



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office

PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

October 25, 2023

Catherine Bulldis Gylys
National Fish and Oyster Company, Inc.
5028 Meridian Road Northeast
Olympia, WA 98505-2339

Re: National Pollutant Discharge Elimination System (NPDES) Class I Compliance Inspection,
NPDES Permit Number WA0038407.

Dear Catherine Bulldis Gylys:

On August 22, 2023, the Department of Ecology conducted an inspection of National Fish and Oyster Company, Inc. Enclosed you will find a copy of our inspection report for your records. There were a couple concerns regarding timely reporting and effluent discharge that are detailed in the report with suggested action items. Ecology understands that summer is a busy time of year for seafood processing facilities. We appreciate your continued efforts to keep Washington's water safe and clean.

We would like to express our thanks to you and Nick Bulldis for the courtesy extended during the inspection.

If you have any other questions, please contact me at annw461@ecy.wa.gov or (360) 522-6216.

Sincerely,

Anna Rose Wallace Ph.D.
Permit Manager
Southwest Region Office
Water Quality Program

Enclosures: National Fish and Oyster National Pollution Discharge Elimination System
Inspection Report Permit No. WA0038407 August 22, 2023
Inspection Photo Log

cc: Adonia McKinzi, Ecology

Facility Site Review:

My colleague Adonia McKinzi arrived at National Fish and Oyster on Tuesday afternoon. The weather was sunny. We met with Catherine Buldis Gylys and Nick Buldis. I entered the shucking building with Catherine to check records and Adonia stayed outside with Nick. I checked their DMR's and confirmed that they had access to their permit. They keep their permit as an electronic file on their computer. Catherine printed a copy for me so I could double check effluent parameters/limits etc. I also checked their record keeping for in house sampling of residual chlorine. I brought up the trouble with continued DMR violations because the quantitation level of the meter's lower limit is 10 µg/L and NFO's daily max is 7.5 µg/L. As a result, they have a continued DMR violation that is unavoidable. In the next permit cycle, I would like to find a different way to report so they do not have continued DMR violation.

We also discussed the BOD₅ sample violation in December. Catherine explained they were unable to analyze the BOD in December because the lab was closed, and the sample was past the holding time. She assured me that they do their utmost to submit their samples in a timely manner to the lab and ensure their DMR's are on time. She also informed me that the month of July they were late with getting the sample to the lab, and that their DMR is a few days late for July's data. She also informed me that they keep a record of cleaning the pits (catch basins for solid waste). I did not ask to see the pit cleaning records during this inspection.

After the records review, we walked through the facility. NFO was processing oysters at the time of inspection. Catherine pointed out the sampling point (Photo 1). The sampling point is where they are rinse the oysters. Photo 2 is where the oysters are shucked and then the shells leave the facility on a conveyer belt that transports the shells to the solid waste truck. The discharge leaves the facility through a small hole in the wall (Photo 3) and drains into the catch basin (Photos 4 and 5). The solid waste looked to be 6-8 inches from the top of the catch basin. Catherine then walked me over to the permitted outfall 001. The photos of the discharge showed a rather mirky flow (Photos 6 and 7). This poses concern that the discharge is gathering dirt and/or other debris during its flow from the facility to the outfall.

Compliance with Permit:

Due to the holding time limit of 15 min for residual chlorine, NFO must conduct in-house testing for this parameter. Because field instruments for chlorine have QL that is higher than NFO's chlorine limit, they incur monthly violations for this parameter. For this reason, Ecology will not include the chlorine violations as part of the compliance evaluation.

NFO has incurred 8 violations over the duration of this permit cycle (8/1/2021 to present). Seven of the 8 are late submittals of DMRs as listed below:

1. 4/1/2022 late submittal of DMRs
2. 7/1/2022 late submittal of DMRs
3. 10/1/2022 late submittal of DMRs
4. 12/1/2022 late submittal of DMRs
5. 5/1/2023 late submittal of DMRs
6. 6/1/2023, late submittal of DMRs
7. 7/1/2023, late submittal of DMRs

The 8th violation was for BOD₅ flagged on 12/1/2022 and 12/20/2022 for "analysis not conducted."

Ecology does not routinely issue enforcement actions for facilities that submit DMRs up to 5 days late. However, Ecology encourages NFO to submit DRMs on time to prevent a Notice of Violation. Other than the listed violations, NFO complied with the permit requirements.

Records/Reporting

NFO has provided all the records and reports required for this permit cycle for the period between August 2021 to August 2023.

Self-monitoring Program

NFO has submitted all the monthly discharge monitoring reports and required for the period between August 2021 to August 2023.

Action Items:

1. Please submit DMRs on time
2. Look into some BMPs that may help reduce the dirt/murkiness of the discharge at Outfall 001

Verify Latitude and Longitude

Lat: 47.1051, Long: -122.7375

Announced
 Unannounced

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Anna R. Wallace, Ph.D. 	Ecology/SWRO (360) 522-6216	8/28/2023
Adonia McKinzi, Ph.D. 	Ecology/SWRO (360) 480-1434	8/28/2023
Signature of Management QA Reviewer John Y. Diamant, P.E. 	Agency/Office/Phone and Fax numbers Ecology/SWRO (360) 819-3824	Date 10/20/2023

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.

Column 3 - 11: NPDES Permit No.: Enter the facility's NPDES permit number – third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the 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	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge – Biosolids	{	Stormwater-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Stormwater-Construction-Non-Sampling
F	Pretreatment Follow-up	\$	Combined Sewer Overflow-Non-Sampling	:	Stormwater-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Stormwater-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Stormwater-MS4-Sampling
M	Multimedia	\	CAFO-Sampling	-	Stormwater-MS4-Non-Sampling
N	Spill	=	CAFO-Non-Sampling	>	Stormwater-MS4-Audit
O	Compliance Evaluation (Oversight)	2	IU Sampling Inspection		
P	Pretreatment Compliance Inspection	3	IU Non-Sampling Inspection		
R	Reconnaissance	4	IU Toxics Inspections		
S	Compliance Sampling	5	IU Sampling Inspection With Pretreatment		
		6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics With Pretreatment		

Column 19: Inspector Code: Use one of the codes listed below to describe the *lead agency* in the inspection

A - State (Contractor)	O - Other Inspectors, Federal/EPA (Specify in Remarks columns)
B - EPA (Contractor)	P - Other Inspectors, State (Specify in Remarks columns)
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors-EPA Lead	S - State Inspector
L - Local Health Department (State)	T - Joint State/EPA Inspectors-State Lead
N - NEIC Inspectors	

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.
- 5 - Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389

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 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.

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.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K-CAFO, V-SSO, Y-COS, W-Stormwater, 9-MS4. States may also use the new wet weather CAFO and MS4 inspection types shown in column 19 of this form. The EPA regions are required to use the new wet weather CAFO and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.



Figure 1. Aerial view of facility. Photo retrieve from Google Earth 8/28/2023

PIMS Photo Export

<p>Photo 1. Rinsing of raw oysters. Sample collection point</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>NATIONAL FISH & OYSTER</p>
<p>Photo 2. Shucking area</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>NATIONAL FISH & OYSTER</p>

<p>Photo 3. Building drain leading outside catchment</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>NATIONAL FISH & OYSTER</p>
<p>Photo 4. Outside catchment. Conveyer belt for solid waste</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>NATIONAL FISH & OYSTER</p>

<p>Photo 5. Catchment before discharge flows to Outfall 001</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>NATIONAL FISH & OYSTER</p>
<p>Photo 6. Outfall 001</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>NATIONAL FISH & OYSTER</p>
<p>Description</p>	<p>Photographs</p>	<p>Image Name</p>

Photo 7. Outfall 001



NATIONAL FISH
& OYSTER

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