

State of Washington Department of Ecology  
Northwest Regional Office  
**WATER COMPLIANCE INSPECTION REPORT**

substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94) (last file update 12-95.)

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

Transaction Code 1 <b>N</b> 2 <b>5</b>	NPDES # <b>WA 0501489</b>	yr/mo/day 12 <b>13/10/24</b>	Inspection Type 18 <b>C</b>	Inspector 19 <b>S</b>	Fac Type 20 <b>1</b>
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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) <b>Hughes Farms</b> <b>1325 Farm to Market Road</b> <b>Mount Vernon, WA 98273</b>	Entry Time/Date <b>11:35 am 10/24/13</b>	Permit Effective Date
	Exit Time / Date <b>1:12 pm 10/24/13</b>	Permit Expiration Date

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  
**Jose Velazquez**  
**Plant Manager**

Other Facility Data

Name, Address of Responsible Official/Title/Phone and Fax Number.  
**David Hughes**  
**Owner**

Phone Number: (360) 424-3772 Fax: Contacted?  Yes  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 checked="" 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 checked="" type="checkbox"/> other

Section D: Summary of Findings/Comments

INTRODUCTION

This was an unannounced inspection. Cheryl Thompson and I arrived on site at approximately 11:35 am. We signed in, and spoke with Dean Cunningham, Marketing Manager, in the office. Dean informed us that he is not familiar with the plant's wastewater management and disposal methods. Dave Hughes was out in the field harvesting potatoes at the moment, but the plant manager, Jose Valazquez was able to assist us with our inspection. Dean couldn't reach Jose. He gave us the okay to walk around and inspect the site's drainage on our own. As we walked around the back of the plant, the processing area, we saw Jose on a tractor. We introduced ourselves, and Jose answered our questions, and showed us the potato washer assembly line, and wash water collection points. He gave us directions to drive to the nearest point to walk to the application site. Then, Cheryl and I drove to, and inspected the 141-acre application lot. The following details our discussion and our findings during the inspection.

FINDINGS

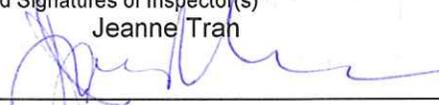
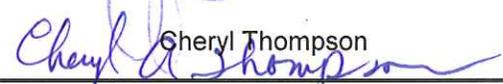
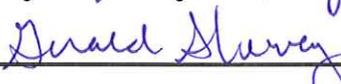
1) Jose informed us that all wash water and stormwater runoff (see photos # 3 to 13) from the yard are collected in a large underground vault (see photo #12), which is gravity drained to the settling pond. This pond is not lined, and the outlet of the pond is piped to the land application site. It appears that all water collected is routed to the farmland for land application and that there is no discharge to surface water. The wash water from the plant is reused two times, prior to discharge to the settling pond. There are approximately 5 underground stormwater vaults located around the processing buildings, and they all drain to the large underground vault. We observed no absorbent pad or stormwater filters installed in the on-site stormwater vaults.

2) Since Hughes Farms discharges to the settling pond on a regular basis (more often than the neighboring facility, Chemtrade Sulex), Hughes Farms has assumed the responsibility of maintaining the settling pond. This includes dredging the settling pond every other year or as often as necessary(See photo #13). The water in the settling pond had a muddy appearance.

3) The outlet of the settling pond is piped underneath and across the facility's access road and across the public access road (Farm to Market Road), to the farmland (see photos #14-18). The water is emptied into the field ditch (see photos #19 - 24), where it is then drawn and irrigated on the field. Each end of the field ditch is blocked off with a wooden barrier/plate to prevent water from draining off-site (see photos #21 and 24). The entire farmland is approximately 140 acres in area.

**CONCLUSION**

We verified that the facility discharges its wastewater to the land surface by means of irrigation, and there appears to be no surface water discharge. This implies that the facility would need a state waste discharge permit to discharge to land surface by means of land application. However, the consultant firm, Semrau Engineering & Surveying, PLLC, retained by the facility indicated that the facility might not be able to extend the lease agreement for the farmland with the property owner, and is anticipated to begin discharge to the surface waterbody, Little Indian Slough, in the near future. The expiration date of the lease is unknown at this point. Jeanne awaits the consultant's verification of the expiration date in order to determine the type of discharge permit to be issued to the facility.

Name(s) and Signatures of Inspector(s) Jeanne Tran 	Agency/Office/Telephone WA State Dept. of Ecology/NWRO/(425)649-7078 3190 160th SE Ave, Bellevue, WA 98008-5452	Date 11/12/13
Cheryl Thompson 	WA State Dept. of Ecology/NWRO/(425)649-7001 3190 160th SE Ave, Bellevue, WA 98008-5452	
Signature of Management Q A Reviewer 	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/(425)649-7000 fax (425)649-7098	Date 11/14/2013

**UNANNOUNCED** 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 (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

**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 ADDENDUM – HUGHES FARMS, INC., WA0501489**

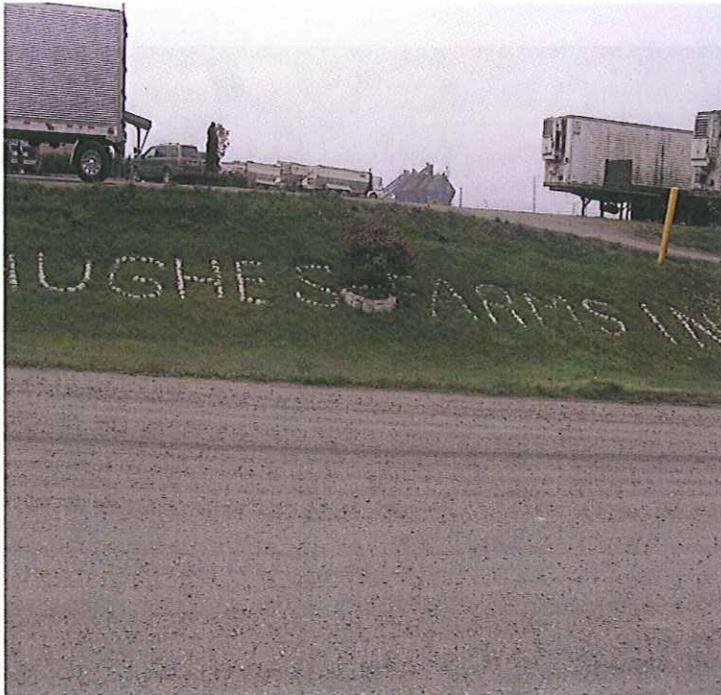


PHOTO #:01 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: ARRIVED AT HUGHES FARMS AT 11:37 AM.



PHOTO #:02 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: TRUCK LOADING AREA, LOCATED EAST OF THE OFFICE, WEST OF THE COOLER, AND NORTH OF THE WARE HOUSE.



PHOTO #:03 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: POTATO TRUCK OFF-LOADING AREA.



PHOTO #:04 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: A VIEW OF THE POTATO WASHER ASSEMBLY LINE.

**PHOTO ADDENDUM – HUGHES FARMS, INC., WA0501489**



PHOTO #:05 DATE: 10/24/13 TAKEN BY: JEANNE TRAN:  
DESCRIPTION: WASH WATER BEING COLLECTED IN A LARGE TUB  
TO SCREEN OUT ROCKS AND LARGE DEBRIS.



PHOTO #:06 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: SCREENED WASH WATER IS THEN DISCHARGED  
INTO FLOOR SUMPS FOR COLLECTION AND SEDIMENTATION  
TREATMENT PRIOR TO BEING REUSED FOR SECOND AND THIRD  
WASHES. WASH WATER IS REUSED THREE TIMES PRIOR TO  
DISCHARGE TO THE SETTLING POND LOCATED NORTH OF THE  
FACILITY.



PHOTO #:07 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: THIS STORMWATER DRAIN IS LOCATED OUTSIDE OF  
THE INCOMING TRUCK OFF-LOADING BUILDING.



PHOTO #:08 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: SCREENED SOLIDS ARE CONVEYED OUT OF THE  
PLANT AND INTO TRUCKS TO BE TAKEN BACK TO THE FIELD.

**PHOTO ADDENDUM – HUGHES FARMS, INC., WA0501489**



PHOTO #:09 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: SOIL LOADED ON TRUCK, WAITING TO BE TAKEN BACK TO THE FIELD FOR RE-APPLICATION.



PHOTO #:010 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: SOME AREAS OF THE PLANT ARE NOT PAVED, AND STORMWATER RUNOFF DRAINS INTO UNDERGROUND SUMPS, WHICH DRAIN INTO AN UNDERGROUND COLLECTION SUMP BEFORE IT IS GRAVITY DRAINED TO THE SETTLING POND.



PHOTO #:11 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: A VIEW OF THE STORMWATER SUMP. NO ABSORBENT PADS OR STORMWATER FILTER WERE OBSERVED IN STORMWATER DRAINS.



PHOTO #:12 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: AN UNDERGROUND COLLECTION SUMP LOCATED WEST OF THE PROCESSING PLANT AND SETTLING POND. THIS SUMP COLLECTS WASH WATER AND STORMWATER AND GRAVITY DRAINS IT TO THE SETTLING POND.

## PHOTO ADDENDUM – HUGHES FARMS, INC., WA0501489



PHOTO #:13 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
 DESCRIPTION: THE SETTLING POND THAT HUGHES FARMS SHARES WITH NEIGHBORING FACILITY, CHEMTRADE SULEX. SINCE HUGHES FARMS DISCHARGES INTO THIS SETTLING POND ON A REGULAR BASIS IN COMPARISON TO CHEMTRADE SULEX, HUGHES FARMS MAINTAINS AND DREDGES THE SETTLING POND WHENEVER IT IS NECESSARY.



PHOTO #:14 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
 DESCRIPTION: CURRENTLY, THE SETTLING POND'S OUTLET IS PIPED UNDER THE ROADS TO THE LAND APPLICATION FIELD FOR IRRIGATION.



PHOTO #:15 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
 DESCRIPTION: A CLOSE UP VIEW OF THE POND'S OUTLET BEING PIPED ACROSS AND UNDER THE FACILITY ACCESS ROAD, THEN TRAVELS WEST ACROSS AND UNDERNEATH FARM TO MARKET ROAD TO THE LAND APPLICATION SITE.



PHOTO #:16 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
 DESCRIPTION: AFTER CROSSING THE FACILITY'S ACCESS ROAD, THE PIPE IS ELBOWED AND CONTINUES UNDERGROUND AND ACROSS THE FARM TO MARKET ROAD TO THE LAND APPLICATION SITE.

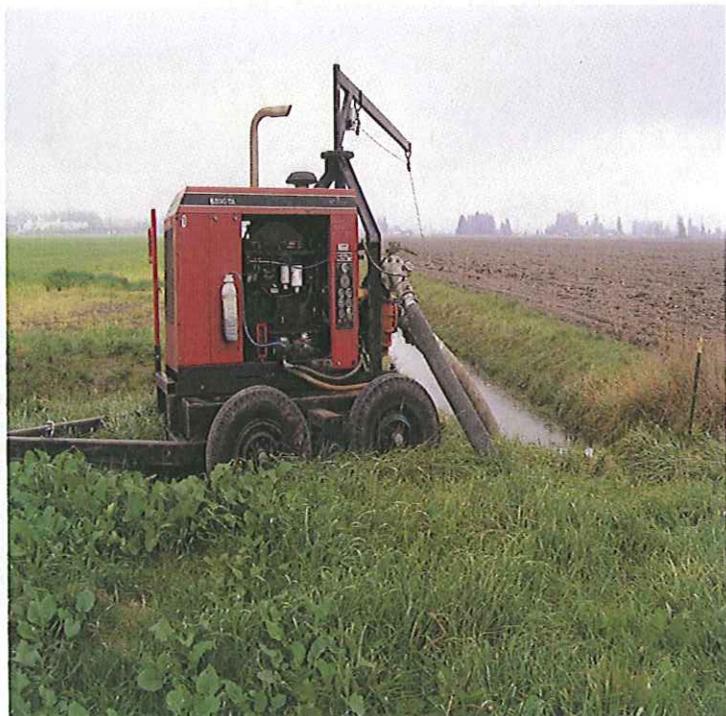
**PHOTO ADDENDUM – HUGHES FARMS, INC., WA0501489**



**PHOTO #:17** DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: A VIEW OF THE FACILITY'S ACCESS ROAD, WHERE THE TRANSFER PIPE TRAVELS ALONG UNDERGROUND AND ACROSS THE FARM TO MARKET ROAD.



**PHOTO #:18** DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: FARM TO MARKET ROAD, THE TRANSFER PIPE TRAVELED UNDERNEATH THIS ROAD AND ACROSS TO THE LAND APPLICATION SITE.



**PHOTO #:19** DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: WATER FROM THE TRANSFER PIPE DISCHARGES INTO THE FIELD DITCH PRIOR TO BEING LAND APPLIED TO THE FIELD.



**PHOTO #:20** DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: A CLOSE-UP VIEW OF THE FIELD DITCH IN THE FARMLAND APPLICATION SITE.

**PHOTO ADDENDUM – HUGHES FARMS, INC., WA0501489**



PHOTO #:21 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: EACH END OF THE DITCH IS BLOCKED OFF WITH A WOODEN PLATE TO PREVENT FLOW FROM DRAINING OFF SITE.



PHOTO #:22 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: WATER IN THE DITCH IS THEN WITHDRAWN AND LAND APPLIED THROUGH AN IRRIGATION SYSTEM.

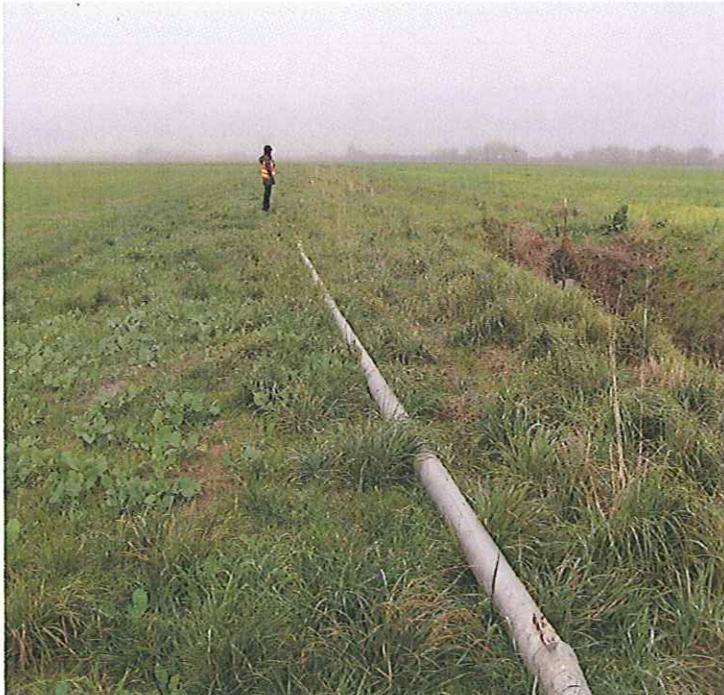


PHOTO #:23 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: ANOTHER VIEW OF THE END OF THE FIELD DITCH.



PHOTO #:24 DATE: 10/24/13 TAKEN BY: JEANNE TRAN  
DESCRIPTION: ANOTHER VIEW OF THE END OF THE FIELD DITCH WHICH IS BLOCKED OFF TO PREVENT FLOW FROM DRAINING OFF-SITE.