



Sumner Public Works Department
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Wastewater Permit Fact Sheet and Statement of Basis for Permit Limits

Permit Number:	SIU-2026-002
Facility Name and Physical Address:	The XCJ Corp. DBA Mila Dumplings 1515 Puyallup Street Sumner, WA 98390 Parcel No. 0420138019
Type of Facility:	Frozen Specialty Foods
Standard Industrial Classification Code (SIC):	NAICS 311412
Permit Classification & Applicable Categorical Standard:	Significant Industrial User
Discharge Location:	Outfall 002A City of Sumner, WA Sumner Wastewater Treatment Plant, WA0023353
Contact at Facility:	Mike Hammond, Maintenance Manager (206) 226 - 0738 mikeh@thexcj.com
Contact for Permit:	Mike Hammond, Maintenance Manager (206) 226 - 0738 mikeh@thexcj.com
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A. Fact Sheet Revision History:

Version 1: 3/4/26

B. Summary of Operations:

Facility Processes

The X CJ / Mila dumpling facility in Sumner operates as a food manufacturing and packaging facility that produces frozen dumpling products for distribution. Operations begin with the receiving of raw ingredients, including proteins, vegetables, sauces, seasonings, and dry goods, which are staged and stored in appropriate refrigerated, frozen, or dry storage areas. Ingredients are then moved to preparation areas where proteins and vegetables may be washed, trimmed, cut, ground, or portioned, and ingredients are weighed and batched in accordance with product recipes.

Prepared ingredients are transferred to mixing areas where dumpling fillings and sauce components are blended in commercial mixers. In parallel, dough ingredients are mixed to form dumpling wrappers, which may be sheeted and cut prior to assembly. Filling and wrapper components are then conveyed to forming equipment, where dumplings are assembled, portioned, and shaped. Off-spec or rejected product generated during forming is collected and removed from the process for appropriate disposal rather than being discharged to the sanitary sewer.

Depending on the specific production line, dumplings undergo a thermal processing step such as par-cooking, steaming, or boiling prior to freezing, or they may be transferred directly from forming to freezing operations. Finished dumplings are rapidly cooled or frozen using commercial freezing equipment and then conveyed to packaging areas where product is weighed, bagged, sealed, labeled, boxed, and palletized for distribution and storage.

Throughout the production process, industrial wastewater is generated primarily during equipment cleaning and sanitation activities, including the cleaning of mixers, forming equipment, conveyors, utensils, and food contact surfaces, as well as from floor washdown in production and preparation areas. These cleaning activities occur on a routine schedule and represent the primary source of wastewater discharged to the sanitary sewer, with wastewater characteristics influenced by food residues, organic material, and fats, oils, and grease associated with meat- and sauce-handling operations.

Ancillary Processes

Ancillary processes at the X CJ / Mila facility in Sumner support primary food manufacturing operations and include employee welfare areas, utility systems, and facility maintenance activities. These processes consist of employee restrooms and handwashing sinks, janitorial and mop sinks, and limited non-process water uses associated with general facility cleaning. The facility may also generate ancillary wastewater from equipment maintenance, refrigeration system defrost, HVAC condensate, and utility operations such as boiler blowdown or water softener regeneration, if present. Wastewater from these ancillary sources is generally intermittent and lower in strength than process-related discharges, though it may contain residual cleaning agents or minor organic material. All ancillary wastewater streams are conveyed to the sanitary sewer in accordance with facility operating procedures and applicable discharge requirements.

Maintenance and Ancillary Chemicals at Facility

BMP/manual requirements anticipate facility use/storage of materials that require standardized controls,

including inspection and maintenance of storage tanks, housekeeping practices in storage areas, handling/transfer of solid waste materials, and worker training—indicating ancillary chemicals/materials are expected to be managed under a BMP framework.

Waste Generation and Storage

The X CJ / Mila facility in Sumner generates solid and liquid wastes associated with food manufacturing, packaging, and routine facility operations. Solid wastes include food scraps, off-spec or rejected product, packaging materials, and general refuse generated during ingredient preparation, forming, and packaging activities. These materials are collected at designated points within production areas and stored in covered containers or compactors prior to off-site disposal or recycling, as applicable. Liquid wastes consist primarily of wastewater generated during equipment cleaning, sanitation, and floor washdown, which is discharged to the sanitary sewer. The facility implements waste management practices intended to minimize the discharge of solids and fats, oils, and grease to the sewer, including dry cleanup of food residues prior to washdown and the use of drain screens or similar controls. Waste storage areas are managed to prevent spills, odors, and vector attraction, and wastes are removed from the site on a routine basis in accordance with facility procedures.

Storm, Surface, and Subsurface Water

The X CJ / Mila facility has received a Conditional No Exposure Exemption (CNE) for stormwater, industrial activities and materials are managed to avoid exposure to precipitation and to minimize stormwater contamination potential.

C. Summary of Process Wastewater:

Process wastewater at the X CJ dumpling manufacturing facility is generated primarily from routine food production and sanitation activities associated with dumpling manufacturing. Wastewater sources include equipment and utensil cleaning, mixer and processing line washout, floor washdown in production and preparation areas, and limited ingredient preparation activities. The facility reported an average process wastewater discharge of approximately 5,600 gallons per day, with a maximum daily discharge of up to 45,000 gallons per day during peak operations, and operates approximately 5 days per week. The discharge is characterized as intermittent and variable, with higher-strength wastewater occurring during cleaning and sanitation cycles rather than during active product assembly. Reported wastewater constituents of concern include biochemical oxygen demand (BOD), total suspended solids (TSS), fats, oils, and grease (FOG), nutrients, and residual cleaning agents, consistent with food manufacturing operations. The facility does not report the use of regulated toxic chemicals in its production processes, and no on-site wastewater treatment is identified beyond standard best management practices to minimize solids and grease entering the sanitary sewer.

D. Summary of Pretreatment:

The X CJ / Mila dumpling manufacturing facility employs an existing wastewater pretreatment facility (WPTF) designed to provide detention, settling with solids removal, mechanical filtration, and pH adjustment prior to discharge to the sanitary sewer. Process wastewater generated from food manufacturing, equipment cleaning, sanitation, and floor washdown activities is collected through floor and trench drains throughout the facility and conveyed to underground storage tanks that provide initial detention and settling. From the storage tanks, wastewater is pumped through a 400-micron mechanical screen to remove coarse solids before entering detention and settling tanks.

Within the first settling tank, wastewater pH is automatically adjusted through controlled injection of sodium hydroxide (NaOH) and sulfuric acid (H₂SO₄) to maintain discharge within acceptable pH limits. Following pH

neutralization, wastewater undergoes a series of additional filtration, detention, settling, and decantation steps to further reduce suspended solids and organic material. Treated effluent is then monitored to verify pH and flow conditions prior to being pumped to the City of Sumner publicly owned treatment works (POTW).

Solids removed during the pretreatment process are managed as sludge and are collected and hauled off site for disposal or beneficial reuse, including rendering or use as animal feed, as appropriate. The facility generates approximately 100 gallons of sludge per week, which is considered a relatively small volume and does not warrant evaluation of alternative sludge handling or disposal methods at this time. The WPTF configuration and process flow are depicted in the facility's single-line diagram and supporting documentation.

E. Summary of Compliance with Previous Permit

The facility previously discharged industrial wastewater under a City-issued authorization that established effluent limitations, batch discharge requirements, and self-monitoring obligations for the metal finishing process.

Available compliance information indicates that the facility implemented the required pretreatment controls and monitoring practices during the prior authorization period. No chronic or ongoing noncompliance affecting the sanitary sewer system or treatment plant has been identified.

This permit supersedes the prior authorization and incorporates comparable or more stringent effluent limitations, monitoring requirements, and operational controls. The issuance of this permit does not relieve the Permittee of responsibility for any unresolved compliance issues that may have occurred prior to the effective date.

F. Flow Limit

The permitted industrial wastewater discharge from the facility is limited to an average daily flow of 56,000 gallons per day (gpd) at the authorized discharge point.

The maximum daily flow limit is based on:

- The design and operating capacity of the facility's discharge tank and pretreatment system;
- The need to protect the hydraulic capacity and treatment performance of the publicly owned treatment works (POTW); and
- The Control Authority's requirement to limit industrial contributions in a manner that prevents pass-through, interference, and operational disruption.

No discharge in excess of the maximum daily flow limit is authorized. Any increase in flow above this limit, or any change from batch discharge to continuous discharge, requires prior written approval and a permit modification.

G. Special Permit Conditions:

1) Accidental Discharge / Slug Discharge Control Plan (AD/SDCP)

An Accidental Discharge and Slug Discharge Control Plan (AD/SDCP) is required. The Permittee shall develop, implement, and maintain a written AD/SDCP that describes measures to prevent, detect, and respond to spills, accidental discharges, and slug loads that could adversely affect the sanitary sewer system or treatment works.

The AD/SDCP shall, at a minimum, address:

- Identification of potential spill and slug discharge sources;

- Spill prevention, containment, and response procedures;
- Emergency notification procedures and contact information;
- Employee training and spill response responsibilities; and
- Procedures for preventing recurrence of accidental discharges.

If an AD/SDCP has been previously submitted and approved, the Permittee shall review and update the plan as necessary to reflect current operations and shall submit revisions to the Control Authority upon request. The Permittee shall notify the Control Authority of any facility or operational changes that increase the potential for accidental or slug discharges.

2) Best Management Plans

The Permittee shall implement and maintain pollution prevention and best management practices (BMPs) to minimize the generation of pollutants in industrial wastewater and to prevent the introduction of prohibited substances into the sanitary sewer.

These practices shall address, as applicable:

- Good housekeeping and material handling;
- Chemical and waste storage;
- Equipment maintenance and inspection;
- Management of solids, filters, and residuals generated by pretreatment operations; and
- Measures to prevent stormwater or non-process waters from contacting industrial materials.

Formal submittal of a separate Pollution Prevention Plan or Pollutant Management Plan is not required at issuance unless requested by the Control Authority. The Permittee shall make BMP documentation available for review during inspections.

3) Operation and Maintenance (O&M) Requirements

The Permittee shall operate and maintain the pretreatment system at all times to ensure effective treatment and compliance with permit limits. Operation and maintenance requirements include:

- Routine inspection and servicing of pretreatment system components;
- Timely replacement of filters, media, and worn components;
- Maintenance of adequate treatment capacity; and
- Proper management and disposal of pretreatment residuals.

Failure to properly operate and maintain the pretreatment system constitutes a permit violation.

4) Logs, Recordkeeping, and Certification

The Permittee shall maintain records sufficient to document compliance with this permit, including but not limited to:

- Flow measurements and discharge volumes;
- Sampling results and laboratory reports;
- Pretreatment system operation and maintenance activities;

- Calibration and inspection records for monitoring equipment;
- Spill and slug discharge incidents and corrective actions; and
- Training records related to wastewater management.

Records shall be retained for a minimum of three (3) years, or longer if required by enforcement actions or litigation.

All self-monitoring reports, certifications, and other required submittals shall be signed by an authorized representative and shall include the applicable certification statement required by pretreatment regulations, affirming that the information submitted is true, accurate, and complete.

H. Sampling Location:

Effluent sampling for compliance with this permit shall be conducted at Outfall 002A, the designated sampling location for the facility's industrial wastewater discharge.

The sampling point is configured with a fixed, accessible sampling port that allows for the collection of grab and composite samples representative of each batch discharge. The sampling location provides sufficient hydraulic conditions (including adequate flow and turbulence during discharge) to ensure representative sampling and safe sample collection.

The Permittee shall maintain the sampling location in a condition that allows:

- Safe and unobstructed access for facility staff and Control Authority personnel;
- Proper placement of sampling equipment;
- Collection of representative samples during each batch discharge; and
- Compliance with approved sampling methods and quality assurance requirements.

No alternative sampling locations may be used for compliance monitoring without prior written approval from the Control Authority. Any modification to the discharge piping, sampling port, or pretreatment system that could affect the representativeness of samples must be reported to the Control Authority and may require permit modification.

I. Basis for Concentration Limits and Monitoring Requirements:

EFFLUENT LIMITATIONS

REPORTING REQUIREMENTS

Parameter¹	Average Daily Effluent Limitations	Maximum Daily Effluent Limitations	Sample Type	Reporting Frequency
pH	Within the range 5.5 and 10.0 SU		Grab	Daily
Non-Polar Oil & Grease	100 mg/L	100 mg/L	Grab	Quarterly
Total Suspended Solids	56 lbs	70 lbs	Composite	Monthly
5-Day Biochemical Oxygen Demand	112 lbs	140 lbs	Composite	Monthly

Notes on Monitoring and Reporting:

- All required laboratory analysis for self-monitoring reports shall be performed by an accredited lab, certified for the analysis by the State of Washington

pH	pH shall remain within the range of 5.5 to 10.0 standard units, measured using grab samples collected during each discharge event.
Basis:	The pH limitation is based on local pretreatment standards established in SMC 13.18 and is necessary to protect the integrity of the sanitary sewer collection system, prevent corrosion or scaling, and maintain conditions suitable for biological treatment processes at the publicly owned treatment works (POTW). Grab sampling is appropriate because pH can vary rapidly and must be controlled at all times during discharge.
Non-polar Oil & Grease	Non-polar oil and grease shall not exceed 100 mg/L as either an average or maximum daily concentration. Grab samples shall be collected and analyzed using an approved method.
Basis:	The oil and grease limit is derived from local pretreatment standards in SMC 13.18 and is intended to prevent sewer blockages, operational problems, and interference with treatment processes. Grab sampling is appropriate due to the potential for episodic releases and the need to capture peak concentrations.
Total Suspended Solids	Total suspended solids shall not exceed 70 pounds as a daily maximum and 56 pounds as a monthly average. Composite samples shall be collected and analyzed using an approved method.
Basis:	The TSS limit is based on local limits established to protect the hydraulic capacity and treatment efficiency of the POTW.
5-Day Biochemical Oxygen Demand	Total suspended solids shall not exceed 112 pounds as a daily maximum and 140 pounds as a monthly average. Composite samples shall be collected and analyzed using an approved method.
Basis:	The BOD limit is based on local limits established to protect the hydraulic capacity and treatment efficiency of the POTW.