



NPDES Compliance Inspection Report

Darigold – Chehalis Facility Chehalis, Washington

Permit #: WAR005575

Inspection Date: January 13, 2022

Prepared by:

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Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Field, Data & Drinking Water Enforcement Section

Signature/Date:

Supervisor Signature/Date:

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ATTACHMENT A – Aerial Images and Site Diagram

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(All details in this report were obtained through conversations with Mr. Brent Daniels, Plant Manager, Ms. Erin Avery, Senior Environmental Health and Safety Manager, and Mr. Bruce Reynolds, Environmental Health and Safety Manager, review of facility documents or observations made during the inspection.)

I. Facility Information

Facility Name: Darigold – Chehalis

Facility Owner/Operator: Darigold Inc.

Physical Address: 67 SW Chehalis Avenue
Chehalis, Washington 98532
Lewis County

Lat/Long: 46.65952, -122.97040

Mailing Address: 67 SW Chehalis Avenue
Chehalis, Washington 98532

NAICS Code: 311514 (Dry, Condensed, and Evaporated Dairy Product Mfg)

SIC Code: 2023 (Dry, condensed, & evaporated dairy product mfg)

Facility Contacts: Brent Daniels
Plant Manager
Office Phone: 360-748-8826 x15
Email: brent.daniels@darigold.com

Erin Avery
Senior Environmental Health and Safety Manager
Office Phone: 425-677-0798
Email: erin.avery@darigold.com

Bruce Reynolds
Environmental Health and Safety Manager
Office Phone: 360-748-8826 x13
Email: bruce.reynolds@darigold.com

Permit Number: WAR005575

Receiving Water: City Municipal Stormwater System → Dillenbaugh Creek → Chehalis River

II. Inspection Information

Inspection Date: January 13, 2022

Inspectors: Raymond Andrews, Inspector
EPA Region 10, ECAD /FDDWES
Phone: 206-553-4252

CJ Langlois, Observer
EPA Region 10, ECAD /FDDWES
Phone: 206-553-2739

Arrival Time: 9:30 AM

Departure Time: 3:40 PM

Weather: Overcast, 45°F

Purpose: To determine facility compliance with the Washington Industrial Stormwater General Permit (ISGP) and the Clean Water Act.

III. Permit Information

Darigold – Chehalis is permitted under Washington Industrial Stormwater General Permit (ISGP) (“Permit”) for Stormwater Discharges Associated with Industrial Activities. The facility’s current permit, NPDES permit # WAR005575, became effective on January 1, 2020, and will expire on December 31, 2024. Table 3 of the ISGP indicates the facility has additional industry specific sampling requirements as a business that operates under the “Food and Kindred Products” industry.

IV. Background

Darigold – Chehalis (“Facility”) located at 67 SW Chehalis Avenue Chehalis, Washington is owned and operated by Darigold Inc.

In August 2019, the Washington Department of Ecology (WDOE) inspected the facility for compliance with its ISGP. On March 11, 2021, the facility was inspected by WDOE for compliance with its individual wastewater permit, NPDES Permit #WA0037478. The facility has not had any formal enforcement actions due to non-compliance with its permit.

V. Inspection Chronology

This was an announced inspection. On January 10, 2022, I emailed Mr. Brent Daniels, Plant Manager, and told him I would be conducting an industrial stormwater compliance of the Darigold – Chehalis facility in Chehalis, Washington on January 13th.

I conducted an opening conference, which included an interview of Mr. Daniels, Ms. Erin Avery, Senior Environmental Health and Safety Manager, and Mr. Bruce Reynolds, Environmental Health and Safety Manager, followed by a records review, a site inspection, and a closing conference.

VI. Opening Conference

I arrived at the facility at 9:30 am. CJ Langlois accompanied me as an observer as part of his on-the-job (OJT) training to qualify for inspector credentialing. Once we arrived at the facility, we followed Darigold's COVID protocol which included electronically signing-in, filling out a COVID questionnaire, and having our temperature taken. Once cleared, we proceeded to the office.

I presented my credentials to Mr. Daniels, Ms. Avery, and Mr. Reynolds; henceforth, collectively called "the Representatives."

I explained the purpose of the inspection was to determine compliance with the Washington Industrial Stormwater General Permit (ISGP) and the Clean Water Act (CWA).

The facility has been in operation at its current location since approximately 1974, and has approximately 40 full time employees. It operates 24-hours per day, 365-days per year with various shifts to meet production needs during different times of the year.

The site is approximately 8.3-acres and is generally flat with enough grading to allow industrial stormwater to flow to one of the eight stormwater catch basins. The facility map shows a ninth catch basin but it collects water and sends it to the facility's wastewater treatment plant which is not part of the industrial stormwater management program so is not included in the Stormwater Pollution Prevention Plan (SWPPP.)

According to usclimatedata.com, Chehalis, Washington, receives approximate average annual precipitation of 47.04 inches. November is the wettest month with approximate average precipitation of 7.88 inches, while July is the driest month with approximate average precipitation of 0.61 inches.

As stated above, the facility has eight Catch Basins (CB) labeled CB-1 through CB-8. The facility only samples two of the basins, CB-5 and CB-7. Per the Representatives, only those two basins are sampled because CB 1 and CB 2 are "substantially identical" to CB-5 and CB-4, CB-6, and CB-8 are "substantially identical" to CB-7. CB-3 is not sampled because it is plugged.

The facility's primary operation is the processing of fluid milk. The facility receives liquid dairy milk. The milk is pasteurized and processed into powdered dairy goods such as dried whey, nonfat milk, and buttermilk powders.

All process activities are conducted indoors. No raw material or finished products are stored outside.

No vehicle washing is conducted on-site. The facility has a contracted street sweeper that cleans all paved areas every two weeks.

VII. Laboratory Inspection

The facility has statewide benchmark monitoring requirements applicable to all facilities, as well as industry-specific benchmark monitoring requirements. The statewide benchmarks are pH, turbidity, oil sheen, total copper (Cu), and total zinc (Zn). The oil sheen parameter is observational only. The industry-specific benchmarks for the facility's industry, Food and Kindred Products, are biological oxygen demand (BOD₅), nitrate + nitrite nitrogen (N), and total phosphorus (P).

Stormwater samples are collected by either Ms. Avery or Mr. Mike Donahue, Wastewater Supervisor. All samples are grab samples. The facility conducts pH sampling, using a pH meter and probe, and the oil sheen observation. All other parameters are analyzed by:

ALS Environmental – Kelso Laboratory
1317 South 13th Avenue
Kelso, Washington 98626
(360) 577-7222

VIII. File Review

The Washington ISGP requires documentation be retained for a minimum of five years.

I reviewed the following records and documents:

- Notice of Intent (NOI) – dated June 11, 2019
- Permit Reissuance Letter – December 30, 2019
- Stormwater Pollution Prevention Plan (SWPPP) – revised August 25, 2021
- Monthly Facility Inspection Reports – January 2017 through December 2021
- Discharge Monitoring Reports (DMRs) – 1Q 2017 through 4Q 2021
- Chain of Custody Documents (CoCs) – 1Q 2017 through 4Q 2021
- Annual Employee Training Records – January 2017 through December 2021
- Level 1, 2, and 3 Corrective Action Forms – 1Q 2017 – 4Q 2021

IX. Site Inspection

Attachment A contains an aerial map, provided by Google Maps, and a site diagram map provided by the facility.

Attachment B contains photos used in this inspection report and a complete photo log.

Following the records review, the Representatives took me on a tour of the site. I told them since the scope of the inspection was the facility's industrial stormwater program, I would be focusing on those components during the Site Tour.

As stated in Section VI of this report, the facility only monitors Catch Basins (CB) 5 and 7 because they are substantially identical to Catch Basins 1, 2, 4, 6, and 8. Catch Basin 3 has been plugged and directs stormwater drainage to the City of Chehalis' main storm sewer line that runs alongside Southwest Chehalis Avenue.

We started the site tour by exiting the offices on the east side of the facility adjacent to Southwest Chehalis Avenue. We walked around the building to the south to CB-1. CB-1 is near the truck loading/unloading dock (**Photo 1**). Water that enters CB-1 flows to a sump pump which pumps the stormwater to the City's storm drain located in the street.

We headed north back to the office to look at CB-5, which was past the office on Southwest Chehalis Avenue. CB-5 (**Photo 2**) is one of the facility's two sampling points. The facility collects a grab sample from the pipe that extends into the vault (**Photo 3**). The vault outlet (**Photo 4**) drains into the City's stormwater conveyance system. Stormwater collected by CB-5 comes from a strip drain inside the perimeter fence a short distance further to the west of the vault, which collects stormwater from the facility's parking lot and drainage from building rooftops. Prior to water from the rooftops entering CB-5, it is collected and filtered by a passive filtration system (**Photo 5**).

We continued heading north to the northern edge of the facility site to CB-7 (**Photo 6**). CB-7 lies outside the site's perimeter fence and is the second point that the facility samples. CB-7 collects stormwater from the north parking lot and the rooftops on the northern side of the site.

Catch Basins 4 (**Photo 7**), 6 (**Photo 8**), and 8 (**Photo 9**) are all in relatively close proximity. Based on the locations of CB-4, CB-6 & CB-8, and the industrial activity at those locations, it is likely their discharges are substantially identical to CB-7 as claimed by the facility.

We walked to the west side of facility to CB-3 (**Photos 10 – 12**). The Representatives said CB-3 is not sampled because it is plugged and stormwater drainage is directed to flow to the main stormwater conveyance that runs alongside Southwest Chehalis Avenue into the City's municipal storm sewer system which discharges into Dillenbaugh Creek, a tributary of the Chehalis River.

We ended the industrial stormwater site inspection at CB-2 (**Photo 13**), which lies southwest of CB-3 and is the final Catch Basin associated with industrial stormwater management. Based on the location of CB-2 and the industrial activity nearby, it is likely that its discharge is substantially identical to CB-5 as claimed by the facility.

X. Areas of Concern

At the time of inspection, I found the following areas of concern:

A. SWPPP Sampling Plan

S3.B.5 of the ISGP states the SWPPP shall include a Sampling Plan and the plan shall "b. Include documentation of why applicable parameters are not sampled at each discharge Point...The required documentation includes...

- i. Location of which discharge points the Permittee does not sample applicable parameters because the pollutant concentrations are substantially identical to a discharge point being sampled.
- vi. Reasons why the Permittee expects the discharge points to discharge substantially identical effluents."

At the time of the inspection, I reviewed the facility's SWPPP. The SWPPP contained a Sampling Plan; however, the Sampling Plan did not include the discharge points not sampled because they were substantially identical to other points. The Sampling Plan did not contain additional documentation that supported the facility's claim the discharge points had substantially identical effluents. Due to the location of CB-1 at the truck loading/unloading dock, I'm concerned its effluent is not substantially identical to the discharge of CB-5 due to the potential for additional zinc and other pollutants to be deposited by truck tires.

B. SWPPP Map

S3.B.1 of the ISGP states “ the SWPPP shall contain a site map...the site map shall identify...b. The size of the property in acres...f. Locations of all receiving water (including wetlands and drainage ditches) in the immediate vicinity of the facility...m. Locations of stormwater inlets and outfalls with a unique identification number for each sampling point and discharge point, indicating any that are identified as substantially identical, and identify, by name, any other party other than the Permittee that owns any stormwater drainage or discharge structures...”

At the time of the inspection, I reviewed the facility site map. The map in the SWPPP is largely illegible. The map was missing the following items:

1. Size of the property in acres.
2. Locations of all receiving water in the immediate vicinity of the facility.
3. The locations of sampling points with unique identification numbers.
4. Discharge points that are identified as substantially identical.

C. Laboratory Analysis

S5, Tables 2 and 3 of the ISGP indicates the analytical methods authorized for each benchmark parameter. The ISGP indicates the analytical method of SM 5210B for BOD₅, SM4500 NO₃-E/F/H for the parameter nitrate + nitrate nitrogen (N), and EPA 356.1 for phosphorus (P).

S5, Footnote a. of Table 2 and 3 of the ISGP states, “The Permittee shall ensure laboratory results comply with the quantitation level (QL) specified in the table. However, if an alternate method from 40 CFR Part 136 is sufficient to produce measurable results in the sample, the Permittee may use that method for analysis. If the Permittee uses an alternative method, it must report the test method and QL on the discharge monitoring report. The permittee must also upload the QA/QC documentation from the lab on the QL development.”

At the time of inspection, I reviewed the facility SWPPP and laboratory documents and found the following issues:

1. The SWPPP indicates the lab may use analysis method EPA 405.1 or SM 5210B for BOD₅. The ISGP does not authorize the use of analysis method EPA 405.1 for this parameter.
2. The SWPPP indicates the lab is to use analysis method EPA 365.1 for total phosphorus, which is the method indicated in the ISGP. However, lab reports show the lab was using analysis method EPA 365.3.

I did not see QA/QC documentation from the lab on QL development.

D. Monthly Inspection Reports

S7.C.1 of the ISGP states, in part, “The Permittee shall ensure each inspection report documents the observations, verifications and assessments required...includes...a. Time and date of inspection...b. Locations inspected...e. Name, title, and signature of person conducting inspection...”

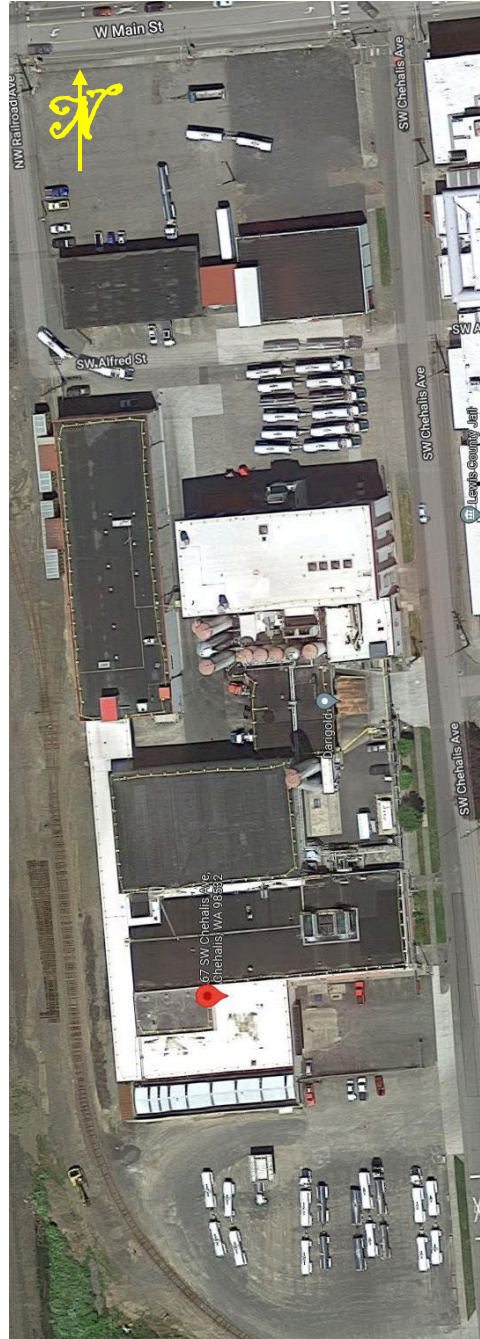
Upon review of the facility’s routine monthly inspection reports, I found the inspection reports did not include the time of inspection, the locations inspected, or the title of the person conducting the inspection.

XI. Closing Conference

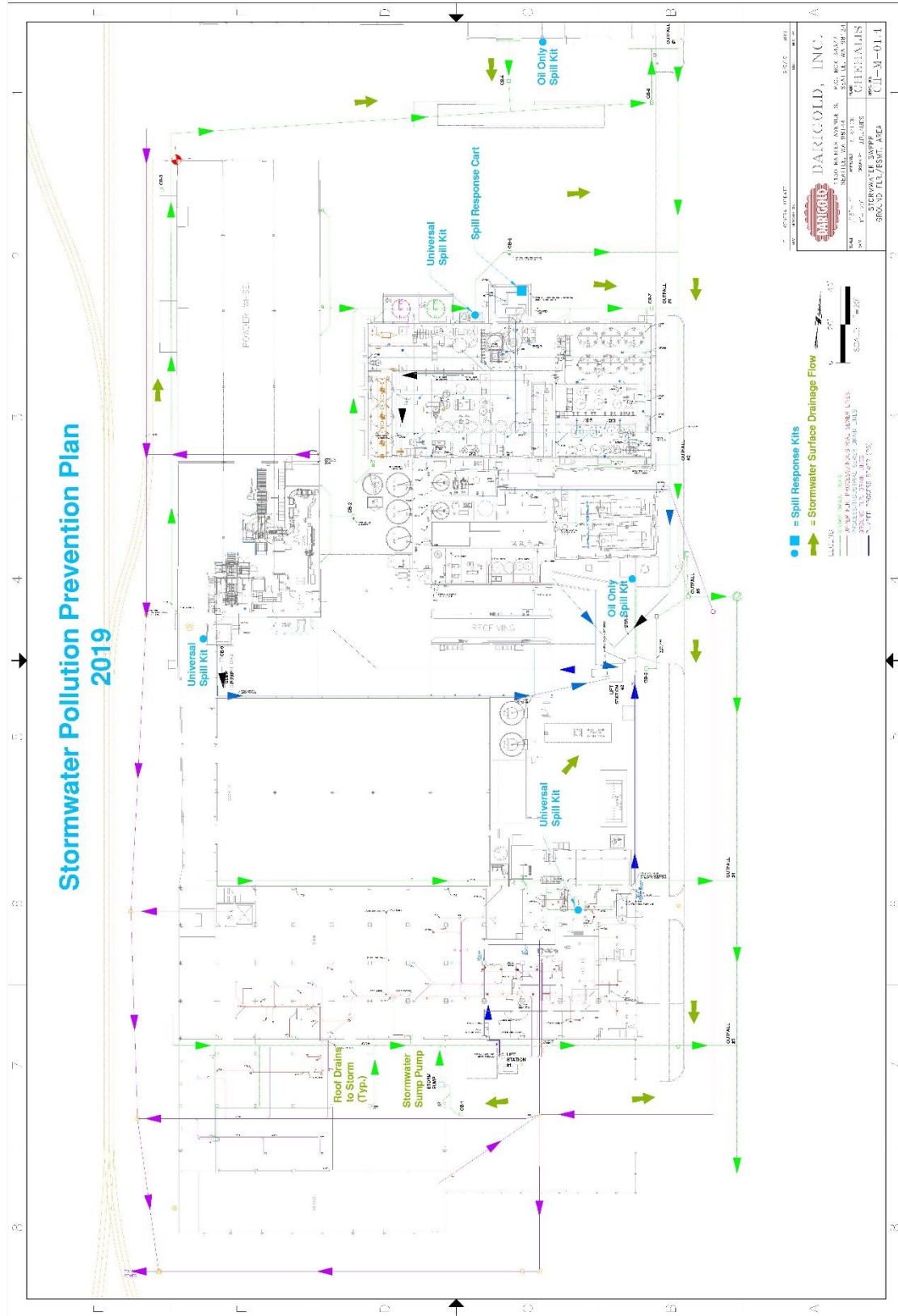
On January 13, 2022, I held a closing conference with Mr. Daniels, Ms. Avery, and Mr. Reynolds. We discussed my observations, and I gave a brief overview of the post-inspection process. I thanked them for their time and assistance.

ATTACHMENT A

Aerial Image of Site Provided by Google



Site Diagram Provided by Facility



ATTACHMENT B

Inspection Photographs and Photograph Log

(Photographs taken by Ray Andrews on January 13, 2022, with a Panasonic DMC-FH25 camera)



Photo 1 / P1010151 – Catch Basin 1



Photo 2 / P1010154 – Catch Basin 5 Vault, exterior

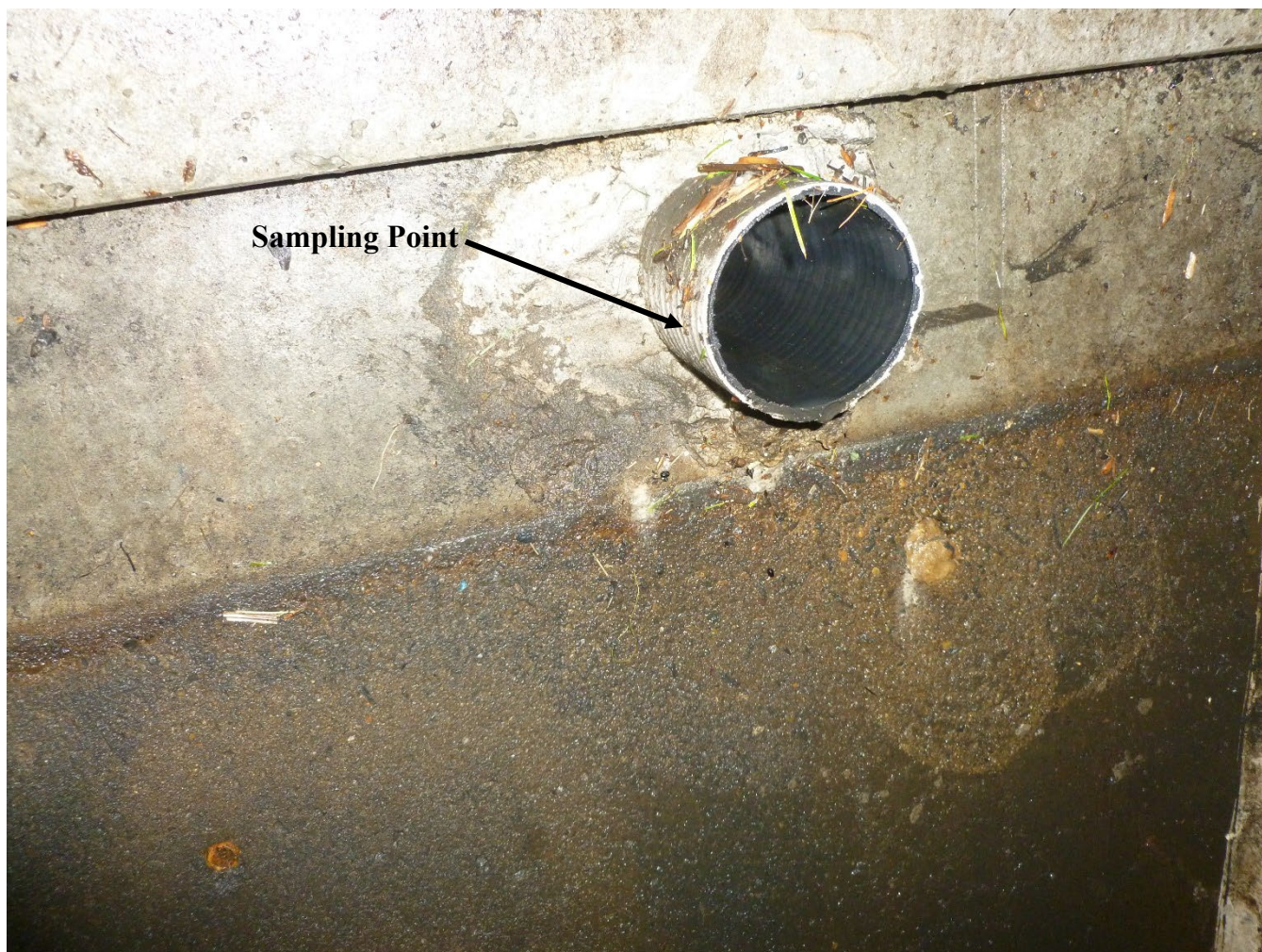


Photo 3 / P1010153 – Catch Basin 5 Sample Point in Vault



Photo 4 / P1010152 – Catch basin 5 Vault, interior



Photo 5 / P1010155 – Filtration System



Photo 6 / P1010157 – Catch Basin 7, sampling point



Photo 7 / P1010160 – Catch Basin 4, facing north



Photo 8 / P1010158 – Catch Basin 6, facing west



Photo 9 / P1010159 – Catch Basin 8, facing west



Photo 10 / P1010161 – Catch Basin 3, facing north



Photo 11 / P1010163 – Catch Basin 3, facing west, close-up



Photo 12 / P1010164 – Catch Basin 3, facing west, extended view



Photo 13 / P1010165 – Catch Basin 2, facing north

Complete list of photographs taken during the inspection:

- P1010147 – Letter to WDOE
- P1010148 – 2020 Annual Report, photo 1
- P1010149 – 2020 Annual Report, photo 2
- P1010150 – 2020 Annual Report, photo 3
- P1010151 – Catch Basin 1
- P1010152 – Catch basin 5 Vault, interior
- P1010153 – Catch Basin 5 Sample Point in Vault
- P1010154 – Catch Basin 5 Vault, exterior
- P1010155 – Filtration System
- P1010156 – Strip Drain
- P1010157 – Catch Basin 7, sampling point
- P1010158 – Catch Basin 6, facing west
- P1010159 – Catch Basin 8, facing west
- P1010160 – Catch Basin 4, facing north
- P1010161 – Catch Basin 3, facing north
- P1010162 – Catch Basin 3, facing East
- P1010163 – Catch Basin 3, facing west, close-up
- P1010164 – Catch Basin 3, facing west, extended view
- P1010165 – Catch Basin 2, facing north
- P1010166 – Catch Basin 9, photo 1
- P1010167 – Catch Basin 9, photo 2
- P1010168 – pH Calibration Log
- P1010169 – pH Probe & Monitor
- P1010170 – pH Buffer Solution