



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1265 • 509-329-3400

April 3, 2024

Gregory Pincelli
Environmental Engineer
SGL Composites
8781 Randolph Road NE
Moses Lake, Washington 98837

RE: Discharge Monitoring Report Violations for State Waste Discharge Permit
ST0501273 – SGL Composites

Dear Gregory Pincelli:

SGL Composites (SGL) is out of compliance with State Waste Discharge permit ST0501273 (Permit) that was issued February 25, 2021. Below is a list of violations reported by SGL during the reporting months of January 1, 2022 to February 29, 2024 (Table 1). Because a permit modification was done to revise BOD₅ limits, those violations are not included in the list.

Ecology wants to make sure that SGL is aware of the violations and to help SGL stay in compliance with limits, monitoring requirements, and terms and/or conditions in SGL's permit.

Please contact Charlotte Daskalopoulos, permit manager for SGL at (509) 863-2186 or cdas461@ecy.wa.gov if you have questions about permit conditions.

Sincerely,

Shara Joy
Water Quality Program
Eastern Regional Office

SJ:sj

cc: Lee McKinley, SGL Composites

Charlotte Daskalopoulos, WQP Permit Manager, Ecology Eastern Region
Andy O'Neill, WQP Technical Assistance Provider, Ecology Eastern Region
Rob Buchert, WQP Senior Compliance Specialist, Ecology Eastern Region
Art Jenkins, PE, WQP Permit Management Unit Supervisor, Ecology Eastern Region
Pat Hallinan, WQP Permit Development Unit Supervisor, Ecology Eastern Region



Table 1: Violations Between January 1, 2022 – February 29, 2024

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
01/01/2022	001	Nitrogen	lbs	Annual Total	22,710.55	20,548	Numeric effluent violation
	Na	Na	Na	Na	Na	Na	Late submittal of DMR
01/01/2022-12/31/2022 Biannual	Na	Na	Na	Na	Na	Na	Late submittal of DMR
02/01/2022	001	Conductivity	micromhos/cm	Six Month Average	1,635.5	1,600	Numeric effluent violation
	001	Nitrogen	lbs	Annual Total	23,252.51	20.548	Numeric effluent violation
03/01/2022	001	Flow	gpd	Single sample (3/2/2022)	202,976	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/3/2022)	265,376	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/4/2022)	256,752	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/5/2022)	280,848	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/9/2022)	234,880	195,833	Numeric effluent violation



Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
	001	Flow	gpd	Single sample (3/10/2022)	238,800	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/11/2022)	264,528	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/12/2022)	237,648	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/13/2022)	259,712	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/14/2022)	214,088	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/15/2022)	202,848	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/22/2022)	251,200	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/23/2022)	240,048	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/24/2022)	239,920	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/25/2022)	257,648	195,833	Numeric effluent violation

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
	001	Flow	gpd	Single sample (3/26/2022)	240,096	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/27/2022)	241,120	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/28/2022)	256,064	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/29/2022)	238,288	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (3/30/2022)	260,784	195,833	Numeric effluent violation
	001	Conductivity	micromhos/cm	Single sample (03/16/2022)	3,352.9	3,130	Numeric effluent violation
	001	Conductivity	micromhos/cm	Six Month Average	1,786.9	3,130	Numeric effluent violation
	001	Nitrogen	lbs	Annual Total	27,958.2	20,548	Numeric effluent violation
04/01/2022	001	Sulfate	lbs/day	Na	Na	Na	Frequency of sampling
	001	Sulfate	mg/L	Na	Na	Na	Frequency of sampling

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
	001	Flow	gpd	Single sample (4/4/2022)	244,032	195,833	Numeric effluent violation
	001	Flow	gpd	Maximum	244,032	195,833	Numeric effluent violation
	001	Conductivity	micromhos/cm	Six Month Average	1,808.6	3,130	Numeric effluent violation
	001	Nitrogen	lbs	Annual Total	29,531.6	20,548	Numeric effluent violation
05/01/2022	001	Conductivity	micromhos/cm	Six Month Average	1,713.1	3,130	Numeric effluent violation
	001	Nitrogen	lbs	Annual Total	30,198.8	20,548	Numeric effluent violation
06/01/2022	001	Nitrogen	lbs	Annual Total	29,377.3	20,548	Numeric effluent violation
07/01/2022	001	Flow	gpd	Single sample (7/05/2022)	267,264	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (7/6/2022)	312,272	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (7/7/2022)	295,424	195,833	Numeric effluent violation

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
	001	Flow	gpd	Single sample (7/8/2022)	203,680	195,833	Numeric effluent violation
	001	Flow	gpd	Maximum	312,272	195,833	Numeric effluent violation
	001	Flow	gpd	Average Monthly	145,772	112,500	Numeric effluent violation
	001	Nitrogen	lbs	Annual Total	27,669	20,548	Numeric effluent violation
07/01/2022-12/31/2022 Biannual	001	Na	Na	Na	Na	Na	Late submittal of DMR
08/01/2022	001	Flow	gpd	Average Monthly	144,362	112,500	Numeric effluent violation
	001	Nitrogen	lbs	Annual Total	27,193.8	20,548	Numeric effluent violation
09/01/2022	001	TKN	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	TKN	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Nitrate	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Nitrate	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Nitrogen	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
	001	Nitrogen	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Nitrogen	lbs	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	TDS	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	TDS	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	TDS	lbs	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Ammonia	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Ammonia	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Calcium	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Calcium	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Magnesium	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Magnesium	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Sodium	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Sodium	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Potassium	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Potassium	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
	001	Chloride	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Chloride	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Sulfate	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Sulfate	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Alkalinity	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Alkalinity	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Phosphorus	mg/L	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Phosphorus	lbs/day	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	SAR	Ratio	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	SAR	Ratio	Single sample (9/20/2022)	E code	Na	Analysis not conducted
	001	Nitrogen	lbs	Annual Total	26,090.2	20,548	Numeric effluent violation
10/01/2022	001	Nitrogen	lbs	Annual Total	25,755.3	20,548	Numeric effluent violation
11/01/2022	001	Conductivity	micromhos/cm	Single sample (11/14/2022)	3,973.9	3,130	Numeric effluent violation

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
	001	Conductivity	micromhos/cm	Single sample (11/14/2022)	3,973.9	3,130	Numeric effluent violation
	001	Conductivity	micromhos/cm	Single sample (11/30/2022)	3,301.6	3,130	Numeric effluent violation
	001	Nitrogen	lbs	Annual Total	25,486.1	20,548	Numeric effluent violation
12/01/2022	001	Nitrogen	lbs	Annual Total	25,474.5	20,548	Numeric effluent violation
1/1/2023	001	Nitrogen	Pounds (lbs)	Annual Total	25,358.11	20,548	Numeric effluent violation
	001	Mercury	mg/L	Six Month Average	LE code	0.05	Improper analysis or lab error
	001	Mercury	mg/L	Maximum	LE code	0.1	Improper analysis or lab error
	001	Mercury	mg/L	Single sample (9/20/2023)	LE code	Na	Improper analysis or lab error
1/1/2023 – 6/30/2023 Biannual	Na	Na	Na	Na	Na	Na	Late submittal of DMR
1/1/2023 – 12/31/2023 Annual	001	Mercury	mg/L	Single sample (9/20/2023)	LE code	Na	Improper analysis or lab error

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
	001	Mercury	mg/L	Maximum	LE code	0.1	Improper analysis or lab error
	001	Mercury	mg/L	Six Month Average	LE code	Na	Improper analysis or lab error
	Na	Na	Na	Na	Na	Na	Late submittal of DMR
2/1/2023	001	Nitrogen	lbs	Annual Total	26,486.34	20,548	Numeric effluent violation
3/1/2023	001	Nitrogen	lbs	Annual Total	23,293.96	20,548	Numeric effluent violation
	001	Conductivity	micromhos/cm	Six Month Average	1673.741	1,600	Numeric effluent violation
4/1/2023	001	Nitrogen	lbs	Annual Total	22,616.1	20,548	Numeric effluent violation
	001	Conductivity	micromhos/cm	Six Month Average	1767.813	1,600	Numeric effluent violation
5/1/2023	001	Nitrogen	lbs	Annual Total	23,013.21	20,548	Numeric effluent violation
6/1/2023	001	Nitrogen	lbs	Annual Total	23,064.05	20,548	Numeric effluent violation
7/1/2023	001	Nitrogen	lbs	Annual Total	22,907.84	20,548	Numeric effluent violation

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
	001	Flow	Gallons per day (gpd)	Average monthly	163,488	112,500	Numeric effluent violation
	001	Flow	gpd	Maximum	351,360	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (7/10/2023)	248,736	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (7/11/2023)	291,968	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (7/12/2023)	340,416	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (7/13/2023)	342,784	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (7/14/2023)	343,072	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (7/15/2023)	343,552	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (7/16/2023)	348,000	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (7/17/2023)	351,360	195,833	Numeric effluent violation

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
7/1/2023 – 12/31/2023 Biannual	Na	Na	Na	Na	Na	Na	Late submittal of DMR
8/1/2023	001	Nitrogen	lbs	Annual Total	25,463.43	20,548	Numeric effluent violation
	001	Flow	gpd	Average monthly	125,013	112,500	Numeric effluent violation
	001	Flow	gpd	Maximum	224,288	195,833	Numeric effluent violation
	001	Flow	gpd	Single sample (8/23/2023)	224,288	195,833	Numeric effluent violation
9/1/2023	001	Nitrogen	lbs	Annual Total	26,533.44	20,548	Numeric effluent violation
	001	Flow	gpd	Average monthly	133,117	112,500	Numeric effluent violation
10/1/2023	001	Nitrogen	lbs	Annual Total	27,198.1	20,548	Numeric effluent violation
11/1/2023	001	Nitrogen	lbs	Annual Total	27,137.27	20,548	Numeric effluent violation
12/1/2023	001	Nitrogen	lbs	Annual Total	26,034.15	20,548	Numeric effluent violation

Monitoring Period	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Max Limit	Type of Violation
1/1/2024	001	Nitrogen	lbs	Annual Total	24,805.09	20,548	Numeric effluent violation
	001	Flow	gpd	Missed samples	Na	Na	Frequency of sampling violation
2/1/2024	001	Nitrogen	lbs	Annual Total	23,256.49	20,548	Numeric effluent violation

Table Notes:

Late submittal of DMR – discharge monitoring report was submitted past the due date.

Numeric effluent violation – the reported value exceeds the permit limit for that parameter

Frequency of sampling – you did not meet the sampling frequency required for the parameter for that reporting period.

LE code – Laboratory Error

E code – Analysis not complete/Not conducted/Not reported