		State of Washington Department of Ecology <b>INSPECTION REPORT</b>			Northwest Regional Office PO Box 330316 Shoreline, WA 98113 ph: (206) 594-0000 (rev. 5-28-21)		
Section A: General Information							
Report Version	PERMIT #	mm/dd/yy	Inspection Type	Inspector Code	Facility Type		
<input checked="" type="checkbox"/> New <input type="checkbox"/> Changed <input type="checkbox"/> Deleted	<b>WA0991008</b>	01/10/24	<b>IU</b>	<b>S</b>	<input checked="" type="checkbox"/> <b>2 Industrial</b>		
Remarks							
Inspection workdays <b>0.25</b>	Facility Self-Monitoring <b>3</b>	Photos Taken <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Samples Taken <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	BI <b>N</b>	QA <b>N</b>		
Lead Ecology Inspector(s) Vu Tran							
Section B: Facility Data							
Name, Location, and Phone of Facility Inspected Hughes Farm, Inc. 13255 Farm to Market Road Mount Vernon, WA 98273			Entry Time 10:00 am	Permit Effective Date January 1, 2017			
			Exit Time 11:30 am	Permit Expiration Date  December 31, 2021			
Name(s)/Title(s) of On-Site Representative(s) David Hughes - President  Hughes Farm Employee			Ecology Staff On-Site Vu Tran – Water Quality Engineer Sylvia Graham – Ecology Inspector				
Name, Address, Title, Phone, and Fax Number of Responsible Official David Hughes - President 13255 Farm to Market Road Mount Vernon, WA 98273 Phone: 360-424-3772			Other Facility Data				
Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)							
<input checked="" type="checkbox"/>	Permit	<input checked="" type="checkbox"/>	Flow Measurement	<input checked="" type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	CSO/SSO (Sewer Overflow)
<input type="checkbox"/>	Records/Reports	<input type="checkbox"/>	Effluent ○ Receiving Water	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Pollution Prevention
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Compliance Schedules	<input checked="" type="checkbox"/>	Pretreatment	<input type="checkbox"/>	Multimedia
<input checked="" type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Laboratory	<input checked="" type="checkbox"/>	Storm Water	<input type="checkbox"/>	Other

## Section D: Summary of Findings/Comments

**I. INTRODUCTION**

Department of Ecology (Ecology) water quality engineer, Vu Tran, and stormwater inspector, Sylvia Graham, conducted an inspection at Hughes Farm, Inc (Hughes Farm). The purpose of the visit was to conduct a routine inspection in preparation for a NPDES permit reissuance and to respond to the Statewide Environmental Incident Report (ERTS) #727166 & #727391. ERTS #727166 detailed visually high turbid conditions in Little Indian Slough. ERTS #727391 detailed a sample collected in Little Indian Slough which resulted in a high value of 20,220 CFU/100 mL for fecal coliforms. The water quality criteria for fecal coliform is 100 CFU/100 mL. Hughes Farm, along with multiple point and non-point sources, discharge treated process wastewater, stormwater, or runoff to Little Indian Slough.

The inspection was announced and coordinated with Hughes Farm representative David Hughes. Hughes Farm is an agricultural farm and potato washing facility located in Mount Vernon.

**II. DISCUSSION AND INSPECTION**

Ecology representatives arrived at Hughes Farm at 10:00 am and was met by owner David Hughes and a Hughes Farm employee. I (Vu Tran) went over the permitting process with David. David informed me that Hughes Farm would like to switch

from the NPDES surface water discharge permit to a state waste discharge permit for land application (groundwater discharge). Maintenance, labor, and costs in maintaining the treatment ponds made groundwater discharge a more feasible alternative to surface water discharge. David would like to directly pump process wastewater from potato washing operations to the adjacent farmlands. I told him that I would send a follow up email with information concerning the permit switch within 7 days of the inspection. I talked to David about Ecology's concern about coliform levels in Little Indian Slough and Padilla Bay and that any reissued NPDES permit will impose a coliform limit.

David suspects that the potential source for ERTS #727166 to be roadwork that may have incidentally discharged turbid waters to the slough as runoff. The prior condition of the road was mostly dirt with potholes and the road improvements involved a regrade of the road surface. Sylvia Graham inspected Little Indian Slough prior to the site visit on December 5, 2023 which showed a change in turbidity at the Hughes Farm outfall to the slough. Ecology will continue to work with Hughes Farm to ensure turbidity limits are met and that facility discharge does not further degrade the slough.

David suspects the most likely source of fecal coliforms from Hughes Farm are birds that defecate in the treatment ponds. Analysis of discharge monitoring reports submitted by Hughes Farm indicate an average e-coli value of 84 cfu/100mL for 2023, 441 cfu/100mL for 2002, and 461 cfu/100mL for 2001 with e-coli levels dropping throughout the years. E-coli is a subgroup of fecal coliforms and acts as an indicator species for fecal coliforms. Hughes Farm is required to monitor and sample e-coli on a bi-weekly basis. Ecology will continue to work with permitted facilities that discharge to Little Indian Slough to implement Best Management Practices to reduce the amount of fecal coliforms from entering the slough.

Hughes Farm grows potatoes on adjacent farmlands and processes the potatoes at their processing facility. Potatoes are the main crop for the facility with various grain and broccoli substituted in various fields as a cover crop. The cover crops are not transported to the processing facility and are instead picked and packaged in the field. Trucks transport the potatoes to the wash line (Photo 1). Wash water is reused three times before it is discharged to the treatment ponds. Trench drains traverse the processing floor where it gets discharged to the treatment ponds (Photo 2). Food safe biocide is applied to the potatoes to prevent growth of harmful microorganisms (Photo 3). The biocide containers were observed to not be stored in secondary containment. Flocculant is stored in secondary containment on the processing floor and metered out to the treatment ponds via a chemical feed pump (Photo 4). Potato wash water drains to an outdoor catch basin (Photo 5) where it joins with stormwater before discharging to the treatment ponds. Outdoor trench drains (Photo 6) capture and drain stormwater from the area between the storage building and the processing building to the treatment ponds. The storage building roof drains to a to an 8" outfall at the sought (Photo 7). The silo area (Photo 8) is located next to the storage building and runoff from this area is designated as Outfall 002.

The treatment ponds are located north of the silo area and west of the processing building. Treatment pond 1 (Photo 9) receives process wastewater from potato washing and stormwater from the middle of the site. Flocculant is mixed inline before discharge to the pond for settling and sedimentation. A pump installed on top of a floating structure allows Hughes Farm to decant water from pond 1 to pond 2. Treatment pond 2 (Photo 10) contains treated water and is the sampling point for the facility. Grab samples are taken directly from the pond and sent to a laboratory for analysis. Pond 2 has a return line to enable reuse of treated water back to the processing building. This feature has not been used due to the possibility of e-coli contamination from birds that frequent the ponds. Sediment buildup in the ponds is removed on an as needed or monthly basis. The sediment is transported back to the farm fields as topsoil.

Treated water drains to Outfall 001 (Photo 11). Outfall 001 is a piped discharge point with an attached flow meter that discharges directly to Little Indian Slough. Hughes Farm monitors permit required analytes from the pond 2 before it is discharged to outfall 001 and Little Indian Slough.

### III. CONCLUSION

Hughes Farm was found to be in violation of the following permit provision.

1. Best Management Practices

S7.B(b) Structural Source Control BMPs

Biocide barrels were not stored on secondary containment.

#### Recommended Actions

- Consult the Ecology link below providing information on secondary containment.

- o <https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/dangerous-waste-basics/proper-containment>
- o Secondary containment must be large enough to contain whichever is greater of the following:
  - 10% of the total volume of all containers holding liquid within the secondary containment, OR
  - 100% of the volume of the largest container holding liquid.

Please store the biocide barrels on secondary containment and provide photographic proof to Ecology Water Quality Engineer Vu Tran by April 15, 2024.

Chapter 173-226 Washington Administrative Code (WAC) requires that no pollutants shall be discharged to waters of the State from any point source, except as authorized by a permit.

Chapter 90.48.080 Revised Code of Washington (RCW) prohibits the discharge of polluting matter into waters of the state.

The Department of Ecology has the authority to issue formal enforcement actions including issuance of orders and civil penalties of up to \$10,000 per day per violation for violations of your NPDES permit and/or state laws and regulations.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Vu Tran <i>Vu Tran</i>	WA Dept. of Ecology, NWRO, (425) 395-2456	3/5/2024
Sylvia Graham <i>Sylvia Graham</i>	WA Dept. of Ecology, NWRO, (360) 927-4900	3/5/2024
Name and Signature of Management QA Reviewer	Agency/Office/Telephone	Date
Monika Kannadaguli <i>Monika Kannadaguli</i>	WA Dept. of Ecology, NWRO, (206) 594-0144	March 05, 2024

Announced Inspection

**INSTRUCTIONS**

**Section A: General Information**

**Report Version:** N for 1<sup>st</sup> version, C for Changed or amended, or D for Delete

**NPDES Permit No.:** Enter the facility's NPDES or State permit number.

**Inspection Date:** Insert the date entry was made into the facility. Use the month/day/year format (e.g.,06/30/04 = June 30, 2004).

**Inspection Type:** Use one of the codes listed below to describe the type of inspection:

A Performance Audit	L Enforcement Case Support	2 IU Sampling Inspection
B Compliance Biomonitoring	M Multimedia	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	

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

C - Contractor or Other Inspectors (Specify in Remarks Columns)	N - NEIC Inspectors
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors - EPA Lead	S - State Inspector
	T - Joint State/EPA Inspectors - State Lead

**Facility Type:** Use of one of the choices 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

**Remarks:** These columns are reserved for remarks.

**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. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, travel time and preparation time. This estimate does not require detailed documentation.

**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.

**Biomonitoring Information.** Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

**Quality Assurance Data Inspection.** Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

**Photos Taken:** Yes or No

**Samples Taken:** Yes or No

**Lead Ecology Inspector:** Enter lead inspector's name

**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), e-mail addresses...; and "Ecology Staff On-Site", which may include staff names, titles, phone numbers, or e-mail addresses.

**Section C: Areas Evaluated During Inspection**

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary.

**Section D: Summary of Findings/Comments**

Support the findings, as necessary, in a narrative report. Use the headings given on the report form (staffing, back-up power) as appropriate. Reference a list of attachments, such as completed checklists, photos, lab reports, etc. Use extra sheets as necessary.

Inspection Photos



Photo 1

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Potato wash line.

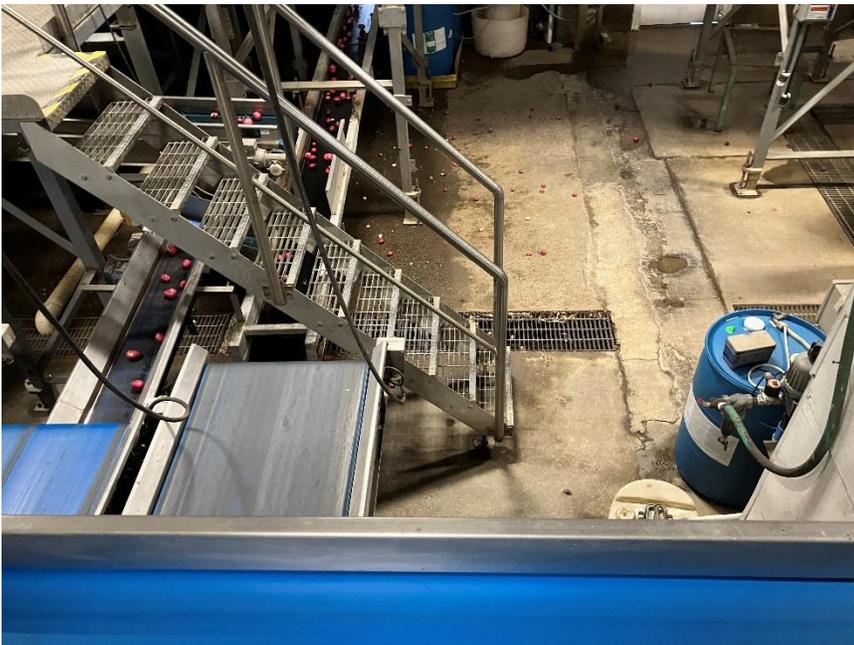


Photo 2

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Trench drains on the processing floor.



Photo 3

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Biocide



Photo 4

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Flocculant



Photo 5

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Catch basin.



Photo 6

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Outdoor trench drains.



Photo 7

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Roof drains on the storage building.



Photo 8

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Silo area.



Photo 9

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Treatment pond 1.



Photo 10

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Treatment pond 2.



Photo 11

Date: January 10, 2024

Taken by: Vu Tran

Witness: Sylvia Graham and David Hughes

Description: Outfall 001.