



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

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Salem, OR 97302

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TTY 711

March 15, 2024

Will Worman, Mayor
City of Siletz
PO Box 318
Siletz, OR 97380

Re: Warning Letter with Opportunity to Correct
Siletz Wastewater Treatment Plant
2024-WLOTC-9043
NPDES Permit #101680, EPA ID OR0020419
File 81276
WQ-Lincoln County

Dear Mr. Worman,

On February 15, 2024, DEQ conducted a compliance evaluation inspection at the Siletz wastewater treatment plant. The purpose of the inspection was to determine compliance with the conditions of National Pollution Discharge Elimination System permit number 101680, issued to the City of Siletz on November 1, 2023. The findings are summarized below. I have enclosed a copy of the inspection report checklist that provides additional information.

Site Visit

I met with Ted LePine, Utility Operator III, and Darin Viar, Public Works Lead. Also present during the inspection was Monty Norris, OAWU Wastewater Technician, Kenzie Billings, DEQ WQ Senior Environmental Engineer and Rene Soto, DEQ CWSRF Project Officer. The plant is operated well but could use some general maintenance and clean up.

Records Review

DEQ reviewed records from January 2021 through January 2024. The City of Siletz has submitted most monthly discharge monitoring reports (DMR) on time in NetDMR. Not all DMRs are complete since there are two missing noncompliance reports. All records have been submitted in a timely manner.

Schedule A Effluent Limit Violations

DEQ has concluded that the City of Siletz is responsible for violations of Schedule A in its permit as listed in Table 1.

Schedule B Monitoring and Reporting Requirement Violations

DEQ has concluded that the City of Siletz is responsible for not submitting two noncompliance reports as listed in Table 2.

Required Corrective Actions:

Please submit documentation that the following issues have been corrected:

1. By April 15, 2024 the City of Siletz needs to correct the NetDMR entries as shown in Table 3 and the missing noncompliance reports as shown in Table 2.
2. By May 15, 2024 the City of Siletz needs to update the Emergency Response and Public Notification Plan to meet the requirements listed in Schedule F, Section B8.
3. By June 15, 2024, the City of Siletz needs to update the QA/QC plan to meet the requirements listed in Schedule B, Condition 2(e)(i).
4. By July 15, 2024, the City of Siletz needs to update their Biosolids Management Plan and Land Application Plan to meet the requirements listed in Schedule D, Condition 5.

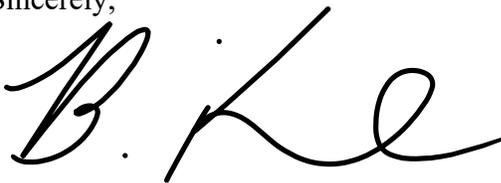
Recommendations:

1. The City of Siletz should train a second person in the operation of NetDMR.
2. The City of Siletz should create an alarm testing schedule for the wastewater treatment facility. The alarms should be tested on a weekly basis and the results should be recorded in the daily logbook.

This notice is a warning letter with opportunity to correct. DEQ does not intend to take formal enforcement action at this time. However, should you fail to submit documentation that the corrective action has been completed by the date requested, or should you repeat any of these violations, the matter may be referred to DEQ's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a DEQ order. Civil penalties can be assessed for each day of violation.

If you have any questions, please contact me in writing at brenda.kuiken@deq.oregon.gov or by phone at (503) 893-0924.

Sincerely,



Brenda Kuiken
WQ Compliance Specialist

cc: DEQ Salem Office file

cc: Ranei Nomura, Manager, Western Region DEQ
 Oregon Records Management Solution
 Ted LePine, Utility Operator III

Table 1 – pH Limit Violations

Exceeded the compliance range of 6.0 to 9.0 as follows:

Monitoring Period	Parameter	Reported Value	Over/Under Limit by how much?	Violation Class
December 6, 2021	Daily minimum	5.4	0.6	III
April 10 & 17, 2023	Daily minimum	5.9	0.1	III
December 22, 2023	Daily minimum	5.8	0.2	III

If the discharge is outside the permitted pH range by more than 2 pH units, it is a Class I violation per OAR 340-012-0055(1)(k). If the discharge is outside the permitted pH range by more than 1 but less than or equal to 2 pH units, it is a Class II violation per OAR 340-012-0055(2)(a). If the discharge is outside the permitted pH range by 1 pH unit or less, it is a Class III violation per OAR 340-012-0055(3)(b).

Table 2 – Failure to Report Violations

Failed to submit the following reports:

Monitoring Period or Due date	Parameter	Monitoring Event Missed	Violation Class
December 2021	Noncompliance report	Noncompliance report for low pH value.	II
April 2023	Noncompliance report	Noncompliance report for low pH value.	II

Failing to timely submit a report or plan as required by permit is a Class II violation per OAR 340-012-0055(2)(b).

Table 3 – Incorrect Calculations and Reporting in NetDMR

Monitoring Period	Parameter	Reported Value	Correct Value	Violation Y/N
January 2021	<i>e. coli</i> , monthly geometric mean, #/100 mL	2.0	3.4	N
January 2021	Effluent cBOD concentration, monthly average, mg/L	5.3	2.9	N
January 2021	cBOD percent removal	94	92	N
January 2021	TSS percent removal	91	94	N
February 2021	Effluent pH, monthly minimum, SU	6.8	6.2	N
February 2021	Effluent pH, monthly maximum, SU	6.2	6.8	N
March 2021	<i>e. coli</i> , Row R	#s entered	NODI Code 9	N
November 2021	Influent pH, daily minimum, SU	0.152	6.7	N

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Monitoring Period	Parameter	Reported Value	Correct Value	Violation Y/N
November 2021	Influent pH, daily maximum, SU	0.416	7.3	N
December 2021	Influent TSS concentration, daily maximum, mg/L	29.0	65	N
October 1, 2022	Influent flow, MGD	0.730	Unknown	N
August 2023	Influent pH, daily minimum, SU	0.065	7.6	N
August 2023	Influent pH, daily maximum, SU	0.104	8.2	N
August 2023	Effluent TSS concentration, monthly average, mg/L	2.0	3.1	N
September 2023	Effluent TSS concentration, monthly average, mg/L	1.6	2.8	N
September 2023	Effluent cBOD concentration, monthly average, mg/L	2.5	4.0	N
New Permit Effective Date: November 1, 2023				
December 22, 2023	Effluent pH, monthly minimum, SU	NODI Code 3	5.8	Y