



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

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TTY 711

September 9, 2024

Chris Taylor, Hydro Generation Supervisor
Eugene Water and Electric Board
4200 Roosevelt Blvd.
Eugene, OR 97402-6520

Re: Warning Letter
EWEB Carmen-Smith
2024-WL-9528
NPDES Permit #101329, EPA ID OR0000680
File 28393
WQ-Linn County

Dear Mr. Taylor,

DEQ has completed a records review for EWEB Carmen-Smith to determine compliance with the conditions of National Pollution Discharge Elimination System permit number 101329, issued to Eugene Water and Electric Board, on November 22, 2021. The findings are summarized below.

Records Review

I reviewed records from August 2021 through July 2024. EWEB has submitted all monthly discharge monitoring reports (DMR) on time in NetDMR.

Schedule A Violations

1. Schedule A Item 1d Table A-4 of the permit requires EWEB to meet pH limits. EWEB failed to meet those limits in July 2022 as listed below. Violating pH limits is a Class III violation if the discharge is outside the permitted pH range by 1 pH unit or less per OAR 340-012-0055(3)(b). Failing to meet the pH limit as required by the permit is a violation of the permit.

Monitoring Period	Parameter	Reported Value	Over/Under Limit by how much?	Violation Class
July 27, 2022	pH, Trail Bridge Sump Water (002B-B)	5.0	<1	III

Schedule B Violations

1. Schedule B Table B2 and Table B3 of the permit requires EWEB to monitor temperature on a weekly basis year-round. EWEB failed to monitor temperature at all four outfalls for the week of May 19, 2024. Failing to collect all monitoring data required in Schedule B of the permit is a Class I violation per OAR 340-012-0055(1)(o).
2. Schedule B Table B1 of the permit requires EWEB to submit an Oil and Grease Best Management Practices and Environmentally Acceptable Lubricants Annual Report by January 15 of each year. EWEB submitted this report in August 2024. Failing to timely submit a report or plan as required by permit is a Class II violation per OAR 340-012-0055(2)(b).

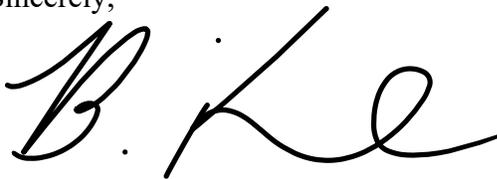
Class I violations are the most serious violations; Class III violations are the least serious. Compliance with your permit is required by Oregon Revised Statute 468B.025(2).

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 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

cc: Ranei Nomura, Manager, Western Region DEQ
Oregon Records Management Solution
Andrew Janos, Senior Environmental Specialist