



Friends of Toppenish Creek

July 12, 2025

Water Quality Permit Coordinator
Department of Ecology
Central Regional Office
1250 West Alder Street
Union Gap, WA 98903-0009

Dear WA Ecology,

Friends of Toppenish Creek is a 501(C)(3) non-profit organization dedicated to protection of the environment in the Lower Yakima Valley. We thank you for considering our comments regarding application for an NPDES permit by Greenwood Mushrooms in Sunnyside, WA.

Sincerely,

Jean Mendoza

Friends of Toppenish Creek
3142 Signal Peak Road
White Swan, WA 98952

Comments regarding Greenwood Mushrooms NPDES permit application:

Section B.1. The Greenwood application states that this facility produces organic mushrooms. The organic certification site CCOF at [Organic Member Directory - CCOF.org](https://www.ccof.org/) does not list Greenwood Mushrooms or Windmill Mushrooms or Ostrom's Mushrooms.

Section B.2. The application states that this facility uses 208 tons of supplement per year. To our understanding supplement may be wheat bran, soybean meal, corn flour, rice bran, soybean hulls, beet pulp, dried bean dregs, or distillers' grain. Which supplements are used and do they contain agro-chemicals?

Does the wheat straw or dried poultry waste contain agro-chemicals?

Section C.2. We do not find a schematic diagram showing water flow through the facility.

Section C.3. No numbers for volume of wastewater discharge.

Sections C.4 & 5. No answers.

Section E.2. No information

Section E.4. Apparently, Greenwood Mushrooms does not analyze effluent for important contaminants. We do not understand why this might be allowed. If the Port of Sunnyside does not know how much wastewater is discharged by Greenwood Mushrooms and does not know the concentration of common contaminants, how can the port regulate treatment and control of those pollutants?

Section E.6 & 8. Since Greenwood does not list the chemicals used for cleaning between crops of mushrooms and does not list chemicals that may cling to supplement, wheat straw and dried poultry waste, there is no way to determine whether these chemicals are found at the facility.

Section F.1. No map of sampling sites.

Section G.1. No listing of permits. We know for certain that Ostrom Mushrooms obtained an air quality permit when the facility opened. That permit looked at emissions from machinery needed to operate the factory. It would seem that the same machinery would require petroleum fuels and lubricants and that there should be some plan for managing petroleum spills.

Section H.5. We do not see a facility site map showing stormwater drainage/collection areas, disposal areas, and discharge points.

Section I.3. No answer

Checklist on page 25/25

We find no information on the Greenwood lagoon and this information is crucial for monitoring potential groundwater contamination in an NPDES permit. Is the lagoon lined, single lined or double lined? Are there ways to monitor for leaks or for groundwater pollution? The aquifer is very shallow at this location. Is there routine testing of lagoon contents?

Other

It is unclear whether waste water from Greenwood Mushrooms will all go to the Port of Sunnyside Waste Water Treatment Plant, or whether some will be sprayed on Port of Sunnyside cropland. If some of the effluent is sprayed onto the land Ecology should be

aware that some monitoring wells at the Port of Sunnyside show high levels of contamination and the impact of Greenwood effluent should be quantified.

It appears to FOTC that too much contaminated water is sprayed onto the Port of Sunnyside cropland.

FOTC is currently inquiring about renewal of the NPDES permit for the Port of Sunnyside. Ecology assures us that an application for permit renewal has been filed, but we do not find it on Ecology's Permitting and Reporting Information System (PARIS) website. We believe there are problems at the port that should be addressed in both the POS NPDES permit and the Greenwood Mushroom NPDES permit.

Sincerely,

Jean Mendoza

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