



# Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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May 14, 2020

**Dan Huff**  
**City of Molalla**  
**P.O. Box 248**  
**Molalla, OR 97038**

RE: **Pre-Enforcement Notice - Amended**  
**Molalla STP**  
**2020-PEN-5391**  
**Facility ID #57613/ Permit #101514**  
**Clackamas County**

Dear Mr. Huff:

Through self-reporting via Discharge Monitoring Report (DMR), the Department of Environmental Quality (DEQ) was notified that the Molalla Sewage Treatment Plant (STP) had violated their NPDES permit Biological Oxygen Demand (BOD) concentration and loading for January, February, March and April 2020. The minimum percent removal as required by the Clean Water Act was also violated.

**BOD<sub>5</sub> Limits, Recorded  
Violation, Percent Exceedance**

Month	Effluent Concentrations mg/L		Monthly Average lbs/day	Weekly Average lbs/day	Daily Max Lbs	%Removal
	10	15				
			<b>160</b>	<b>240</b>	<b>320</b>	<b>85</b>
January	15 (50%)	18 (20%)	224 (40%)	320 (33%)	-	84
February	30 (200%)	34 (127%)	514 (221%)	558 (133%)	693(117%)	77
March	24 (140%)	30 (100%)	342 (114%)	474 (98%)	516 (61%)	84
April	34 (240%)	44 (193%)	508 (218%)	634 (164%)	835 (161%)	81

**VIOLATIONS:**

- (1) WQ OAR 340-012-0055(1)(l) Violating a Water Quality Based Effluent Limitation [WQBEL] in an NPDES permit. These are **Class I violations**
- (2) WQ OAR 340-012-0055(1)(k) Violating a Technology Based Effluent Limitation [TBEL] in an NPDES permit. These are **Class I violations.**

Class I violations are the most serious violations; Class III violations are the least serious.

Excessive BOD in the receiving water may cause oxygen depletion in the river, which is detrimental to aquatic life. Excessive TSS may also impair migrating fish. Exceeding the limit may impair water quality in the receiving water body.

The inability of the Molalla STP to treat BOD to within permit limits is new, with the exception of times of high flow, such as a storm event. Normally the operation of the plant has resulted in BOD to below the permit limit. TSS concentrations has remained very low. The plant has recently improved influent screening capacity, maintained their DAF system and tertiary filters, and emptied the aeration basin of accumulated grit, all of which should improve treatment reliability. The only change from past operations has been the removal of sludge from the lagoons over the past two dry seasons. It is possible that the removal of sludge depleted the lagoon of facultative bacteria, which treats the water. Oxygen levels in the lagoons have been low which would hamper the ability of bacteria to consume carbon-based food. If the food is not removed in the basin, it will be removed in the river, which may cause dissolved oxygen depletion. Plant personnel have reacted to increase oxygen to the wastewater in lagoon 1, running the aerators 24/7 and as of March 9<sup>th</sup> operating permanent aerators there as well.

More biosolids will be removed from the lagoons this coming summer, as a part of a consent decree, perhaps as early as May, 2020. The plan is that by the end of July, the operation will be complete and the lagoons will have three months to adjust before the ability to discharge to the Molalla River.

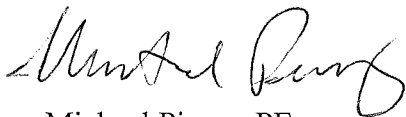
The permit does not require BOD and TSS measurement during the land application period. DEQ asks that bi-weekly measurements of BOD in each lagoon, as well as the effluent be conducted. The information these test give will dictate if additional measure are needed to lower the BOD in time for the beginning of the discharge season, scheduled for November 1.

This notice is a Pre-Enforcement Notice. These violations are being referred to the Department's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a Department 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 written information to me at the address shown at the top of the letter. The Department will consider new information you submit and take appropriate action.

Please address all submittals to my attention and contact me at (503) 229-5310 if you have any questions.

Respectfully,



Michael Pinney PE  
Senior Environmental Engineer  
Northwest Region Water Quality

cc: Gerald Fisher, Public Works Director, City of Molalla  
Office of Compliance and Enforcement, DEQ Headquarters