



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office
1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

April 23, 2025

Josh Lawrence
Desert Wind Winery
13000 Road D SW
Royal City, WA 99357-9776

Sent via email only: Josh@lawrenceenterprises.com

RE: Application for Renewal State Waste Discharge Permit No. ST0009272 and Permit Review Comments

Dear Josh Lawrence:

The Department of Ecology (Ecology) has reviewed the application that you submitted on December 18, 2024 for the renewal of State Waste Discharge Permit No. ST0009272 for Desert Wind Holdings LLC dba Desert Wind Winery (Desert Wind Winery). Your submittal of the renewal application satisfies the Warning Letter (issued June 6, 2024) requirement. The application has been reviewed by Ecology's Nicole Gassman and Keith Primm, it is considered incomplete. Ecology has the following comments:

Application	
Reference	Comment
Industrial User Contract (IUC)	A final signed City of Prosser IUC is required for Ecology's permit development of local limits. Currently, Ecology has a draft IUC dated January 1, 2020.

Additionally, we have reviewed your facility's Discharge Monitoring Reports (DMRs), Operations and Maintenance Manual, Solid Waste Control Plan, Spill Control Plan, and Slug Discharge Control Plan and require a response to our comments listed below (and enclosed):

Permit Review	
Reference	Comment
Technical Memorandum (TM)	A Technical Memorandum dated March 25, 2025, is attached for reference and requires submittal of missing information to the Operations and Maintenance Plan requirements of WAC 173-240-150 2 (a) & (m), Solid Waste Control Plan, Spill Control Plan, and Slug Control Plan.

Permit Review	
Reference	Comment
Wastewater Pond (Design and Disposal)	<p>Ecology's inspection on March 20, 2024, identified wastewater discharged to an onsite unpermitted pond. Desert Wind Winery stated that the lagoon was abandoned and had not been used by the facility for processing wastewater since the permit was transferred from the previous owner in 2021. It is unclear to Ecology if the lagoon was recommissioned in December 2024. Wastewater in the pond is not considered to be protected from ground infiltration by the pond without confirmation of engineering design and specification.</p> <p>Information about the wastewater in the pond is requested:</p> <ul style="list-style-type: none"> A. Submit all known and available: dates of discharge, volume, characteristics, testing done, and waste designation of wastewater in the pond. B. If no wastewater characterization has previously been done, conduct a waste characterization using testing necessary for disposal at Prosser POTW. C. If characterized within disposal limits, divert to the Prosser POTW in accordance with permit limits, and as directed by Prosser POTW, or otherwise legally dispose and submit documentation to Ecology. D. If pond wastewater has since been already removed, provide disposal records. E. Ecology is requesting engineering, plans and specifications for design of the pond. If the wastewater disposed to the pond is highly acidic, then the liner may not perform adequately to protect groundwater. <p>The facility should protect against use of the pond for wastewater disposal unless applied for and approved by Ecology. Install measures to prevent future unpermitted discharges.</p>
Discharge Monitoring Reports (DMR)	<p>Desert Wind Winery is submitting DMR's and must additionally submit notification to Ecology whenever permit limits are exceeded. This includes flow rate, BODs, TSS, Ammonia, and <i>pH below 4</i>. Refer to permit conditions S1,S3.F, S5B.8. Ecology's WQWebPortal has been updated to now inform you when pH limits are exceeded.</p>
pH	<p>DMRs indicate recurring pH violations below the lower limit of 4.0 during the prior two permit terms. See attached pH trends analysis for Desert Wind Winery.</p> <p>Please submit a report with explanation or study, and proposed remedy for these annual exceedances. The report or study should analyze and determine if there is a need to upgrade to automated continuous pH monitoring and automated pH adjustments.</p>



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Please respond with either the requested information or a proposed schedule for submission by no later than **June 23, 2025**. Please resubmit to: crowqpermits@ecy.wa.gov.

If you have any questions concerning this letter, please contact me at (509) 379-3967 or by email at crowqpermits@ecy.wa.gov.

Sincerely,

Joy Espinoza (signed electronically) 4/23/25

Joy Espinoza

Permit Coordinator Information Specialist

Water Quality Program

Enclosure: Desert Wind Winery Technical Memorandum
 Desert Wind Winery pH Data Analysis

e-cc: Ben Hieb, bhieb@desertwindwinery.com
 Andrea Jedel, Ecology-Union Gap, andrea.jedel@ecy.wa.gov

