

March 13, 2025

Matt Durkee  
Department of Ecology Central Regional Office  
1250 West Alder Street  
Union Gap, WA 98903

DEPARTMENT OF ECOLOGY  
CENTRAL REGIONAL OFFICE

RECEIVED

March 14, 2025

Received via: [matthew.durkee@ecy.wa.gov](mailto:matthew.durkee@ecy.wa.gov)

Re: February 2025 violations and Outfall 2 bypass of equalization tank on 3/11/2025. National Pollutant Discharge Elimination System Permit # WA0052078

Mr. Durkee:

As I mentioned in my January follow-up communication, the Sunnyside plant's ammonia samples for Outfall 1 were exceeding the permit limit. Upon learning this, I immediately shut down the discharge to Outfall 1 on February 7th, and we have not resumed discharging there since. The Sunnyside plant discharged to Outfall 1 on five days in February: the 1st, 2nd, 3rd, 6th, and 7th. During these discharge days, our Hach ammonia analyzer never recorded a reading above 1.09 mg/L while discharging to Outfall 1. However, despite these readings, all lab samples exceeded the permit limit. The daily maximum of 1.6 mg/L and the monthly average limit of 1.1 mg/L were both exceeded during the five days of discharge. Please see the table below for details.

DATE	Ammonia sensor minimum mg/L	Ammonia sensor average mg/L	Ammonia sensor maximum mg/L	Lab Analysis Ammonia mg/L
Saturday, February 1, 2025	0.63	0.84	1.08	7.98
Sunday, February 2, 2025	0.72	0.87	1.09	18.50
Monday, February 3, 2025	1.09	1.09	1.09	35.60
Thursday, February 6, 2025	0.14	0.47	1.09	3.77
Friday, February 7, 2025	0.37	0.65	1.02	4.26

We have a Hach technician visit monthly, and his most recent visit was on February 26th. During this visit, he did not find any issues with the unit. Additionally, we conducted extra sampling from Water Recovery System 4 (reverse osmosis), and the results came back significantly lower. See the results below.

WRS-4 Permeate	
Date	Ammonia mg/L
Friday, February 21, 2025	0.81
Monday, February 24, 2025	1.30
Tuesday, February 25, 2025	0.10

Despite the lower lab results, I am not comfortable resuming discharge to Outfall 1. I have scheduled a membrane consultant from Hydrite Chemical to assess our membranes on WRS-4. He is set to be on-site on April 7th. Until then, I will continue directing the Sunnyside plant to divert all flow from Outfall 1 to Outfall 4.

In addition to the Outfall 1 violations, the Sunnyside plant exceeded all of its Outfall 2 Schedule A contract limits in February. This includes volume, COD, TKN, and chloride concentration. Please see the table below.

Outfall #	Parameter	Actual	Schedule A Limit
2	Flow (gallons)	31,497,110	29,727,064
2	COD (pounds)	1,465,886	1,125,439
2	TKN (pounds)	53,429	49,600
2	Chloride (mg/L)	258.1	250

The final purpose of this letter is to inform you that on March 11th, the Sunnyside plant had to bypass its equalization tank again due to high levels. The bypass valve was partially opened, as it was on March 7th. The bypass lasted from approximately 12:00 PM to 4:00 PM. As before, this action was coordinated with the Port of Sunnyside in advance. They will use their ultrasonic flow meter in the flume to determine the daily volume.

The production plant has been working on improving wastewater management but continues to struggle. COW water management issues have contributed—and continue to contribute—to overall volume. High loading to the Port of Sunnyside also remains a concern. Darigold engineers and I are exploring the possibility of adding a second equalization tank and considering partial treatment options. Additionally, I have requested an increase in our Schedule A contract limits with the Port of Sunnyside. While they have agreed in principle to raising the limits, they are unsure of the specific adjustments they can make. Currently, they are implementing upgrades and plan to bring in a consulting company this summer to assess treatment capabilities. As a result, we plan to revisit the Schedule A contract limits later this summer. If you have questions, please feel free to reach out to me. My email is [chris.babcock@darigold.com](mailto:chris.babcock@darigold.com) and my mobile phone number is (509) 854-4379.

Best Regards,



Chris Babcock  
Darigold