



NPDES Compliance Inspection Report

Nisqually Clear Creek Fish Hatchery

**NPDES Permit Tracking Number
WAG130015**

Inspection Date: August 8, 2023

Prepared by:

Vanessa Oquendo
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Surface Water Enforcement Section

Inspector Signature/Date:

VANESSA OQUENDO	Digitally signed by VANESSA OQUENDO Date: 2023.09.28 12:23:42 -07'00'
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Supervisor Signature/Date:

Marshalonis, Daniel (Dino)	Digitally signed by Marshalonis, Daniel (Dino) Date: 2023.09.28 12:46:01 -07'00'
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ATTACHMENT A - Site Aerial Images and Maps

ATTACHMENT B - Photograph Log

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Bill St. Jean, Mr. Tom Friedrich, and Ms. Marissa Paulling or from observations made during the inspection.]

I. Facility Information

Facility Name:	Nisqually Clear Creek Fish Hatchery
Facility Address:	#1 Fish Hatchery Lane, Olympia, WA 98513
Facility Operator:	Nisqually Indian Tribe
Facility Owner:	U.S. Fish and Wildlife Service
Facility Contact(s):	Bill St. Jean Chief Enhancement Biologist Nisqually Indian Tribe Phone: (360) 789-5038 Email: stjean.william@nisqually-nsn.gov Tom Friedrich Biologist Nisqually Indian Tribe Phone: (360) 664-3767 Email: tom@nisquallyriver.org Marissa Paulling Hatchery NPDES Permit Biologist Northwest Indian Fisheries Commission Phone: (360) 515-8205 Email: mpaulling@nwifc.org
Latitude/Longitude:	47.031305°N, - 122.670786°W
NPDES Tracking Number:	WAG130015
NAICS Code(s):	112511
SIC Code(s):	0921
Facility Size:	Approximately 90 acres

II. Inspection Information

Inspection Date:	August 8, 2023
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Inspector(s): Vanessa Oquendo
EPA Region 10, ECAD / SWES

Kyle Masters
EPA Region 10, ECAD / SWES

Arrival Time: 9:46 AM
Departure Time: 3:15 PM

Weather: Sunny and warm

Purpose: To evaluate compliance with the requirements of the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) Federal Aquaculture Facilities and Aquaculture Facilities Located in Indian Country Within the boundaries of the State of Washington.

III. Permit Information

This facility is permitted under NPDES permit WAG130015. The permit became effective on August 1, 2016. The expiration date of the permit was July 31, 2021 and has been administratively extended.

IV. Facility Background

The Nisqually Clear Creek Fish Hatchery (“Facility”) is a Chinook and Coho salmon hatchery that operates year-round. The Facility is owned by the U.S. Fish & Wildlife Service (USFWS) but operated and funded by the Nisqually Indian Tribe. The USFWS checks on Facility infrastructure, such as buildings, every five years. The primary purpose of the Facility is to produce fish to properly stock adjacent habitat for tribal and recreational use. The Facility produces approximately 45,000 fish per year.

Facility operations include egg harvesting from returning adult salmon between late September through November, egg incubation for 6-8 weeks, and fish fry rearing until they are released into Clear Creek between April and June depending on species. Fish health checks are conducted by a pathologist and veterinarian monthly. Clear Creek subsequently flows into the Nisqually River as the receiving waterbody indicated in the Facility’s Notice of Intent (NOI). The Facility utilizes continuous water flow from its intake sources (springs, wells, and the Forebay) for egg incubation and fish rearing activities and continuously discharges directly to Outfall 001 at Clear Creek or indirectly via the Forebay dam spillway.

The Facility is divided up into an upper and lower hatchery complex. The upper hatchery complex is the southernmost portion of the Facility and includes the incubation building, ten raceways, rearing pond #11 and an offline settling basin (OLSB) to manage solids generated from the upper hatchery complex raceways and the rearing pond. The water supply is obtained from two spring water sources and four wells near the upper

hatchery complex. Intake water is collected in a water tower and then routed through the incubation building, raceways, and rearing pond #11 before being discharged into the Upper Forebay waterbody. The Facility can also route water to Outfall 001 if necessary. See **Attachment A**, Site Aerial Images and Maps.

The lower hatchery complex is the northernmost portion of the Facility and includes rearing ponds #13-16 and an OLSB for rearing pond solids management. The Lower Forebay, located downgradient of the upper hatchery complex discharge, supplies water for rearing ponds #13-15. A nearby well and spring are the intake sources supplying water to rearing pond #16. Water used in the lower hatchery complex routes through the rearing ponds before discharged to Outfall 001. See **Attachment A**, Site Aerial Images and Maps.

The Forebay waterbody adjacent to the Facility is divided up into the Upper and Lower Forebay, with the Upper Forebay located in the upper hatchery complex and the Lower Forebay located in the lower hatchery complex. Water in the Forebay flows to the North (Upper Forebay to Lower Forebay). Mr. St. Jean explained that the Forebay was created from surrounding spring activity. Dam construction North of the Forebay (near the lower hatchery complex) also contributed to its creation. The dam has a spillway that can discharge Forebay water into Clear Creek if the Forebay water level is high enough.

According to Mr. St. Jean, the Facility was previously inspected by EPA in August of 2019 and confirmed by compliance monitoring data in EPA's Enforcement and Compliance History Online (ECHO).

On October 30, 2019, EPA sent a letter to the Nisqually Tribe Chairman offering an opportunity to consult on permit noncompliance based on the August 2019 inspection. That consultation meeting was held on February 4, 2020. On February 19, 2020, the Nisqually Director of the Department of Natural Resources sent a commitment letter to EPA outlining steps the Facility and the Nisqually Tribe were going to take to return to compliance. On March 9, 2020, EPA sent a response letter thanking the Nisqually Tribe Director of Natural Resources for the consultation meeting and for the subsequent commitment letter.

V. Inspection Chronology

This was an announced inspection. On Thursday July 20, 2023, I emailed Mr. St. Jean announcing the inspection and targeting the morning of August 8, 2023 to conduct the inspection. The next day, I received a response email from Mr. Bill St. Jean indicating an inspection on August 8, 2023 would work for his schedule and requested to know what time the inspection was to begin so that he could allow access into Joint Base Lewis-McChord. I responded to Mr. St. Jean confirming an inspection start time of 9:30AM on August 8, 2023.

Upon arriving on-site, Mr. Masters and I made our way to the Facility's main office and stopped at Outfall 001 and observed the Lower Forebay along the way. The inspection consisted of an opening conference, a walk-through of the Facility's hatchery operations from influent sources to discharge point, partial records review, and ended with a

closing conference. An in-depth review of additional records was conducted post inspection/offsite. We were accompanied by Mr. St. Jean, Mr. Friedrich, and Ms. Paulling throughout the inspection except in the beginning upon arriving on site when we observed Outfall 001 and the Lower Forebay with Mr. St. Jean only.

VI. Opening Conference

Opening conference began at 10:11AM.

We met Mr. St. Jean at one of the Joint Base Lewis-McChord gates at 9:46AM. Mr. St. Jean granted us access through the gate and we followed him to the hatchery. Upon arrival at the Facility, Mr. St. Jean showed us Outfall 001 and the Lower Forebay and then we held the opening conference with Mr. Friedrich and Ms. Paulling joining in. We held initial introductions and presented our inspector credentials to all Facility representatives. Then we discussed the purpose and scope of the inspection. During the opening conference, Facility representatives provided a general background of the Facility operations, current staffing, and general hatchery management responsibilities during which we also followed up on prior informal enforcement actions from the last EPA inspection.

VII. Site Review

See **Attachment A** for detailed site maps and **Attachment B** for a photograph log of pictures taken during the site walk-through. Prior to commencing the opening conference and on the way to the Facility's main administration building, Mr. Masters and I began a brief portion the site walkthrough. Mr. St. Jean showed us Outfall 001, the Facility's single discharge point into Clear Creek (**Photo 1**) located in the lower hatchery complex. We observed active discharge at the time of inspection. All upper and lower hatchery wastewater discharges to Outfall 001 except for Pond #16 because it was inactive at the time of inspection. Pond #16 is also Outfall 002 per the Facility's NOI. Proportional effluent flow sampling is conducted at Outfall 001 using bottles attached to long poles. Clear Creek downgradient of the discharge point appeared clean with no turbidity (**Photo 2**).

Mr. St. Jean then showed us the fish ladder (**Photo 3**) on the way to view the Lower Forebay (**Photo 4**). Coho salmon are retained in the Lower Forebay but not fed. Water in the Lower Forebay can be ultimately discharged to Clear Creek through Outfall 001 via a dam spillway for Lower Forebay overflow (**Photo 5**). At the time of inspection, the dam was flowing out to allow for Coho salmon release from the Lower Forebay.

Mr. Friedrich and Ms. Paulling joined us for the remainder of the site walkthrough (post-opening conference) on our way to the spring intake sources in the upper hatchery complex. We walked past the main water distribution towers (**Photo 6**). The springs feed one tower and wells feed the other tower. We viewed Spring #2 that had a culvert and a collection box piped to the water distribution tower (**Photo 7**). On our way to Spring #1, we observed the Upper Forebay (**Photo 8**). Mr. St. Jean indicated the Upper Forebay was fed by a spring and used to be the creek. At the end of the Forebay, we viewed Spring #1 (**Photo 9**). Then we viewed the Clear Creek Springs intake that had a

valve to pipe spring water to the main water distribution tower (**Photo 10**).

On our way back to the main upper hatchery complex, we observed the mechanism for the Facility to draw water from the Forebay into the upper hatchery complex raceways and into Pond #11 (**Photo 11**). As we walked North, we observed a dam dividing the Upper Forebay and Lower Forebay with a release pipe (**Photo 12**).

We walked toward the incubation building in the upper hatchery complex. Next to the incubation building was the Facility's diesel station containing 500 gallons of diesel within a double-walled tank that was properly labeled (**Photo 13**). This diesel station fuels Facility equipment, tractors, generators, and pumps. We observed the Facility's formaldehyde storage with secondary containment (**Photo 14**). Safety Data Sheets for all Facility chemicals are maintained in the main office and a spill kit was located next to the incubation building. We observed inside the egg incubation building that was inactive at the time of inspection (**Photo 15**). The incubation building receives water from the spring-fed water tower. Any chemicals applied to eggs, such as formaldehyde and iodine, are subsequently discharged via a pipe into the woods.

Next, we walked to the upper hatchery complex's raceways (**Photo 16**). Some of the raceways contained fish at the time of inspection. Raceways not in use are cleaned using a vacuum and then wastewater is pumped to the offline settling basin (OLSB). Flow for each raceway is measured by hand using the crest weir. Raceway water can also be pumped to pond #11 (**Photo 17**) which can be discharged back into the Forebay. When fish in these raceways achieve adequate growth, they are transferred to rearing ponds in the lower hatchery complex. We then observed the OLSB (**Photo 18**) where vacuumed waste is settled. OLSB solids are pumped into the woods a few yards North of the OLSB (**Photo 19**) and remaining water decants and subsequently discharges into Clear Creek through Outfall 001.

We then drove North to the lower hatchery complex where we observed another OLSB that functioned the same way as the upper hatchery complex's OLSB. We also observed the adult rearing ponds in this complex. Pond #15 was empty, but the Facility was expecting to fill it with adult fish within the next three weeks (**Photo 20**). The intake for pond #15 was located at the Lower Forebay (**Photo 26**). We observed another diesel station containing 500 gallons of diesel within a double-walled tank that did not have a National Fire Protection Association (NFPA) label on it (**Photo 21**). As we walked East across the lower hatchery complex, Mr. Masters noticed an unlabeled glass jar with no lid that contained an unknown white substance (**Photo 22**). At the time of inspection, Facility representatives were investigating what the substance was. We observed pond #13 that was active to facilitate straggler Coho salmon release from the Lower Forebay (**Photo 23**). We then observed the spawning area where each trough has a drain that discharges to the lower hatchery complex OLSB (**Photo 24**). Pond #16 was the last lower hatchery complex pond we observed was not in use (**Photo 25**). Pond #16 had not been in use for the last couple of years due to insufficient spring and well water. If pond #16 was in use, it can release Chinook salmon into the Lower Forebay. Pond #16 can also discharge to Clear Creek via a dedicated pipe only if it is being drawn down.

We concluded the site walkthrough going through the Facility's in-house laboratory, located in the same main administration building, where all sampling analyses are conducted. Cones were used in settleable solids analysis (**Photo 27**), and disks were also used to bake samples in the lab's oven before measuring required parameters. Results are recorded in internal Facility bench sheets (**Photo 28**) and then reported in DMRs. We proceeded back to the Facility's conference room of the administration building.

VIII. File Review

Unless otherwise noted, the following documents were reviewed post-inspection due to some not being available nor accessible at the time of inspection (all documents received electronically on September 25, 2023 – sent by Mr. St. Jean and Mr. Friedrich):

- Best Management Practices Plan (BMP Plan) was reviewed during the site inspection. The Facility had a current BMP Plan onsite that was certified on August 7, 2023. According to EPA's ECHO and EPA's Integrated Compliance Information System (ICIS), the Facility has not submitted timely annual review certification statements since 2018. During onsite review, we observed the following deficiencies:
 - Additional detail is needed on personnel training such as describing content and frequency to ensure personnel are properly trained in spill prevention and response as well as operational maintenance at the Facility.
 - Additional detail is needed on how the Facility prevents fish from entering quiescent zones.
 - Additional detail is needed on drug and chemical use to include roles of the pathologist and veterinarian and their prescription or application of any drugs or chemicals on fish at the Facility.
- Quality Assurance Plan (QAP) was reviewed during the site inspection. The Facility had a QAP onsite that was dated for February 18, 2020, but not recently certified. During onsite review, we observed the following deficiencies:
 - Sampling and analyses procedures need to be updated to include more detail on oven testing, effluent flow measurements, and that all analyses are conducted in a Facility in-house lab by Facility personnel including what the method detection limits are for each measured parameter.
 - Site map indicating location of each sampling point was illegible.
 - Generally, the QAP needs to be updated to reflect current year certification.
- Notice of Intent – The Facility's most recent NOI was certified by Mr. St. Jean on 2/2/2021. NOI information aligned with hatchery operations observed during the inspection and during records review (onsite and post-inspection).
- Annual Reports – Years reviewed were 2018 - 2022. The 2020 annual report was missing and has not yet been submitted to EPA. All reports reviewed were submitted late to EPA (except 2020's report), but generally aligned with hatchery operations during the inspection and during records review (onsite and post-inspection).
- Monthly monitoring results - Discharge Monitoring Reports (DMRs): I reviewed the following random sample of DMRs for Outfall 001 between 2018 and 2023 and compared submitted DMR data for monitored parameters with Facility-specific documents such as internal bench sheets and flow spreadsheets :
 - December of 2019

- October of 2021
 - April of 2021
 - May of 2022
 - June of 2023
- According to EPA’s ICIS and ECHO, there were 13 instances of late DMR submittals between March 2020 and July 2023.
- No effluent violations were observed.
- I had the following observation from the random sample DMR review:
 - The Facility needs to identify what its own laboratory method detection limits are for required parameters to ensure compliance with Part IV.E. of the General Aquaculture Permit indicating that “for purposes of reporting on the DMR for a single sample, if a value is less than the Method Detection Limit (MDL), the Permittee must report less than {numeric value of the MDL}”. Method detection limits are not stated in the Facility’s QAP.
- Internal Facility laboratory bench sheets and flow spreadsheets were reviewed and generally met permit requirements apart from not knowing what the method detection limits are for measured parameters.
- Annual production logs were reviewed and supported annual report information.

IX. Areas of Concern

Observations during the inspection and post-inspection records review identified the following areas of concern:

A. Best Management Practices Plan

Part IV.G.5.a of the General Aquaculture Permit describes the material storage requirements of the BMP Plan.

Part IV.G.5.d of the General Aquaculture Permit describes the training requirements of the BMP Plan.

Part IV.G.5.e of the General Aquaculture Permit describes the operational content requirements of the BMP Plan.

The lower hatchery complex diesel station did not have an NFPA label on it, and an unlabeled glass jar with no lid containing an unknown white substance was observed during the inspection. Both of these observations suggest a need for the Facility’s BMP Plan material storage section to be updated to ensure the Facility follows proper material storage procedures.

Additional detail is needed in the BMP on personnel training such as describing content and frequency to ensure personnel are properly trained in spill prevention and response as well as operational maintenance at the Facility.

Additional detail is needed on how the Facility prevents fish from entering quiescent zones and on drug and chemical use to include roles of the pathologist and veterinarian and their prescription or application of any drugs or chemicals on fish.

On August 10, 2023, I received an email from Mr. St. Jean stating that the unknown white substance in the glass jar observed during the inspection was baking soda paste used on the battery terminal of a tote tipper.

B. Quality Assurance Plan

Parts IV.F.d.1 and IV.F.d.3 of the General Aquaculture Permit describe QAP content requirements such as sampling procedures and map illustrating sampling point locations.

The QAP needs to be updated to reflect current year certification. Sampling and analytical procedures need to be updated to include more detail on oven testing, effluent flow measurements, and that all analyses are conducted in an in-house lab by Facility personnel. The QAP also must include what the Facility's in-house laboratory method detection limits are for each measured parameter. Additionally, the site map indicating location of each sampling point was illegible.

C. Annual Report of Operations Missing

Part V.G.5 of the General Aquaculture Permit describes the due date to submit the annual report of operations to EPA by January 20th of each year.

The Facility's 2020 annual report was not submitted to EPA. The Facility needs to submit missing and future annual reports via the NetDMR system.

D. Late Discharge Monitoring Report Submittals

Part VI.C.2 of the General Aquaculture Permit describes discharge monitoring report (DMR) electronic submission to EPA requirements including due date of "no later than the 20th day of the month."

Since the consultation meeting between EPA and the Nisqually Tribe in March of 2020, the Facility still submitted late DMRs 13 times through July of 2023.

E. General Provisions – Inspection and Entry

Part V.III.G.2 of the General Aquaculture Permit describes the requirement for an inspector or authorized representative conducting an inspection to "have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit."

At the time of inspection, the Facility did not have access to certain documents and information and therefore not available to be reviewed by Mr. Masters and I.

X. Closing Conference

Following the site walk-through, a closing conference was held with Mr. St. Jean, Mr.

Friedrich, and Ms. Paulling where we shared our observations, areas of concern, and next steps regarding post-inspection file review and inspection report transmittal. We also followed up on whether the Forebay was a Waters of the U.S. (WOTUS), and facility representatives indicated that it was not based on prior communication with EPA and that all four sides of the Forebay were man-made. Additionally, the Facility indicated there was a 1980s letter from the U.S. Army Corps of Engineers (USACE) detailing the Forebay was no longer a WOTUS. We thanked them for their time and cooperation. Closing conference concluded at 3:15PM.

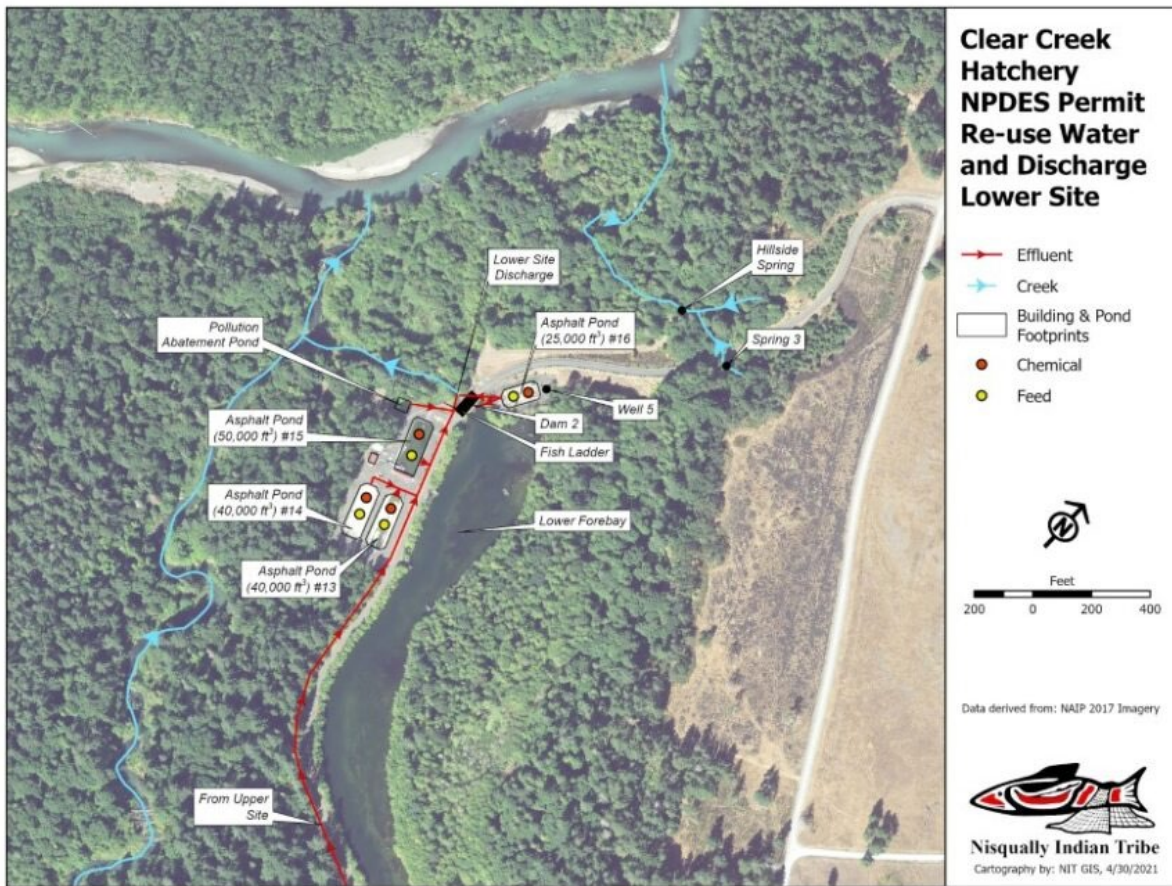
XI. Post Inspection Activity

On August 25, 2023, I held a meeting with the General Aquaculture Permit writer and with an EPA Region 10 Wetland Coordinator to discuss the WOTUS concern regarding the Forebay at the Facility. The Wetland Coordinator indicated that there was evidence that the Forebay was not a WOTUS and requested additional documentation from the USACE. Once USACE documentation is received, it will be kept with the Facility inspection file. We agreed this should no longer be a compliance concern, however the permit writer may assess any need for additional monitoring requirements when the Facility's new NOI is reviewed after new permit issuance.

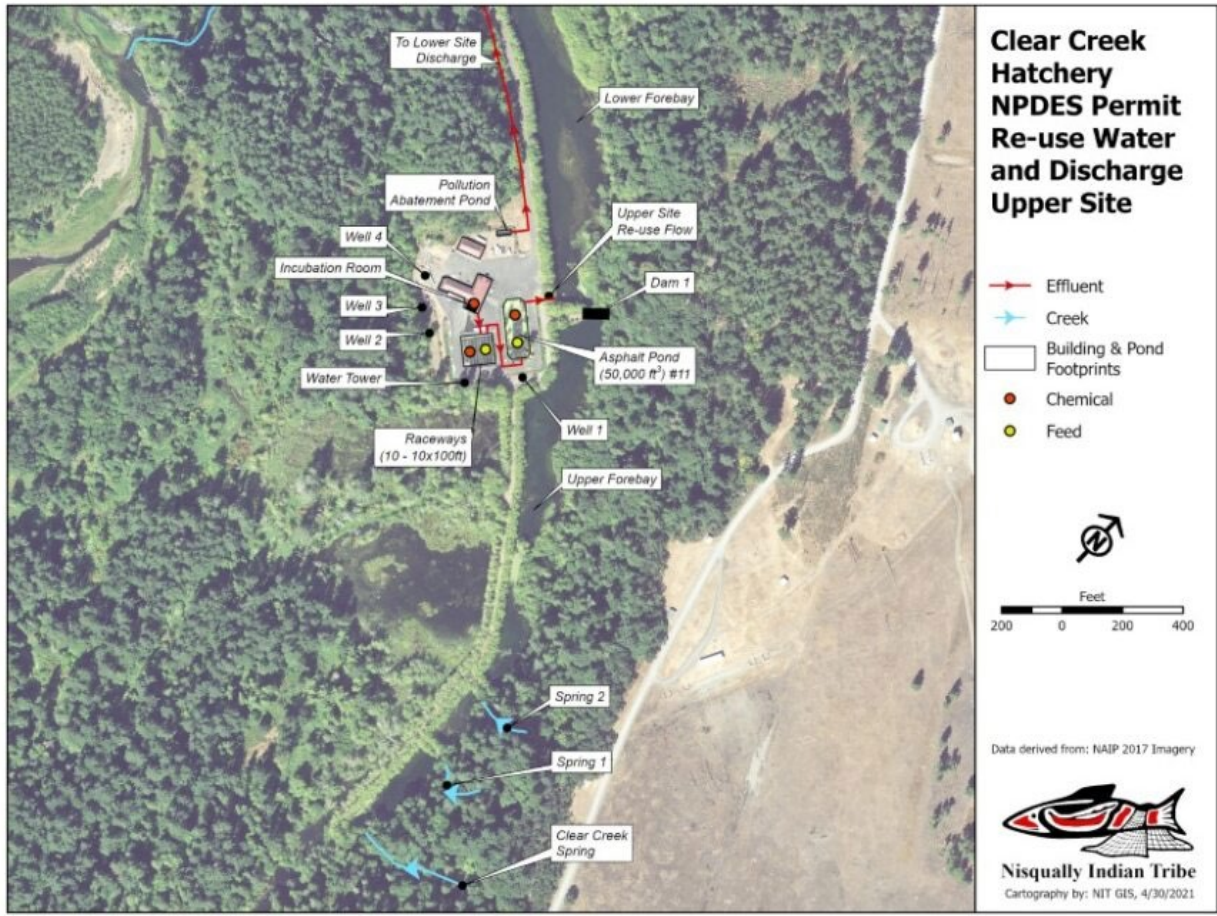
ATTACHMENT A

Site Aerial Images and Maps





ClearCreekHatchery_PermitNPDES_Discharge_LowerClearCreek_Landscape_10r



ClearCreekHatchery_PermitNPDES_Discharge_UpperClearCr_Landscape_130

ATTACHMENT B

Photograph Log

All photographs taken by Vanessa Oquendo on August 8, 2023

Olympus Tough TG-6/F2.0 Camera

Photo Log- Nisqually Clear Creek Fish Hatchery



Photo #:01 (P8080001)

Description: Facing North, photo of the Facility's Outfall 001 with active discharge into Clear Creek from both upper and lower hatchery complexes except pond #16 (inactive).



Photo #:02 (P8080006)

Description: Facing West, photo of Clear Creek just downstream of Outfall 001. Clear Creek flows into the Nisqually River.



Photo #:03 (P8080010)

Description: Facing North, photo of the Facility's fish ladder leading to Outfall 001.



Photo #:04 (P8080011)

Description: Facing Southeast, photo of the Facility's Lower Forebay.

Photo Log- Nisqually Clear Creek Fish Hatchery



Photo #:05 (P8080016)

Description: Photo of the Lower Forebay's dam spillway that would discharge overflow to Clear Creek via Outfall 001.



Photo #:06 (P8080020)

Description: Facing Southwest, photo of the Facility's main water distribution tower.



Photo #:07 (P8080027)

Description: Photo of spring #2, one of the Facility's intake sources for the upper hatchery complex.



Photo #:08 (P8080028)

Description: Facing Southeast, photo of the Upper Forebay near the spring intake sources.

Photo Log- Nisqually Clear Creek Fish Hatchery



Photo #:09 (P8080029)

Description: Photo of spring #1, another one of the Facility's intake sources for the upper hatchery complex.



Photo #:10 (P8080032)

Description: Photo of the Clear Creek Springs valve that pipes this intake source to the Facility's main water tower.



Photo #:11 (P8080035)

Description: Facing West, photo of the valve the Facility uses to draw Upper Forebay water into upper hatchery complex raceways and pond #11.



Photo #:12 (P8080038)

Description: Facing West, photo of a dam that divides the Upper Forebay and Lower Forebay with a release pipe.

Photo Log- Nisqually Clear Creek Fish Hatchery



Photo #:13 (P8080040)

Description: Photo of the Facility's upper hatchery complex diesel station used to fuel equipment, tractors, generators, and pumps.



Photo #:14 (P8080045)

Description: Photo of the Facility's formaldehyde drum storage with secondary containment. One of the drums was empty.



Photo #:15 (P8080053)

Description: Photo of inside the Facility's inactive egg incubation building in the upper hatchery complex.



Photo #:16 (P8080057)

Description: Facing Southwest, photo of the Facility's upper hatchery complex raceways.

Photo Log- Nisqually Clear Creek Fish Hatchery



Photo #:17 (P8080061)

Description: Facing Southwest, photo of pond #11 of the Facility's upper hatchery complex containing water pumped from the raceways.



Photo #:18 (P8080065)

Description: Facing East, photo of the Facility's upper hatchery complex offline settling basin in which solids are subsequently pumped into the woods in the background.



Photo #:19 (P8080068)

Description: Photo of solids discharge in the woods next to the Facility's upper hatchery complex offline settling basin.



Photo #:20 (P8080074)

Description: Facing South, photo of the Facility's inactive pond #15 in the lower hatchery complex.

Photo Log- Nisqually Clear Creek Fish Hatchery



Photo #:21 (P8080077)

Description: Photo of the Facility's lower hatchery complex diesel station not bearing the National Fire Protection Agency label.



Photo #:22 (P8080079)

Description: Photo of an unknown white substance inside an unlabeled glass jar with no lid observed in the Facility's lower hatchery complex.



Photo #:23 (P8080083)

Description: Facing South, photo of the Facility's pond #13 in active use to move straggling Coho salmon from the Lower Forebay.



Photo #:24 (P8080086)

Description: Facing North, photo of the Facility's spawning area in the lower hatchery complex with a trough that has a drain connecting to the offline settling basin.

Photo Log- Nisqually Clear Creek Fish Hatchery



Photo #:25 (P8080088)

Description: Facing Northeast, photo of the Facility's pond #16 not in active use. This pond has been inactive for a couple of years.



Photo #:26 (P8080090)

Description: Facing West, photo of inside the Facility's intake from the Lower Forebay into pond #15 in the lower hatchery complex.



Photo #:27 (P8080092)

Description: Photo of inside the Facility's laboratory illustrating the cones used to analyze settleable solids.

Date	Sampler	Water flow	Total suspended solids	Settleable solids	remarks
1/10/22	Tom Friedricks	8,000 gpm	.0058	.1	
2/16	Tom Friedricks	12,700 gpm 8,000 gpm	.0043	.01	
3/18	TF	11,400,000	.0036	.1	
4/18	TF	14,400,000	.0029	.1	
5/16	GF	14,400,000	.0032	.01	
6/17	Tom	12,000,000	.0021	.01	
7/14	TF	4,320,000	.0024	.01	
8/16	TF	7,100,000	.0061	.01	
9/16		7,344,000 3,000 gpm	.0017	.01	
10/12	TF	5,500,000	.0039	.01	
11/22	TF	7,600,000	.0022	.01	
12/19/22	TF	7,600,000	.0020	.01	

Photo #:28 (P8080097)

Description: Photo of an example of a Facility laboratory bench sheet from 2022.