

	State of Washington Department of Ecology Northwest Regional Office	substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94) (last file update 12-95.)
	WATER COMPLIANCE INSPECTION REPORT	

Section A: National Data System Coding (i.e., PCS)

Transaction Code 1 <b>N</b> 2 <b>5</b>	NPDES # <i>State Permit Application submitted</i>	yr/mo/day 12 <b>10/12/06</b>	Inspection Type 18 <b>C</b>	Inspector 19 <b>S</b>	Fac Type 20 <b>1</b>
---	--	---------------------------------	--------------------------------	--------------------------	-------------------------

Remarks

Pending Application

Inspection work days 67 <b>1.0</b> 69	Facility Self-Monitoring Evaluation Rating 70 <b>4</b>	BI 71 <b>N</b>	QA 72 <b>N</b>	Reserved 73 _____ 74 _____ 75 _____ 80
--	---	-------------------	-------------------	---

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Hughes Farms 1325 Farm to Market Road Mount Vernon, WA 98273	Entry Time/Date 1 pm 12/06/10	Permit Effective Date
	Exit Time / Date 1:45 pm 12/06/10	Permit Expiration Date

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) David Hughes Plant Owner (360) 424-3772	Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number. David Hughes	
Phone Number: (360) 424-3772 Fax: Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input type="checkbox"/>	Permit	<input type="checkbox"/>	Flow Measurement	<input checked="" type="checkbox"/>	Operations & Maint.	<input type="checkbox"/>	CSO/SSO (Sewer Overflow)
<input type="checkbox"/>	Records/Reports	<input checked="" type="checkbox"/>	Self-Monitoring Program	<input checked="" type="checkbox"/>	Sludge Handling/Disposal	<input checked="" type="checkbox"/>	Pollution Prevention
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Compliance Schedules	<input type="checkbox"/>	Pretreatment	<input type="checkbox"/>	Multimedia
<input checked="" type="checkbox"/>	Effluent/Receiving water	<input type="checkbox"/>	Laboratory	<input checked="" type="checkbox"/>	Storm Water	<input type="checkbox"/>	other

Section D: Summary of Findings/Comments

INTRODUCTION

This was an announced inspection. Cheryl Thompson and I arrived on site at approximately 1:00 pm. We met with Dave Hughes, owner of the plant. The facility submitted a state waste discharge permit application and supplement to Ecology in 2009. The application package has not yet been completed, and I am still waiting for application Form 2D to be submitted for stormwater discharge. Since the last inspection on February 4, 2009, the facility has routed part of their wastewater from the settling pond to a nearby agricultural application site. Mr. Hughes accompanied us on a walk-through inspection of the plant. The following details our discussion and my findings during the inspection.

OBSERVATION

1) We briefly inspected the wash room where we observed potatoes were being moved through the spray washers for cleaning. Washwater is reused three times before it is discharged to the settling pond. Floor washing is conducted at the end of the day. Wastewater including stormwater is collected in an underground collection vault and drained to the settling pond. The vault has a manual control valve (see photo 3). Mr. Hughes informed us that the valve is usually kept in the open position, and it would only be closed if the settling pond is really full. The facility was not discharging at the time of the inspection. Mr. Hughes informed us that since our last visit in February 2009, they have installed a 4-inch underground pipe to route the water from the settling pond to the land application site. This pipe can be viewed crossing over Little Indian slough to the field (see photo 8).

2) Mr. Hughes indicated that there have been no significant changes at the plant. In June of last year they lost about 35% of their potatoes because of the weather. Beside potatoes, they grow other vegetables such as cucumbers in the summer.

3) Stormwater from the site is drained to the collection system which ultimately drains to the settling pond. The area around the buildings is paved, but the access road to the plant is not paved (See photo 6 and 7). Those unpaved areas

appeared to be muddy from truck traffic. There are underground graded catch basins throughout the site. We did not observe a filter in these catch basins.

### CONCLUSION

We did not observe any water quality violations during our inspection. However, Ecology is concerned that the settling pond is being made larger and larger each year. Dave Hughes indicated that he will inform his staff not to dredge the pond too much when they are cleaning out the sludge build-up in the pond.

Name(s) and Signatures of Inspector(s)  Jeanne Tran	Agency/Office/Telephone WA Dept. of Ecology/NWRO/(425)649-7078 3190 160th SE, Bellevue, WA 98008-5452	Date 1/13/11
 Cheryl Thompson	WA Dept. of Ecology/NWRO/(425)649-7001 3190 160th SE, Bellevue, WA 98008-5452	1-31-11
Signature of Management Q A Reviewer  David Shively	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/(425)649-7000 fax (425)649-7098	Date 2-7-11

**ANNOUNCED** Inspection



**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.

**Columns 3-11: NPDES Permit No.** Enter the facility's NPDES permit number. *(Use the Remarks columns to record 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	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	

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

C - Contractor or Other Inspectors <i>(Specify in Remarks Columns)</i>	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

**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

**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 of all 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. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

**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.



**PHOTO NO. 1**

DATE: 12/6/10

TAKEN BY:  
Jeanne Tran

WITNESS: Cheryl  
Thompson, David  
Hughes

FACILITY:  
Hughes Farms

DESCRIPTION:  
The facility  
discharges potato  
washwater to the  
settling pond,  
located northwest  
of the facility. This  
pond is shared with the neighboring facility, Sulex.



**PHOTO NO. 2**

DATE: 12/6/10

TAKEN BY:  
Jeanne Tran

WITNESS: Cheryl  
Thompson, David  
Hughes

FACILITY:  
Hughes Farms

DESCRIPTION:  
Potatoes are being  
routed through the  
wash table for  
washing.





**PHOTO NO. 3**

DATE: 12/6/10

TAKEN BY:  
Jeanne Tran

WITNESS: Cheryl  
Thompson, David  
Hughes

FACILITY:  
Hughes Farms

DESCRIPTION:  
All process wash  
water and  
stormwater are  
collected in this  
wastewater  
collection vault.

The water in the vault can be manually controlled to be released to the settling pond. However, the valve is typically left open unless the pond is full.



**PHOTO NO. 4**

DATE: 12/6/10

TAKEN BY:  
Jeanne Tran

WITNESS: Cheryl  
Thompson, David  
Hughes

FACILITY:  
Hughes Farms

DESCRIPTION: A  
view of the  
removed mud/soil  
from the potatoes  
being moved by  
means of a  
conveyor belt to the truck. The soil is to be trucked back to the field.





**PHOTO NO. 5**

DATE: 12/6/10

TAKEN BY:  
Jeanne Tran

WITNESS: Cheryl  
Thompson, David  
Hughes

FACILITY:  
Hughes Farms

DESCRIPTION:  
The off-spec  
potatoes are being  
taken by elevator  
up into the hopper,  
where they are  
ground up and  
trucked out for livestock feed.



**PHOTO NO. 6**

DATE: 12/6/10

TAKEN BY:  
Jeanne Tran

WITNESS: Cheryl  
Thompson, David  
Hughes

FACILITY:  
Hughes Farms

DESCRIPTION:  
Stormwater runoff  
from the paved area  
is drained to the  
underground catch  
basin, which drains  
to the settling pond.





**PHOTO NO. 7**

DATE: 12/6/10

TAKEN BY:  
Jeanne Tran

WITNESS: Cheryl  
Thompson, David  
Hughes

FACILITY:  
Hughes Farms

DESCRIPTION:  
The access road to the plant is not paved. Stormwater runoff either infiltrates to the ground or drains to the nearest catch basin, which drains to the settling pond.



**PHOTO NO. 8**

DATE: 12/6/10

TAKEN BY:  
Jeanne Tran

WITNESS: Cheryl  
Thompson, David  
Hughes

FACILITY:  
Hughes Farms

DESCRIPTION: A view of Little Indian Slough. The 8-inch white pipe gravity drains water from the settling pond to the land application site.

