



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

4026 Fairview Industrial Dr SE

Salem, OR 97302

(503) 378-8240

FAX (503) 373-7944

TTY 711

August 7, 2024

Steve Nipp, Facility Manager
Reworld Marion
4850 Brooklake Road NE
Salem, OR 97305

Re: Warning Letter with Opportunity to Correct
Reworld Marion, Inc.
2024-WLOTC-9479
NPDES Permit #101240, EPA ID OR0031305
File 89638
WQ-Marion County

Dear Mr. Nipp,

On July 15, 2024, DEQ conducted a compliance evaluation inspection of the Reworld Marion wastewater treatment process. The purpose of the inspection was to determine compliance with the conditions of National Pollution Discharge Elimination System permit number 101240, issued to Covanta Marion, Inc. on February 23, 2022. The findings are summarized below. I have enclosed a copy of the inspection report checklist that provides additional information.

Records Review

I reviewed records from June 2021 through June 2024. Reworld Marion has submitted all monthly discharge monitoring reports (DMR) on time in NetDMR. Based upon this review, DEQ has concluded that Reworld Marion is responsible for the following violations.

Schedule B Violations

1. Schedule B, item 2e of your NPDES permit requires Reworld Marion to develop and implement a written Quality Assurance Plan. Not having a plan is a Class II violation per OAR 340-012-0055(2)(a).

Requested Corrective Actions:

By **October 15, 2024**, please submit documentation that the following issues have been corrected:

1. Develop and implement a written Quality Assurance/Quality Control plan that details the facility sampling procedures, equipment calibration and maintenance, analytical methods, quality control activities and laboratory data handling and reporting. The

QA/QC program must conform to the requirements of 40 CFR 136.7 and include the following:

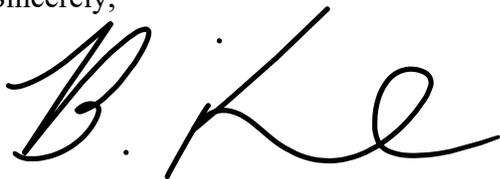
- a. pH: The three-point calibration of the pH meter must be documented. This calibration must be completed before each pH monitoring episode.
 - b. Chlorine: A chlorine standard solution must be used to calibrate the Hach meter.
 - c. Temperature: The thermometer within the pH meter must be calibrated annually.
2. Demonstrate that Reworld Marion understands how to report pH as required by the permit by accurately reporting in Aug and Sep 2024.
 - a. Daily Data Attachment for NetDMR should show a daily minimum pH and a daily maximum pH for every 24-hour day of the month.
 3. Correct NetDMR entries for any pH excursions reported in the past 36 months as shown in the Attachment 1 below.
 4. Provide DEQ with a copy of the Emergency Response and Public Notification Plan as listed in Schedule D of the permit and detailed in Schedule F Section B7.
 5. Provide DEQ with a copy of the Spill/Emergency Response Plan as listed in Schedule D of the permit.

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,

A handwritten signature in black ink, appearing to read 'B. Kuiken', with a stylized flourish at the end.

Brenda Kuiken
WQ Compliance Specialist

cc: DEQ Salem Office file

cc: Ranei Nomura, Manager, Western Region DEQ
Oregon Records Management Solution
Elizabeth Bobe, Environmental Specialist

Attachment 1 – pH Excursion Corrections in NetDMR

I cannot tell from the submitted DDA if the excursion was below 6.0 or above 9.0 SU. Both the daily minimum and daily maximum need to be verified and possibly corrected to accurately reflect the data for the following months:

Apr 2022
Dec 2022
May 2023
Jun 2023
Jul 2023
Nov 2023
Jan 2024
Jun 2024