



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

April 24, 2024

Doug Farnham, Regional Oregon Manager
Monolith Parks
5055 NE Elliot Circle
Corvallis, OR 97330-9008

Re: Warning Letter with Opportunity to Correct
Knoll Terrace MHC
2024-WLOTC-9250
NPDES Permit #102611, EPA ID OR0026956
File 46990
WQ-Benton County

Dear Mr. Farnham,

On April 10, 2024, DEQ conducted a compliance evaluation inspection at the Knoll Terrace MHC stabilization lagoons. The purpose of the inspection was to determine compliance with the conditions of National Pollution Discharge Elimination System permit number 102611, issued to Corvallis MHC, LLC on July 8, 2013. These findings are summarized below. I have enclosed a copy of the inspection report checklist that provides additional information.

Site Visit

I met with you, Phillip Merrill, Contract Operator, Otis Phillips, Operator, and Marco Cordero, Maintenance Technician. Also present during the inspection was Jennifer Maglante-Timbrook, DEQ WQ Compliance Assurance Specialist. The plant is operated and maintained well.

Records Review

Records have been reviewed by DEQ on several different occasions. October and December 2021, January 2022 and January 2023 were reviewed under letter 2023-WL-8203. The remaining months between March 2020 and December 2023 were reviewed under letter 2024-WLOTC-8981. Records from January 2024 through March 2024 were reviewed in preparation for this inspection. Knoll Terrace MHC has submitted most DMRs on time in NetDMR. DEQ has concluded that Knoll Terrace is responsible for the following violations:

Schedule A Violations

1. Schedule A, condition 1. b of the permit requires Knoll Terrace MHC to meet a monthly BOD₅ percent removal efficiency of 85%. In January 2024 and March 2024 Knoll Terrace MHC violated their permit by achieving a 29% and 48% removal efficiency, respectively. This is a Class III violation per OAR 340-012-0055(3)(c).
2. Schedule A, Condition 1. b of the permit requires Knoll Terrace MHC to meet a monthly TSS percent removal efficiency of 65%. In January 2024 Knoll Terrace MHC violated their permit by achieving 54% removal efficiency. This is a Class III violation per OAR 340-012-0055(3)(c).

Schedule B Violations

1. Schedule B, condition 1 of the permit requires Knoll Terrace MHC to develop and implement a QA/QC program. See also Schedule F, Sections B1 and C. Failing to develop and implement this program is a Class II violation per OAR 340-012-0055(2)(b).

Schedule F Violations

1. Schedule F, condition B8 of your NPDES permit requires you to develop and implement an Emergency Response and Public Notification Plan. Knoll Terrace MHC has not maintained this plan. Failing to timely submit this plan is a Class II violation per OAR 340-012-0055(2)(b).

Class I violations are the most serious violations; Class III violations are the least serious. Compliance with your permit is required by Oregon Revised Statute 468B.025(2).

Requested Corrective Actions:

By May 30, 2024, please submit documentation that the following issues have been corrected:

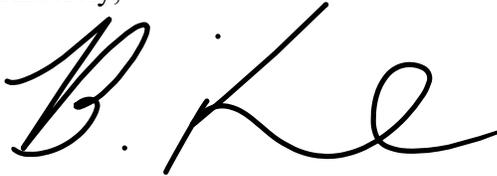
1. Submit a QA/QC program that meets the requirements in Schedule F of your permit.
2. Submit an Emergency Response and Public Notification Plan that meets the requirements in Schedule F of your permit.
3. Correct NetDMR entries as indicated in Table 1 of the attachment.

This notice is a warning letter. DEQ does not intend to take formal enforcement action at this time. However, should you fail to submit documentation that the corrective actions have been completed by the date requested or 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 believe any of the facts in this warning letter with opportunity to correct are in error, you may provide information to me at the office at the address shown at the top of this letter. DEQ will consider the new information you submit and take appropriate action.

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

ec: Ranei Nomura, Manager, Western Region DEQ
Oregon Records Management Solution
Phillip Merrell, Knoll Terrace MHC

Table 1 – Incorrect Calculations and Reporting in NetDMR

Monitoring Period	Parameter	Reported Value	Correct Value	Violation Y/N
January 2024	<i>e. coli</i> , Row R, #/100 mL	1.0	NODI Code 9	N
February 16, 2024	Total residual Chlorine, daily maximum, mg/L	0.004	0.04	N