 <b>5</b>	NPDES # 3 <b>ST0007285</b> 11	yr./mo./day 12 <b>20/01/22</b> 17	Inspection Type 18 <b>C</b>	Inspector 19 <b>S</b>	Facility Type 20 <b>2</b>
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Remarks

Inspection and discuss permit revisions.

Inspection work days 67 <b>2.0</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) Hannegan Properties LLC 6069 Hannegan Road Bellingham, WA 98226	Entry Time/Date 09:50 AM 01/22/20	Permit Effective Date 12/19/2019
	Exit Time / Date 10:50 AM 01/22/20	Permit Expiration Date 10/31/2022
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jason Reynolds Operations Manager 6069 Hannegan Road Bellingham, WA 98226 360-398-9708 ext.52	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number. Andy Vitaljic President 6069 Hannegan Road Bellingham, WA 98226 Phone Number 360-398-1117 Fax Contacted? 360-398-8801 <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 checked="" type="checkbox"/> Operations & Maintenance	<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**

Hannegan Properties owns about 40 acres at the intersection of Hemmi Road and Hannegan Road east of Bellingham, Washington. Originally, this facility was operated as a meat rendering plant. When Q Sea LLC purchased the property salmon and herring roe were processed, frozen, stored, and sold to retail markets.

The fresh fish and herring processing operations formerly conducted at this site have been moved to the Q Sea facility located at the Squalicum Fill on Bellingham Bay, and are permitted under a separate state wastewater discharge permit. With that move, wastewater generation has been significantly reduced.

The following three companies currently operate at this location: American Canadian, Fat Cat Fish, and Pelican Packers. All companies are covered under the Hannegan Properties' wastewater discharge permit, even though not all have a wastewater discharge. The Whatcom County Food Bank also uses the former cold storage building for storage of food products for distribution through the food bank.

The current wastewater treatment system includes a side-hill screen for solids reduction, an oil/water separator for reduction of oil and grease, a sequential batch reactor (SBR) to reduce the organic content of the wastewater, and a 1.4-million-gallon capacity aerated, lined lagoon for further biological reduction and storage before land application.

Storm water discharges from building roofs, paved and unpaved areas is regulated under Industrial Storm water General Permit No. WAR001210.

## INSPECTION RESULTS

Mr. Christopher Martin, Permit Manager and Northwest Region Water Quality Hydrogeologist, arrived on site at 0950 and met with Mr. Jason Reynolds (title). Mr. Reynolds asked Mr. Martin what he would like to see. Mr. Martin replied he was interested in the processes at the facility that generated wastewater.

The inspection started with an overhead view of the Fat Cat pet food processing area. Because this is a food processing area sanitary protective equipment, (hair and beard nets) are required. Mr. Martin felt it was not necessary to enter the processing area the two went upstairs to the building breakroom where a window gives a good view of the processing area. The primary product is fish-based pet food ingredient. They accept fresh salmon waste parts (fins, head, etc.) on ice in large plastic bins (totes). Processing starts with the totes being dumped into a hopper. The hopper feeds a conveyor where the material is visually inspected and then passes beneath a metal detector before emptying into a grinder. The material is ground to a coarse paste-like consistency and pumped into two sets of plate freezers for freezing. Once frozen, the blocks are removed from the plate freezer, individually wrapped, and palletized for shipment. Machine cleanup is the primary process that generates wastewater, with a minor amount resulting from spilled liquids as the totes are emptied.

Mr. Reynolds pointed out that the entire processing line was new within the past 6-months. Only the grinder was not replaced. The new equipment was purchased in an effort to reduce the amount of solids going into the wastewater system during clean-up operations. Mr. Reynolds noted that the new system has a catch tank beneath the receiving hopper to capture liquids from the totes. This liquid is now used to add moisture to the ground fish instead of tap water, and therefore reduces wastewater generation.

Clean water is pumped from two wells located west of the plant for use in the clean-up operations at all the buildings. Water is stored in an 11,000-gallon aboveground storage tank.

We then proceeded to the northern most building to observe a new herring "cracking" line. Cracking is the process of manually removing the fishes head and recovering the egg sacs. The egg sacs are sold on the Asian market. Wastewater is generated from equipment and floor clean up with only minor amount from the "cracking" process.

Upon exiting this building, Mr. Martin noted the standing water in the grass to the north of the trailer parking area. Mr. Martin told Mr. Reynolds that he had discussed this issue with Mr. Reynolds predecessor and that that water was okay to go into the storm drain system. We then walked to the west of the facility to observe the SBR and lagoons. A strong odor was noted at the SBR. The lagoon also had a thin layer of foam at the time of the inspection. Mr. Reynolds noted that this was not a normal situation, but does occur from time to time. He noted that they have not been able to locate an exact cause, but believe it is related to excess soap from clean-up operations getting into the system.

We then walked around the south side of the facility and viewed the land treatment area. Pretreated wastewater is land applied via an aboveground fixed-head irrigation system, to ten acres of land located immediately south of the facility. The sprinkler system is composed of 172 sprinkler heads rated at 3.2 gpm each. The land application site is irrigated in sections on a rotating basis using automatic timers. Wastewater application is not allowed during significant rainfall, and during December through February. The application rate is based on the groundwater levels as determined from groundwater monitoring wells.

A buffer zone was set aside adjacent to the surrounding ditches. The roadside ditches ultimately flow to Fish Trap Creek.

Mr. Martin asked about condensate from the recently installed chiller. Mr. Reynolds noted that it is not captured. Mr. Martin did observe that there are no visible signs of runoff from the chiller unit on the cargo container on which it is mounted. We then returned to the front of the Fat Cat building. Mr. Martin asked to see the Pelican processing operations. We met with the owner of Pelican Packers and went into the building adjacent to the Fat Cat building to view Pelicans operations. Pelican is a small specialty salmon packer. Cleaned whole salmon arrive from their supplier. Pelicans processing includes filleting, weighing, and filling and sealing cans. They also label the finished cans. Pelican can also do retort canning. Like the other operations on site wastewater is primarily from equipment and floor cleanup with only minor amounts from actual processing.

Before departing, Mr. Martin explained to Mr. Reynolds about the reasoning behind the recent permit modification. Mr. Martin recognized that chloride levels in the monitoring wells was high. His intention was to set the groundwater chloride level as a benchmark not a permit limit, as was done in the recently issued permit. The permit modification was to correct this.

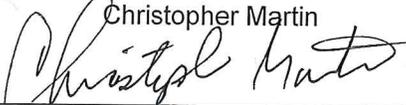
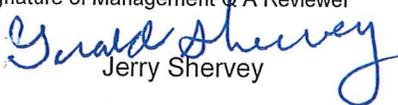
Mr. Martin asked Mr. Reynolds if he had any questions. Mr. Reynolds stated not at this time. Mr. Martin therefore departed the site at 10:50.

**DISCUSSION**

Since the issuance of the new permit, Mr. Reynolds has been working diligently to identify causes for the high chloride, BOD and TSS levels in the land applied wastewater. Mr. Reynolds feels the newly installed processing equipment by Fat Cat should have a significant impact in lowering those levels.

Housekeeping at the site was quite good. Totes awaiting cleaning were all stored within a bermed area in front of the building with the pressure washer. Mr. Reynolds noted that this was a "dirty operation" and that small bits of material could be found outside the bermed area. He did note that employees do their best to clean up this stray material and push it back into the bermed area.

A recommendation not made at the time of the inspection is to evaluate the efficiency of the SBR system for the current wastewater load. The system was designed when the plant was in full operation and creating 25,000 gallons per day of wastewater. With the much reduced wastewater generation of a few hundred gallons per day it is possible that the SBR is no longer operating efficiently.

Name(s) and Signatures of Inspector(s) Christopher Martin 	Agency/Office/Telephone WA Dept. of Ecology NWRO / (425)649-7110 3190 160th SE, Bellevue, WA 98008-5452	Date 2/5/2020
Signature of Management Q A Reviewer  Jerry Shervey	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology NWRO / (425)649-7000 Fax: (425)649-7098	Date 2-6-2020

**ANNOUNCED** Inspection

Appendix E

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)
- 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 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 – Hannegan Properties



Photo 1 Description: View of newly installed processing line.



Photo 2 Description: Existing grinder at end of new processing line.

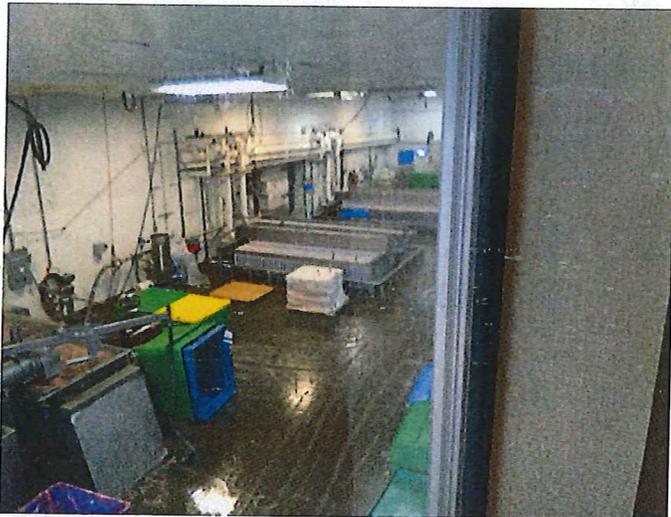


Photo 3 Description: View of the two plate freezers.



Photo 4 Description: Oil/water separator (square lids) and wet well.



Photo 5 Description: Biological treatment/ aeration/ settling tank.



Photo 6 Description: Float in aeration/settling tank is intake for pump to storage lagoon.

### Photo Addendum – Hannegan Properties



Photo 7

Description: Looking West at aeration/ storage lagoon.



Photo 8

Description: Another view of lagoon. Foam is believed to be from soap in clean-up water.



Photo 9

Description: Empty totes awaiting pressure cleaning.

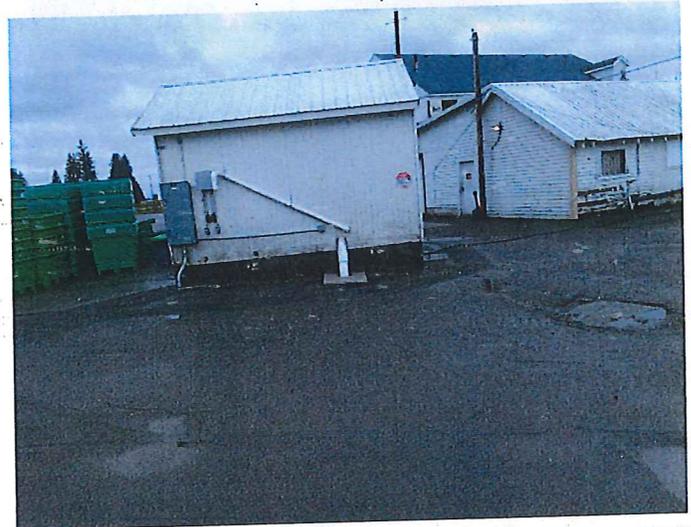


Photo 10

Description: Building that houses pressure washer and hydroseive.

Photo 11

Description:

Photo

Description: