



State of Oregon
Department of
Environmental
Quality

Water Pollution Control Facilities Permit Permit Fact Sheet Gray and Company

Oregon Department of Environmental Quality
Western Region Office
4026 Fairview Industrial Dr SE, Salem, OR 97302

Final: November 14, 2024

Permittee	Gray and Company 17100 SE Palmer Creek Road Dayton, OR 97114
Existing Permit Information	File Number: 34853 Permit Number: 101693 Expiration Date: December 31, 2014
Permittee Contact	Randy Koziol 17100 SE Palmer Creek Road Dayton, OR 97114 503-864-2252
Facility Location	17100 SE Palmer Creek Road Dayton, OR Yamhill County
LLID	1230703452218 River Mile 4.0
Nearest Surface Stream/Basin	Receiving stream: Palmer Creek Basin: Willamette Sub-Basin: Upper Willamette
Proposed Action	Renew Permit Application Number: 959403 Date Received: October 31, 2014
Source Category	WPCF – Industrial Minor
Sources Covered	Industrial Wastewater
Permit Type	WPCF-IW-B03
Permit Writer	Steve Nichols 541-972-5466 Natural Resource Specialist / Western Region Date Prepared: September 19, 2024

WPCF Permit Renewal Fact Sheet Gray and Company

Table of Contents

1. Introduction	3
2. Permit History	3
2.1 Issuance, Renewal, and Modification	3
3. Facilities Description	3
3.1 Overview.....	3
3.2 Wastewater Sources, Treatment and Transfer	4
3.3 Stormwater.....	5
3.4 Groundwater	5
4. Permit Draft Discussion	6
4.1 Face Page	6
4.2 Schedule A: Waste Disposal Limitations	6
4.3 Schedule B: Minimum Monitoring and Reporting Requirement	7
4.4 Schedule D: Special Conditions.....	7
4.5 Schedule F: General Conditions	7

List of Figures

Figure 3-1: Gray and Company – Aerial View.....	4
Figure 3-2: Gray and Company/ Sleger’s Dairy Map.....	5

WPCF Permit Renewal Fact Sheet

Gray and Company

1. Introduction

On May 21, 2005, the Department of Environmental Quality (DEQ) issued Water Pollution Control Facility (WPCF) permit, number 101693 to Gray and Company, located at 17100 SE Palmer Creek Road, Dayton, Oregon. Though presently there is no need, the permit does allow Gray to dispose of wastewater via land application when certain requirements are met.

DEQ received renewal application number 959403 on October 31, 2014. DEQ proposes to renew the permit. The purpose of this permit evaluation report is to explain and provide justification for the permit renewal. A renewed permit is necessary to operate a wastewater treatment and disposal system pursuant to provisions of Oregon Revised Statutes (ORS) 468B.050. This proposed permit action by DEQ complies with state requirements.

2. Permit History

2.1 Issuance, Renewal, and Modification

Presently, wastewater is treated in accordance with existing WPCF permit number 101693. No intentional disposal activities are occurring. DEQ issued the facility's current permit on April 21, 2005. The permit expired on December 31, 2014. The permittee submitted a renewal application on time and the current permit remains in effect until DEQ takes final action on the renewal application as per OAR 340-045-0040. No modifications were made to the current permit.

3. Facilities Description

3.1 Overview

The Gray plant processes 7,000 to 8,000 tons of maraschino cherries per year. The facility consists of the plant operations building, a 12,000,000-gallon capacity storage/treatment lagoon with aeration, two 75,000-gallon concrete treatment tanks, and an outdoor brining area with approximately 60 cells, each lined with 26-mil liner. A deep field tile encircles the brining area to capture water loss, and water occasionally observed in the associated manhole is pumped back to the treatment tanks.

During the irrigation season, both newly generated wastewater, and treated wastewater from the aerated storage lagoon, enter the concrete tanks for pH adjustment using lime, and is then transferred via pipe to Sleger's Dairy. During the non-irrigation season, wastewater from the storage lagoon may also be transferred to maintain sufficient lagoon freeboard during heavy precipitation.

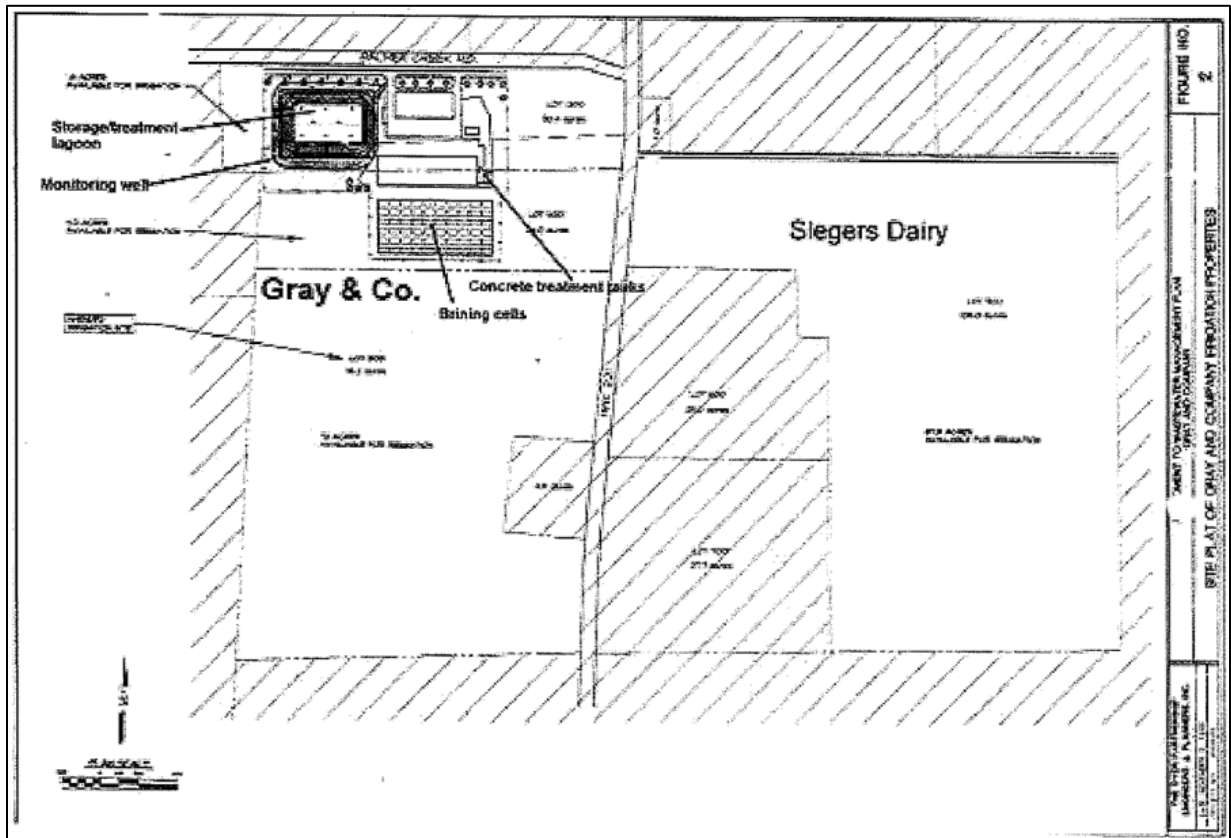
Figure 3-1: Gray and Company – Aerial View



3.2 Wastewater Sources, Treatment and Transfer

Sources of wastewater include brining, color leaching (using sulfur dioxide), bleaching (using sodium chlorite), washdown, and other process waters associated with cherry rinsing, sizing, and sorting. Wastewater from these sources enters one of the two concrete treatment tanks. Acidic wastewater is neutralized within the tanks. During the irrigation season, after neutralization, the wastewater is piped under the road (Dayton-Salem Highway), to the Dairy.

Figure 3-2: Gray and Company/ Slegers Dairy Map



During the non-irrigation season, Gray pumps wastewater from the concrete treatment tanks to the storage lagoon, where it is held and aerated until the start of the irrigation season (unless there is a freeboard issue). During the irrigation season, both newly generated wastewater, and water from the aerated storage lagoon, enter the concrete tanks for pH adjustment using lime, before being transferred to the Dairy.

3.3 Stormwater

On March 22, 2011, DEQ issued the facility a 1200Z Stormwater Discharge permit (Water Quality File No. 120670). The 1200Z permit expired on June 30, 2017. The facility does not have a current 1200Z permit.

3.4 Groundwater

A DEQ senior hydrogeologist recently reviewed facility records and found Gray currently has three monitoring wells, located around the perimeter of the disposal lagoon. The initial monitoring well (MW-1) is located near the lagoon's southwest corner. The facility's permit has required monitoring of MW-1 since about 1999. The permit requires facility personnel to collect and analyze groundwater samples from MW-1 for pH, nitrate and Total Dissolved Solids (TDS).

In October 2017, Gray met with DEQ to discuss permit renewal for the facility. During the meeting, DEQ expressed concern that the wastewater lagoon may be the source of elevated TDS in MW-1. Based on this concern, DEQ requested Gray expand its existing groundwater monitoring network to a minimum of three monitoring wells to assess potential impacts to groundwater from the wastewater lagoon. Gray submitted a Preliminary Groundwater Assessment Work Plan on January 15, 2018. DEQ-approved the Work Plan on February 7, 2018. Gray contracted with Golder Associates, Inc. to prepare a technical memorandum, detailing the Preliminary Groundwater Assessment.

The hydrogeologist review also found that Gray contracted surface water sampling of Palmer Creek in 2005-2006 to evaluate potential groundwater to surface water impacts to Palmer Creek. Surface water samples, collected from apparent upstream and downstream locations, were analyzed for nitrate and TDS.

The hydrogeologist review found that, consistent with historical results, TDS in groundwater from MW-1 has been consistently well above the federal secondary maximum concentration level of 500 mg/L. Elevated TDS in groundwater, particularly in MW-1, is likely the result of discharge from the storage lagoon.

The review further found that elevated TDS concentrations are unlikely to adversely impact drinking water quality in the vicinity of the facility because there are no existing or likely potential beneficial uses of drinking water located downgradient of the facility, and because drinking water and other supply wells in the area appear to be screened in the deeper water bearing zone.

The review also found there were no apparent groundwater to surface water impacts from lagoon discharges because apparent upstream and downstream Palmer Creek samples were nearly identical.

4. Permit Draft Discussion

4.1 Face Page

The permit allows wastewater treatment and land application within limits set by Schedule A. The surface stream which would accept overflow from the facility would be Palmer Creek.

4.2 Schedule A: Waste Disposal Limitations

Though Gray has no current plans to irrigate its wastewater, in the event Gray pursues land irrigation in the future, DEQ proposes to retain the Schedule A narrative limits for irrigating wastewater.

4.3 Schedule B: Minimum Monitoring and Reporting Requirement

Influent:

The proposed permit retains the existing requirement for daily influent flow monitoring, annual flow meter calibration, and weekly gauge reading of the storage lagoon freeboard. There are also quarterly TDS and nitrate monitoring requirements for water flowing from the concrete tanks to the storage lagoon.

Outfall 001-Process Wastewater:

Outfall 001 is not presently active, and no monitoring is currently required. If Gray eventually irrigates with treated wastewater, the permittee must monitor wastewater as specified in an approved OM&M Plan.

Wastewater Transferred to Dairy:

The proposed permit requires monitoring of wastewater before transfer to the Dairy. Flow metering from either the storage lagoon or the processing plant is included, as well as annual flow meter calibration. The proposed permit also retains the existing pH and total Kjeldahl nitrogen (TKN) monitoring requirements for wastewater transferred to the Dairy.

Groundwater:

Based on the DEQ hydrogeologist review, the proposed permit includes quarterly monitoring of the monitoring well network for TDS, pH and nitrate, as well as quarterly measurement of groundwater elevations.

4.4 Schedule D: Special Conditions

Schedule D includes several special conditions to be implemented during the term of the permit.

4.5 Schedule F: General Conditions

These conditions are standard to all WPCF permits and address state statutes and rules that pertain to all types of system operations that do not discharge directly to surface waters. The General Conditions were revised in 2015.