



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

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Salem, OR 97302

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TTY 711

December 11, 2024

Jennifer Hayward, Director of Facilities Management and Planning
Lane Community College
4000 East 30th Avenue
Eugene, OR 97406

Re: Pre-Enforcement Notice
Lane Community College
2024-PEN-9746
NPDES Permit #102116, EPA ID OR0026875
File 48854
WQ-Lane County

Dear Ms. Hayward,

DEQ has completed a records review for Lane Community College to determine compliance with the conditions of National Pollution Discharge Elimination System permit number 102116, issued to Lane Community College, on January 29, 2001. The findings are summarized below.

Records Review

I reviewed records from January 2020 through November 2024. Lane Community College has submitted all monthly discharge monitoring reports (DMR) on time in NetDMR.

Schedule A Violations

Lane Community College is required to meet BOD₅ loading limits as listed in Schedule A of the permit. Lane Community College violated the following permits limits. The class of these violations is determined by OAR 340-012-0055(1)(k) and 340-012-0055(2)(a) as listed in Table 1 below.

Table 1: Schedule A Effluent Limit Violations

Monitoring Period	Limit	Reported or Corrected Value	Percentage Over Limit	Violation Class
February 2024	Monthly average	50	43%	II
February 16, 2024	Daily maximum	84.1	20%	II
Week of Feb 11, 2024	Weekly average	84.1	59%	I

Schedule B Violations

Lane Community College violated the following monitoring and reporting requirements in Schedule B of the permit. The class of these violations is determined by OAR 340-012-0055(1)(o) and OAR 340-012-0055(2)(b) as listed in Table 2 below.

Table 2: Schedule B Monitoring and Reporting Violations

Monitoring Period	Parameter	Monitoring Event Missed	Violation Class
March 30, 2024	Chlorine Residual	Daily maximum	I
March 31, 2024	Chlorine Residual	Daily maximum	I
Calendar Year 2020	I & I	Annual Report	II
Calendar Year 2021	I & I	Annual Report	II
Calendar Year 2023	I & I	Annual Report	II
Calendar Year 2020	Reclaimed Water	Annual Report	II
Calendar Year 2021	Reclaimed Water	Annual Report	II
Calendar Year 2022	Reclaimed Water	Annual Report	II
Calendar Year 2023	Reclaimed Water	Annual Report	II

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).

Required Corrective Actions:

By February 1, 2025, please submit documentation that the following issues have been corrected:

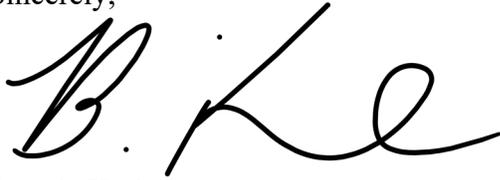
1. Submit I&I reports for 2020-2024.
2. Submit Reclaimed Water annual reports for 2020-2024.

These are serious violations, and they are being referred to DEQ's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of a civil penalty and/or DEQ order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this pre-enforcement 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,

A handwritten signature in black ink, appearing to read 'B. Kuiken'. The signature is fluid and cursive, with a large 'B' and a long, sweeping underline.

Brenda Kuiken
WQ Compliance Specialist

cc: DEQ Salem Office file

ec: Ranei Nomura, Manager, Western Region DEQ
Oregon Records Management Solution