



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • PO Box 330316 • Shoreline, Washington 98133-9716 • (206) 594-0000  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

August 28, 2023

Doug Dickinson  
Syndel  
1441 W Smith Rd  
Ferndale, WA 98248  
***Sent via email***

Dear Doug Dickinson:

Re: Application for State Wastewater Discharge Permit

Water Pollution Control Law, Chapter 90.48 RCW, requires facilities to obtain a permit for the discharge of non-domestic wastewater to a wastewater treatment plant. Ecology conducted a site visit at your facility located at 1441 W Smith Rd, Ferndale, WA 98248 on August 9, 2023. At the site visit Ecology and City of Ferndale staff viewed operations that are potentially discharging industrially-impacted wastewaters to the sewer. Ecology requires Syndel to submit a discharge application to determine permit applicability. Syndel must submit the application within 60 days of receipt of this letter or by October 27, 2023.

The Ecology contact for your facility is Maia Hoffman. Maia has marked those sections of the application which need to be filled out based upon our understanding of your facility. Please submit any additional information that you feel may help Ecology determine the impact of your discharge upon the wastewater treatment plant.

**Completing the Application**

Please use the State Application Form 040-177 from the Ecology website at <https://fortress.wa.gov/ecy/publications/SummaryPages/ecy040177.html> (If you do not have access to a computer, please contact Tricia Miller at 206-594-0167 to request a hard copy.)

Please mail the **original, signed application** to:

Water Quality Permit Coordinator  
Department of Ecology  
Northwest Regional Office  
PO Box 330316  
Shoreline, WA 98133

The application must be signed by either a principal executive officer or ranking elected official (WAC 173-216-070).

Signature authority for submittals required by the permit such as monthly reports may be delegated to a particular, qualified individual or to a position which is expected to be filled by a qualified individual. Please submit a copy of the letter delegating signature authority along with the application for our files.

**Please complete Sections A and J of the application and those sections which are checked below.**

☒ All of *Section B. Product Information* or the following subsections only;

- ☐ 1. Description of manufacturing processes and products
- ☐ 2. Raw materials and products

☒ All of *Section C. Plant Operational Characteristics* or the following subsections only:

- ☐ 1. Wastestream name and ID numbers
- ☐ 2. Schematic drawing of production and flow
- ☐ 3. Wastewater flows
- ☐ 4. Wastewater treatment improvements
- ☐ 5. Seasonal variation of flow
- ☐ 6. Hours and days of operation
- ☐ 7. Incidental materials
- ☐ 8. Other spill and pollution prevention plans

☒ All of *Section D. Water Consumption and Loss* or the following subsections only:

- ☐ 1. Water source
- ☐ 2. Water use

☒ All of *Section E. Wastewater Information* or the following subsections only:

- ☐ 1. Method of flow measurements
- ☐ 2. Measure those parameters checked in the left column ***\*see note below***
- ☐ 3. Collection method for wastewater samples
- ☐ 4. Other data on the effluent
- ☐ 5. Toxic chemicals
- ☐ 6. Pesticides
- ☐ 7. Pollutants
- ☐ 8. Dangerous Wastes

☒ *Section F. Sewer Information*

☒ *Section G. Other Permits*

☒ *Section H. Stormwater*

☒ All of *Section I. Other Information* or the following subsections only:

- ☐ 1. Liquid wastes and sludges
- ☐ 2. Storage areas
- ☐ 3. Designated wastes

#### **Permit Fees**

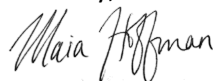
Fees paid by permit holders support the wastewater permit program (RCW 90.48.465). Ecology regulation (Chapter 173-224 WAC) establishes annual permit fees to recover costs associated with issuing and

Syndel  
8/28/2023

managing wastewater discharge permits. Once we have reviewed the application and determined if a permit is required, we will assess a permit fee and notify you. Please direct any questions you may have about the permit fees to the fee unit at [wqfeeunit@ecy.wa.gov](mailto:wqfeeunit@ecy.wa.gov) or 1-800-633-6193.

If you have questions regarding the permit application, please contact Maia Hoffman at (425) 507-5681 or by email at [mhof461@ecy.wa.gov](mailto:mhof461@ecy.wa.gov).

Sincerely,



Maia Hoffman  
Permit Manager  
Northwest Regional Office

**\*Permit application monitoring note**

Syndel must collect samples and report results for the regulated parameters in 40 CFR Part 439 Subpart C for pretreatment standards for new sources, as well as pH, BOD<sub>5</sub>, and TSS. Samples must be representative of the wastewater generated from the production of pharmaceuticals without dilution from other wastestreams. Syndel must use analytical methods approved in 40 CFR Part 136 or authorized for use in the effluent guideline. Since the wastewater is discharged in batches, Syndel may take grab samples. The following table outlines the parameters and recommended analytical methods.

| Parameter            | Recommended Analytical Method |
|----------------------|-------------------------------|
| Ammonia              | SM 4500 NH <sub>3</sub>       |
| Cyanide              | EPA 335.4                     |
| pH                   | SM 4500 H <sup>+</sup>        |
| BOD <sub>5</sub>     | SM 5210 B                     |
| TSS                  | FM 2540 D                     |
| Acetone              | EPA 624.1                     |
| 4-methyl-2-pentanone | EPA 624.1                     |
| Isobutyraldehyde     | EPA 1666                      |
| n-Amyl acetate       | EPA 1666                      |
| n-Butyl acetate      | EPA 1666                      |
| Ethyl acetate        | EPA 624.1                     |
| Isopropyl acetate    | EPA 1666                      |
| Methyl formate       | EPA 1666                      |
| Isopropyl ether      | EPA 1666                      |
| Tetrahydrofuran      | EPA 624.1                     |
| Benzene              | EPA 624.1                     |
| Toluene              | EPA 624.1                     |
| Xylenes              | EPA 624.1                     |
| n-Heptane            | EPA 1666                      |
| n-Hexane             | EPA 1666                      |
| Methylene chloride   | EPA 624.1                     |
| Chloroform           | EPA 624.1                     |
| 1,2-dichloroethane   | EPA 624.1                     |
| Chlorobenzene        | EPA 624.1                     |
| o-Dichlorobenzene    | EPA 624.1                     |
| Diethyl amine        | EPA 1666                      |
| Triethyl amine       | EPA 1666                      |