



**STE  
MICHELLE**  
WINE ESTATES

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February 16, 2024

Caleb Bos, Information Specialist  
Water Quality Program  
Central Office, WA DOE  
1250 West Alder Street  
Union Gap, WA 98903-0009

Re: Comments on draft Wastewater Permit for Canoe Ridge Estate Winery  
State Waste Discharge Permit No. ST0009275

Dear Mr. Bos

Thank you for giving us a chance to review the draft copy of the above referenced Permit and Fact Sheet. In places where we would like language deleted the original language will be identified using the ~~strikeout mode~~, proposed new language will be in **a bold blue font**.

I. Permit Comments:

A. **"S1 Discharge Limits**

**S1.A. Process wastewater evaporation lagoons"**

Please remove the first paragraph under **"S1.A. Process wastewater evaporation lagoons"** since this language is already found in condition **"G11 Duty to Comply"**

B. **"1. Interim Limitations Discharge to Ponds A, B, C, and D Outfall 001"**

**Effluent Limits: Outfall 001**

Pond A - Latitude 45.870070	Longitude -119.779090
Pond B - Latitude 45.887085	Longitude -119.772560
Pond C - Latitude 45.887017	Longitude -119.770926
Pond D - Latitude 45.886827	Longitude -119.774833

**Parameter**

**Maximum Depth**

Effluent Limits: Outfall 001		
Pond A - Latitude 45.870070 Longitude -119.779090		
Pond B - Latitude 45.887085 Longitude -119.772560		
Pond C - Latitude 45.887017 Longitude -119.770926		
Pond D - Latitude 45.886827 Longitude -119.774833		
Depth of Water – Pond A	Minimum of two feet of freeboard – Depth to be determined within 1 year of permit effective date	
Depth of Water – Pond B	Minimum of two feet of freeboard – Depth to be determined within 1 year of permit effective date	
Depth of Water – Pond C	Minimum of two feet of freeboard – Depth to be determined within 1 year of permit effective date	
Depth of Water – Pond D	Minimum of two feet of freeboard – Depth to be determined within 1 year of permit effective date	
	Minimum	Maximum
pH	3.5 standard units	<del>10.0</del> 11.0 standard units

Comment: Ste Michelle Wine Estates (SMWE) Canoe Ridge Wine Estates (CREW) winery is requesting that the maximum pH value be changed to 11.0 since that is consistent with the pH limit at our 14 Hands Winery in Prosser, WA.

C. **“S1.A. 2. Final Limitations Discharge to Ponds A, B, C, and D Outfall 001”**

Comment: As in the above comment CREW is requesting that the maximum pH limit be increased to 11.0 standard units to make it consistent with the permit limits in our 14 Hands Wastewater permit.

D. **“S2. Monitoring requirements**

**S2.A. Process wastewater monitoring”**

The Permittee must monitor the process wastewater and stormwater prior to its discharge to the evaporation ponds.

A sampling station will need to be installed for the wastewater after it leaves the facility and before entering the clarifier and lagoon system within ~~one~~ **four years** year from the effective date of this permit.

Gauges measuring the depth of water in each lagoon ~~with~~ **will** need to be installed within one year of the effective date of this permit.

A letter confirming the installation of the monitoring points and a description of the location and type of equipment installed is due to Ecology within one year from the effective date this permit.

The Permittee must monitor in accordance with the following schedule and the requirements specified in **Appendix A**.

<b>Process Wastewater and Stormwater  Lagoon Influent</b>			
<b>Sample at a Location Before the Clarifier and Lagoon System</b>			
<b>Parameter</b>	<b>Units &amp; Speciation</b>	<b>Sampling Frequency</b>	<b>Sample Type</b>
Flow	gallons/day (gpd)	Continuous <sup>a</sup>	Metered
Flow (Monthly Total)	gallons/month	1/month <sup>b</sup>	Calculated
Depth of Water – Pond A	feet	1/month	Measurement <sup>c</sup>
Depth of Water – Pond B	feet	1/month	Measurement
Depth of Water – Pond C	feet	1/month	Measurement
Depth of Water – Pond D	feet	1/month	Measurement
Biochemical Oxygen Demand (BOD <sub>5</sub> )	mg/L	12/month <sup>d</sup>	24-hour composite <sup>e</sup>
BOD <sub>5</sub>	lbs/day	1/month	Calculated <sup>f</sup>
Soluble BOD <sub>5</sub>	mg/L	2/month	24-hour composite
Soluble BOD <sub>5</sub>	lbs/day	2/month	Calculated
Total Dissolved Solids (TDS)	mg/L	1/month	24-hour composite
TDS	lbs/day	1/month	Calculated
Total Suspended Solids (TSS)	mg/L	1/month	24-hour composite
TSS	lbs/day	1/month	Calculated
Fixed Dissolved Solids (FDS)	mg/L	1/month	24-hour composite
FDS	lbs/day	1/month	Calculated
pH	Standard Units	2/month	Grab <sup>g</sup>
Kjeldahl Nitrogen (TKN)	mg/L as N	1/month	24-hour composite
TKN	lbs/day	1/month	Calculated
Nitrate plus Nitrite Nitrogen	mg/L as N	1/month	24-hour composite

<b>Process Wastewater and Stormwater            Lagoon Influent            Sample at a Location Before the Clarifier and Lagoon System</b>			
Parameter	Units & Speciation	Sampling Frequency	Sample Type
Nitrate plus Nitrite Nitrogen	lbs/day	1/month	Calculated
NH <sub>3</sub> (Ammonia) Nitrogen	mg/L as N	1/month	24-hour composite
NH <sub>3</sub> (Ammonia) Nitrogen	lbs/day	1/month	Calculated
Total Nitrogen	mg/L as N	1/month	Calculated
Total Nitrogen	lbs/day	1/month	Calculated
Total Phosphorus	mg/L as P	1/month	24-hour composite
Chloride	mg/L	1/month	24-hour composite
Total Zinc	mg/L	1/month	24-hour composite
Total Zinc	lbs/day	1/month	Calculated
Total Copper	mg/L	1/month	24-hour composite
Total Copper	lbs/day	1/month	Calculated
a	Continuous means uninterrupted except for brief lengths of time for calibration, power failure, or unanticipated equipment repair or maintenance. The Permittee must sample daily when continuous monitoring is not possible.		
b	1/month means once (1) time during each calendar month.		
c	Not required until one year after the effective date of this permit.		
d	2/month means at least two (2) times during each calendar month.		
e	24-hour composite means a series of individual samples collected over a 24-hour period into a single container, and analyzed as one sample.		
f	Calculate the average lbs per day according to the following formula: Average of concentration measurements times average flow of days of discharge in MG, times 8.34.		
g	Grab means an individual sample collected over a fifteen (15) minute, or less, period.		



Comment: We are requesting that the Soluble BOD and FDS sampling, analysis and calculation requirements be deleted since the wastewater lagoons are not being treated with microbes to reduce the amount of solids in the lagoons.

We are also requesting that the requirements for sampling, analysis, and calculations for TKN, nitrate plus nitrite nitrogen, ammonia, and total nitrogen be deleted since there is ample data from our 14 Hands winery that should be consistent with these items in the wastewater discharges to the CREW wastewater lagoons.

Please delete the requirements for sampling, analysis and calculation for total phosphorus and chloride since wastewater from the CREW wine production is not land applied.

Zinc and copper monitoring and reporting requirements should be removed since the roofs on the buildings at CREW are a composite membrane that contains no zinc or copper.

Footnotes in the table should be revised as necessary.

E. **"S2.FC.Sampling and analytical procedures"**

"Samples and measurements taken to meet the requirements of this permit...."

~~The Permittee must conduct and report all soil analysis in accordance with the Western States Laboratory Plant, Soil and Water Analysis Manual, Soil, Plant And Water Reference Methods for The Western Region, 4<sup>th</sup> Edition, 2013. You can find more information at:~~

~~<http://www.naptprogram.org/files/napt/publications/method-papers/western-states-methods-manual-2013.pdf>.~~

~~The Permittee must also participate in a proficiency testing program such as the North American Proficiency Testing Program. You can find more information at:~~  
~~<http://www.naptprogram.org/>.~~

Comment: please change "S2.F." to S2.C. to be consistent with the permit numbering system; the permit jumps from "S2.B." to "S2.F". Either several sections have been left out by mistake or the permit numbers are typographical errors in the rest of this section.

We also request that the last two paragraphs of this section be removed since CREW is a winery and not a laboratory. As stated on NAPT's webpage

"The North American Proficiency Testing (NAPT) Program of the Soil Science Society of America (SSSA) furnishes agricultural and environmental laboratories with quality assurance and/or quality control tools to generate accurate and precise analyses."

Since CREW is a winery and not a laboratory this requirement should be removed.

F. **"S2.G.D. Flow measurement, field measurement, and continuous monitoring devices"**

The Permittee must:

1. Select and use appropriate flow measurement, field measurement, and continuous monitoring devices and methods consistent with accepted scientific practices.
2. Install, calibrate, and maintain these devices to ensure the accuracy of the measurements is consistent with the accepted industry standard, the manufacturer's recommendation, and approved O&M manual procedures for the device and the ~~wastestream~~ **waste stream**.
3. Calibrate ~~continuous monitoring instruments weekly unless it can demonstrate a longer period is sufficient based on monitoring records~~ **each device or instrument based upon the manufacturer's recommendation. The calibration frequency for each instrument or device should be specified in the O&M manual.** The Permittee:
  - a. May calibrate apparatus for continuous monitoring of dissolved oxygen by air calibration.
  - b. Must calibrate continuous pH measurement instruments using a grab sample analyzed in the lab with a pH meter calibrated with standard buffers and analyzed within 15 minutes of sampling.
  - c. Must calibrate continuous chlorine measurement instruments using a grab sample analyzed in the laboratory within 15 minutes of sampling.
4. Use field measurement devices as directed by the manufacturer and do not use reagents beyond their expiration dates.
5. ~~Establish a calibration frequency for each device or instrument in the O&M manual that conforms to the frequency recommended by the manufacturer.~~
6. ~~Calibrate flow monitoring devices at a minimum frequency of at least one calibration per year.~~



**7.5.** Maintain calibration records for at least three years.

Comment: please change “S2.G.” to S2.D. to be consistent with the permit numbering system. In addition, SMWE feels that the suggested changes to paragraph “3.” make the calibration requirements clear and removes redundant language in conditions “5.” and “6.” Furthermore, instruments should also be calibrated according to the frequency recommended by the manufacturer. If paragraphs 5 and 6 are removed, then paragraph “7.” should be renumbered to paragraph “5.”

**G. “S4. Evaporation lagoon leak survey”**

The Permittee must conduct an electronic leak detection survey of each lagoon (Ponds A-D) in the evaporation lagoon system by **Enter a specific date 2 4 years after effective date.**

Leak detection methods must follow ASTM D6747-04, Standard Guide for Selection of Techniques for Electrical Detection of Potential Leak Paths in Geomembrane and ASTM D7007-16, Standard Practices for Electrical Methods for Locating Leaks in Geomembranes Covered with Water or Earth Materials.

The Permittee must submit results from the leak detection survey, with documented repairs for any leaks found from the survey, by **Enter a specific date 3 5 years after effective date.**

Comment: SMWE is requesting additional time to comply with this requirement since this will be a capital project.

**H. “S8.B. Engineering documents”**

1. The Permittee must prepare and submit an approvable **engineering report** in accordance with WAC 173-240 to Ecology for review and approval by **Enter a specific date 3 years after effective date.**
2. The report must contain any appropriate requirements as described in “*Guidelines for Preparation of Engineering Reports for Industrial Wastewater Land Application Systems*” (Washington State Department of Ecology, 1993).
3. The Permittee must prepare and submit approvable **plans and specifications** to Ecology for review and approval in accordance with chapter 173-240 WAC by **Enter a specific date 4 years after effective date.**

Comment: Will DOE accept an updated version of the original engineering report that was submitted in July 2010?

## II. Fact Sheet Comments:

A. Please amend any comments in the “Fact Sheet” to reflect the language in the final permit.

B. “II.A

### **Table 1 General Facility Information”**

Comment: Please change the “Responsible Official” Information as follows since Stuart McNab is no longer working for SMWE.

Name: ~~Stuart McNab~~ **Laura Eder**

Title: ~~Chief Supply Officer~~ **V.P., Production and Operations**

Address: ~~14111 NE 145th St.~~ **178810 SR 221**

~~Woodinville, WA 98072-6981~~ **Paterson, WA 99345**

Telephone #: ~~(425) 415-3399~~ **(509) 875 – 4213**

C. “**Industrial Process(s)**”

Canoe Ridge Estate Winery industrial processes include manufacturing wines and blending wines. This includes grape crushing/pressing, fermentation of wine, blending of wine, and bottling of wine. The facility operates approximately ~~20~~ **10** hours per day, 4 days per week and 24 hours per day, 7 days per week during harvest (August-November).

Comment: Please change the hours of operation from 20 hours to 10 hours since that is CREW’s operating schedule except during harvest.

D. **Wastewater treatment processes** ~~(prior to land treatment)~~

Comment: Please delete the language in the parenthesis above since none of the wastewater at CREW in land applied

E. “~~Land Treatment and Distribution System~~ **(Evaporation Ponds)**”

Comment: SMWE believes that the above change for this section more accurately reflects the actual operations at CREW. There is no land application of the wastewater and there is more than one evaporation pond/lagoon.



F. **“III. Proposed Permit Limits**  
**A. Design criteria”**

Under WAC 173-216-110 (4), flows and waste loadings must not exceed approved design criteria. Ecology has not approved design criteria for this facility’s treatment plant and the sprayfields. Ecology received an engineering report titled Canoe Ridge Winery Wastewater Balance Report and Calculations dated July 8, 2010 prepared by Meier Architecture and Engineering, although this report has not yet been approved. Ecology provided comments on the report on December 16, 2010, although the report was never approved by Ecology.

Comment: When can SMWE expect approval of the above referenced engineering report?

G. Please amend any comments in the “Fact Sheet” to reflect the language in the final permit.

III. **Appendix A—Public Involvement Information**

- A. Comment: Does the date, January 17, 2024 need to be amended to reflect the current timeline?
- B. Comment: Please change all references to “Canoe Ridge Winery” to Canoe Ridge Estate Winery” to avoid confusion with a winery with a similar name.

C. **Appendix A—PUBLIC COMMENT AND INFORMATION**

The link referenced at the beginning of this paragraph does not appear to be working.

Thank you for the opportunity to review and comment on the draft permit and fact sheet. Please call if you have any questions. I can be reached at [kelly.champion@smwe.com](mailto:kelly.champion@smwe.com) or via telephone at 509.202.2771

Sincerely,



Kelly J. Champion  
EHS, SMWE

