



Oregon

Tina Kotek, Governor

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June 24th, 2024

Mr. Jordon Bennett
City Administrator
City of Cascade Locks
PO Box 308
140 SW WaNaPa St.
Cascade Locks, OR 97014

RE: Warning Letter
City of Cascade Locks
2024-WL-9380
File #108653, NPDES Permit #101328
EPA Reference Number: OR0041271
Hood River County

Dear Mr. Bennett:

The City of Cascade Locks operates a domestic wastewater treatment plant and discharges treated effluent to the Columbia River under National Pollution Discharge Elimination System (NPDES) Permit #101328. Contracted operational staff are hired on behalf of the City to operate the treatment plant.

Based on file review of submitted compliance reports in NetDMR, DEQ has documented the following violations of Oregon environmental law.

Violation #1: Technology Based Effluent Limit Exceedances

According to written reports, the Cascade Locks wastewater treatment plant discharged effluent water in violation of the technology based effluent limits provided by Schedule A of the assigned permit. The facility formerly had a mutual agreement and order (MAO WQ/M-ER-13-163), which provided interim limits for total suspended solids until completion of facility upgrades. The MAO terminated on October 31, 2023.

Schedule A, Condition 1(a)(ii) of the permit establishes effluent limits for total suspended solids (TSS) for discharges November 1-April 30. Exceedance of a technology based effluent limit (TBEL) for TSS by 50% or more is a Class I violation. See OAR 340-012-0055(1)(k).

Effluent Limit	Reported Result (over limit)	Violation Date	Violation Class
Total Suspended Solids Monthly Average Concentration not to exceed 30 mg/L.	52.9 mg/L (76% exceedance)	November 2023	I
TSS weekly average concentration not to exceed 45 mg/L	91 mg/L (102% exceedance)	Week of November 19-25, 2023	I

The city must ensure that all effluent limitations are met, including all Schedule A effluent limits. The November 2023 violations occurred during a period of startup of a major facility upgrade.

Under 40 CFR § 122.29(d)(4), new treatment systems are allowed a start-up period within the shortest feasible time (not to exceed 90 days). As such, in consult with our Office of Compliance and Enforcement, DEQ is issuing a warning letter for these violations, which would otherwise trigger a formal enforcement action.

Corrective Action Required

As a part of DEQ's review, it was noted that the TSS percent removal for November was reported as 84.9% in NetDMR, where the permit limit is established at greater than or equal to 85%. By July 31, 2024, please correct the November 2023 NetDMR using appropriate rounding convention, which will clear the flagged TSS % removal violation (for a value of 84.9%, in NetDMR, the City should report 85%). Please refer to DEQ's NetDMR user's guide for information on how to correctly report in NetDMR and for instructions on how to correct a submitted NetDMR if this is in error:

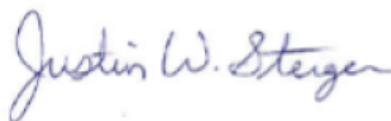
<https://www.oregon.gov/deq/FilterDocs/WQP-guide-NETDMR-Useguide.pdf>

Summary

This notice is a warning letter. DEQ does not intend to take formal enforcement action at this time. However, 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 believe any of the facts in this Warning Letter 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) 714-0206.

Sincerely,



Justin Sterger
Senior Water Quality Permit Writer

ec: Sheldon Price, City of Cascade Locks
Mike Hiatt, DEQ
Shane Cossel, DEQ
DEQ Operator Certification
Water Quality Data Team
DEQ Enforcement Section - OCE