



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

October 6, 2022

Mr. Zeeshan Qazi, President
ZYK Enterprises
17658 W Snoqualmie River Rd NE
Duvall, WA 98019-9203

Re: **WARNING LETTER** for State Waste Discharge Permit Number ST0003974
ZYK Enterprises

Dear Zeeshan Qazi:

This letter is to inform you that your facility is out of compliance with the conditions in your industrial wastewater discharge permit as listed in Tables 1 through 3.

The Department of Ecology (Ecology) Water Quality Program modified the Compliance Schedule in your permit on August 3, 2021 (Table 1). The Compliance Schedule states that by the dates tabulated below, the Permittee must complete the following tasks and submit a report describing, at a minimum:

- Whether the task is completed and, if not, the date on which the Permittee expects to complete the task.
- The reasons for delay and the steps the Permittee is taking to return the project to the established schedule.

Table 1. Compliance Schedule in Permit Special Condition S7

	Tasks	Date Due
1	<ul style="list-style-type: none">• Hire a consulting engineer.• Contract a septic truck (or equivalent) to haul all process wastewater to a wastewater treatment plant until day tank, holding tank, grinder pit and drain field can be cleaned out and the disinfection treatment of day tank can be reinstated.• Locate the sample port for the groundwater monitoring well and resume sampling.	9/1/2021
2	Consulting engineer to review the following:	12/1/2021
2.a	<ul style="list-style-type: none">• What is the current disinfection procedure and how is it implemented? Specifically to determine cause(s) of continued exceedance of permit limits for total coliform.	12/1/2021

	Tasks	Date Due
2.b	<ul style="list-style-type: none"> What is current de-chlorination procedure and how is it implemented? Specifically to determine if it has the potential to exceed the permit limit for residual chlorine. 	12/1/2021
2.c	<ul style="list-style-type: none"> What is the current sampling procedure, and how and where are samples collected? Specifically, are samples being collected in the appropriate locations, with the correct equipment (such as a digital chlorine meter), to prevent contamination of the sample that may lead to a violation of a permit limit? 	12/1/2021
3	After review of current practices the consulting engineer shall make recommendations on improvements to operations to eliminate continued permit limit violations. This may include additional treatment prior to disinfection. Recommendations shall be made in a written report following the requirements of 173-240-150 WAC that must also be provided to Ecology for review.	2/1/2022
4	Make changes recommended by consulting engineer to eliminate continued permit violations.	4/1/2022
4.a	<ul style="list-style-type: none"> Hire a contractor as needed to make/install any material/equipment modifications. 	3/1/2022
4.b	<ul style="list-style-type: none"> Prepare operation and maintenance procedure(s) for any new/modified equipment. 	4/1/2022
5	Train appropriate personnel on new equipment operation and use.	5/1/2022
6	Begin use of new equipment and related processes (e.g. sampling).	5/1/2022

In the Compliance Schedule, Ecology required your facility to hire a consulting engineer to address disinfection of your wastewater. Adequate disinfection has not been achieved, as shown by the high levels of fecal coliform and total coliforms listed in Table 2, despite maintaining a high chlorine residual. Exceedance of early warning levels in Table 3 is also evidence of poor disinfection. Therefore, Ecology requests that ZYK **hire a wastewater treatment engineer to address your lack of wastewater disinfection.**

ZYK has submitted incomplete responses to the Compliance Schedule. On 9/2/ 2021, Ecology received an unsigned contract between ZYK and a consulting firm. On 10/8/2021, Ecology received copies of invoices for tank pump-out and cleaning but no report on how this task was completed. On 8/12/2022, Ecology received an email stating that “the new system [had been] installed”, without submitting an engineering report for review prior to installation (this is required by 173-240-150 WAC). **A report for each task must be uploaded to Ecology’s WQWebPortal as a Permit Submittal.**

Table 2. Numeric Effluent Violations from October 2021 to August 2022

Date	Outfall	Parameter	Measurement	Units	Limit	Limit Type
10/19/2021	3	Total Residual Chlorine	2.87	mg/L	0.1	Maximum Daily
10/19/2021	3	Fecal Coliform	180000	MPN/100 mL	400	Maximum Daily
10/19/2021	3	Total Coliforms	860000	MPN/100 mL	1000	Maximum Daily

Date	Outfall	Parameter	Measurement	Units	Limit	Limit Type
October 2021	3	Total Residual Chlorine	2.87	mg/L	0.05	Average Monthly
October 2021	2	Total Coliforms	2000	MPN/100 mL	200	Monthly Geometric Mean
11/19/2021	3	Total Residual Chlorine	0.44	mg/L	0.1	Maximum Daily
11/19/2021	3	Fecal Coliform	30000	MPN/100 mL	400	Maximum Daily
11/19/2021	3	Total Coliforms	40000	MPN/100 mL	1000	Maximum Daily
November 2021	3	Total Residual Chlorine	0.44	mg/L	0.05	Average Monthly
12/13/2021	3	Fecal Coliform	2000000	MPN/100 mL	400	Maximum Daily
12/13/2021	3	Total Coliforms	2700000	MPN/100 mL	1000	Maximum Daily
1/26/2022	3	Fecal Coliform	18000000	MPN/100 mL	400	Maximum Daily
1/26/2022	3	pH	6.34	S.U.	6.5	Minimum Daily
1/26/2022	3	Total Coliforms	18000000	MPN/100 mL	1000	Maximum Daily
2/23/2022	3	Fecal Coliform	3300000	MPN/100 mL	400	Maximum Daily
2/23/2022	3	pH	6.34	S.U.	6.5	Minimum Daily
2/23/2022	3	Total Coliforms	3300000	MPN/100 mL	1000	Maximum Daily
3/24/2022	3	Fecal Coliform	4700000	MPN/100 mL	400	Maximum Daily
3/24/2022	3	Total Coliforms	1800000	MPN/100 mL	1000	Maximum Daily
3/24/2022	2	pH	5.69	S.U.	6.5	Minimum Daily
4/21/2022	3	Fecal Coliform	900000	MPN/100 mL	400	Maximum Daily
4/21/2022	3	Total Coliforms	1300000	MPN/100 mL	1000	Maximum Daily
4/21/2022	2	pH	6.28	S.U.	6.5	Minimum Daily
5/19/2022	3	Fecal Coliform	1200000	MPN/100 mL	400	Maximum Daily
5/19/2022	3	Total Coliforms	5800000	MPN/100 mL	1000	Maximum Daily
6/27/2022	3	Fecal Coliform	500000	MPN/100 mL	400	Maximum Daily
6/27/2022	3	Total Coliforms	1900000	MPN/100 mL	1000	Maximum Daily
7/27/2022	3	Fecal Coliform	250000	MPN/100 mL	400	Maximum Daily
7/27/2022	3	Total Coliforms	5000000	MPN/100 mL	1000	Maximum Daily
July 2022	3	Total Residual Chlorine	0.06	mg/L	0.05	Average Monthly
8/26/2022	3	Fecal Coliform	330000	MPN/100 mL	400	Maximum Daily
8/26/2022	3	Total Coliforms	510000	MPN/100 mL	1000	Maximum Daily

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 numeric effluent violations from December 2021 to August 2022 in Table 2, therefore you are in violation of your permit. Ecology received notices on non-compliance for violations in October and November of 2021. You may refer to **Permit Special Condition S3.F.6.a.** for more information about what must be included in a written notice of non-compliance. The written notice of non-compliance should be attached to the DMR submission. Discharge of wastewater in excess of authorized effluent limits is a violation of **Permit Special Condition S1.A.**

Two consecutive exceedances of early warning levels (Table 3) require additional investigation according to **Permit Special Condition S1.D.** Your facility should provide Ecology with a **written**

report on the investigation into the source(s) of the elevated ammonia, 5-day biochemical oxygen demand (BOD5), chloride, and nitrate + nitrite. This report must include a discussion of the steps taken to locate the source(s), steps taken to correct those sources, and steps taken to ensure future exceedances do not occur.

Table 3. Consecutive Exceedances of Early Warning Levels from October 2021 to August 2022

Date	Monitoring Point	Parameter	Measurement	Units	Limit	Limit Type
10/19/2021	3	Ammonia	201	mg/L	10	Maximum Daily
October 2021	3	Ammonia	201	mg/L	12	Average Monthly
October 2021	3	BOD5	1100	mg/L	41	Average Monthly
11/19/2021	3	Ammonia	24.8	mg/L	10	Maximum Daily
November 2021	3	Ammonia	24.8	mg/L	12	Average Monthly
November 2021	3	BOD5	190	mg/L	41	Average Monthly
12/13/2021	3	Ammonia	156	mg/L	10	Maximum Daily
December 2021	3	Ammonia	156	mg/L	12	Average Monthly
December 2021	3	BOD5	1200	mg/L	41	Average Monthly
1/26/2022	3	Ammonia	25.4	mg/L	10	Maximum Daily
January 2022	3	Ammonia	25.4	mg/L	12	Average Monthly
January 2022	3	BOD5	530	mg/L	41	Average Monthly
2/23/2022	3	Ammonia	108	mg/L	10	Maximum Daily
February 2022	3	Ammonia	108	mg/L	12	Average Monthly
February 2022	3	BOD5	480	mg/L	41	Average Monthly
3/24/2022	3	Ammonia	144	mg/L	10	Maximum Daily
3/24/2022	2	Nitrate + Nitrite	2.49	mg/L	1.26	Maximum Daily
March 2022	3	Ammonia	144	mg/L	12	Average Monthly
March 2022	3	BOD5	820	mg/L	41	Average Monthly
March 2022	3	Chloride	87.8	mg/L	76	Average Monthly
4/21/2022	3	Ammonia	161	mg/L	10	Maximum Daily
4/21/2022	2	Nitrate + Nitrite	3.22	mg/L	1.26	Maximum Daily
April 2022	3	Ammonia	161	mg/L	12	Average Monthly
April 2022	3	BOD5	660	mg/L	41	Average Monthly
April 2022	3	Chloride	84.6	mg/L	76	Average Monthly
5/19/2022	3	Ammonia	136	mg/L	10	Maximum Daily
May 2022	3	Ammonia	136	mg/L	12	Average Monthly
May 2022	3	BOD5	1100	mg/L	41	Average Monthly
6/27/2022	3	Ammonia	132	mg/L	10	Maximum Daily
June 2022	3	Ammonia	132	mg/L	12	Average Monthly
June 2022	3	BOD5	780	mg/L	41	Average Monthly
7/27/2022	3	Ammonia	153	mg/L	10	Maximum Daily
July 2022	3	Ammonia	153	mg/L	12	Average Monthly
July 2022	3	BOD5	270	mg/L	41	Average Monthly
July 2022	3	Chloride	87.2	mg/L	76	Average Monthly
8/26/2022	3	Ammonia	157	mg/L	10	Maximum Daily
August 2022	3	Ammonia	157	mg/L	12	Average Monthly
August 2022	3	BOD5	130	mg/L	41	Average Monthly
August 2022	3	Chloride	89.2	mg/L	76	Average Monthly

BOD5 = 5-Day Biochemical Oxygen Demand

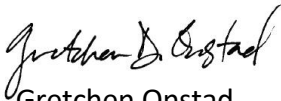
If you fail to comply with the conditions of your permit, Ecology may take formal administrative enforcement action, including issuing penalties. Ecology's enforcement authority for state waste discharge permits is governed by Chapter 173-216 of the Washington Administrative Code (WAC).

Ecology requests that you submit the following:

1. Proof of hiring a wastewater treatment engineer to address disinfection as required by the compliance schedule in Table 1.
2. Reports describing completed tasks from the Compliance Schedule (Table 1) must be uploaded to Ecology's WQWebPortal.
3. Notices of non-compliance for numeric effluent violations in Table 2.
4. Report on the investigation into the source(s) of the elevated parameters in Table 3.

If you have any questions or concerns, please contact me at gretchen.onstad@ecy.wa.gov or 425-457-0999.

Sincerely,



Gretchen Onstad
Compliance Specialist
Water Quality Program

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