



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 # 3 ST0007285 11	yr/mo/day 12 21/11/15 17	Inspection Type 18 C	Inspector 19 S	Facility Type 20 2
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Remarks

This inspection was prompted by ERTS 709922 from the Northwest Clean Air agency.

Inspection work days 67 1.0 69	Facility Self-Monitoring Evaluation Rating 70 5	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) Hannegan Properties 6069 Hannegan Road Bellingham, WA	Entry Time/Date 10:45 AM 11/15/21	Permit Effective Date 12/1/2017
	Exit Time / Date 12:15 PM 11/15/21	Permit Expiration Date 10/31/2022
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jason Reynolds General Manager 360-305-7533	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number. Andy J. Vitaljic President 6069 Hannegan Road Phone Number (360) 398-1117 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 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 type="checkbox"/> Effluent/Receiving water	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input checked="" type="checkbox"/> odor ERTS

Section D: Summary of Findings/Comments

INTRODUCTION

Hannegan Properties owns about 40 acres at the intersection of East Hemmi Road and Hannegan Road east of Bellingham, Washington.

The following four companies currently operate at this location: American Canadian, Fat Cat Fish, Sonny Foods, and Pelican Packers. All companies are covered under the Hannegan Properties' wastewater discharge permit, even though not all have a wastewater discharge.

An advanced wastewater treatment system was designed and installed between September 1995 and March 1996. The treatment system includes a side-hill screen for solids reduction, and 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 storage and further biological reduction.

Operations at this facility are covered under NAIC Code 311710, seafood product preparation and packaging. The primary products are lox and 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 paste-like consistency and pumped into a vertical plate press for freezing. Once frozen, the blocks are ejected from the plate freezer, individually wrapped, and palletized for shipment. Clean water is pumped from two wells located west of the plant for use in the processing operations. Water is stored in an 11,000-gallon above-ground storage tank.

INSPECTION RESULTS

On October 14, 2021 Ecology received an Environmental Reporting Tracking System (ERTS) notification no. 709922 from the NW Clean Air Agency related to odors originating from this facility. This inspection was conducted to address the issues reported in the ERTS.

NOTE: The Northwest Clean Air Agency issued a separate Notice of Violation (NOV) to the facility on October 1, 2021.

Aside: Weather conditions had created major roadway flooding. This led to late arrival of the Ecology inspectors.

Ecology inspector Robert Nolan (Permit Engineer) arrived on site at approximately 10:45 and met Mr. Jason Reynolds (General Manager) of Hannegans. J. Reynolds discussed current conditions and plans to correct the issues cited in the ERTS.

Process water is generated during wash down which includes some chlorine based cleaners and various sizes of fish waste. Ammonia based cleaners are not utilized, and any chlorine demand is completely neutralized prior to biological treatment. Some wash water and fish scraps are introduced during tote pressure washing.

The facility has grown considerably since the biological sequencing batch reactor (SBR) treatment system was designed and the system is likely overloaded. R. Nolan and J Reynolds discussed options for increasing the treatment capacity, either by reducing the biological solids entering the system, adding to the treatment facilities, or both. The facility has purchased and was installing a rotating screen which should improve fine solids removal prior to treatment. J Reynolds discussed adding a screening basket at an expanded tote washing area to remove fish parts. Treatment additions could include a second SBR or a dissolved air floatation (DAF) unit to remove solids and fats prior to the existing SBR. Facility growth has outpaced treatment capacity and improvements are needed in both pretreatment (solids removal prior to treatment) and treatment (additional SBR or DAF unit). Odors are likely the result of an overloaded system and should correct over time with treatment system improvements.

Permit Manager Mr. Chris Martin was delayed due to weather related traffic and arrived on site at approximately 11:30. He met R. Nolan and J. Reynolds in the back of the facility. At that time J. Reynolds proceeded to show R. Nolan and C. Martin his planned changes. First stop was the hydrosieve screen. At the time of the inspection the system was not in operation. A large amount of fish waste was present on the screen table (Photo 1). J. Reynolds explained that "farm" raised salmon are much fattier than wild salmon. As a result when they process farm raised salmon the higher fat content rapidly plugs the hydrosieve. This leads to material bypassing the screen and entering the pumping sump. J. Reynolds explained that, although not a trash pump (a pump equipped with blades) the size of the sump pump resulted in significant reduction in size of the bypassed materials. This reduction leads to an increase in biological oxygen demand (BOD) loading of the wastewater. Wastewater from the hydrosieve discharges to a wet well that pumps the effluent to the bioreactor (Photo 2).

R. Nolan asked about the pressure washing station. J Reynolds showed us the pressure washers (Photo 3) and explained his intention of expanding the current bermed area. Presently empty fish totes are cleaned out in a bermed area that drains directly to the wet well (Photos 4 and 5). J Reynolds explained that the new area will be located in the same location and extend north on the current paved area. The new cleaning area will be sloped to an in-ground sump with two removable filter baskets. The sump outlet will be piped directly to the current wet well. The filter baskets can be removed with a small forklift and rotated to empty while still on the forklift. C. Martin asked if totes from company operations in Bellingham are also cleaned here. J Reynolds stated no, only totes used at the facility are cleaned here.

The three of us then walked over to the bioreactor. J. Reynolds explained how the system works for B. Nolan. At the time of inspection the system was in a quiet cycle (Photos 6 and 7). B. Nolan asked about sludge generation. J. Reynolds noted that the system generates very little sludge, and in fact the last time the reactor was emptied six years ago (to replace aging aerators) there was no sludge in the bottom of the tank. Tank has not been drained in the last six years. J. Reynolds then escorted the Ecology inspectors to the newly purchased and installed rotating screen. Plans are for this to eventually replace the hydrosieve, but will initially be a pre-screen before the hydrosieve (Photos 8 and 9).

From here we all returned to J Reynolds office to do a quick close-out. B Nolan asked about if the facility has an operation and maintenance manual or an engineering report that details the treatment system. J Reynolds was able to locate their O&M manual for B Nolan to review. J. Reynolds also discussed the NOV from the NW Clean Air Agency. J Reynolds stated that the agency wanted the facility to install costly odor controls on the bioreactor. He saw this as a "Band-Aid" that would solve the odors, but not the underlying cause. J Reynolds stated he would rather spend money on solving the underlying issues that are causing the odors. B. Nolan and C. Martin agreed this was likely a better expenditure of resources.

B. Nolan and C. Martin departed the site at approximately 12:15.

DISCUSSION

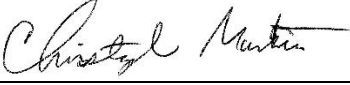


J. Reynolds made it clear that he believed the odors are a direct result of solids from the fish processing by-passing the hydrosieve and getting further into the treatment system. At the time of inspection a new rotating screen has been installed and was undergoing final electrical connection. Once running it will initially serve as a pre-screen for the hydrosieve.

Housekeeping at the time of the inspection needed to be addressed. J Reynolds stated a number of times that "It usually doesn't look like this." Solid fish waste was noted in bermed tote cleaning area (Photo 5) and at several areas around the rear paved area (Photo 10). Due to the heavy rains and winds it is understandable that some trash may be blown out of containers. The presence of solid fish waste must be addressed. As noted in the NW Clean Air NOV this material it is a source of odors. And this source is easily controlled by improving housekeeping at the facility.

Ecology makes the following recommendations:

- Increase cleaning/pick-up of solid waste that can enter stormwater catch basins.
- Implement processes to reduce odors associated with fish totes/solid fish waste by not removing totes from refrigeration until ready for processing and prompt cleaning of residual solid waste in processed totes.
- Increase cleaning of hydrosieve screen.
- Complete installation, testing, and start-up of new rotating screen.
- Complete planning and expansion/installation of new bermed tote cleaning area.

Photos 11 and 12 show some of the flooding at the facility. Photos 13 to 16 are additional photos from the inspection.

Name(s) and Signatures of Inspector(s) Christopher Martin 	Agency/Office/Telephone WA Dept. of Ecology NWRO / (206) 594-0159 PO Box 330316, Shoreline, WA 98133-9716	Date 12/2/2021
 Robert Nolan, PE	WA Dept. of Ecology NWRO / 206 - 594 - 0166	
Signature of Management Q A Reviewer Monika Kannadaguli, PE, CPESC 	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology NWRO / (206) 594-0144 Fax: (206) 594-0000	Date 11/17/2021

ANNOUNCED 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 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: Hydrosieve and screening table.



Photo 2

Description: Wet well that collects wastewater from hydrosieve and tote cleaning area.



Photo 3

Description: Pressure washers used for tote cleaning.



Photo 4

Description: Discharge from berm area to wet well.



Photo 5

Description: Solid fish waste from tote washing heading for wet well.



Photo 6

Description: Bioreactor left side view.

Photo Addendum – Hannegan Properties



Photo 7 Description: Bioreactor right side view.



Photo 8 Description: New rotating self-cleaning screen.



Photo 9 Description: Side view of new rotating screen.



Photo 10 Description: Solid fish waste on paved area. Catch basin is for stormwater.



Photo 11 Description: Ditch along North side of land treatment field.



Photo 12 Description: Land treatment field flooding along Hannegan Road.

Photo Addendum – Hannegan Properties



Photo 13

Description: Effluent inlet (upper pipe) and outlet (lower pipe) to hydroosieve.



Photo 14

Description: Flooded North ditch adjacent to land treatment field.



Photo 15

Description: Another view of the pressure washers used for tote cleaning.



Photo 16

Description: Fish waste and other debris on paved area.

Photo

Description:

Photo

Description: