

Schenk Packing Co., Inc.

8204 288th STREET N.W. • STANWOOD, WASHINGTON 98292
Stanwood (360) 629-3939 • FAX (360) 629-4451
Seattle (425) 743-9211 • Everett (360) 652-0660 • Mt. Vernon (360) 336-2828

June 24, 2020

ATTN: Christopher Martin
Washington State Department of Ecology
Northwest Regional Office
Water Quality Program
3190 160th AVE SE
Bellevue WA, 98008

RE: Warning Letter Received on 06/23/2020

Dear Mr. Martin,

This letter is to inform you that Schenk Packing Inc. received your letter regarding non-compliance with State Waste Discharge Permit No ST0005174.

The monitoring violations listed in Table 1 of the letter we received were caused by recent employee turnover. In November of 2019 the individual employed by Schenk Packing Co. (Biff Benbow) who was in charge of processing and submitting monthly DMR data left the company without giving notice. Biff was an employee who had retired several years ago but continued working on our waste water reporting until this past November. Several attempts were made to contact this individual but were unsuccessful. John Lenz was identified as the replacement and will be the individual responsible for submitting DMR's moving forward. After reviewing the non-compliances with John, it was noticed that the violations outlined on Table 1 (see table on next page) were caused by the Nitrogen calculation data not being entered in the proper location of the online form. John had entered the data in the summary table at the bottom of the online form but not the table above. John resubmitted the DMR's on 06/23/2020 with the Nitrogen calculation data in the correct location and this eliminated the 'errors' listed in the online DMR system for these DMR's.

The first ten monitoring violations listed in Table 1 (dated 11/1/2019 and 11/4/2019) are because the first Tuesday samples for November were not collected. This is unusual as we have a consistent history of collecting monthly DMR samples on time. Regardless of this the importance of collecting monthly DMR samples on time was reiterated to the individual responsible for this task.

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Table 1. Monitoring Violations from November 2019 to April 2020

Date	Outfall	Parameter	Violation	Units	Limit Type	Sampling Frequency
11/1/2019	I	BOD5	Analysis not Conducted	mg/L	Average	Monthly
11/1/2019	I	Oil & Grease	Analysis not Conducted	mg/L	Average	Monthly
11/1/2019	I	TDS	Analysis not Conducted	mg/L	Average	Monthly
11/4/2019	I	BOD5	Analysis not Conducted	mg/L	Max Daily	Monthly
11/4/2019	I	Fecal Coliform	Analysis not Conducted	#/100ml	Max Daily	Monthly
11/4/2019	I	TKN	Analysis not Conducted	mg/L	Max Daily	2/Month
11/4/2019	I	Nitrate + Nitrite	Analysis not Conducted	mg/L	Max Daily	2/Month
11/4/2019	I	Oil & Grease	Analysis not Conducted	mg/L	Max Daily	Monthly
11/4/2019	I	pH	Analysis not Conducted	S. U.	Max Daily	Monthly
11/4/2019	I	TDS	Analysis not Conducted	mg/L	Max Daily	Monthly
11/1/2019	01FA	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
11/1/2019	01GH	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
11/1/2019	01P	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
12/1/2019	01FA	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
12/1/2019	01GH	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
12/1/2019	01P	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
1/1/2020	01FA	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
1/1/2020	01GH	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
1/1/2020	01P	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
3/1/2020	01FA	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
3/1/2020	01GH	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
3/1/2020	01P	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
4/1/2020	01FA	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
4/1/2020	01GH	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
4/1/2020	01P	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
5/1/2020	01FA	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
5/1/2020	01GH	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly
5/1/2020	01P	Nitrogen (calculation)	Frequency of Sampling	Lbs/Acre		Monthly

BOD5 = 5-Day Biochemical Oxygen Demand

TDS = Total Dissolved Solids

TKN = Total Kjeldahl Nitrogen

I reviewed the late DMR's from Table 2 of the Warning Letter. We are aware of the importance of submitting DMR's on time. I reiterated this to our staff as well.

We have not been able to obtain the data collected for the missing annual soil monitoring DMR from 06/01/2017 – 07/15/2018. The individual responsible for collecting the samples for this study indicated that the samples were collected but were not analyzed by the contracted laboratory. The samples were either lost in transit to or from the laboratory conducting the soil analysis or the laboratory misplaced the samples. The laboratory was contacted to determine if they have records from this study and they confirmed that they do not have such records.

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The data related to the soil monitoring DMR dated 06/01/2018 – 05/31/2019 has been collected. This DMR will be submitted ASAP.

The importance of timely and correct sampling and reporting is of the utmost importance to our company. We have had some issues in lieu of unplanned employee turnover but I feel strongly in our new staff and that these issues will stop occurring.

Best Regards,

Steve Lenz

