Linda S. Adams
Secretary for Environmental Protection

California Regional Water Quality Control Board
Central Valley Region

Katherine Hart, Chair

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Arnold Schwarzenegger
Governor

10 November 2010

Dan Scholl
General Manager
California Sprouts
5640 Warehouse Way
Sacramento, California 95826-4912

NOTICE OF VIOLATION AND COMPLIANCE EVALUATION INSPECTION, PACIFIC COAST SPROUT FARMS, SACRAMENTO COUNTY

Attached is a copy of an inspection report for Pacific Coast Sprout Farms. The inspection was conducted on 31 August 2010 by Central Valley Water Board staff, to determine compliance with Waste Discharge Requirements (WDRs) Order R5-2005-0034 and Time Schedule Order R5-2005-0035. Central Valley Water Board staff found six violations of the Reporting section of the Monitoring and Reporting Program and three areas of concern. Please see the summary provided in the attached inspection report for descriptions of the violations and areas of concern.

Please develop and implement the appropriate corrective actions and submit a technical report describing the actions, planned or taken, to correct the violations and address the areas of concern noted above and in the attached NPDES Compliance Evaluation Inspection Report. The report must be received by the Central Valley Regional Water Board no later than **17 December 2010.**

If you have any questions regarding this letter or the inspection report, please contact Ann M. Palmer at (916) 464-4825 or at apalmer@waterboards.ca.gov .

VICTOR R. VASQUEZ
Senior Engineer
NPDES Compliance and Enforcement

Attachment: NPDES Compliance Evaluation Inspection (CEI) Report

CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

INSPECTION REPORT

10 November 2010

DISCHARGER: Pacific Coast Sprout Farms, Inc.

LOCATION & COUNTY: 5640 Warehouse Way
Sacramento, California 95826-4912
Sacramento County

CONTACT(S): Dan Scholl, General Manager

INSPECTION DATE: 31 August 2010, 10:35 AM – 1:10 PM

INSPECTED BY: Ann M. Palmer, WRC Engineer

ACCOMPANIED BY: Dan Scholl, General Manager

WEATHER: Sunny, 80 ˚F

BACKGROUND

Pacific Coast Sprout Farms (PCSF) produces 3.5 million pounds per year of organic mung bean sprouts. The facility is a flow-through configuration that receives supply water from an on-site well that is used in the growing rooms and washing room. Each room contains a floor drain to convey used supply water (i.e., wastewater) to Outfall 001, a permitted wastewater discharge point. PCSF is permitted to discharge 0.124 mgd of wastewater, pursuant to Waste Discharge Requirements (WDRs) Order No. R5-2005-0034 (NPDES No. CA0082961), to the storm drain system that is owned and operated by the City of Sacramento. The storm drain ultimately discharges to Morrison Creek, a tributary to the Sacramento-San Joaquin River Delta.

Time Schedule Order (TSO) No. R5-2005-0035 contains interim effluent limitations for arsenic, fluoride, and nitrate. The TSO provides until 1 March 2010 for full compliance with the effluent limitations provided in the WDRs.

OBSERVATIONS AND COMMENTS

Facility Operations

1. The facility flow meter measures the supply water pumped from an on-site water well. The measured influent flows from the well are reported for the facility effluent flows in this flow-through system. The supply water is used to irrigate and cool the bean sprouts during the grow stage, wash the sprouts upon completion of the growing cycle, and washing equipment used for sprout growing prior to discharge.

All other wastewater, such as the restrooms, is discharged to the local sewer system.

2. The Discharger is currently reporting effluent flows using a recently-installed new totalizer flow meter (figure 2). The Discharger maintains a flow meter checklist to maintain daily records of the totalizer readout (figure 3). The new flow meter was calibrated upon installation, approximately June 2010. The old influent flow meter is still in place, but not being used for NPDES compliance purposes (figure 1).

3. Grow Room #1 was being used to store equipment and was not in use for sprout production. Figure 4 shows the floor drain that discharges to Outfall 001. The drain is covered with a screen and had pieces of equipment being stored around and on top of it.

4. Grow Room #2 was in production mode (figures 5 and 6). There were several growing bins of bean sprouts and the ceiling watering system was operational. Production water was flowing into the floor drains as permitted.

5. The chemical storage contained calcium hypochlorite, potassium hydroxide, and sodium hypochlorite. There was some secondary containment, but not enough for all of the liquid chemicals (figure 7). There was also good chemical safety signage provided in this area.

6. The production area contained a large, white basin where bean sprouts are washed and then prepared for distribution. Figures 8 through 11 show the washing basin and the long, screened channel that collects all the wastewater and conveys it to the drain located at the end of the room shown in figures 12 and 13. Mr. Scholl stated that when they use cleaning agents to sanitize the production room, they block-off the drain channel and pump the cleaning wastewater directly to the sewer system. The pump is located next to the drain, as shown in figures 13 and 14.

7. Mr. Scholl also stated that when it treats the sprout seeds with calcium hypochlorite, the chlorinated wastewater is discharged to the sewer system.

8. The Discharger is planning to begin growing wheat grass as well, and has begun installation of a wheat grass growing system (figure 15).

9. Figure 16 shows the drain that connects into the sewer system and the white facility piping that discharges to it.

Self Monitoring Report (SMR) Review

The Discharger submitted a report in which the cover letter stated that the report included the facility's required 2nd Quarter Monitoring Report . The SMR was dated 19 April 2010 and received by the Central Valley Water Board on 20 July 2010.

A review of the 2nd Quarter SMR, found the following violations:

Monitoring and Reporting Program (MRP) Violations

The Reporting section of the MRP (page 4 of the MRP) requires that monitoring data shall be reported in a tabular format in such a way that the date, sample types, constituents, and concentrations are readily discernible. The tabular data should summarize the laboratory results in a manner that clearly illustrates whether the discharge complies with the waste discharge requirements, which includes calculating and reporting values for the highest daily maximum for the month and the monthly averages, as needed to show compliance with the Effluent Limitations for Outfall 001 (page 12 of the Order). The following are violations of the Reporting section of the MRP:

1. The sampling dates were not included in the summary tabular data.

2. The flow was reported as a range. The MRP requires the total daily flow rate to be reported for at least one date quarterly.

3. Units of measurement were not provided for any of the parameters (also referred to as constituents). In addition, biochemical oxygen demand, total chlorine residual, total suspended solids, arsenic, fluoride, and nitrate (as N) require reporting in two separate types of units of measurement as follows: mass loading rates (lbs/day) and concentrations (mg/L).

4. Total Chlorine Residual was only reported once over the quarter. The MRP requires a total chlorine residual sampling frequency of once per week.

5. Total Residual chlorine must be reported to the significant figures as the effluent limit (i.e. 0.01 mg/L versus 0 mg/L).

6. Nitrate was reported as NO3 instead of as N. Nitrate must be reported as N as required by the Order.

SUMMARY

Mr. Scholl recently became General Manager of the facility and was trying to get up to speed on the requirements of the Order. As we discussed during the inspection and as listed under the MRP violations in the previous report section, there are six violations for SMR deficiencies that must be addressed.

In addition, the following are areas of concern that must also be addressed by the Discharger:

1. Please provide the test method, identify testing equipment, and the whether the test is done in-house or at a contract laboratory for the weekly total chlorine residual monitoring.

2. Please discuss whether, and if so how, nutrients are used in the grow cycle for the bean sprouts at PCSF.

3. How flow is calculated from the data recorded on the flow meter checklist.

Attachments: A-Photo Log

Approved:	

ANN M. PALMER
Water Resource Control Engineer
NPDES Compliance and Enforcement Unit

Attachment A—Photo Log

Figure 1: Old influent flow meter totalizer. 8/31/2010. AMH.

Figure 2: New influent flow meter totalizer. 8/31/2010. AMH.

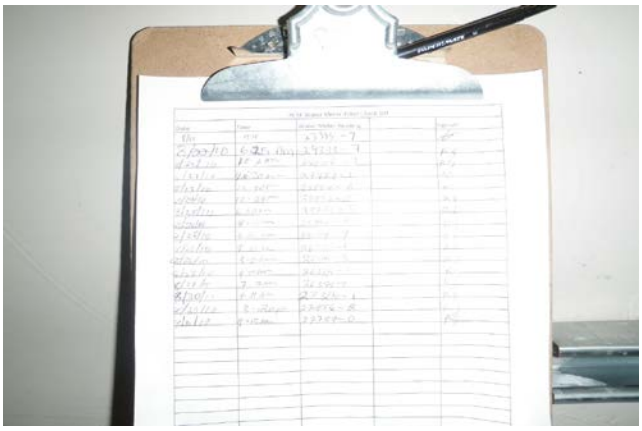

Figure 3: Flow meter checklist. 8/31/2010. AMH.

Figure 4: Wastewater drain in Grow Room #1, which is not currently in use. 8/31/2010. AMH.

Figure 5: Ceiling watering system and sprout growing bins in Grow Room #2. 8/31/2010. AMH.

Figure 6: Three sprout growing bins around the wastewater floor drain. 8/31/2010. AMH.

Figure 7: Chemical storage area with some secondary containment. 8/31/2010. AMH.

Figure 8: Production area basin where sprouts are rinsed. Floor drain running along length of basin. 8/31/2010. AMH.

Figure 9: Close-up of floor drain that runs along length of basin. 8/31/2010. AMH.

Figure 10: Farm employee cleaning Production area. 8/31/2010. AMH.

Figure11: Wastewater from sprout wash basin drains into the floor drain from 2-pipes at the bottom of the basin. 8/31/2010. AMH.

Figure 12: Final drain in production area, discharges to Outfall 001 8/31/2010. AMH.

Figure 13: Pump located at the final drain in production area. 8/31/2010. AMH.

Figure 14: Pump from Figure 13. 8/31/2010. AMH.

Figure 15: Future system for wheat grass. 8/31/2010. AMH.

Figure 16: Drain that connects to the city sewer line. 8/31/2010. AMH.