



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 5, 2021

Scott Collins
National Safety Director
Applied Plant Science
1625 Heritage Street
Woodland, WA 98674

Re: Inspection Report

Dear Scott Collins:

Thank you for an opportunity to visit your facility in Woodland on July 27, 2021. Please find enclosed a copy of my report.

Feel free to contact me at jacek.anuszewski@ecy.wa.gov or 360-407-6288 if you have any questions.

Sincerely,

A handwritten signature in blue ink, reading "Jacek Anuszewski".

Jacek Anuszewski, P.E.
Facility Manager
Columbia Gorge Basin
Southwest Regional Office
Water Quality Program

Enclosure

cc: Steve Eberl, Ecology



Waste Discharge Compliance Inspection Report

Section A

| | | | | | |
|--------------------------------|--|---|---|---|------------------------|
| State Permit Number | ST 0 6 2 4 5 | Municipal <input type="checkbox"/> | Industrial <input type="checkbox"/> | IUs <input checked="" type="checkbox"/> | Permit Effective Date |
| | | | | | Unpermitted |
| Recon <input type="checkbox"/> | Inspection <input checked="" type="checkbox"/> | Inspection <input type="checkbox"/> with Samples | Unpermitted <input checked="" type="checkbox"/> Facility | Land Application <input type="checkbox"/> | Permit Expiration Date |
| | | | | | Unpermitted |

Section B

| | |
|---|-----------------|
| Name and Location of Facility Inspected | County |
| Applied Plant Science (APS) | Cowlitz |
| 1625 Heritage Street, Suite 101 | Inspection Date |
| Woodland, WA 98674 | July 27, 2021 |

| | | |
|--------------------------------------|--------------------------|-----------------|
| Name(s) of On-Site Representative(s) | Title(s) | Phone Number(s) |
| Scott Collins | National Safety Director | |
| Trevor Donison | | |
| Glynn Dale | Senior Project Engineer | |
| William Ritchie | Facility Maintenance | (360) 869-1436 |

| | | |
|---------------------------------------|----------------|---|
| Name, Address of Responsible Official | Phone | Contacted |
| Michael Straumietis | (360) 841-8484 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Title | |
| | CEO/Funder | |

Section C

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

| | | | | | | | |
|---|----------------------|---|---------------------------|---|----------------------|---|-----------------|
| S | Permit | N | Effluent/Receiving Waters | N | Compliance Schedules | N | Sludge Disposal |
| N | Records/Reports | N | Flow Measurement | N | Laboratory | N | Pretreatment |
| S | Facility Site Review | N | Self-Monitoring Program | N | Operations/Maint. | N | Other |

Section D Summary of Findings

Purpose:

- The purpose of this inspection was to review wastewater discharges from APS as a response to a request to withdraw from the wastewater permit process. The letter requesting the withdrawal stated that, "...no wastewater that has been in contact with fertilizer constituents will be placed into city sewer system and the total flow of water from water filtration is less than 25,000 gallons per day." Michael Straumietis, CEO/Founder, signed the letter.

Findings:

- During the inspection it was confirmed that the following wastewaters are being discharged to the City of Woodland Publicly Owned Treatment Works (POTW):
 - Sanitary wastewater.
 - Filter backflush wastewater.
 - Reverse osmosis (RO) reject wastewater.
- APS plans to collect the filter backflush and RO reject wastewaters in a wastewater tank (white tank). Discharge from the tank will be metered to meet an instantaneous flow limit set by the City of Woodland

POTW at 20 gallons per minute (gpm). A maximum of 13,000 gallons per day (gpd) will be discharged from the tank.

- APS generates washwater (categorical wastewater) from washing totes and process tanks. The washwater is collected in a blue product wastewater storage tank (blue tank) and is mostly evaporated. Concentrated waste is discharged to a tank located outside of the warehouse and hauled for an offsite disposal by Waste Express two to three times a week.

Conclusions:

- According to 40 CFR 403.3(v)(2):

(2) The Control Authority WA State Department of Ecology (Ecology) may determine that an Industrial User subject to categorical Pretreatment Standards under § 403.6 and 40 CFR chapter I, subchapter N is a Non-Significant Categorical Industrial User [NSCIU] rather than a Significant Industrial User [SIU] on a finding that the Industrial User never discharges more than 100 gallons per day (gpd) of total categorical wastewater (excluding sanitary, non-contact cooling and boiler blowdown wastewater, unless specifically included in the Pretreatment Standard) and the following conditions are met:

(i) The Industrial User, prior to the Control Authority's finding, has consistently complied with all applicable categorical Pretreatment Standards and Requirements;

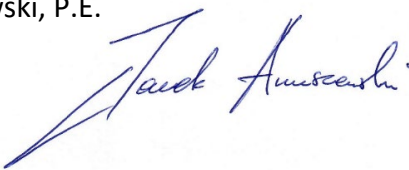

(ii) The Industrial User annually submits the certification statement required in § 403.12(q) together with any additional information necessary to support the certification statement; and

(iii) The Industrial User never discharges any untreated concentrated wastewater.

- Ecology excluded the filter backflush and RO reject wastewaters from categorical wastewater as well.
- APS needs to meet the two-year consistent compliance requirement before Ecology can determine its NSCIU status.
- According to 40 CFR 403, an indirect discharger that has been designated an NSCIU by its Control Authority (Ecology) is no longer a significant industrial user (SIU), so there is no requirement to control it through a permit or other control mechanism.

Latitude and Longitude Verified? ☐ WPLCS ☐ GPS

☒ Announced
☐ Unannounced

| | | |
|---|--|-------------------|
| Name(s) and Signature(s) of Inspector(s) Jacek Anuszewski, P.E.  | Agency/Office/Phone and Fax Numbers Ecology/SWRO (360) 407-6288 | Date 10/5/2021 |
| Signature of Management QA Reviewer Steven G. Eberl, P.E.  | Ecology/SWRO (360) 407-6293 | Date 11/5/2021 |