



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • PO Box 330316 • Shoreline, WA 98133-9716 • 206-594-0000  
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April 26, 2022

Mr. Brad Helland  
GWI Holdings, Inc.  
1000 1st Ave #2201  
Seattle WA 98104-0902

Re: **WARNING LETTER** for State Waste Discharge Permit Number ST0501318  
GACO Western

Dear Brad Helland:

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 through 4.

**Table 1.** Numeric Effluent Violations in July 2021 (*see Permit Special Condition S1.A.*)

<i>Monitoring Period</i>	<i>Monitoring Point</i>	<i>Parameter</i>	<i>Measurement</i>	<i>Limit</i>	<i>Limit Type</i>
July 2021	MW1	pH	6.06	6.5	Minimum Daily

**Table 2.** Monitoring Violations in July 2021 (*see Permit Special Condition S2.A.*)

<i>Monitoring Period</i>	<i>Monitoring Point</i>	<i>Parameter</i>	<i>Sampling Frequency</i>	<i>Violation</i>
July 2021	MW1	Electrical Conductivity	Monthly	Analysis not conducted
July 2021	MW2, MW3	1,1-Dichloroethane 1,2 Cis-Dichloroethylene 1,2-Dichloroethane Acrylonitrile Benzene Dissolved Oxygen Electrical Conductivity Ethylbenzene m-xylene Measured depth to groundwater o-Xylene Oil & Grease Oxidation Reduction Potential pH Temperature Toluene Turbidity Vinyl Chloride Xylene	Monthly	Analysis not conducted
July 2021	VZ1, VZ2, VZ3	Matric Potential	Once Every 2 Weeks	Analysis not conducted

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

<i>Monitoring Period</i>	<i>Begin Date</i>	<i>End Date</i>	<i>Due Date</i>	<i>Date Submitted</i>	<i>Days Late</i>
June 2021	6/1/2021	6/30/2021	7/28/2021	12/28/2021	153
July 2021	7/1/2021	7/31/2021	8/28/2021	1/4/2022	129
August 2021	8/1/2021	8/31/2021	9/28/2021	Draft	
September 2021	9/1/2021	9/30/2021	10/28/2021	12/28/2021	61
October 2021	10/1/2021	10/31/2021	11/28/2021	12/28/2021	30
December 2021	12/1/2021	12/31/2021	1/28/2022	Draft	
2 <sup>nd</sup> Half of 2021	7/1/2021	12/31/2021	1/28/2022	Not Started	
January 2022	1/1/2022	1/31/2022	2/28/2022	Not Started	
February 2022	2/1/2022	2/31/2022	3/28/2022	Not Started	
March 2022	3/1/2022	3/31/2022	4/28/2022	Not Started	

**Table 4.** Missing Reports

<i>Permit Section</i>	<i>Report</i>	<i>Due Date</i>
S4A	Operation And Maintenance Manual	10/1/2021
S10	Vadose Zone Monitoring	1/1/2022
S9	Summary Irrigation Report	3/1/2022

**Non-compliance notifications are required by your permit.** You have explained the cause of the monitoring violations (Table 2) but not the pH effluent limit exceedance (Table 1) on your July 2021 discharge monitoring report (DMR). You have not fulfilled this permit requirement. From this point forward, every violation must be addressed in your report (as a note on your DMR or as an attached notice of noncompliance) and an electronic copy of the **laboratory report** should be attached to every DMR submission.

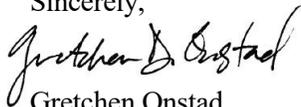
The DMR is the principal tool used to evaluate compliance with permit requirements. The Department of Ecology (Ecology) places great importance on the **timely submittal of complete and accurate DMRs**. Your facility has a pattern of late or missing DMRs (Table 3) and reports (Table 4). If you fail to 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 without delay:

1. Missing DMRs listed in Table 3.
2. Missing 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](mailto:christopher.martin@ecy.wa.gov) or by phone at (425) 577-3854.

Sincerely,



Gretchen Onstad  
 Compliance Specialist  
 Water Quality Program

WARNING LETTER from Washington Department of Ecology - Water Quality Program - NWRO

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e-cc: Permit and Reporting Information System (PARIS): GACO Western, ST0501318  
Chris Martin, Ecology  
Chris Smith, Ecology  
Monika Kannadaguli, Ecology  
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