



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

December 20, 2024

Steve Lenz, President  
Schenk Packing Co., Inc.  
8204 288th St NW  
Stanwood, WA 98292-9525

Re: **WARNING LETTER** for State Waste Discharge Permit Number ST0005174  
SCHENK PACKING CO

Dear Steve Lenz:

This letter is to inform you that your facility is out of compliance with your industrial wastewater discharge permit. Violations are listed in Tables 1-3.

**Table 1.** Monitoring Violations from June 2021 to October 2024 (see Permit Special Conditions S2. A. and B.)

Monitoring Period	Monitoring Point(s)	Parameter(s)	Sampling Frequency	Violation
June 1, 2021 – May 31, 2022	01FA 01GH 01P	Nitrogen (calculation, lbs/acre)	Annual	Failed to Sample / Analysis not conducted
June 1, 2021 – May 31, 2022	02S1 02S2 02S3 02S4 03S1 03S2 03S3 03S4 04S1 04S2 04S3 04S4	Ammonia (mg/kg), Calcium (meq/100g), Cation Exchange Capacity (meq/100g), Electrical Conductivity (micromhos/cm), Exchangeable Sodium (%), Kjeldahl Nitrogen (TKN, mg/kg), Magnesium (meq/100g), Moisture content (%), Nitrate + Nitrite (mg/kg), Organic Matter (%), pH, Phosphorus (mg/kg), Potassium (mg/kg), Sodium (meq/100g), Sulfate (mg/kg)	Annual	Failed to Sample / Analysis not conducted
October 2023	01	Kjeldahl Nitrogen (TKN, mg/L) and Nitrate + Nitrite (mg/L)	2/Month	Failed to Sample / Analysis not conducted
October 2024	01	Kjeldahl Nitrogen (TKN, mg/L) and Nitrate + Nitrite (mg/L)	2/Month	Failed to Sample / Analysis not conducted

**Table 2.** Discharge Monitoring Reports Submitted Late or Missing (Permit Special Condition S3.A.)

Monitoring Period	Begin Date	End Date	Due Date	Date Submitted	Days Late
Annual 2019-2020	6/1/2019	5/31/2020	7/15/2020	8/19/2020	35
August 2020	8/1/2020	8/31/2020	9/15/2020	9/16/2020	1
December 2020	12/1/2020	12/31/2020	1/15/2021	1/19/2021	4
April 2021	4/1/2021	4/30/2021	5/15/2021	5/18/2021	3
Annual 2020-2021	6/1/2020	5/31/2021	7/15/2021	8/26/2021	42
June 2021	6/1/2021	6/30/2021	7/15/2021	7/16/2021	1
July 2021	7/1/2021	7/31/2021	8/15/2021	8/19/2021	4
December 2021	12/1/2021	12/31/2021	1/15/2022	2/15/2022	31
March 2022	3/1/2022	3/31/2022	4/15/2022	4/21/2022	6
April 2022	4/1/2022	4/30/2022	5/15/2022	5/17/2022	2
Annual 2021-2022	6/1/2021	5/31/2022	7/15/2022	8/31/2022	47
July 2022	7/1/2022	7/31/2022	8/15/2022	8/17/2022	2
August 2022	8/1/2022	8/31/2022	9/15/2022	10/3/2022	18
November 2022	11/1/2022	11/30/2022	12/15/2022	12/16/2022	1
December 2022	12/1/2022	12/31/2022	1/15/2023	1/18/2023	3
February 2023	2/1/2023	2/28/2023	3/15/2023	3/24/2023	9
April 2023	4/1/2023	4/30/2023	5/15/2023	6/1/2023	17
May 2023	5/1/2023	5/31/2023	6/15/2023	6/20/2023	5
Annual 2022-2023	6/1/2022	5/31/2023	7/15/2023	<b>Not Started</b>	
June 2023	6/1/2023	6/30/2023	7/15/2023	7/25/2023	10
September 2023	9/1/2023	9/30/2023	10/15/2023	11/13/2023	29
October 2023	10/1/2023	10/31/2023	11/15/2023	12/9/2023	24
November 2023	11/1/2023	11/30/2023	12/15/2023	12/19/2023	4
March 2022	12/1/2023	12/31/2023	1/15/2024	1/16/2024	1
February 2024	2/1/2024	2/29/2024	3/15/2024	4/22/2024	38
April 2024	4/1/2024	4/30/2024	5/15/2024	5/28/2024	13
May 2024	5/1/2024	5/31/2024	6/15/2024	6/24/2024	9
Annual 2023-2024	6/1/2023	5/31/2024	7/15/2024	<b>Draft</b>	
June 2024	6/1/2024	6/30/2024	7/15/2024	7/25/2024	10
July 2024	7/1/2024	7/31/2024	8/15/2024	<b>Draft</b>	
September 2024	9/1/2024	9/30/2024	10/15/2024	10/21/2024	6
October 2024	10/1/2024	10/31/2024	11/15/2024	12/4/2024	19
November 2024	11/1/2024	11/30/2024	12/15/2024	<b>Not Started</b>	

**Table 3.** Permit Required Reports Submitted Late or Missing

Permit Section	Submittal Name	Due Date	Days Late	Date Submitted
S8	Irrigation and Crop Management Plan	1/15/2015		<b>Not Received</b>
S4.A.a.2.	Operation and Maintenance Manual Additional Updates or Review Confirmation Letter	1/15/2015		<b>Not Received</b>
S4.A.a.1.	Operation and Maintenance Manual (Update)	6/15/2015		<b>Not Received</b>
S5	Solid Waste Control Plan	6/15/2015		<b>Not Received</b>

Permit Section	Submittal Name	Due Date	Days Late	Date Submitted
S7	Groundwater quality evaluation (hydrogeologic study)	1/1/2017	260	9/18/2017
S6	Application for Permit Renewal	5/15/2018	199	11/30/2018

**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 Table 1, 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).

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. Your facility has a pattern of missing and late submission of DMRs (Table 2). Furthermore, four (4) permit required reports were not submitted to Ecology (Table 3).

**Ecology requests the following:**

1. Notices of noncompliance for the monitoring violations listed in Table 1.
2. An electronic copy of the laboratory report to be attached to every DMR.
3. Submission of four (4) missing DMRs listed in Table 2.
4. Submission of four (4) missing reports listed in Table 3.

Failure to comply with the conditions of your permit may result in formal administrative enforcement action, including orders and penalties. Ecology's enforcement authority for state waste discharge permits is governed by Chapter 173-216 of the Washington Administrative Code (WAC).

If you have any questions or concerns, please contact your new permit manager Adrienne Yang by email at [adrienne.yang@ecy.wa.gov](mailto:adrienne.yang@ecy.wa.gov) or by phone at (425) 941-8633.

Sincerely,



Gretchen Onstad  
Compliance Specialist  
Water Quality Program

ecc: Permit and Reporting Information System (PARIS): SCHENK PACKING CO, ST0005174  
Adrienne Yang, Ecology  
Chris Martin, Ecology  
Monika Kannadaguli, Ecology  
Miguel Garcia, Schenk Packing Co.  
Tom Hayes, Schenk Packing Co.  
Steve Lenz, Schenk Packing Co.