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WA State Department
of Ecology (SWRO)

August 14, 2023

To: Kamren Moen, Ecology

From: Chris Lam, President Safe Coast Seafoods

Subject: Wastewater Permit (WA0000361) Modification

Mr. Moen,

This letter is in regards to the Ilwaco plant. We are proposing a process modification that will improve operations, resulting in efficiencies and discharge quality improvement. A brief background discussion and description of the process improvement follows.

Background: The current Wastewater Permit (WA0000361) had been modified in 2015 to allow for the plant owner at that time to process surimi with the addition of a Dissolved Air Flotation (DAF) system to the wastewater discharge. This addition was required to reduce the solids found on and around the discharge outfall. Those solids were presumed to be from the surimi processing at the plant and the DAF unit was needed to meet water quality standards.

Safe Coast Seafoods purchased this property at the end of 2020 after the previous owner fell into receivership and closed the doors to the plant.

Safe Coast Seafoods does not process surimi at the Ilwaco plant currently. However, the DAF unit is still in place and under the permit, is required to be used during any wastewater discharge.

The DAF is a problem. This DAF unit is designed for a specific purpose -surimi- which is now inconsistent with current operations. We have struggled with repeated violations for EColi bacteria exceedances and have determined they are caused by the DAF. In an effort to eliminate the bacteria, we have attempted to modify operations to batch discharge, which means to only use the DAF sparingly. However, this is not consistent with the design or purpose of this system and has had limited success. Holding process water within the DAF allow these bacteria to thrive and multiply resulting in exceedances to the discharge permit limit.

Our Environmental Consultant (Trendline Environmental Chemistry) has performed a source identification at the Ilwaco plant in attempt to isolate and eliminate this bacterial source. As you might be aware, fish and shellfish are not a source of these EColi bacteria. The source tracing showed the DAF itself was the source and we believe it is acting like a bacterial incubator. Then, when the DAF is turned on and water passes through it, bacteria move downstream, which is where the compliance samples are taken. And exceedances are recorded.



Proposal: We propose to modify the existing process by removing the DAF from the system and modifying the wastewater permit to allow us to sample monthly without the DAF. We feel the DAF has been the source of our bacterial exceedances all along and we would like to bypass this unit to collect samples truly representing the current seafood industrial processing.

Respectfully,

Chris Lam

President Safe Coast Seafood