



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

December 13, 2022

Mr. Alfonso Cisneros, President
Pristine Valley Farms Pickle LLC
PO Box 207
La Conner, WA 98257-0207

Re: **WARNING LETTER** for State Waste Discharge Permit Number ST0501288
Pristine Valley Farms Pickle

Dear Alfonso Cisneros:

This letter is to inform you that your facility was out of compliance with the conditions in your industrial wastewater discharge permit as listed in Tables 1-4.

Table 1. Numeric Effluent Violations for Outfall #001 during 2022 (Permit Special Condition S1.A.)

Date	Parameter	Measurement	Units	Limit	Limit Type
2/17/2022	Chloride	677.9	mg/L	250	Maximum Daily
2/17/2022	TDS	1560	mg/L	500	Maximum Daily
February 2022	Chloride	677.9	mg/L	250	Average Monthly
February 2022	TDS	1560	mg/L	500	Average Monthly
3/31/2022	Chloride	429	mg/L	250	Maximum Daily
3/31/2022	TDS	1344	mg/L	500	Maximum Daily
March 2022	BOD5	74	mg/L	69	Average Monthly
March 2022	Chloride	429	mg/L	250	Average Monthly
March 2022	TDS	1344	mg/L	500	Average Monthly
4/28/2022	Chloride	999	mg/L	250	Maximum Daily
4/28/2022	TDS	2316	mg/L	500	Maximum Daily
April 2022	Chloride	999	mg/L	250	Average Monthly
April 2022	TDS	2316	mg/L	500	Average Monthly
5/16/2022	Chloride	792	mg/L	250	Maximum Daily
5/16/2022	TDS	1560	mg/L	500	Maximum Daily
May 2022	Chloride	792	mg/L	250	Average Monthly
May 2022	TDS	1560	mg/L	500	Average Monthly
6/14/2022	Flow	121,200	gpd	25,000	Maximum Daily
6/29/2022	Chloride	784	mg/L	250	Maximum Daily
6/29/2022	Flow	200,900	gpd	25,000	Maximum Daily
6/29/2022	TDS	1658	mg/L	500	Maximum Daily
June 2022	Chloride	784	mg/L	250	Average Monthly

Date	Parameter	Measurement	Units	Limit	Limit Type
June 2022	TDS	1658	mg/L	500	Average Monthly
June 2022	Flow	165,550	gpd	16,000	Average Monthly

TDS: total dissolved solids; BOD5: 5-day biochemical oxygen demand

Table 2. Monitoring Violations in the 1st Half of 2022 (see Permit Special Conditions S2.A-D.)

Monitoring Period	Monitoring Point	Parameter	Sampling Frequency	Violation
January 2022	All	All	Monthly	Analysis not conducted
February 2022	001	BOD ₅ (lbs/thousand lbs), Flow (gallons/day), Nitrogen (calculation, lbs/day), TSS (lbs/thousand lbs), Application/Loading Rate	Monthly	Analysis not conducted
March 2022	001	BOD ₅ (lbs/thousand lbs), Flow (gallons/day), Nitrogen (calculation, lbs/day), TSS (lbs/thousand lbs), Application/Loading Rate	Monthly	Analysis not conducted
April 2022	001	BOD ₅ (lbs/thousand lbs), Flow (gallons/day), Nitrogen (calculation, lbs/day), TSS (lbs/thousand lbs), Application/Loading Rate	Monthly	Analysis not conducted
May 2022	001	BOD ₅ (lbs/thousand lbs), Flow (gallons/day), Nitrogen (calculation, lbs/day), TSS (lbs/thousand lbs), Application/Loading Rate	Monthly	Analysis not conducted

BOD₅: 5-day biochemical oxygen demand; TSS: total suspended solids

Table 3: Discharge Monitoring Reports Submitted Late (Permit Special Condition S3.A.)

Monitoring Period	Begin Date	End Date	Due Date	Date Submitted	Days Late
February 2022	2/1/2022	2/28/2022	3/28/2022	4/5/2022	8
March 2022	3/1/2022	3/31/2022	4/28/2022	4/29/2022	1
1st Quarter 2022	1/1/2022	3/31/2022	4/28/2022	7/28/2022	91
July 2022	7/1/2022	7/31/2022	8/28/2022	8/29/2022	1
August 2022	8/1/2022	8/31/2022	9/28/2022	10/28/2022	30

Table 4. Missing Submittals in 2022

Due Date	Submittal Report	Permit Section
6/1/2022	O&M - Operation and Maintenance Manual	S4.A
7/1/2022	Groundwater Quality Evaluation Study Report	S9

Non-compliance notifications are required by your permit. You must submit this notice immediately. You have not submitted a written notice of non-compliance for the violations in February through June 2022, therefore you are in violation of your permit. You may refer to **permit section S3.E.** for more information about what must be included in a written notice of non-compliance. From this point forward, an electronic copy of the **laboratory report** should be attached to every discharge monitoring report (DMR) submission. The written notice of non-compliance should also be attached to the DMR submission. At this time, Ecology requests a single letter by email to address the source(s) of the numeric effluent violations from February through June 2022 (Table 1) and how you are going to take action to prevent future violations. You have already submitted an explanation on your DMR for monitoring violations listed in Table 2: "waiting on equipment and installation."

The DMR is the principal tool used to evaluate compliance with permit requirements. The Department of Ecology places great importance on the **timely submittal of complete and accurate DMRs** (see Table 3). Two of the reports required by your permit are past due (Table 4). If you fail to comply with the conditions of your permit, Ecology may take formal administrative enforcement action, including issuing orders and penalties. Ecology's enforcement authority for state waste discharge permits is governed by Chapter 173-216 of the Washington Administrative Code (WAC).

Ecology requests that you submit the following items:

1. Notice of Non-compliance for all permit violations in Table 1.
2. Lab reports attached to all future DMR submissions.
3. Missing submittal reports listed in Table 4.

If you have any questions or concerns, please contact your permit manager Chris Martin by email at christopher.martin@ecy.wa.gov or his new office number (206) 594-0159.

Sincerely,



Gretchen Onstad
Compliance Specialist
Water Quality Program

ecc: Permit and Reporting Information System (PARIS): Pristine Valley Farms Pickle, ST0501288
Chris Martin, Ecology
Monika Kannadaguli, Ecology
Alfonso Cisneros, President, Pristine Valley Farms Pickle LLC, acisnerospvf@hotmail.com