Oregon

Tina Kotek, Governor

Department of Environmental Quality
Eastern Region Pendleton Office
800 SE Emigrant Avenue, Suite 330
Pendleton, OR 97801
(541) 276-4063
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May 22, 2024

Mr. Erick Watkins
Pacific Coast Producers, Inc.
P.O. Box 1600
Lodi, CA 95241-1600

RE: Pre-Enforcement Notice
Oregon Cherry Growers - Downtown
2024-PEN-9298
File #87871, NPDES Permit #101593
EPA Reference Number: OR000073-6
WQ- Wasco County

Dear Mr. Watkins:

The Pacific Coast Producers operate an industrial wastewater treatment plant with discharge to the Columbia River under National Pollutant Discharge Elimination System (NPDES) Permit #101593. The Department of Environmental Quality (DEQ) completed an audit of the discharge monitoring reports (DMRs) submitted by the Oregon Cherry Growers (Downtown) in accordance with National Pollution Discharge Elimination System (NPDES) permit #101593. Additionally, DEQ conducted an in-person inspection in accordance with the NPDES permit on February 13, 2024. Based on a review of submitted Discharge Monitoring Reports (DMRs) for the period of May 2020 through February 2024 and based on the findings in the inspection, DEQ has documented the following violations of the NPDES permit. Failure to comply with permit conditions violates Oregon Revised Statute 468B.025(2).

Management Plan Violations: Violating any management, monitoring, or operational plan established pursuant to a waste discharge permit unless otherwise classified, OAR 340-012-0055(2)(d). In accordance with DEQ's Enforcement Rules, violating any management, monitoring, or operational plan is a Class II violation.

As required by Schedule B, Table B1 of the company's permit, the following analyses are to be conducted at the specified frequencies:

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type/Required Action	Report Statistic
Effluent BOD_5 (00310)	mg/L	Year-round	2/week	24-Hour Composite	1. Daily Values 2. Daily Maximum 3. Monthly Average 4. Annual Average
Effluent TSS (00530)	mg/L	Year-round	2/week	24-Hour Composite	1. Daily Values 2. Daily Maximum 3. Monthly Average 4. Annual Average
Effluent Ammonia-nitrogen	Mg/L	Year-round	1/Two Weeks	24-Hour Composite	1. Daily Values 2. Daily Maximum 3. Monthly Average

During the monitoring period of May 2022 through March 2024, the permittee conducted the required monitoring but failed to attain data in accordance with the Quality Assurance/Quality Control (QA/QC) Plan. There are 20 instances of QA/QC failures that resulted in data that was reported for permit compliance purposes but was flagged and was not verifiable data (see Table below, and notes a-n).

Missed Required Monitoring Parameter	Date	Total Events
Effluent BOD_5 (00310)	**1. May 8th – 14th, 2022 (see note a.)** **2. January 8th – 14th, 2023 (see note b.)** **3. January 15th – 21st, 2023 (see note b.)** **4. January 22nd – 28th, 2023 (see note b.)**	**19 missed monitoring events**

	5. February 5th – 11th, 2023 (see note c.) **6. February 12th – 19th ,2023 (see note c.)** **7. March 5-11th, 2023 (see note d.)** **8. April 9th – 15th , 2023 (see note e.)** **9. June 11th – 17th, 2023 (see note f.)** **10. October 1 – 7, 2023 (see note g.)** **11. October 15 – 21, 2023 (see note g.)** **12. October 29- November 4, 2023 (see note g.)** **13. November 19 – November 25, 2023 (see note h.)** **14. November 26 – December 1, 2023 (see note i.)** **15. December 24 – December 30, 2023 (see note j.)** **16. January 7 – 13, 2024 (see note k.)** **17. February 25- March 2, 2024 (see note l.)** **18. March 10-16, 2024 (see note m).** **19. March 17 – 23, 2024 (see note m.)**	
Effluent TSS (00530)	**1. July 2nd - 8th, 2023 (see note n.)**	**1 missed monitoring event**

Notes:

a. Downtown and Riverside were collected 5/10/22 at 12:30 and 12:10. Due to shipment delays, they were received 5/12/22 at 14:20 with a cooler temperature of 10.8 degrees Celsius. This does not meet the regulatory requirements for holding time/sample preservation for BOD analysis. BOD Sample for 5/10 did not meet holding time requirements.

b. BOD_5 1-11-2023, 1-19-2023, 1-25-2023; result detected in unseeded control blank exceeds 0.2 mg/L. Results included in calculations but reported with qualifier "E". Lab reports attached, 1-11-2023 BOD_5 QC: Duplicate DPD exceeds limit, and one or both sample results are less than 5 times RL, and the absolute difference between results is < the upper reporting limits for both.

c. 2-7-2023, 2-8-2023, 2-14-2023, 2-15-2023, 2-21-2023; BOD_5: Result detected in the unseeded control blank exceeds 0.2 mg/L; results included in calculations but reported in NetDMR with qualifier "E"

d. 3-7-2023 BOD_5: Result detected in the unseeded control blank exceeds 0.2 mg/L; results included in calculations but reported in NetDMR with qualifier "E" 10-26-2023: Facility noted in their DMR that they edited DMR BOD_5 and TSS calculations due to the Waterlab data not being used in the calculations prior to this edit.
e. Qualifier “E” included on all BOD calculations due to Waterlab Blank Dilution exceeding <0.2 mg/L depletion on 04-12-2023 dataset. 10-26-2023: Edited DMR BOD_5 calculations due to the Waterlab data not being used in the calculations prior to this edit.
f. Qualifier “E” included on all BOD_5 calculations due to Waterlab Blank Dilution exceeding <0.2 mg/L depletion on 06-14-2023 dataset.
g. BOD_5 monthly avg conc/load results reported using “E” qualifier in NetDMR *10-3-2023, 10-4-2023, 10-17-2023, 10-18-2023, 10-31-2023: BOD_5 QA, Analyte detected in an associated blank at a level above MRL.
h. 11/20/2023- BOD_5 QA- B: Analyte detected in an associated blank at a level above the MRL. B-06: Oxygen drop for dilution water was above the acceptance limit and could contribute to a positive bias in the sample result.
i. 11/28/2023- BOD_5 QA- B: Analyte detected in an associated blank at a level above the MRL. B-06: Oxygen drop for dilution water was above the acceptance limit and could contribute to a positive bias in the sample result.
j. "12-28-2023: BOD_5 QA B, B06- Analyte detected in an associated blank at a level above mrl B-06- oxygen drop for dilution water was above the acceptance limit and could contribute to a positive bias in the sample result
k. 1/10/2024 Apex Labs BOD (X) EST: Due to inclement weather, the read back of the 5-day Biochemical Oxygen Demand (BOD_5) analysis for the following sample occurred 1 hour and 20 minutes prior to the method specified incubation time of 5 days (plus or minus 6 hours). Data is reported as estimated and may contain a slight low bias. Effluent BOD_5 monthly avg conc/load values reported w/”E” qualifier in NetDMR due to January 10 sample QC failure, method incubation time not met.
l. Effluent BOD_5 QC failure for February 27 sample, BOD_5 monthly avg conc/load values reported w/”E” qualifier in Net DMR *02-27-2024: BOD QA- B Analyte detected in an associated blank at a level above the MRL. BOD QA- B-06 Oxygen drop for dilution water was above the acceptance limit and could contribute to a positive bias in the sample result. BOD_5 monthly averages are estimated "E".
m. Effluent BOD_5 QC failure for March 12, 19 samples, BOD_5 monthly avg conc/load values reported w/”E” qualifier in NetDMR *03/12/24 BOD_5 Estimated: B-Analyte detected in an associated blank at a level above the MRL. (See Notes and Conventions below.) B-06 Oxygen drop for dilution water was above the acceptance limit and could contribute to a positive bias in the sample result. 03/19/24 BOD_5 Estimated: B-Analyte detected in an associated blank at a level above the MRL. (See Notes and Conventions below.) B-06 Oxygen drop for dilution water was above the acceptance limit and could contribute to a positive bias in the sample result
n. 001-A Effluent BOD/TSS minimum sampling frequency not met, missed July 4 sample

Monitoring Violations: Failure to collect monitoring data required in Schedule B of the permit, OAR 340-012-0055(1)(o). In accordance with DEQ's Enforcement Rules, failure to monitor is a Class I violation.

There are 17 instances of Failure to Monitor Violations that resulted in data that was not able to be reported for permit compliance purposes (see Table below, and notes a-h).

In accordance with a March 21, 2021 Request for Supplemental information (Appendix A), DEQ required the permittee to collect Copper Biotic Ligand Model and Aluminum data monthly until 24 months.

The permittee was unable to collect Copper BLM data during the month of December 2022 due to freezing weather making it difficult to sample.

The permittee also failed to collect ammonia samples once every 2 weeks from May 2020 through October 2021 (see Table below).

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type/Required Action	Report Statistic
Effluent Ammonia-nitrogen	Mg/L	Year-round	1/Two Weeks	24-Hour Composite	1. Daily Values 2. Daily Maximum 3. Monthly Average
Effluent BOD_5 (00310)	mg/L	Year-round	2/week	24-Hour Composite	1. Daily Values 2. Daily Maximum 3. Monthly Average 4. Annual Average

Missed Required Monitoring Parameter	Date	Total Events
Effluent Ammonia-nitrogen	**1. May 2020 (see note a.)** **2. January 2021 (see note a.)**	**5 missed monitoring events**

	3. April 2021 (see note a.) **4. July 2021 (see note a.)** **5. October 2021 (see note a.)**	
Effluent BOD_5 (00310)	**1. October 9th – 15th, 2022 (see note b.)** **2. October 16th – 22nd, 2022 (see note b.)** **3. November 13th - 19th, 2022 (see note c.)** **4. February 19-25th, 2023 (see note d.)** **5. February 26th – March 4th, 2023 (see note d.)** **6. July 2nd - 8th, 2023 (see note e.)** **7. August 13th-19th, 2023 (see note f.)** **8. December 24 – December 30, 2023 (see note g.)** **9. February 19th-25th, 2024 (see note h.)** **10. February 26th- March 4th, 2024 (see note h.)**	**10 missed monitoring events**
Effluent TSS (00530)	**1. July 2nd - 8th, 2023 (see note e.)**	**1 missed monitoring event**

Notes:

a. The ammonia samples were conducted during the first two weeks of the month with no sample during the second two weeks of the month.
b. BOD_5 sample from 10/12/2022 received outside of holding time BOD_5 from samples from 10/18/2022 and 10/19/2022 LCS/LCSD outside acceptance limits- high biased; result detected in unseeded control blank Sample results are listed at bottom of spreadsheet, but are not included in calculations.
c. 11-15-2022, 11-16-2022: result detected in unseeded control blank for BOD_5 tests; results are listed at bottom of DMR spreadsheet but not included in calculations.
d. 2-22-2023, 2-28-2023 BOD_5: LCS and/or LCSD is outside acceptance limits, high biased. Results are listed below but not included in calculations.
e. Samples were received over temperature.
f. Samples were received outside the 48-hour hold time.
g. 12-27-2023: BOD_5 QA Q-42- Matrix spike and/or duplicate analysis was performed on this sample. % recovery or RPD for this analyte is outside laboratory control limits.
h. 2-22-2024, 2-28-2024 BOD_5: LCS and/or LCSD is outside acceptance limits, high biased. Results are listed below but not included in calculations.

Placing wastes: Causing any wastes to be placed in a location where such wastes are likely to be carried to waters of the state by any means. In accordance with DEQ's Enforcement Rules, placing wastes is a Class II violation. See OAR 340-012-0055(2)(c).

There are two violations documented below.

During the inspection on February 13, 2024, DEQ inspectors observed waste activated sludge leaving the containment asphalt pad and flowing underneath the property fence onto the hillslope. On February 16th, 2024, the permittee submitted a letter to DEQ showing pictures of containment socks placed along the fence line, along with a plumbing connection designed to prevent reoccurrence of waste leaving the facility.

On April 19th, 2024, the permittee reported approximately 200 gallons of cherry brine leaving the facility and going into soil between their facility and I-84. The release caused by a pipe that burst from transferring brine from one pool to another. The permittee covered the brine with absorbent soil and planned to work with River City Environmental and ODOT (release was on their property) for remediation and removal.

Class I violations are considered to be the most serious violations; Class III violations are the least serious.

Summary

Fulfilling the mandatory reporting requirements in your permit is an important obligation. Without timely submittal of required data and reports, the company, DEQ, and the public are unable to promptly evaluate compliance. Analytical data from laboratories are used to determine compliance with effluent limitations. Without accurate data, the company, DEQ, and the public are unable to evaluate the effectiveness of the company's wastewater treatment system. An ineffective treatment system can cause water quality impairments and/or public health hazards.

The company must ensure compliance with the terms and conditions of the issued NPDES permit including conducting all monitoring and reporting requirements in Schedule B.
The company must ensure waste materials and wastewaters are adequately contained and managed in accordance with the requirements of the assigned permit.

Required Corrective Actions

1. The facility must complete the Copper BLM resampling by July 31st, 2024.

Referral for DEQ Formal Enforcement Action

This matter is being referred to DEQ's Office of Compliance and Enforcement for formal enforcement action, including assessment of potential civil penalties and/or a DEQ order. Civil penalties may be assessed for each day of violation.

If you believe any of the facts in this Pre-Enforcement Notice 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 new information you submit and take appropriate action. DEQ endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter or desire any follow-up technical assistance, please contact me at (541) 714-0035.

Sincerely,

Stuart Blois

Stuart Blois, Water Quality Permit Writer
Eastern Region

ec: Shane Cossel, WQ Compliance, Eastern Region, DEQ
Justin Sterger, Permit Writer, Eastern Region, DEQ
Mike Hiatt, WQ Permitting Manager, DEQ
Oregon Records Management Solution

Appendix A: Request for Supplemental Information. March 21, 2021

Oregon
Tina Kotek, Governor

Department of Environmental Quality
Eastern Region The Dalles Office
400 East Scenic Drive, Suite 307
The Dalles, OR 97058
(541) 298-7255
FAX (541) 298-7330
TTY 711

May 22th, 2024

Mr. Erick Watkins
Oregon Cherry Growers, Inc.
P.O. Box 1600
Lodi, CA 95241-1600

Re: Oregon Cherry Growers – Downtown
File #87871 - NPDES #101593 - EPA ID# OR0000736
NPDES Permit Compliance Inspection Report

Dear Mr. Watkins:

On February 13, 2024, DEQ inspected the Oregon Cherry Growers - Downtown Wastewater Treatment Plant located at First and Madison Streets in The Dalles. The purpose of the inspection was to determine compliance with NPDES Permit #101593 that was issued to the site on October 16, 2013. The permit expired on December 31, 2017 and has been administratively extended.

Enclosed please find the report write-up from the inspection. Violations were discovered during the inspection. The violation descriptions can be found on the following EPA 3560 form and a warning letter is included in this package listing the compiled violations.

If you have any questions about this letter, or concerns with your permit, please feel free to contact me at (541) 714-0035.

Sincerely,

Stuart Blois

Stuart Blois

NPDES Permitting and Compliance Specialist

Water Quality Division

cc: Oregon DEQ WQ Files

DEQ Water Compliance Inspection Report (EPA 3560)

Section A: National Data System Coding

File Number: 87871 **Permit Number**: 101593

NPDES#: OR0000736 **Inspector Code**: ST6-State **Facility Type**: Industrial

Inspection Date: 2/13/2024 **Inspection Type(s)**: Compliance Evaluation (Non-sampling)

Section B: Facility Data

Facility Name: OREGON CHERRY GROWERS, LLC **Permit Effective**:10/16/2013 **Permit Expiration**:12/31/2017

Site Location: FIRST & MADISON ST
THE DALLES, OR 97058

Mailing Address: PO Box 1577
The Dalles, OR 97058-8004

Entry Date: 2/13/2024 **Prep. Time**: 4.00 **Inspection Time**: 4.00 **Post Proc. Time**: 16.00

On-Site Representative: DeHaan, David **On-Site Phone**: 971-719-1851

Additional On-Site Representative(s):

Section C: Areas Evaluated During Inspection

Permit

Section D: Summary of Findings

1. **Single Event Code**: C0011 **SEV Description**: Failure to monitor as required by Schedule B or F
2. **Single Event Code**: N/A **SEV Description**: Placing wastes where it may enter waters of state

Notes:

Signature: Stuart Blois Date: 5/22/2024

Inspector: Stuart Blois

DEQ Water Compliance Inspection Report (EPA 3560)

Section A: National Data System Coding

File Number: 87871 **Permit Number**: 101593

NPDES#: OR0000736 **Inspector Code**: ST6-State **Facility Type**: Industrial

Inspection Date: 2/13/2024 **Inspection Type(s)**: Compliance Evaluation (Non-sampling)

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Section C: Areas Evaluated During Inspection

Permit

Section D: Summary of Findings

1. **Single Event Code**: C0011 **SEV Description**: Failure to monitor as required by Schedule B or F
2. **Single Event Code**: N/A **SEV Description**: Placing wastes where it may enter waters of state

Notes:

Signature: Stuart Blois Date: 5/22/2024

Inspector: Stuart Blois

EQ WQ Inspection Report Checklist

NPDES Minor Industrial Permits

State of Oregon Department of Environmental Quality

Permittee: Oregon Cherry Growers	**DEQ File #:** 87871 **DEQ Permit#:** 101593 **EPA ID #:** OR000073-6
Facility address and location: 101 Madison Street The Dalles, OR 97058	
Primary DEQ inspector name: Stuart Blois	**Date:** **2-13-24**

Brief facility description:

The OCG Downtown plant operates year-round to produce fresh pack cherries, brine cherries and frozen (sweet) cherries at First and Madison Streets in The Dalles. Freezing operations take place about 60 days per year and fresh pack operations occur in June and July. Wastewater is generated from fruit washing, from wash-down of plant process equipment and processing areas, from high strength brine wasted from the cherry processing operation and from industrial storm water collected at the facility. The wastewater contains brine, sulfur preservative and sugars from the cherries. From time to time, the company transports wastewater by truck from the Downtown wastewater facilities to the Riverside facilities and vice versa.

The Downtown wastewater facilities include a Hydrosieve screen, three-cell aerated lagoon system, and effluent flow meter. The Dissolved air flotation (DAF) unit has been replaced with an upgraded filter belt press. The Hydrosieve is located before the aeration cells, which are equipped with floating, mechanical, surface-mounted aerators. Additional aerators and dissolved oxygen (DO) probes have been added in the past few years to better manage DO and prevent anaerobic conditions. Influent is equally distributed to Cells 1 and 2. Sodium hydroxide (pH adjustment) and nitrogen fertilizer (nutrient source for biological treatment) are added to the ponds. Mixed liquor, displaced by the influent into Cells 1 and 2, gravity flows to Cell 3. Sludge is removed from Cells 1 and 2 using the RAS/WAS pumps and filter belt press. Cells 1 and 2 have an available volume of approximately 1.0 million gallons (MG) each. Cell 3 has an available volume of approximately 2.6 million gallons.
Discharge to the Columbia River is intermittent. Each day, effluent is generated by suspending aeration and mixing in Cell 3 and following a short settling interval, clear supernatant is pumped to the effluent outfall line.

The outfall line connects with the City of The Dalles municipal wastewater treatment plant outfall line, commingling the two effluents before discharge to the river. The City of The Dalles operates under a separate NPDES permit. OCG's discharge duration varies, averaging five to seven hours per day, during which time the company discharges 0.158 to 0.226 MG to the river. However, the actual discharge rate is controlled by the effluent pump, which delivers 513 gallons per minute or 0.74 MGD.

Prior inspection date, summary of findings, and permittee response:

The last inspection for this facility occurred on September 21, 2016. The inspection noted a violation for failure to verify flow meter calibration.

. PRE-INSPECTION PREPARATION

II. OPENING CONFERENCE

(*Introductions, present credentials, and explain inspection objectives)*

List people present (include other DEQ and EPA employees):

Name	Title	Phone Number	Email
Stuart Blois	Permit Writer and Compliance Specialist	541-714-0035	Stuart.Blois@deq.oregon.gov
Carl Makepeace	Agronomist	971-300-5142	Carl.Makepeace@deq.oregon.gov
Blair Edwards	Engineer	503-229-5185	Blair.Edwards@deq.oregon.gov
Richard Morris	Operations Supervisor	971-375-8311	rmorris@pcoastp.com
Eric Watkins	Director of Engineering	916-335-9456	ewatkins@pcoastp.com
Will Wersinger	EHS Manager	514-288-8979	WWersinger@pcoastp.com
Mike Shull	General Manager	209-663-7886	mshull@pcoastp.com
Jason Whitehurst	Reg. Ops Manager	503-991-1174	jwhitehurst@pcoastp.com

III. FACILITY SITE REVIEW

List any facility modifications since last inspection: The facility is updating its existing process flows. It is moving a process from one plant to another. Flow has gone down at Riverside and is going up at the Downtown plant.

1.	Y ☒	N ☐	n/a ☐	Are all treatment units operable? If no, explain: They are not using the disk aqua aerobic filter.
2.	Y ☐	N ☒	n/a ☐	Is there excessive scum buildup, grease, foam, or floating sludge in or on any of the treatment units? If yes, explain:
3.	Y ☐	N ☐	n/a ☒	Are tank weirs level? If no, explain:
4.	Y ☐	N ☒	n/a ☐	Is there any indication of a hydraulic overload? If yes, explain:

III. FACILITY SITE REVIEW				
5.	Y ☐	N ☒	n/a ☐	Are there any noxious odors leaving the site? If yes, explain:
6.	Y ☐	N ☒	n/a ☐	Are there any unsafe conditions (e.g., slicks, faulty guardrails, missing grating)? If yes, explain:
7.	Y ☐	N ☒	n/a ☐	Is there any evidence of severe corrosion in any piping or equipment? If yes, explain:
8.	Y ☐	N ☒	n/a ☐	Are there any breaks or leaks in any chemical feed lines or other piping? If yes, explain:
9.	Y ☐	N ☒	n/a ☐	Is there any surcharging of influent lines, overflow weirs, or other structures? If yes, explain:
10.	Y ☐	N ☐	n/a ☒	If the facility receives hauled waste (e.g., septage), is this done in accordance with a hauled waste plan? If no, explain
11.	Y ☐	N ☐	n/a ☒	Is there any evidence of spills at the hauled waste receiving facility? If yes, explain:
12.	Y ☒	N ☐	n/a ☐	Does the facility have any storm drains?
	Y ☒	N ☐	n/a ☐	If yes, are any chemicals and/or wastes stored where they could spill into storm drains?
	Y ☐	N ☐	n/a ☒	Is there any dry weather flow in the storm drain? If yes, explain:
13.	Y ☒	N ☐	n/a ☐	Does the facility have any floor drains? If yes, where are they and where do they discharge? Are any chemicals/oils/wastes stored in the vicinity of the floor drain? The floor drains and industrial stormwater drains both lead to the treatment plant. There is chlorine in the vicinity of the floor drains, however the plant is designed to treat chlorine. There were oil sheens observed going into one of the industrial stormwater drains. The facility fixed the leaking equipment by the time the inspection had ended and has since placed floating oil booms in its lagoons.

IV. EFFLUENT/RECEIVING WATER				
1.	Y ☐	N ☒	n/a ☐	Are there any floating solids, oil sheen, color, or foam **in the effluent**? If yes, explain: No discharge went to river at time of inspection.
2.	Y ☐	N ☐	n/a ☒	Are there any floating solids, oil sheen, color, foam or a recognizable plume **in the receiving water**? If yes, explain: I did not observe the receiving water.

V. FLOW MEASUREMENT				
What type of influent meter is used? N/A; no permit requirements for influent flow. Primary element reading: Instantaneous flow reading: 0 gpm Flow from chart:				
What type of effluent meter is used? Endress Hauser Promag 400 Primary element reading: 115734 gallons Instantaneous flow reading: 1066 gpm Flow from chart:				
1.	Y ☒	N ☐	n/a ☐	Are influent (if applicable) and effluent flow measuring device(s) professionally calibrated, at least once per year? If no, explain: Yes, last calibrated on 12/22/23.
2.	Y ☐	N ☐	n/a ☒	Is the calibration of the flow measuring device(s) checked between the annual professional calibrations at least three times per year? *(Recommendation only)* If no, explain frequency. If yes, do facility personnel record the results of these additional tests, and are the results within 10 percent accuracy?
3.	Y ☒	N ☐	n/a ☐	Are all effluent flow measuring devices clean and free of debris and deposits? If no, explain:
4.	Y ☐	N ☐	n/a ☒	Are the sides of the flume(s) throat vertical and parallel? If no, explain:
5.	Y ☐	N ☐	n/a ☒	Is the effluent weir level? If no, explain:
6.	Y ☐	N ☒	n/a ☐	Is there any leakage around any of the flow measuring devices? If yes, explain:

VI. SELF MONITORING					
List all required monitoring done in-house: pH & temp					
List all required monitoring done by outside laboratory and name of laboratory: BOD, TSS, ammonia, chloride to Apex labs. Eurofins Tacoma does toxics.					
1.	Y ☒	N ☐	n/a ☐	Does the facility have a written laboratory QA/QC manual? If no or NA, explain: The permittee uses a lab for BOD/TSS/*E. coli* monitoring.	
2.	Y ☒	N ☐	n/a ☐	Does the laboratory QA Manual include all the following?	
				☒ Organization and Responsibilities ☒ Sample Control and Documentation ☒ SOP Procedures for Analytical Methods ☒ Training Requirements ☒ Equipment Maintenance and Calibration Procedures	☒ Calibration Procedure and Detection Limits Corrective Action Procedures ☒ Quality Control and Calculations ☒ Performance Audits ☒ Evaluating Data for Precision & Accuracy ☒ Reporting and Record Keeping

				If no, explain: The permittee submitted pH calibration instructions by email on 12/12/2023.
3.	Y ☒	N ☐	n/a ☐	Is the QA/QC manual being used by facility personnel? If no, explain:
4.	Y ☒	N ☐	n/a ☐	Are the influent and effluent sampling locations representative of the waste stream? If no, explain:
5.	Y ☒	N ☐	n/a ☐	Are the correct effluent sample types (grab or composite) taken? If no, explain:
6.	Y ☒	N ☐	n/a ☐	Are composite samples: ☒ flow-proportioned or ☐ time-proportioned? If not flow-proportioned, explain:
7.	Y ☒	N ☐	n/a ☐	Are composite samples cooled to ≤6°C during the compositing period? If ice or gel packs are used, is the temperature of the final sample recorded? If no, explain:
8.	Y ☒	N ☐	n/a ☐	If a refrigerator is used for storing composite samples prior to analysis, is there a thermometer in the refrigerator? Is the temperature recorded routinely? Is the final sample temperature recorded? If no, explain: As a recommendation, the facility should add a thermometer to the sample refrigerator.
9.	Y ☒	N ☐	n/a ☐	Are all grab samples cooled with ice, gel packs or refrigerated to <6°C from the time of collection until analysis including shipping time, if applicable? If no, explain:
10.	Y ☒	N ☐	n/a ☐	Are all samples which require preservation properly preserved? If no, explain:
11.	Y ☒	N ☐	n/a ☐	Are the correct sample containers being used? If no, explain:
12.	Y ☒	N ☐	n/a ☐	Is all the sampling equipment and glassware cleaned before being used? Is bacteria monitoring equipment sterilized? If no, explain:
13.	Y ☒	N ☐	n/a ☐	Are the correct analytical testing procedures used and holding times met? If no, explain:
14.	Y ☐	N ☐	n/a ☒	If Colilert is used for bacterial analysis, is Quanti-Tray/2000 used? If not, are samples diluted at least 10:1?
15.	Y ☒	N ☐	n/a ☐	Are laboratory method detection limits for all parameters tested less than the permit limits? If no, explain:
16.	Y ☐	N ☐	n/a ☒	Is the permittee conducting quality control standards, sample duplicates, spikes and blanks as per the QA manual? If no, explain:

17.	Y ☒	N ☐	n/a ☐	Is the permittee calibrating and maintaining all laboratory instruments and equipment on the periodic basis specified in the QA Manual? (Annual calibrations for thermometers and balances are required; annual calibrations for all other laboratory instruments are recommended but are not required.) If no, explain:
18.	Y ☒	N ☐	n/a ☐	Are the thermometers calibrated annually using a NIST-certified thermometer or does the facility purchase new NIST-certified thermometers yearly? If no, explain: The thermometer calibrations were not checked.
19.	Y ☐	N ☒	n/a ☐	Are the reagents (including pH buffers) and standards being used expired? If no, explain:
20.	Y ☒	N ☐	n/a ☐	Is proper laboratory grade laboratory pure water available for specific analyses? If no, explain: Pure water (DI water) needs to be available for pH calibrations and analyses, and documented in the QA/QC Plan.
21.	Y ☒	N ☐	n/a ☐	Are laboratory safety devices (eyewash and shower, fume hood, proper labeling and storage, pipette suction bulbs) available? (*Recommendation only*) If no, explain
22.	Y ☒	N ☐	n/a ☐	Are reagents and solvents used for the analyses properly stored? If no, explain:
23.	Y ☒	N ☐	n/a ☐	Does the permittee cross-check its calculations? (*Recommendation only; however, no cross-checking may result in misreporting which is a violation of the permit – DMRs are certified to be accurate by signature.*) If not, explain:
24.	Y ☒	N ☐	n/a ☐	Does the permittee use the correct lab formulae to calculate final results? If no, explain:

VII. PERMIT/RECORDS/REPORTS				
1.	Y ☒	N ☐	n/a ☐	Is a copy of the current permit onsite? If no, explain:
2.	Y ☒	N ☐	n/a ☐	If the permit is expired or due to expire within 180 days, has a reapplication been submitted? If no, explain:
3.	Y ☒	N ☐	n/a ☐	Are the records and reports maintained by the permittee for at least 3 years? If no, explain:
4.	Y ☒	N ☐	n/a ☐	If the facility monitors any permitted parameter more frequently than required by the permit, using approved test methods, are these additional results included in its DMR calculations? If no, explain:
5.	Y ☒	N ☐	n/a ☐	Check a random DMR against analytical results reported on the facilities bench sheets. Are they consistent? If no, explain:

VIII. OPERATIONS AND MAINTENANCE				
Classification of System (NA for industrial permits): Treatment: N/A Collections: N/A				
List all operators and include classification levels. Note which operators are designated supervisors (or environmental supervisor for industrial permits): Richard Morris: Wastewater Supervisor Ryan McCool- Wastewater Supervisor (Involved with Downtown and Riverside Wastewater Operations) Miguel Justo- Wastewater Operator Lead (Involved with Downtown and Riverside Wastewater Operations) Brent Gruesbeck- Entry Level Wastewater Operator (Involved with only Downtown Wastewater Operations)				
1.	Y ☒	N ☐	n/a ☐	Does the permittee have a written O&M manual? If no, explain:
2.	Y ☐	N ☐	n/a ☒	Staff (FTE) needed from O&M manual: Number of staff (FTE):
3.	Y ☒	N ☐	n/a ☐	Does the wastewater treatment facility have an alarm system for all essential equipment? ☒ Does the facility check its alarm systems? How often? Monthly ☐ When were the alarm systems last checked? The alarm system is currently being upgraded. ☒ Are alarms sent to qualified personnel who can respond immediately? Yes
4.	Y ☒	N ☐	n/a ☐	Are routine and preventive maintenance (PM) scheduled performed and recorded? Type of PM tracking system: ☐ electronic ☐ paper ☐ other:_____ Check a random equipment unit against recommendations. Has it been maintained adequately? If no, explain: They are moving to a new PM tracking system.
5.	Y ☒	N ☐	n/a ☐	Does the facility maintain written procedures for responding to emergencies such as power failures, floods, fires, and other natural disasters? If no, explain:
6.	Y ☒	N ☐	n/a ☐	Does the facility maintain a written list of contacts for emergencies? If no, explain;
7.	Y ☒	N ☐	n/a ☐	Is a logbook (electronic or paper) kept that documents all facility activities on a daily basis? If no, explain:
8.	Y ☒	N ☐	n/a ☐	Does the facility maintain an inventory of spare parts, either at the facility or close by, sufficient to keep all of its treatment units operational? If no, explain:
9.	Y ☐	N ☒	n/a ☐	Does the facility have standby power for all treatment units? If no, explain: They do not need standby power because flow will stop if their equipment loses power.
10	Y ☐	N ☐	n/a ☒	Is the standby power regularly exercised under load? If no, explain:

IX. SANITARY SEWER OVERFLOWS (NA for Industrial Permits)				
1.	Y ☐	N ☐	n/a ☒	Do they have a written CMOM program? How are maintenance activities tracked? Is the complete collection system cleaned and inspected on a 5 year rotation?
2.	Y ☐	N ☒	n/a ☐	Have any SSOs occurred since the last inspection? Are these SSOs reported within 24 hours verbally and followed up with a letter in 5 days? If no, explain:
3.	Y ☐	N ☐	n/a ☒	List the locations, amounts, surface water impacts, causes, and corrective actions taken for each SSO:

X. OTHER NPDES SPECIFIC REPORTS/REQUIREMENTS

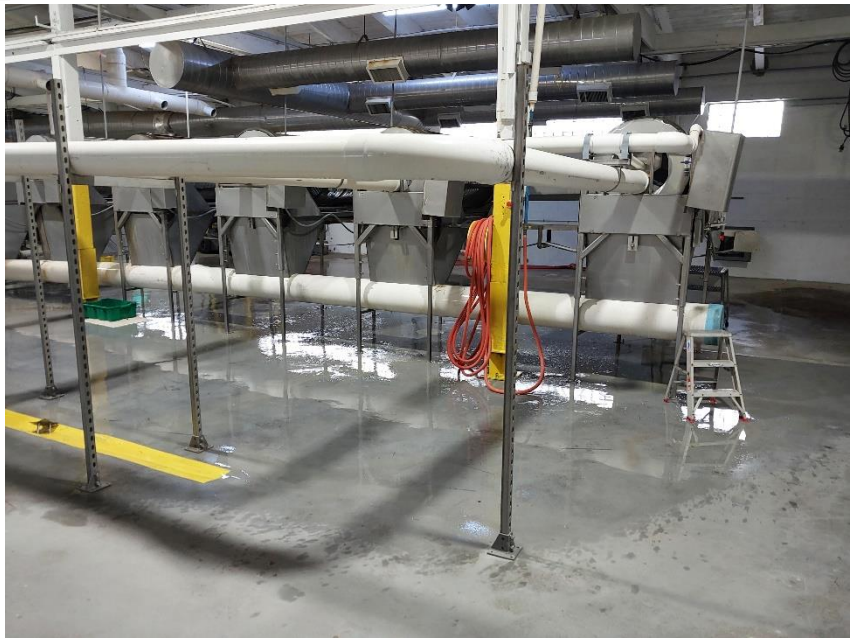
1.	Condition B.3: Effluent Toxics Characterization (Tables B2-B4) - (DEQ Letter: Request for Supplemental Information/Data 3/31/21)
2.	Condition B.4: Ambient Toxics Charecterization - (DEQ Letter: Request for Supplemental Information/Data 3/31/21)
3.	Condition B.5: Wastewater Solids Annual Report (Table B5)
4.	Copper BLM Monitoring: (DEQ Letter: Request for Supplemental Information/Data 3/31/21)
5.	

XI. CLOSING CONFERENCE

Review findings and explain the next steps.

Further consideration may be needed to determine whether findings are violations.

1.	Inspectors discussed with the permittee the prior failure to monitor violations (see attached Pre-Enforcement Notice 2024-PEN-9298).
2.	Inspectors discussed with the permittee the observed oil sheen in the asphalt loading area. (In response, the permittee later submitted a non-compliance report on 2/15/24 documenting a long-term solution for this noncompliance (Floating Oil Boom) and the two locations these will be installed and maintained moving forward).
3.	Inspectors discussed with the permittee the observed waste activated sludge spill running off containment onto the hillside. In response, the permittee later submitted a non-compliance report on 2/16/24 documenting a long-term solution for this noncompliance providing containment. (see attached Pre-Enforcement Notice 2024-PEN-9298).
4.	
5.	
6.	
7.	
8.	
9.	



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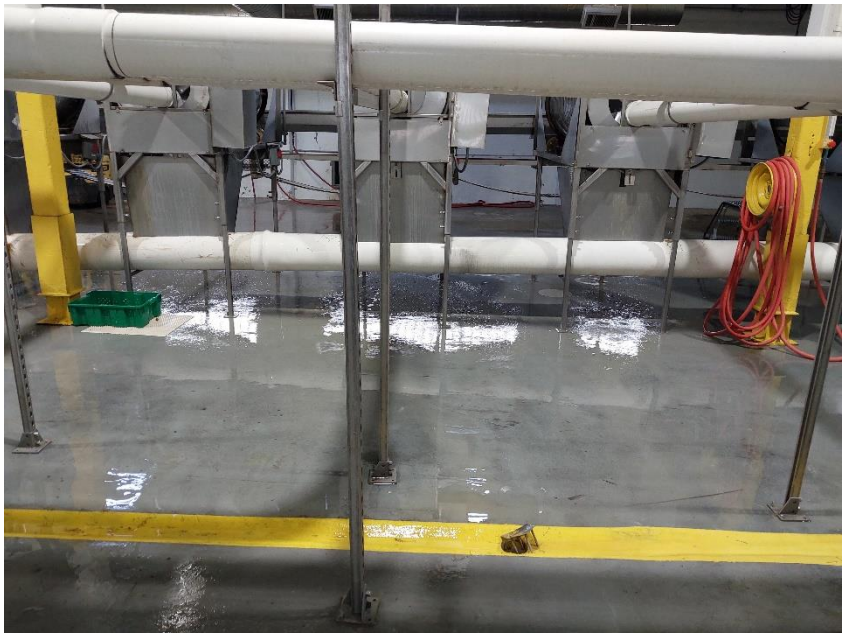

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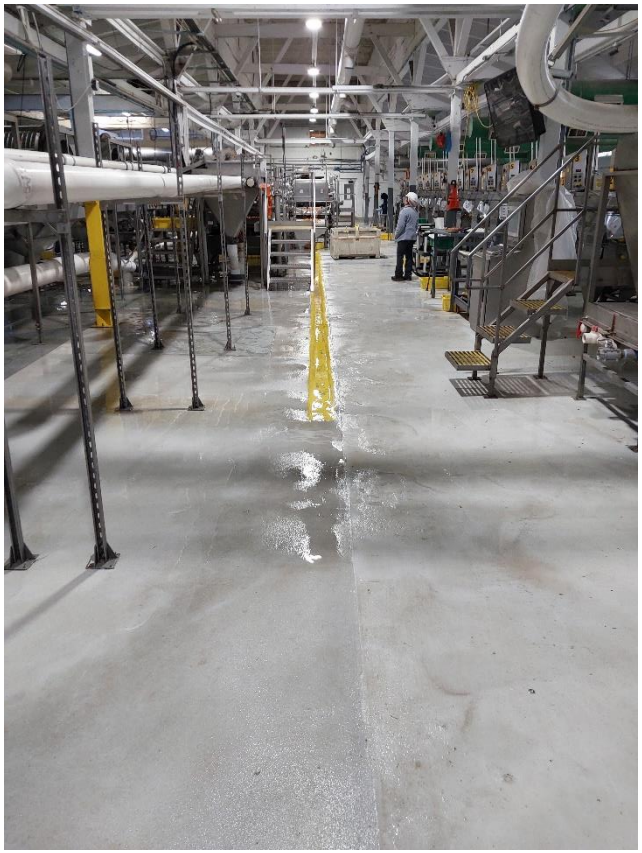

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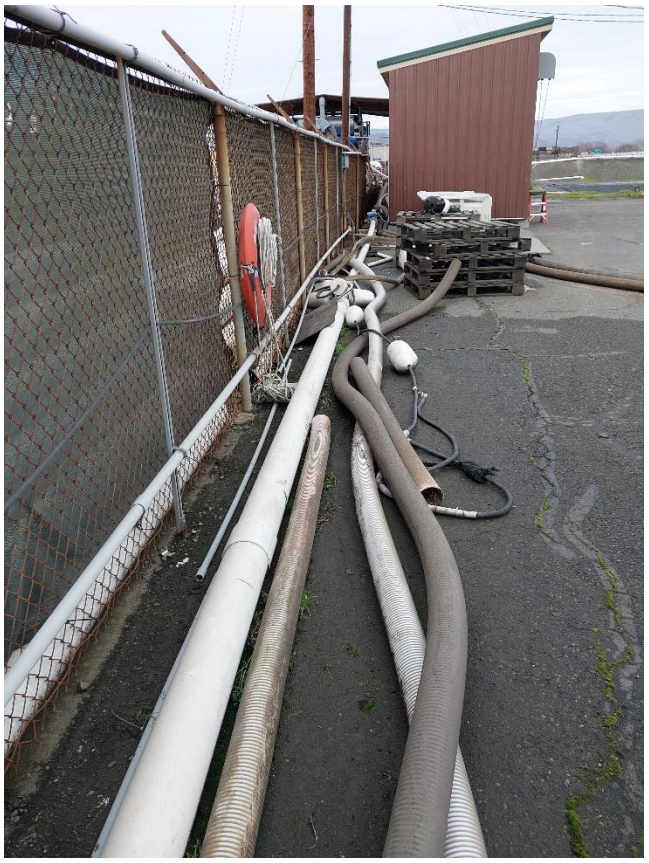

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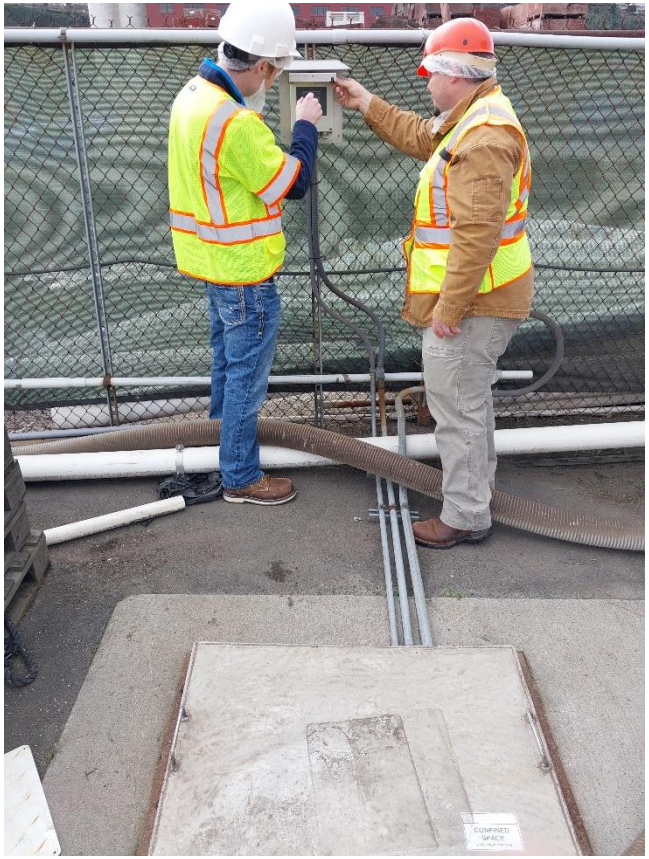

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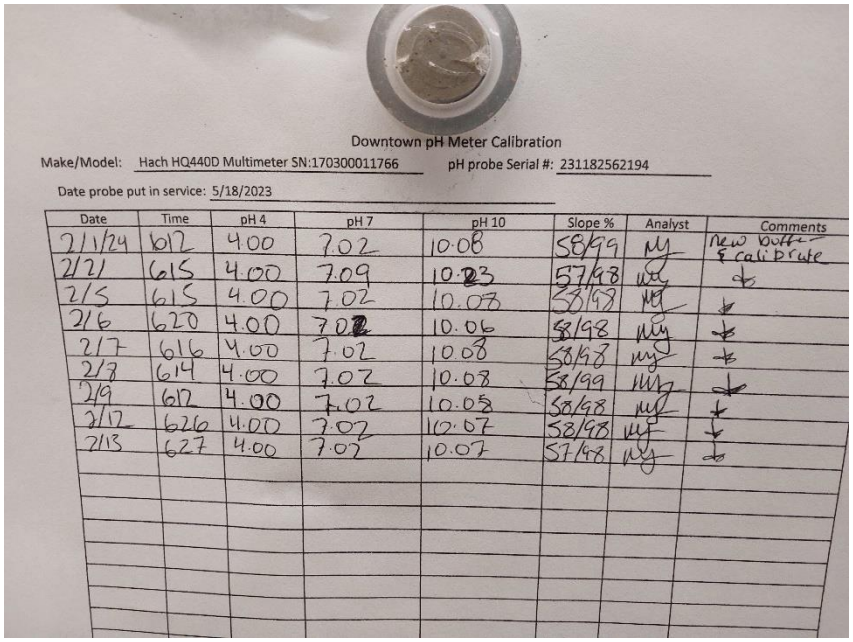


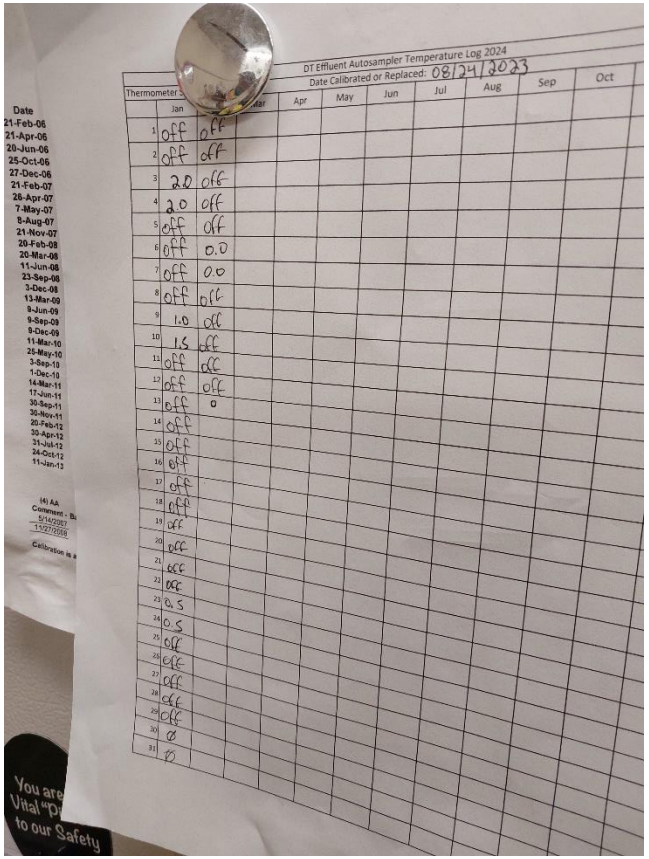
Downtown pH Meter Calibration

Make/Model: Hach HQ440D Multimeter SN:170300011766 pH probe Serial #: 231182562194

Date probe put in service: 5/18/2023

Date	Time	pH 4	pH 7	pH 10	Slope %	Analyst	Comments
2/1/24	612	4.00	7.02	10.08	58/99	MY	New buffer & calibrate
2/2	615	4.00	7.09	10.23	57/98	MY	
2/5	615	4.00	7.02	10.03	58/98	MY	
2/6	620	4.00	7.02	10.06	58/98	MY	
2/7	616	4.00	7.02	10.08	58/98	MY	
2/8	614	4.00	7.02	10.08	58/99	MY	
2/9	612	4.00	7.02	10.05	58/98	MY	
2/12	626	4.00	7.02	10.07	58/98	MY	
2/13	627	4.00	7.02	10.07	57/98	MY	

55: pH meter calibration log.



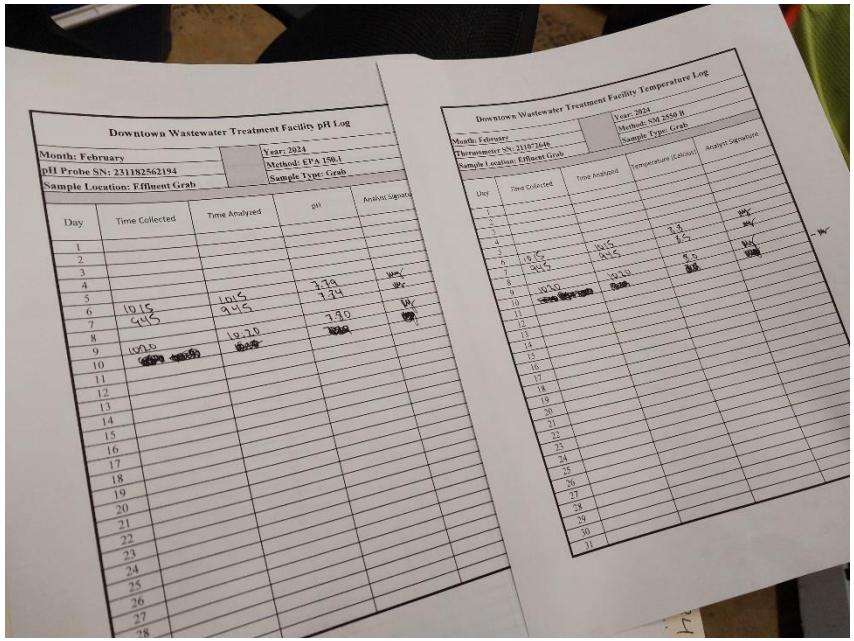
DT Effluent Autosampler Temperature Log 2024

Date Calibrated or Replaced: 08/24/2023

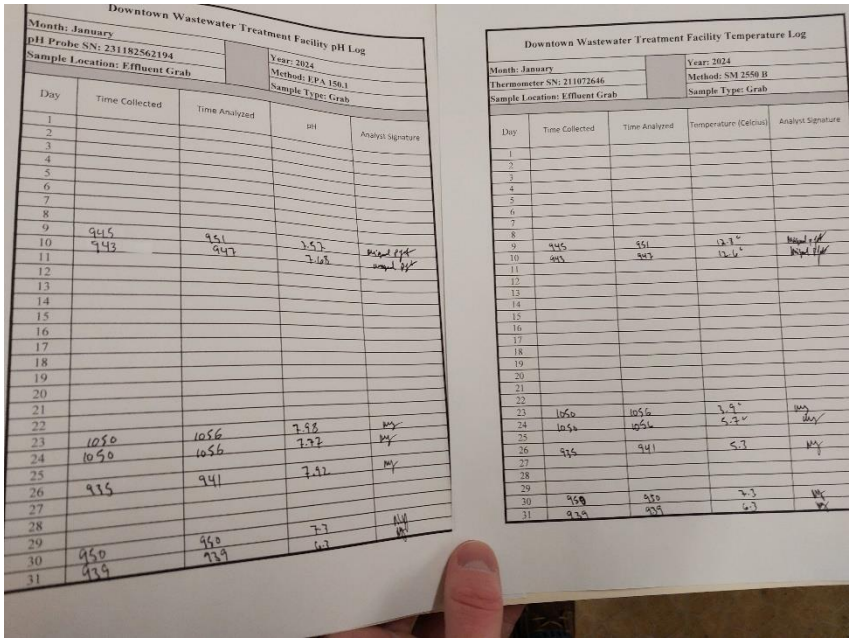
Thermometer	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
1	off	off								
2	off	off								
3	2.0	off								
4	2.0	off								
5	off	off								
6	off	0.0								
7	off	0.0								
8	off	off								
9	1.0	off								
10	1.5	off								
11	off	off								
12	off	off								
13	off	0								
14	off									
15	off									
16	off									
17	off									
18	off									
19	off									
20	off									
21	off									
22	off									
23	0.5									
24	0.5									
25	off									
26	off									
27	off									
28	off									
29	off									
30	0									
31	0									

Date
21-Feb-06
21-Apr-06
20-Jun-06
25-Oct-06
27-Dec-06
21-Feb-07
26-Apr-07
7-May-07
8-Aug-07
21-Nov-07
20-Feb-08
20-Mar-08
11-Jun-08
23-Sep-08
3-Dec-08
13-Mar-09
9-Jun-09
9-Sep-09
9-Dec-09
11-Mar-10
25-May-10
3-Sep-10
1-Dec-10
14-Mar-11
17-Jun-11
30-Sep-11
30-Nov-11
20-Feb-12
30-Apr-12
31-Jul-12
24-Oct-12
11-Jan-13

56: Autosampler temperature log.

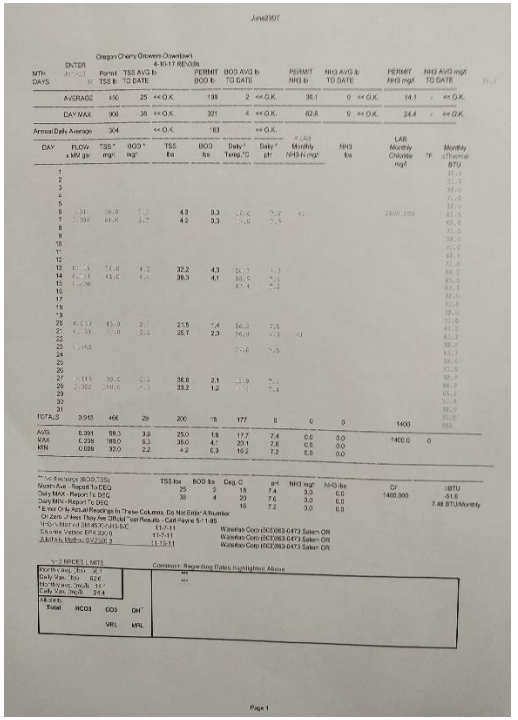


57: Effluent pH log.

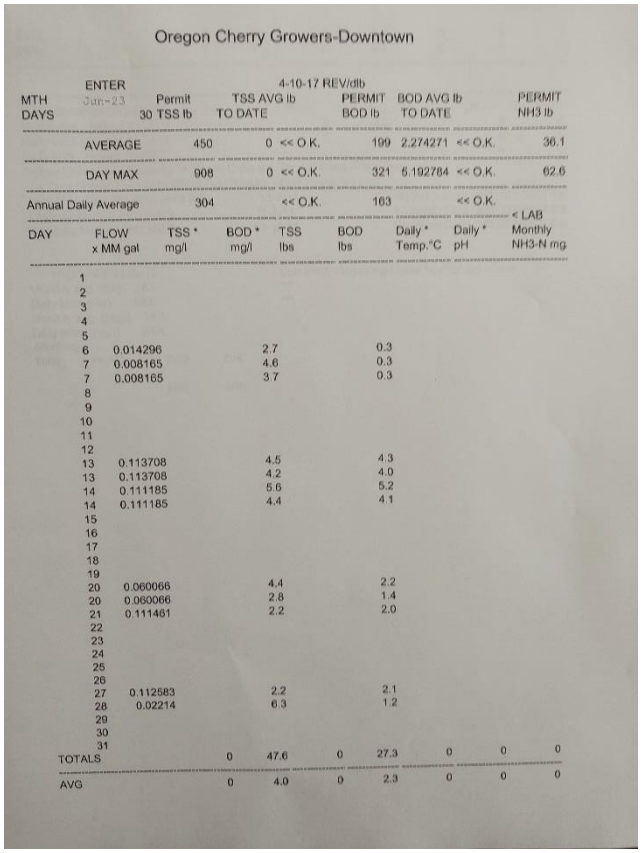


58: Effluent pH log.

59: Site for new construction.



60: Effluent quality report.



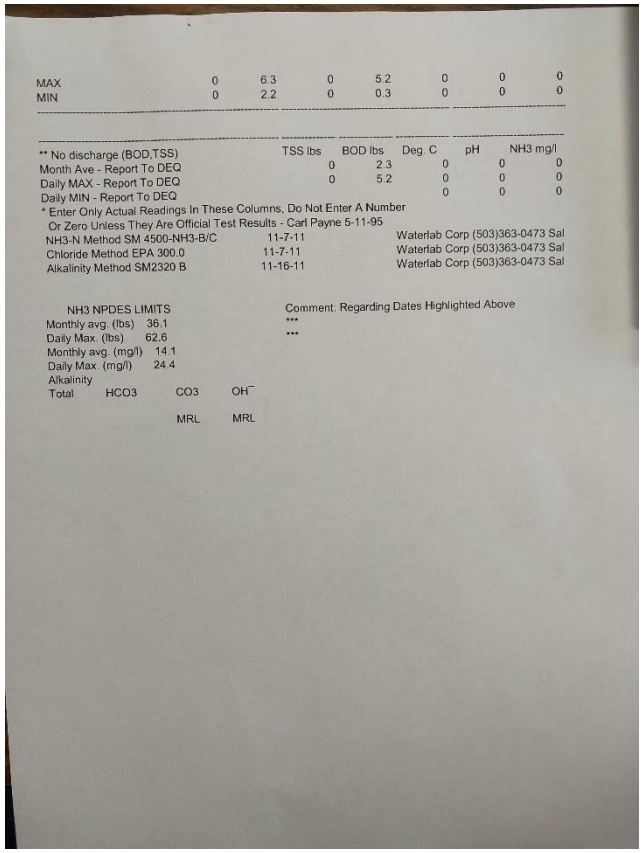
Oregon Cherry Growers-Downtown

4-10-17 REV/dlb

MTH / DAYS	ENTER Jun-23	Permit 30 TSS lb	TSS AVG lb TO DATE		PERMIT BOD lb	BOD AVG lb TO DATE		PERMIT NH3 lb
AVERAGE		450	0	<< O.K.	199	2.274271	<< O.K.	36.1
DAY MAX		908	0	<< O.K.	321	5.192784	<< O.K.	62.6
Annual Daily Average		304		<< O.K.	163		<< O.K.	

DAY	FLOW x MM gal	TSS * mg/l	BOD * mg/l	TSS lbs	BOD lbs	Daily * Temp.°C	Daily * pH	< LAB Monthly NH3-N mg
1								
2								
3								
4								
5								
6	0.014296			2.7		0.3		
7	0.008165			4.6		0.3		
7	0.008165			3.7		0.3		
8								
9								
10								
11								
12								
13	0.113708			4.5		4.3		
13	0.113708			4.2		4.0		
14	0.111185			5.6		5.2		
14	0.111185			4.4		4.1		
15								
16								
17								
18								
19								
20	0.060066			4.4		2.2		
20	0.060066			2.8		1.4		
21	0.111481			2.2		2.0		
22								
23								
24								
25								
26								
27	0.112583			2.2		2.1		
28	0.02214			6.3		1.2		
29								
30								
31								
TOTALS			0	47.6	0	27.3	0	0 0
AVG			0	4.0	0	2.3	0	0 0

61: Effluent quality report.



MAX	0	6.3	0	5.2	0	0	0
MIN	0	2.2	0	0.3	0	0	0

** No discharge (BOD,TSS)	TSS lbs	BOD lbs	Deg. C	pH	NH3 mg/l
Month Ave - Report To DEQ	0	2.3	0	0	0
Daily MAX - Report To DEQ	0	5.2	0	0	0
Daily MIN - Report To DEQ			0	0	0

* Enter Only Actual Readings In These Columns, Do Not Enter A Number
Or Zero Unless They Are Official Test Results - Carl Payne 5-11-95

NH3-N Method SM 4500-NH3-B/C	11-7-11	Waterlab Corp (503)363-0473 Sal
Chloride Method EPA 300.0	11-7-11	Waterlab Corp (503)363-0473 Sal
Alkalinity Method SM2320 B	11-16-11	Waterlab Corp (503)363-0473 Sal

NH3 NPDES LIMITS

Monthly avg. (lbs)	36.1
Daily Max. (lbs)	62.6
Monthly avg. (mg/l)	14.1
Daily Max. (mg/l)	24.4

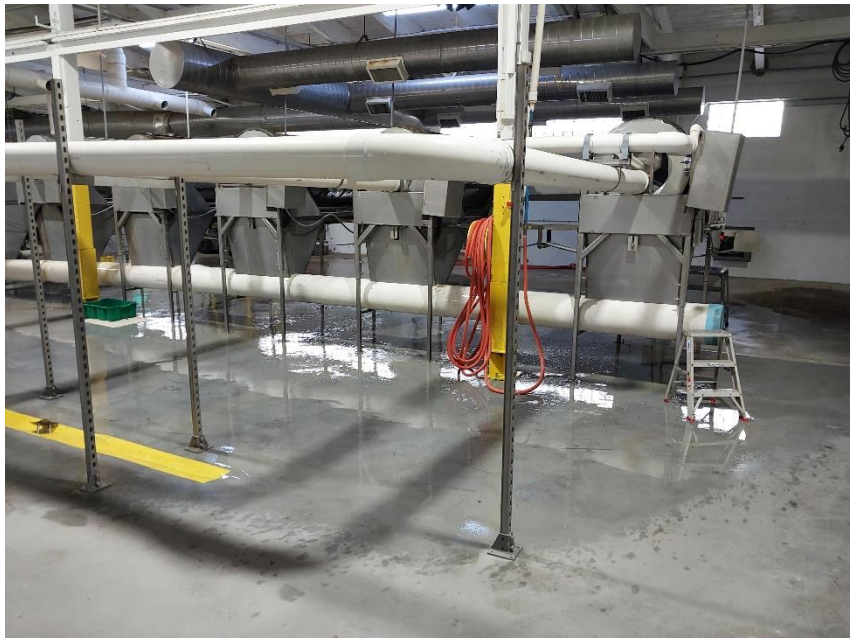
Alkalinity

Total	HCO3	CO3	OH⁻
		MRL	MRL

Comment. Regarding Dates Highlighted Above
***
***

62: Effluent quality report.

63: During the inspection, oil-absorbant socks were placed around the two drains that were downslope from the oil sheen shown in photo #6.



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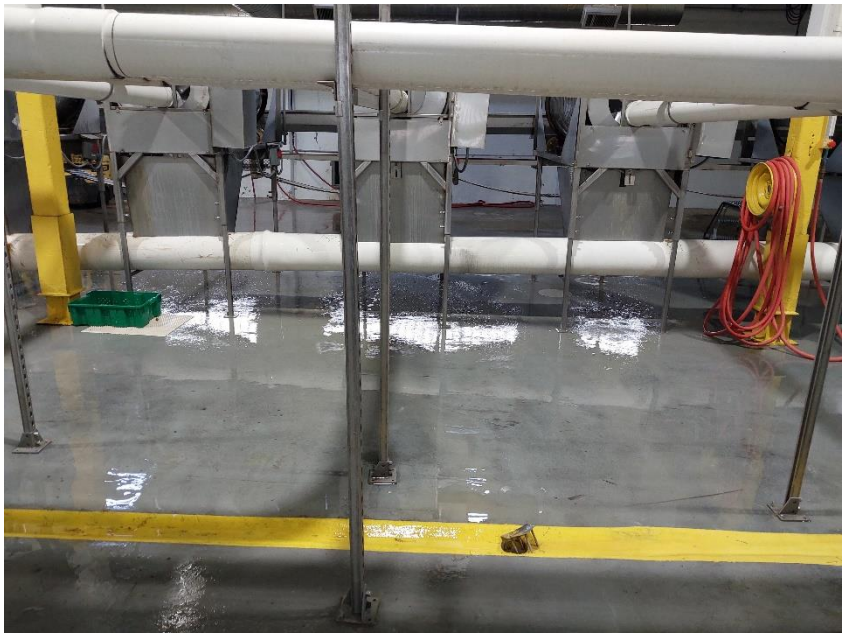

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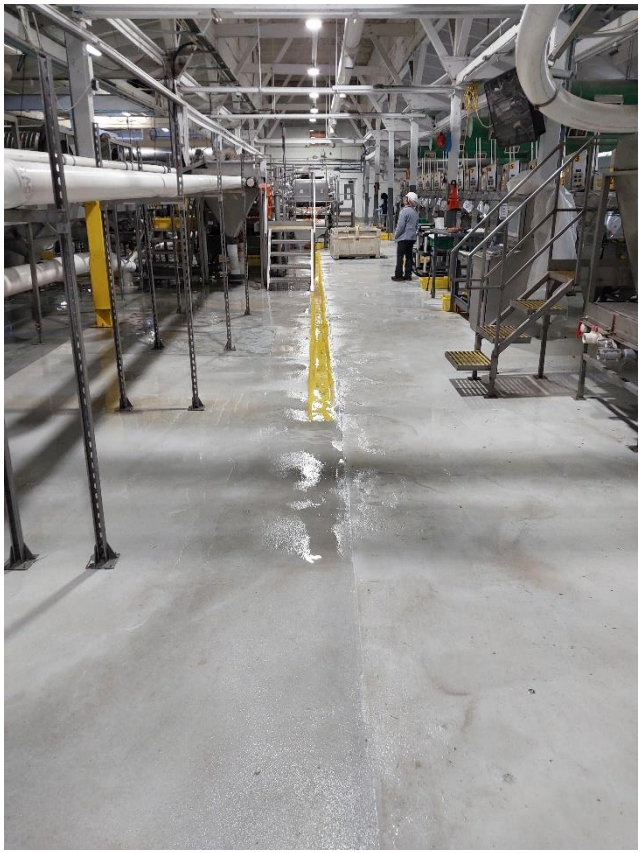

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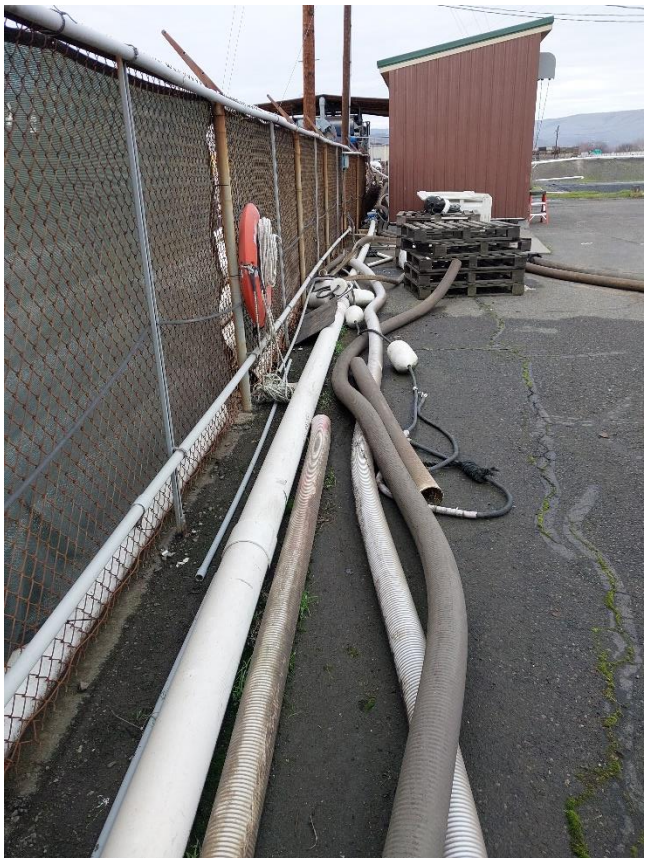

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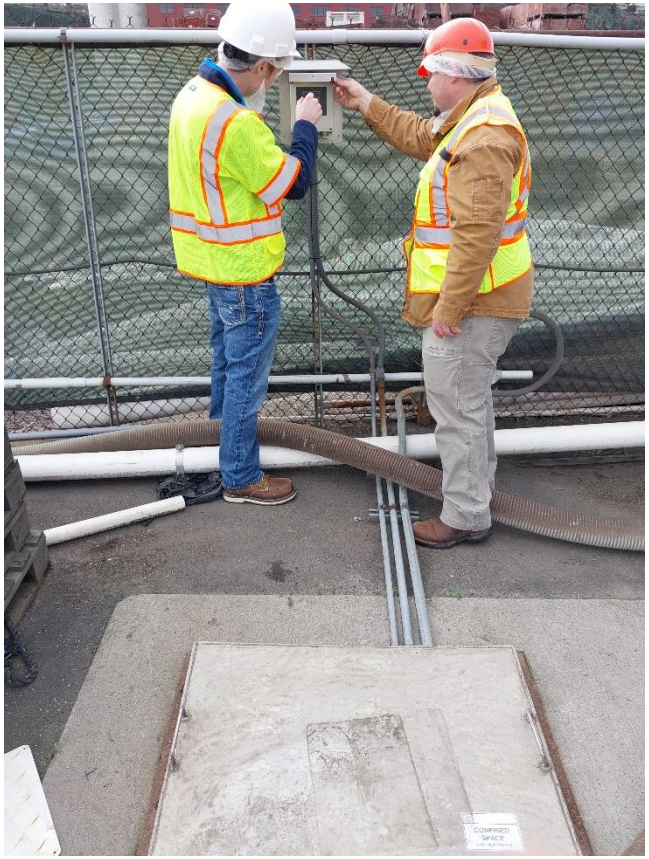

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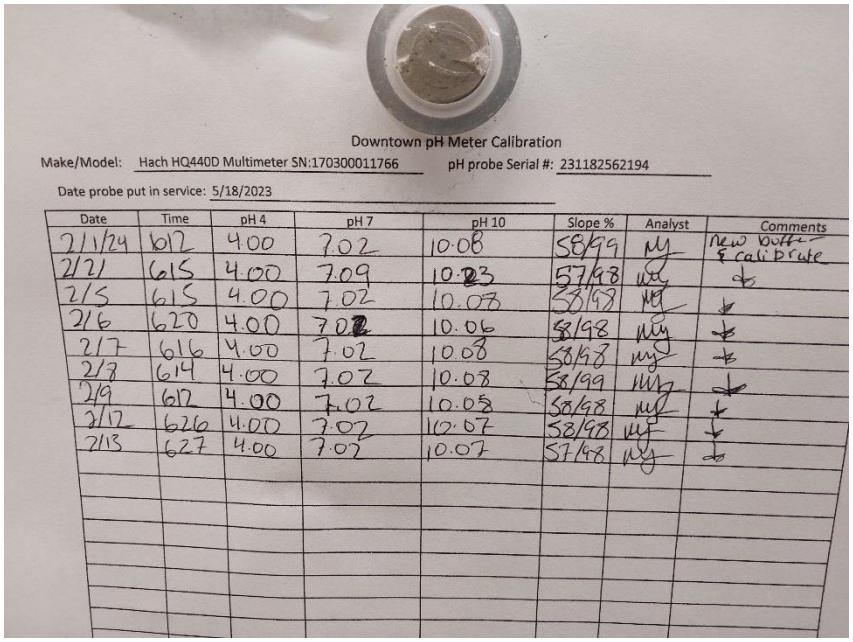

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Date probe put in service: 5/18/2023

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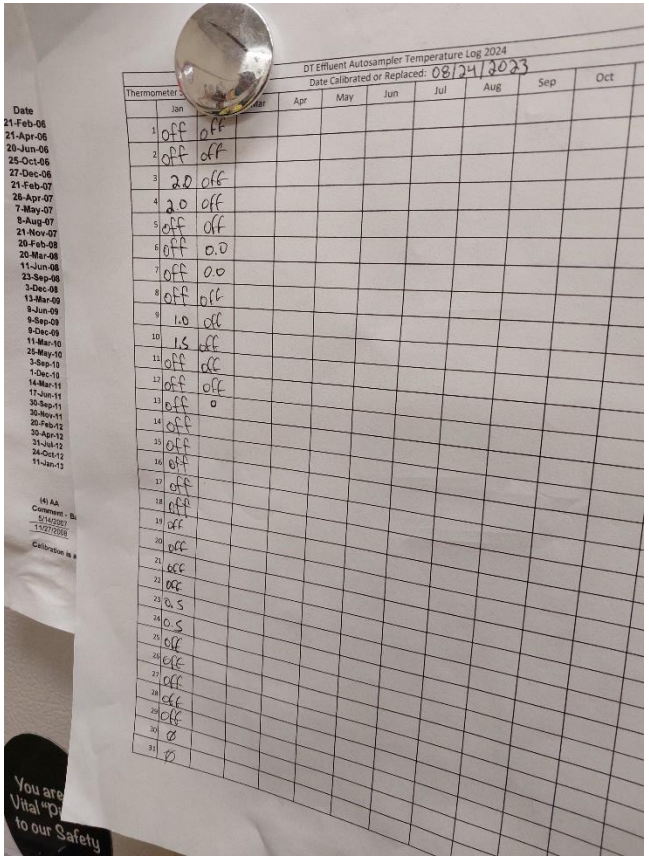
2/1/24	612	4.00	7.02	10.08	58/99	MY	New buffer & calibrate
2/2	615	4.00	7.09	10.23	57/98	MY	
2/5	615	4.00	7.02	10.03	58/98	MY	
2/6	620	4.00	7.02	10.06	58/98	MY	
2/7	616	4.00	7.02	10.08	58/98	MY	
2/8	614	4.00	7.02	10.08	58/99	MY	
2/9	612	4.00	7.02	10.05	58/98	MY	
2/12	626	4.00	7.02	10.07	58/98	MY	
2/13	627	4.00	7.02	10.07	57/98	MY	

55: pH meter calibration log.



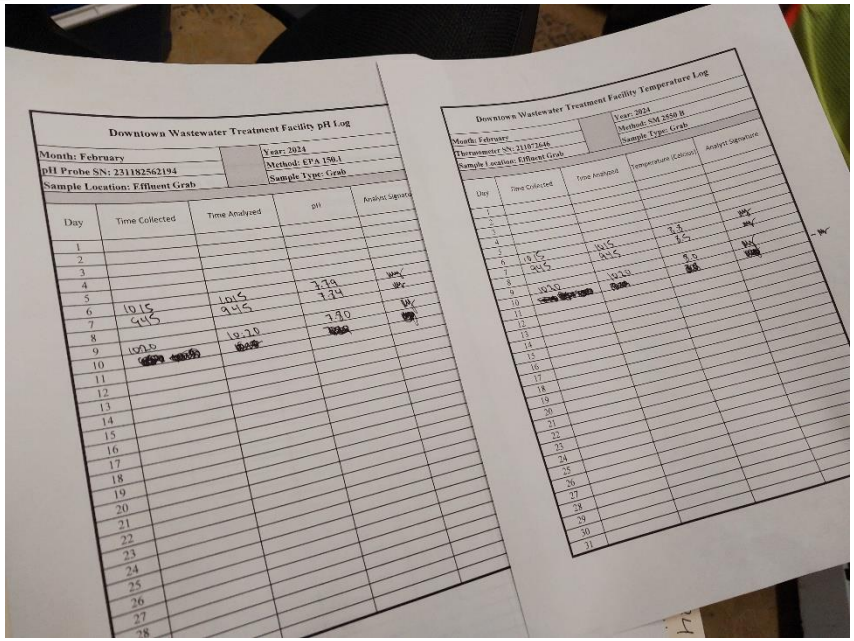
DT Effluent Autosampler Temperature Log 2024

Date Calibrated or Replaced: 08/24/2023

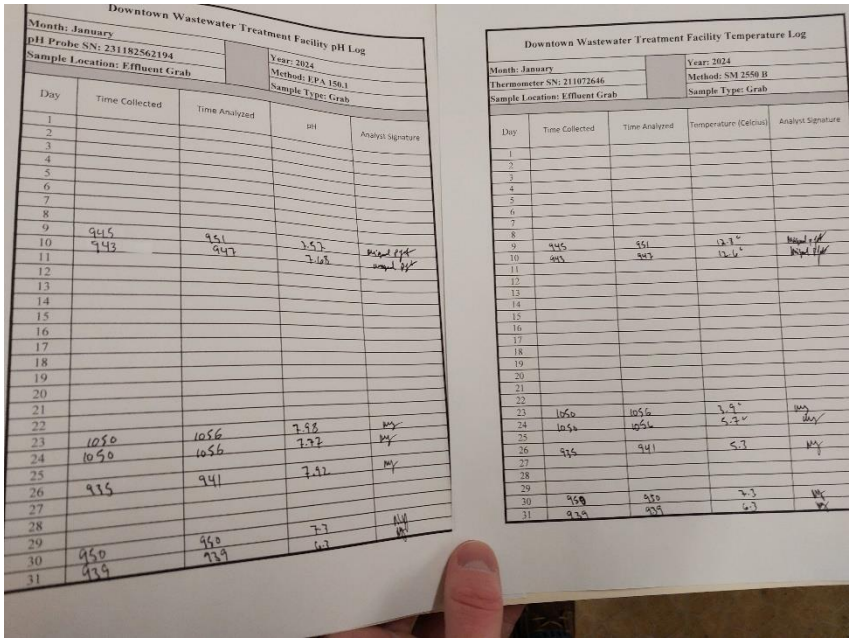
Thermometer	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
1	off	off								
2	off	off								
3	2.0	off								
4	2.0	off								
5	off	off								
6	off	0.0								
7	off	0.0								
8	off	off								
9	1.0	off								
10	1.5	off								
11	off	off								
12	off	off								
13	off	0								
14	off									
15	off									
16	off									
17	off									
18	off									
19	off									
20	off									
21	off									
22	off									
23	0.5									
24	0.5									
25	off									
26	off									
27	off									
28	off									
29	off									
30	0									
31	0									

Date
21-Feb-06
21-Apr-06
20-Jun-06
25-Oct-06
27-Dec-06
21-Feb-07
26-Apr-07
7-May-07
8-Aug-07
21-Nov-07
20-Feb-08
20-Mar-08
11-Jun-08
23-Sep-08
3-Dec-08
13-Mar-09
9-Jun-09
9-Sep-09
9-Dec-09
11-Mar-10
25-May-10
3-Sep-10
1-Dec-10
14-Mar-11
17-Jun-11
30-Sep-11
30-Nov-11
20-Feb-12
30-Apr-12
31-Jul-12
24-Oct-12
11-Jan-13

56: Autosampler temperature log.

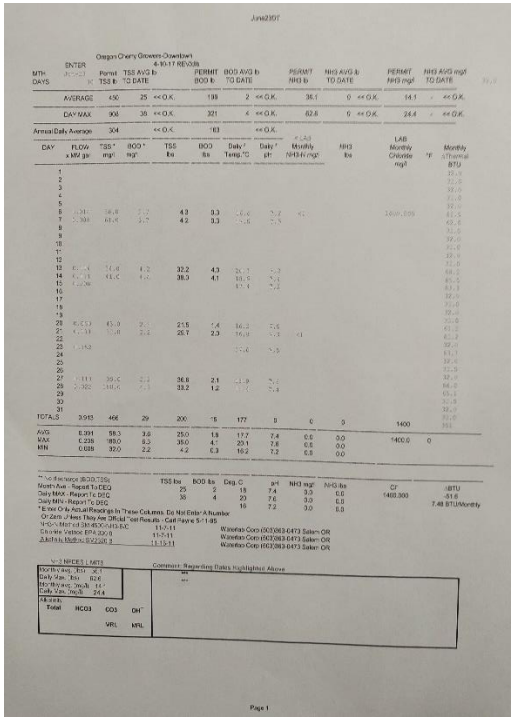


57: Effluent pH log.

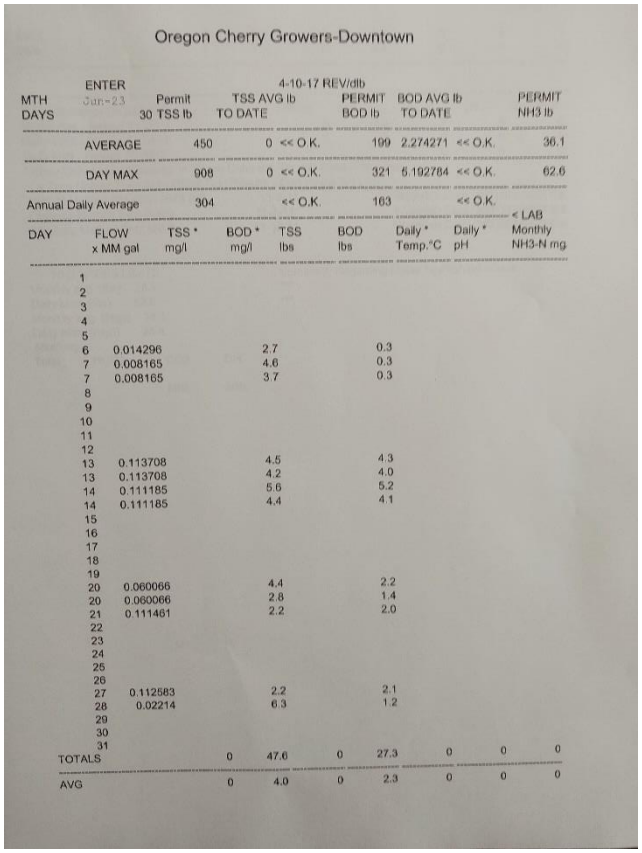


58: Effluent pH log.

59: Site for new construction.



60: Effluent quality report.



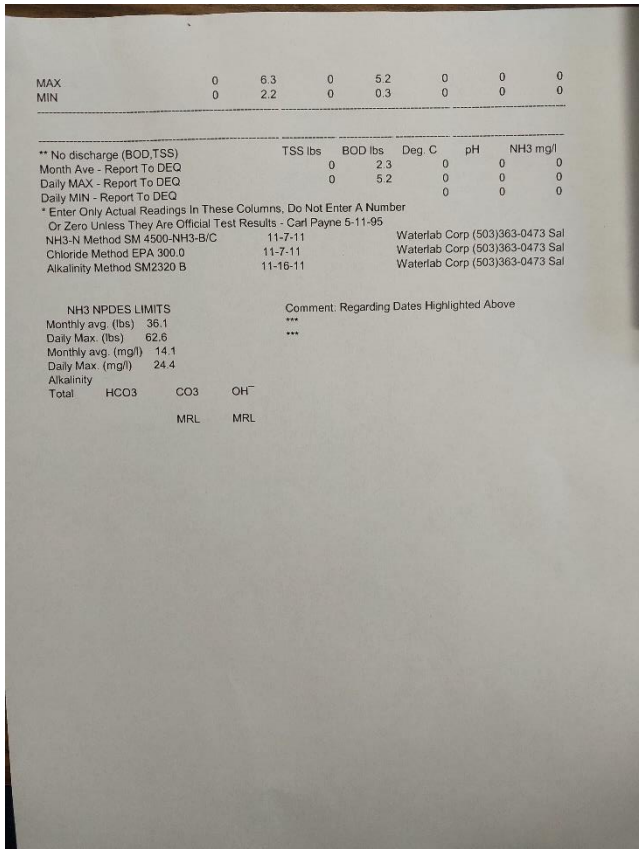
Oregon Cherry Growers-Downtown

4-10-17 REV/dlb

MTH / DAYS	ENTER Jun-23	Permit 30 TSS lb	TSS AVG lb TO DATE		PERMIT BOD lb	BOD AVG lb TO DATE		PERMIT NH3 lb
AVERAGE		450	0	<< O.K.	199	2.274271	<< O.K.	36.1
DAY MAX		908	0	<< O.K.	321	5.192784	<< O.K.	62.6
Annual Daily Average		304		<< O.K.	163		<< O.K.	

DAY	FLOW x MM gal	TSS * mg/l	BOD * mg/l	TSS lbs	BOD lbs	Daily * Temp.°C	Daily * pH	< LAB Monthly NH3-N mg
1								
2								
3								
4								
5								
6	0.014296			2.7		0.3		
7	0.008165			4.6		0.3		
7	0.008165			3.7		0.3		
8								
9								
10								
11								
12								
13	0.113708			4.5		4.3		
13	0.113708			4.2		4.0		
14	0.111185			5.6		5.2		
14	0.111185			4.4		4.1		
15								
16								
17								
18								
19								
20	0.060066			4.4		2.2		
20	0.060066			2.8		1.4		
21	0.111481			2.2		2.0		
22								
23								
24								
25								
26								
27	0.112583			2.2		2.1		
28	0.02214			6.3		1.2		
29								
30								
31								
TOTALS			0	47.6	0	27.3	0	0 0
AVG			0	4.0	0	2.3	0	0 0

61: Effluent quality report.



MAX	0	6.3	0	5.2	0	0	0
MIN	0	2.2	0	0.3	0	0	0

** No discharge (BOD,TSS)	TSS lbs	BOD lbs	Deg. C	pH	NH3 mg/l
Month Ave - Report To DEQ	0	2.3	0	0	0
Daily MAX - Report To DEQ	0	5.2	0	0	0
Daily MIN - Report To DEQ			0	0	0

* Enter Only Actual Readings In These Columns, Do Not Enter A Number
Or Zero Unless They Are Official Test Results - Carl Payne 5-11-95

NH3-N Method SM 4500-NH3-B/C	11-7-11	Waterlab Corp (503)363-0473 Sal
Chloride Method EPA 300.0	11-7-11	Waterlab Corp (503)363-0473 Sal
Alkalinity Method SM2320 B	11-16-11	Waterlab Corp (503)363-0473 Sal

NH3 NPDES LIMITS

Monthly avg. (lbs)	36.1
Daily Max. (lbs)	62.6
Monthly avg. (mg/l)	14.1
Daily Max. (mg/l)	24.4

Alkalinity

Total	HCO3	CO3	OH⁻
		MRL	MRL

Comment. Regarding Dates Highlighted Above
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62: Effluent quality report.

63: During the inspection, oil-absorbant socks were placed around the two drains that were downslope from the oil sheen shown in photo #6.