

Via Electronic Mail

April 1, 2021



Maia Hoffman, P.E.  
Pretreatment Engineer/Permit Manager  
Washington State Department of Ecology  
3190 160<sup>th</sup> Ave SE,  
Bellevue, WA 98008

**Re: Response to Comments on Application for Renewal and Modification of State  
Wastewater Discharge Permit No. ST0003861**

Dear Ms. Hoffman:

On behalf of Perdue Foods LLC dba Draper Valley Farms (DVF), Woodard & Curran, Inc. (W&C) is submitting this cover letter and attachment in response to the Washington State Department of Ecology's (Ecology) comments on the permit renewal and modification application for pretreatment discharge Permit No. ST0003861 submitted on March 11, 2021. Ecology's comments were received on March 17, 2021 and discussed by teleconference on March 22, 2021.

At Ecology's request, Perdue is clarifying that its application for permit renewal and BOD limit increase are separate from its request to make treatment upgrades. The City of Mount Vernon has approved an increase in the facility's effluent BOD limit to a maximum consecutive three-day average of 1,620 ppd. DVF has been compliant with the new proposed limit for the past several months, while it has been adjusting its chemical treatments to meet food safety requirements and resulting wastewater quality. DVF anticipates that it will continue to meet the new limit while the design and implementation of the new MBBR treatment system progresses. The higher limit, and the changes to the treatment system, allow for future flexibility to adjust the food safety chemical treatments at the plant, as needed.

Based on an evaluation of recent years' data, Perdue is requesting a decrease in its effluent flow limit from 760,000 gpd to 720,000 pd, as a maximum consecutive 3-day average. This lower limit reflects the design hydraulic capacity of the existing and proposed future wastewater conveyance systems and allows for future flexibility if production hours or wastewater flows were to increase. The wastewater flows reported are currently based on the influent flowmeter.

Ecology also requested a brief description of where the pesticides, herbicides, and/or fungicides listed in Section E.7 of the permit application are used onsite. The use location for each of the chemicals listed in the table below.

Chemical	Annual Use Rate	Location
Round Up Weed and Grass Killer (super concentrate)	2 gal/yr	Outdoor areas
Garratt/Callahan Formula 315	15 gal/yr	Cooling towers
Garratt/Callahan Formula 3340	15 gal/yr	Cooling towers
CH <sub>2</sub> O, Incorporated 6321U	15 gal/yr	Cooling towers



Chemical	Annual Use Rate	Location
CH <sub>2</sub> O, Incorporated 6270	30 gal/yr	Boilers
CH <sub>2</sub> O, Incorporated MXT-1	30 gal/yr	Cooling towers

Finally, Ecology requested that Perdue group the chemicals listed in Attachment C.7 by the location of use. The table included as Attachment C.7 has been revised to organize the chemicals by the use location and is included as an enclosure with this cover letter.

If you have any questions or need additional information, please contact Mary Miller at 484-845-5434 or by email at [mbmiller@woodardcurran.com](mailto:mbmiller@woodardcurran.com) or Barney Conner at 360-419-7854 or by email at [Barney.Conner@DVFMV.com](mailto:Barney.Conner@DVFMV.com).

Sincerely,

WOODARD & CURRAN, INC.

A handwritten signature in black ink that reads "Mary E. Miller".

Mary E. Miller, P.E.  
Project Manager

Enclosures:

1. Attachment C.7

cc: Barney Conner (DVF)  
Scott Taylor (DVF)  
Rick Harrell (Perdue)  
Richard Colvin, P.E. (W&C)  
Patrick Cyr, P.E., B.C.E.E. (W&C)  
Veronica Keithley (Stoel Rives LLP)

PN: 0233685.00

**ATTACHMENT C.7**  
**Draper Valley Farms**  
**List of Incidental Materials - March 2021**

Product Name	Manufacturer Name	Location of Use	Avg. Quantity Stored	Est. Annual Usage	Last Verified	Revision Date
Deb InstantFOAM Non-Alcohol PURE Hand Antiseptic	SC Johnson Professional, Inc.	Breakroom/ Bathroom	5 gal	50 gal	11/17/2020	05/14/2019
Germ-X Hand Sanitizer	Vi-Jon	Breakroom/ Bathroom	5 gal	50 gal	12/21/2020	06/10/2014
HAND-I-SAN	Zee Company, Inc.	Breakroom/ Bathroom	5 gal	50 gal	03/20/2020	03/20/2020
Instant Hand Sanitizer	Kutol Products Company	Breakroom/ Bathroom	5 gal	50 gal	03/10/2012	01/01/2010
PURELL Advanced Hand Sanitizer Aloe Gel	GOJO Industries, Inc.	Breakroom/ Bathroom	5 gal	50 gal	08/18/2020	03/18/2015
PURELL Food Processing HEALTHY SOAP BAK E 2 Antimicrobial Foam	GOJO Industries, Inc.	Breakroom/ Bathroom	5 gal	50 gal	12/13/2018	12/13/2018
PURELL PAL and PURELL Advanced Instant Hand Sanitizer	GOJO Industries, Inc.	Breakroom/ Bathroom	5 gal	50 gal	12/02/2020	08/02/2020
STOKO Refresh Moisturizing Foam Hand Cleaner	Deb USA, Inc.	Breakroom/ Bathroom	5 gal	50 gal	11/14/2019	11/11/2014
Aquaiox Disinfectant 275	Aquaiox LLC	Production	5 gal	20 gal	03/02/2016	03/02/2016
CCH 3" Calcium Hypochlorite Tablets	Arch Chemicals, Inc.	Production	1200 lbs	32000 lbs	05/27/2015	05/27/2015
Citric Acid 50% Solution Food Grade	Zee Company, Inc.	Production	825 gal	9625 gal	10/23/2014	10/23/2014
MICROTOX PRIME	Zee Company, Inc.	Production	2862 gal	22578 gal		
MICROTOX ULTRA	Zee Company, Inc.	Production	2862 gal	10176 gal	02/18/2019	02/18/2019
NEUTRACHILL	Zee Company, Inc.	Production	1650 gal	21175 gal	06/19/2015	06/19/2015
KC-210 DEGREASER	Packers Chemical, Inc.	Sanitation	15 gal	15 gal	03/20/2017	03/20/2017
KC-262 POLYFOAM	Packers Chemical, Inc.	Sanitation	110 gal	1900 gal	07/18/2019	07/18/2019
KC-404	Packers Chemical, Inc.	Sanitation	110 gal	420 gal	06/14/2019	06/14/2019
KC-543	Packers Chemical, Inc.	Sanitation	450 lbs	2550 lbs	03/11/2016	03/11/2016
KC-545	Packers Chemical, Inc.	Sanitation	110 gal	2145 gal	07/19/2019	07/19/2019
KC-555	Packers Chemical, Inc.	Sanitation	55 gal	110 gal	04/12/2017	04/12/2017
KC-568	Packers Chemical, Inc.	Sanitation	220 gal	2935 gal	07/19/2019	07/19/2019
KC-610	Packers Chemical, Inc.	Sanitation	55 gal	129.5 gal	09/18/2018	06/22/2017
KC-615	Packers Chemical, Inc.	Sanitation	220 gal	4665 gal	10/07/2014	04/01/2014
KC-631 4 Chain Acid Quat	Packers Chemical, Inc.	Sanitation	110 gal	110 gal		

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Product Name	Manufacturer Name	Location of Use	Avg. Quantity Stored	Est. Annual Usage	Last Verified	Revision Date
Compresyn 250 ISO 100	COMPRESYN	Warehouse/ Maintenance	5 gal	50 gal	10/08/2020	05/10/2017
FRICK OIL #3 (DR) 111Q0550010	CPI FLUID ENGINEERING A DIV. OF THE LUBRIZOL CORPORATION	Warehouse/ Maintenance	110 gal	110 gal	05/18/2017	02/19/2016
JAX FGH-AW ISO 32, 46, 68, 100	JAX INC.	Warehouse/ Maintenance	55 gal	110 gal	05/21/2019	07/30/2015
JAX White Mineral Oil 15	JAX INC.	Warehouse/ Maintenance	55 gal	110 gal	06/19/2018	06/27/2016
SAN-I-OX (EPA Reg : 10324-214-12446)	Zee Company, Inc.	Warehouse/ Maintenance	55 gal	110 gal	04/06/2016	03/30/2016
Shell Rotella T6 5W-40	Shell Oil Products US	Warehouse/ Maintenance	55 gal	110 gal	11/04/2020	07/28/2020
Shell Spirax S6 GME 50	Shell Oil Products US	Warehouse/ Maintenance	55 gal	110 gal	09/15/2020	08/31/2018
DEF 32.5% DIESEL EXHAUST FLUID	Brenntag Northeast, Inc.	Warehouse/ Truck shop	265 gal	1060 gal	06/11/2019	02/08/2018
Propane	AIR LIQUIDE	Warehouse/ Truck shop	200 gal	2750 gal	11/21/2016	09/10/2013
SAFETY-KLEEN PREMIUM SOLVENT (VIRGIN AND RECYCLED)	Safety-Kleen Systems, Inc.	Warehouse/ Truck shop	30 gal	30 gal	07/15/2020	10/29/2019
Shell Spirax S6 AXRME 75W-90	Shell Oil Products US	Warehouse/ Truck shop	55 gal	110 gal	11/30/2020	11/30/2020
Spirax S4 AX 80W-90	Shell Oil Products US	Warehouse/ Truck shop	55 gal	110 gal	08/04/2020	01/03/2019
CESCO NEUTRO 5045	Cesco Solutions, Inc.	Wastewater	700 gal	32245 gal		
CESCO PF 622CH	Cesco Solutions, Inc.	Wastewater	265 gal	6095 gal	10/03/2017	10/03/2017
CESCO PROTECT 1043	Cesco Solutions, Inc.	Wastewater	1500 gal	72,000 gal	10/03/2017	10/03/2017