November 19, 2018

Re: ENF-3-1

Dear Mr. Polek

Enclosed in this letter is a response to the areas of concerns that were observed on August 15, 2018.

Areas of concern:

1. The facility was lacking secondary containment in the facility's main chemical storage area. Secondary containment was not observed for phosphoric acid and stomp sanitizer drums (Photographs 3 and 4). It is recommended that the facility place chemical drums on secondary containment to prevent discharge of chemicals to a floor drain or storm drain.

Area 1: Lost Coast Brewery will be adding more secondary containment to chemical storage area and will also be adding a spill containment kit containing booms and sorbents.

2. The facility was lacking secondary containment in chemical storage area #2. Secondary containment was not observed for IBC totes of sodium hydroxide and typhoon II, drums of Optimizer B, drums of Cyclone and drums of Chemeen 330 (Photographs 5-7). In addition, chemical drums were observed without secondary containment nearby, adjacent to the facility's boiler system (photograph 8). It is recommended that the facility place all chemical drums in secondary containment to prevent a discharge of chemicals to a floor drain or storm drain.

Area 2: Lost Coast Brewery will be adding more secondary containment to chemical storage area 2 and boiler area, along with a spill containment kit containing booms and sorbents.

3. The inspection team observed three uninstalled fermentation tanks (photograph 9) near chemical storage area #2. According to the facility representative, the facility plans to install the fermentation tanks in the future, though a time had not yet been established. The federal regulations at 40 CFR 403.12(j) require SIUs to "...notify the control authority ... in advance of any substantial change in volume or character of pollutants in their discharge..."

Area 3: Lost Coast Brewery will notify the control authority when the before installation of the 3 new tanks.

4. Water was observed near the outdoor fermentation tanks. According to the facility representative, and employee washed down the area around one of the fermentation tanks where the facility was producing cider. The waster was observed around drains located directly under the fermentation tanks (Photographs 10 and 11). According to the facility representative, these drains direct flow to the pretreatment system. Due to the location of these drains it appears that they may capture stormwater. Part 3.B.11 of the facility's discharge permit prohibits the discharge of, "stormwater, surface water, ground water, artisan well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, noncontact cooling water, and unpolluted industrial wastewater, unless specifically authorized in wiring by the city manager." The facility is required to ensure that it does not discharge stormwater to the city's sanitary sewer.

   Furthermore, this water was also observed flowing into the nearby storm drain (Photograph 12). Subsection 54.040.A of the city of Eureka's stormwater ordinance (Ordinance No. 705 –C.S) states "No person shall discharge or cause to the discharged into the storm drainage facilities or watercourses and materials, including but not limited to pollutants of waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than storm water." The facility is required to prevent wastewater from flowing to storm drains.

Area 4: Lost Coast Brewery is currently using expansion plugs in all outdoor drains that lead to the pretreatment tanks. Plugs are removed while drains are being used and then reinstalled while not in use. A containment curb will be installed around perimeter of fermenters to prevent any wastewater from entering storm drains.

5. The facility bypassed its pretreatment system on May 17, 2018 by discharging a slug of solids to the city sewer. The facility representative explained that the facility's pretreatment system does not currently include solids separation. Solids may settle out at the bottom of tank 2 and, if the valve is opened, had the potential to discharge to the city sewer. Part 3.B.12 of the facility's discharge permit prohibits the discharge of "any sludges, screenings, or other residues from the pretreatment of industrial wastes including but not limited to spent grains, or yeast." The facility is required to operate its pretreatment system to prevent the discharge of solids to the city sewer. It is recommended that the facility follow through with its proposed plan to install a solids separation device upstream of the three pretreatment tanks, as noted in section I of this report.

Area 5: Lost Coast Brewery will not be diverting/bypassing any part of the pretreatment system in a manner that will allow solids to enter the City of Eureka's

sanitary sewer system. Lost Coast Brewery is still planning on adding a solids separation device to the pretreatment system.

6. The facility's pretreatment consists of three metal tanks outside the northeast side of the building. However, the inspection team observed that there is no secondary containment surrounding the tanks (photographs 13 and 14). Furthermore, an IBC tote of sodium hydroxide was observed between Tanks 2 and 3 and a white stain in the facility driveway suggested a previous spill of sodium hydroxide (Photographs 14 and 15). It is recommended that the facility install secondary containment around the three pretreatment tanks and the sodium hydroxide tote.

Area 6: Lost Coast Brewery will add secondary containment to the sodium hydroxide tote and will also explore the idea adding some sort of secondary containment to the pretreatment tank area.

7. Along the east side of the building the facility had a collection of empty drums and totes. One IBC tote was labeled "Stomp Sanitizer" (Photograph 16); however, according to the facility representative, the tote contained spent yeast that was ready to be hauled offsite. It is recommended that the facility re-label the tote to accurately identify the contents of the tote.

Area 7: Lost Coast Brewery will relabeled all totes that have had there original contents altered or changed.

8. According to the facility representative, the facility calibrates it pH probes every thirty days. It is recommended that the facility ensure that it is calibration its pH probes according to the manufacturer specifications. In addition, the facility representative could not locate its pH buffers at the time of the inspection. It is recommended that the facility representative ensure that all pH buffers are not expired.

Area 8: Lost Coast Brewery is currently calibrating all pH probes per the manufactures specifications. The buffer solution expiration date is checked prior to being used for the calibration procedure.

Sincerely,
Lost Coast Brewery