



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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August 29, 2024

Greg Geist
Director
Water Environment Services,
150 Beavercreek Rd Ste 430
Oregon City, OR 97045-4302

**RE: Pre-Enforcement Notice.
PEN # 2024-PEN-8987
Water Environment Services - Hoodland Sewage Treatment Plant
File #39750/ Permit #100962/ EPA ID OR0031020
Clackamas County**

Dear Mr. Geist:

We have received and reviewed reports submitted for exceedences of the daily maximum and monthly average Residual Chlorine limit, and the E coli limit in the National Pollutant Discharge Elimination System (NPDES) permit for the Hoodland Sewage Treatment Plant (#100962). These include the Discharge Monitoring Report for December 2023, January, March and July of 2024, and Noncompliance Reporting forms submitted for December 12, 2023 (revised Jan 3, 2024), for January 9, 2024, and for March 28 and 29, 2024. Also, the Noncompliance Reporting form submitted July 26 for the E coli exceedence on July 20, 2024. These reports state the following:

On December 12, 2023, at 9:35 am plant operations staff completed the regular chlorine residual monitoring at the effluent sampling location. The sample result was a 0.64 mg/L. Hoodland staff discovered an obstruction of the bi-sulfite dechlorination delivery system and subsequently repaired the system. At 10:17 am, the effluent residual was re sampled and the sample result was < 0.05 mg/L. DEQ was notified on December 12, 2023.

On January 9, 2024 staff measured 0.36 mg/l residual chlorine in the effluent. This occurred after a large rain event. WES found that the chlorine and bi-sulfite dosing systems were operating correctly but programming needed to be adjusted to correctly dose the chemicals during large rain events. The January 2024 DMR reported the Total residual chlorine monthly average was 0.06 mg/L.

On March 28, 2024, a facility alarm indicated a fault at the disinfection system related to hypochlorite usage. At 4:20 am an E coli test showed a result of >2420 cfu/100ml. At 10:40 am E coli testing showed that the effluent E coli was 46 cfu/100ml (back in compliance).

OERS report 2024-1818 filed July 22, 2024 by Water Environment Services reported that as much as 350,000 gallons of undisinfected water was released from the Hoodland STP into the Sandy River.

Facility personnel discovered low residual chlorine and inadequate disinfection at approximately 10:00 am on July 20 2024. This was caused by a failure of the chlorine dosing system. The exact time of the failure is not known, but it was sometime after 9:00 am on July 19. No alarms were triggered. An E.coli sample was collected to verify the lack of disinfection with results at >2420 cfu/100ml. Another sample was collected for E.coli at 4:00 PM, with results at 1300 cfu/100ml (results at 7:07 pm on July 21). A third sample collected July 22 resulted in 19 MPN.

Based upon this information, the DEQ has concluded that the Hoodland Sewage Treatment Plant is responsible for the following violations of Oregon environmental law:

VIOLATIONS:

Oregon Revised Statute (ORS) Chapter 468B.025(2) provides that no person shall violate conditions of a waste discharge permit.

1. Schedule A, Condition 1 limits daily maximum Residual Chlorine to 0.04 mg/l.
 - a. The December 2023 DMR reported a daily maximum Residual Chlorine of 0.64 mg/l. This is a 1500% exceedance. This is a Class 1 violation of the permit.
 - b. The January 9, 2024 DMR reported a daily maximum Residual Chlorine of 0.36 mg/l. This is an 800% exceedance. This is a Class 1 violation of the permit.
2. Schedule A, Condition 1 limits monthly average Residual Chlorine to 0.02 mg/l.
 - a. The December 2023 DMR reported a monthly average Residual Chlorine of 0.08 mg/l. This is a 300% exceedance. This is a Class 1 violation of the permit.
 - b. The January 2024 DMR reported a monthly average Residual Chlorine of 0.06 mg/l. This is a 200% exceedance. This is a Class 1 violation of the permit.
3. Schedule A, Condition 1 limits any single E coli sample to 406 cfu/100ml
 - a. The March 2024 DMR reported an E. coli daily maximum concentration of >2420 cfu/100mL. This is greater than five times the limit and is a Class 2 violation of the permit.
 - b. The July 2024 DMR reported an E. coli daily maximum concentration of >2420 cfu/100mL. This is greater than five times the limit and is a Class 2 violation of the permit.

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

The violations cited above posed the risk of significant environmental harm and the matter is being referred to the Department's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of civil penalties and/or a Department order. A formal enforcement action may include a civil penalty assessment for each day of violation.

If you believe any of the facts in this letter are in error, you may provide information to me at the address shown at the top of this letter. I will consider any new information you submit and take appropriate action. Please submit any additional information by September 16, 2024

DEQ wants to help you comply with your permit conditions and limits. If you have any questions about this letter's content, please contact me preferably via email at randall.bailey@deq.oregon.gov but alternately in writing or over the phone at 503-229-5019, or 971-275-8446.

Sincerely,

A handwritten signature in cursive script that reads "Randall Bailey".

Randall Bailey
Northwest Region, Water Quality Source Control Section

Ecc: Office of Compliance and Enforcement
Tiffany Yelton Bram, DEQ Northwest Region Water Quality Manager