



February 1, 2022

Water Quality Program
Department of Ecology
4601 N. Monroe St.
Spokane, WA 99205-1295

RE: Warning Letter for State Waste Discharge Permit ST0501273

Dear Mr. Buchert,

SGL Composites, LLC (SGL) operates under State Waste Discharge Permit No. ST0501273, issued February 25, 2021.

SGL received a warning letter, dated January 5, 2022, related to various violations that took place between April 2021 – November 2021. It should be noted that most of these issues occurred after the departure of SGL's only environmental scientist in April 2021. SGL hired a part time consultant to take over the facility's environmental duties until the full-time position could be filled. The full-time position was filled in October 2021. Please see SGL responses below in italics.

1. Effluent Limit Violations

SGL generated 23 permit violations in the WQWebDMR database for BOD5, flow, nitrogen, and conductivity.

Section S1.A of the permit authorizes the discharge of industrial wastewater at the permitted location subject to compliance with effluent limitations set in the permit.

BOD5 – *SGL has been experiencing issues with BOD5 compliance for many months. During the summer, warmer months, it was surmised that biological build-up in the sampling tube was causing elevated BOD5 values. The tubing was removed and replaced with new tubing. BOD5 values dropped, and the issue was closed; however, in recent months the values have spiked. SGL staff has ordered new tubing and replacement date is set for February 8, 2022. During a phone call with Pat Hallinan at Ecology, the question of cross contamination with the sanitary sewer was posed. SGL researched the possibility of cross contamination and after reviewing construction documents from the project that separated the two wastewater streams, it does not appear that this is a possibility.*

Flow – *SGL uses more process water for cooling in the hot, summer months. SGL is researching ways to scale back the use of cooling water during these hotter months and stay within the permit limit.*

Nitrogen – *SGL uses nitrogen containing compounds in its process essentially for cleaning the nearly finished product. Research has shown that overflow of the sizing baths could be the defining issue in the cause of wastewater total nitrogen concentrations to be above the permitted limit. A project to better manage the overflow system, along with audio and visual overflow alarms, is underway.*



Conductivity – *SGL's wastewater sample showed high conductivity readings in October. No cause was determined for these data, it occurred during an approximately two and a half hour time period and has not occurred since.*

2. Monitoring Requirements

SGL received violations for 157 unreported values for monitoring under Outfall 001 & 002 on discharge monitoring reports. Values must be sampled and reported per the schedule in Section S2.A of the permit.

In June 2021, SGL experienced a mechanical failure on the unit that records data for the wastewater system. The issue was discovered during the monthly download of data. In the absence of an in-house environmental professional, the DMR for that month was submitted with incomplete data. SGL's current environmental engineer downloaded the data from the company's internal historian data logging system, re-worked the DMR tables, and re-submitted without errors. Many of the violation messages were from this month's lack of data and are now resolved.

3. Reporting Noncompliance

Section S3.E of SGL's permit requires the facility to notify Ecology immediately when they violate or are unable to comply with permit conditions. The facility must follow up with a written report within five days that includes the description of the noncompliance and its cause and actions taken to prevent reoccurrence of noncompliance. SGL did not properly report their permit violations to Ecology.

SGL did not have an on-staff environmental professional from April – October 2021. Failure to report properly was a misunderstanding of the rules by the former person responsible for DMR reporting. The current environmental engineer has worked closely with Water Quality Department staff to ensure that the rules and regulations are clearly understood.

4. Missing Submittals

Special Condition S4.A.a.1 of SGL's permit requires that an Operation & Maintenance Manual update be submitted by October 15, 2021. This submittal has not been received by Ecology to date.

The new SGL Wastewater Management System Operations & Maintenance manual is under review and will be submitted to Ecology by March 1, 2022.

5. Late Submittals/DMRs

SGL submitted four DMRs (Permit Section S3.A), past the due date. All DMR submittals are due by the 15th of the month following the monitoring period.

SGL submitted several DMR's after the regulated due date in 2021. SGL has hired a full-time environmental engineer. SGL staff will submit completed accurate DMR and associated submittals on time.

Each non-submittal and late DMR constitutes a separate violation of the permit.



Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,

Lee McKinley
Plant Manager