		State of Washington Department of Ecology WASTEWATER TREATMENT PLANT COMPLIANCE INSPECTION REPORT			Northwest Regional Office 3190160 th Ave SE Bellevue, WA 98008 ph: (425) 649-7000 fax: (425) 649-7098 (rev. 9-15-15)	
Section A: General Information						
Report Version	PERMIT #	mm/dd/yy	Inspection Type	Inspector Code	Facility Type	
<input checked="" type="checkbox"/> <u>New</u> <input type="checkbox"/> <u>Changed</u> <input type="checkbox"/> <u>Deleted</u>	<u>ST0501301</u>	<u>01/28/2021</u>	<u>I</u>	<u>S</u>	<input checked="" type="checkbox"/> <u>2 Industrial</u>	
Remarks						
Inspection work days <u>2.0</u>	Facility Self-Monitoring <u>N/A</u>	Photos Taken <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Samples Taken <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	BI <u>N</u>	QA <u>N</u>	
Lead Ecology Inspector(s) Maia Hoffman						
Section B: Facility Data						
Name, Location, and Phone of Facility Inspected Boundary Fish Company 223 Sigurdson Avenue Blaine, WA 98230			Entry Time 10:00 am		Permit Effective Date 1/1/2020	
			Exit Time 10:45 am		Permit Expiration Date 12/31/2024	
Name(s)/Title(s) of On-Site Representative(s) Arnold Yuki, Manager			Ecology Staff On-Site Steve Hood			
Name, Address, Title, Phone, and Fax Number of Responsible Official Henry Yuki, President			Other Facility Data			
Phone Number (360) 332-6715			Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)						
<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO (Sewer Overflow)			
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Effluent ○ Receiving Water	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention			
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia			
<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Other			

Section D: Summary of Findings/Comments

I. INTRODUCTION

Department of Ecology (Ecology) inspectors Maia Hoffman and Steve Hood conducted an inspection at Boundary Fish Co. The main purpose of the visit was to discuss the necessity of the discharge permit with Arnold Yuki. The inspection was announced to A. Yuki.

II. RESULTS AND DISCUSSIONPermit History:

Boundary Fish Co. used to be part of a consortium of seafood processors, called Blaine Seafood Processors, that all operated in the area. Process wastewater from fish processing at the companies was discharged to Semiahmoo Bay at the entrance to Drayton Harbor under National Pollutant Discharge Elimination System (NPDES) permit number WA0031321. The permit authorized the seafood processors to discharge fish processing wastewater, generated from fish filleting and clean up. The companies operated independently but discharged process wastewater through a common outfall. Over the years of operation, companies switched ownership or dropped out of the consortium because they were no longer processing fish. In 2008, Ecology issued a cancellation of permit letter to one of the dischargers, Icicle Seafoods Inc. It is unclear whether the permit was cancelled for all involved companies in the Blaine Seafood Processors consortium or just Icicle Seafoods Inc.

participation. In any case, at some point prior to 2016, the NPDES permit number WA0031321 was allowed to lapse and was not reissued.

On November 7, 2016, Boundary Fish Co. applied for a state waste discharge permit (SWDP) to discharge fish processing wastewater to the City of Blaine wastewater treatment plant (WWTP). On April 24, 2017, Ecology issued a temporary SWDP to Boundary Fish Co. On December 12, 2019, Ecology issued a final SWDP, permit number ST0501301, to Boundary Fish Co. requiring specific monitoring and reporting of the wastewater discharge.

Separately, on January 19, 2017, the City of Blaine and Boundary Fish Co. entered into an agreement for the City to accept the process wastewater at the WWTP.

Production/Business Information:

At the time of inspection, Boundary Fish Co. primarily buys, stores, and sells live Dungeness crab. Crab are kept in open top tanks outside with seawater constantly flowing through. Crabs are moved indoors to prepare for shipment, wrapping rubber bands around their claws. There is no wastewater generated from this process. Occasionally, the inside process area is hosed down with water only. Due to the salmon population decline over the past decade, Boundary Fish Co. has substantially scaled back salmon processing operations. A. Yuki stated due to the decline and no season opener some years, Boundary Fish Co. has not processed salmon at all or only for a few days a year. For the past 5 or 6 years, A. Yuki can not recall a time when Boundary Fish Co. processed at all. Boundary Fish Co. may transfer salmon directly from boat to truck for processing at a larger facility in the area.

Boundary Fish Co. was entirely shutdown between March and November 2020 due to COVID-19, more information in the Sampling section below.

Wastewater Treatment:

The only process wastewater generated from Boundary Fish Co. is from salmon fileting and processing. At the time of inspection, Boundary Fish Co. was not processing any salmon and the facility was not even set up for it. If Boundary Fish Co. were to process salmon, wastewater is routed to drains on the facility floor. Wastewater flows from the floor drains to an outdoor/covered sump, pumped up to and through a hydrosieve to remove scales and other solids, and then discharged to the Blaine WWTP. Solids collected from the hydrosieve are collected in a bin and disposed of as solid waste.

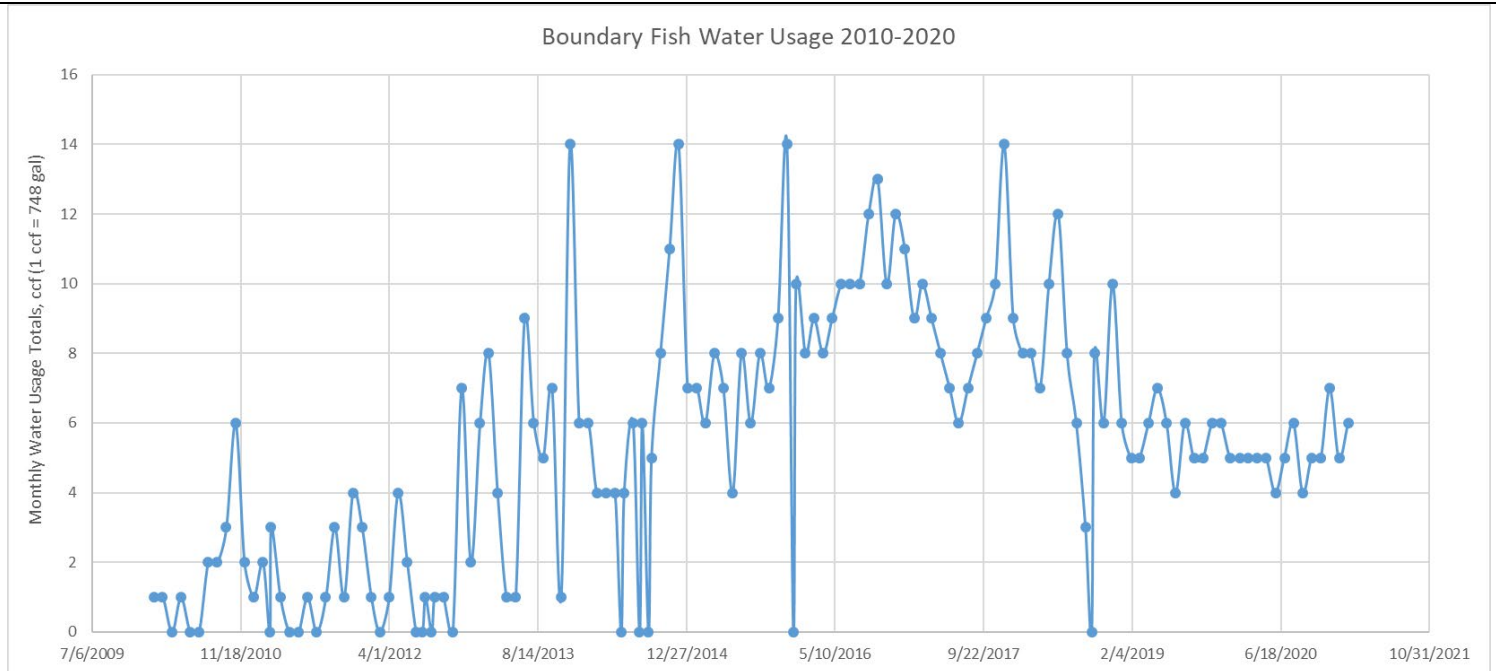
Sampling:

The SWDP requires Boundary Fish Co. to monitor for BOD5, TSS, and oil and grease on a monthly basis and pH on a daily basis. Results of monitoring are required to be submitted in monthly discharge monitoring reports (DMRs) on a monthly basis.

Boundary Fish Co. has not submitted any monthly DMRs since the final permit was issued. Ecology started contacting Boundary Fish Co. in early 2020 about the missing DMRs, however the phone line was disconnected. Ecology was able to reach Boundary Fish Co. in November 2020 and speak to A. Yuki. Boundary Fish Co. shutdown at the onset of the COVID-19 pandemic in March 2020 and did not resume operations until November 2020. A. Yuki stated that no salmon was processed in 2020, therefore no process wastewater was generated or discharged to the Blaine WWTP.

Water Usage:

The City of Blaine provided water usage records for Boundary Fish Co. between 2010 and 2020, see graph below. The months of highest water usage were November 2013 (14 ccf = 10,472 gallons), November 2014 (14 ccf), November 2015 (14 ccf), September 2016 (13 ccf), and November 2017 (14 ccf). A. Yuki said that the typical local salmon season is September and October, so if any processing occurred, it would be in those months. A. Yuki stated, in email, that November water usage correlates to annual cleaning of the facility and dock after the typical salmon and Dungeness crab season.



Staffing:

Boundary Fish Co. is a small, family-owned business. Boundary Fish Co. does not own or manage their own fishing boats, instead acts as an intermediary for processing and selling locally-sourced Dungeness crab and salmon.

III. CONCLUSION


As part of Ecology's EPA approved pretreatment program under 40 CFR Part 403, Ecology issues SWDPs to industrial users to discharge process wastewater to municipal WWTPs. Ecology issues permits to categorical industrial users (those who fall under federal categorical pretreatment standards listed in 40 CFR Part 405-471), to industrial users with a discharge flow rate greater than 25,000 gallons per day, or to industrial users with a reasonable potential to adversely affect a WWTPs operation. State law requires Ecology to issue permits for the discharge of industrial wastewater to WWTPs, exempt is domestic-like discharges.

Ecology issues SWDPs to several large seafood processing companies in the NW region. Most of these companies operate on a much larger scale than Boundary Fish Co. and on a much more consistent basis. Most seafood processors in the NW region do not fall under a federal categorical pretreatment standard, but are permitted due to their reasonable potential to adversely affect the WWTP. Seafood processing wastewater is often high in BOD5 and solids. Permits issued to seafood processors usually require monitoring for BOD5 and TSS and require pretreatment (screening) prior to discharge to the sewer. The Boundary Fish Co. permit requires such conditions and the facility is set up with a hydrosieve to screen the wastewater prior to discharge.

Ecology is considering cancelling SWDP ST0501301, issued to Boundary Fish Co., for the following reasons,

- Boundary Fish Co. is substantially smaller than all other fish processing companies covered by an individual SWDP. Boundary Fish Co. has not processed fish for the past several years. In the future, if fish processing is done, it will likely only be for a few days a month for one to two months, due to the limited salmon season in Puget Sound.
- With best management practices in place, such as maintaining and using the hydrosieve if discharging fish processing wastewater, the Boundary Fish Co. wastewater is expected to be domestic-like. High BOD5 levels at other fish processing facilities in the area is primarily due to the large volume of fish processed 5-6 days per week, which is not typical of Boundary Fish Co. operation.
- The City of Blaine is in a position to control this discharge via a discharge agreement, or other determined mechanism. The City can request Ecology assistance or require Boundary Fish Co. to reapply for a SWDP if the discharge is adversely affecting the Blaine WWTP in the future.

This inspection report does not serve as a permit cancellation letter. Ecology will issue a formal letter of permit cancellation after further review with the City of Blaine.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Maia Hoffman 	WA Dept. of Ecology, NWRO, (425)649-7127	3/10/2021
Name of Management QA Reviewer	Agency/Office/Telephone	Date
Gerald Shervey	WA Dept. of Ecology, NWRO	3/22/2021

ANNOUNCED Inspection

INSTRUCTIONS**Section A: General Information**

Report Version: N for 1st version, C for Changed or amended, or D for Delete

NPDES Permit No.: Enter the facility's NPDES or State permit number.

Inspection Date: Insert the date entry was made into the facility. Use the month/day/year format (e.g., 06/30/04 = June 30, 2004).

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	

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

Facility Type: Use one of the choices 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

Remarks: These columns are reserved for remarks.

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. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, travel time and preparation time. This estimate does not require detailed documentation.

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.

Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Photos Taken: Yes or No

Samples Taken: Yes or No

Lead Ecology Inspector: Enter lead inspector's name

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), e-mail addresses...; and "Ecology Staff On-Site", which may include staff names, titles, phone numbers, or e-mail addresses.

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary.

Section D: Summary of Findings/Comments

Support the findings, as necessary, in a narrative report. Use the headings given on the report form (staffing, back-up power) as appropriate. Reference a list of attachments, such as completed checklists, photos, lab reports, etc. Use extra sheets as necessary.

Inspection Photos



Photo 1: Outdoor sump for equalization to hydrosieve.



Photo 2: Alternate view into sump, pump located at water level.



Photo 3: View into discharge line.

Blank

N/A