



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
Eastern Region Bend Office  
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TTY 711

January 9, 2025

Mr. David Bolich  
Hydro Extrusions USA, LLC  
2929 West Second Street  
The Dalles, OR 97058

RE: Warning Letter with Opportunity to Correct  
Hydro Extrusions USA, LLC  
2025-WLOTC-9789  
File #53166, NPDES Permit #101759  
Wasco County

Dear Mr. Bolich:

Hydro Extrusions USA (Hydro) discharges non-contact cooling water to the Columbia River under National Pollutant Discharge Elimination System (NPDES) Permit #101759. The renewed NPDES for the facility became effective on October 1, 2021. As part of routine compliance evaluation, DEQ has completed a records review of monthly Discharge Monitoring Reports (DMRs) submitted by the facility and noted violations of specific permit requirements. The documented violations are a failure to comply with the terms and conditions of NPDES permit, which is a violation of ORS 468B.025(2). Please see the below list of violations of the assigned permit.

**Violations: Outfall 001 Effluent Discharge Limit Exceedances for pH**

Schedule A, Condition 1, Table A1 of the Hydro NPDES permit establishes the effluent limits for Outfall 001 discharges to the Columbia River as shown below:

Parameter	Units	Average Monthly	Average Weekly	Daily Maximum
Total Aluminum	mg/L	2.4	N/A	6.9
Thermal Load <sup>a</sup> (July 1 – Oct. 31)	million kcal/day	770	N/A	N/A
Total Residual Chlorine <sup>b</sup>	mg/L	0.04	N/A	0.10
Oil and Grease	mg/L	10	N/A	15
pH <sup>c</sup>	SU	Instantaneous limit between a daily minimum of 6.0 and a daily maximum of 8.5		
Temperature	°C	Instantaneous maximum of 34.6		
Notes:				
a. Refer to Table B3 for formula to calculate Thermal Load discharged.				
b. DEQ has established a minimum Quantitation Limit of 0.05 mg/L for Total Residual Chlorine. In cases where the average monthly or maximum daily limit for Total Residual Chlorine is lower than the Quantitation Limit, DEQ will use the reported Quantitation Limit as the compliance evaluation level.				
c. May not be outside the range of 6.0 to 8.5 for more than a total of 7 hours and 26 minutes in any calendar month, and no individual excursion from this range may exceed 60 minutes.				

The facility failed to meet the required effluent discharge limit for pH on the dates shown in the table below, documented as twenty-one (21) violations of the permit.

### pH - Effluent Limit Exceedances

Permit Limit	Date Observed	Reported Violation	Number of Violations
No individual excursion from 6.0 – 8.5 pH range may exceed 60 minutes	April 2024	pH range excursion > 60 minutes 1 time in month	2 (Class III)
	May 2024		
May not be outside range of 6.0 to 8.5 for more than a total of 446 minutes in any calendar month.	April 2024	pH range excursion monthly total accumulated = 4622 minutes.	2 (Class III)
	May 2024	pH range excursion monthly total accumulated = 19260 minutes.	
Instantaneous limit between a daily minimum of 6.0 and a daily maximum of 8.5	April 27, 2024	Daily Maximum 8.6 S.U.	17 (Class III)
	April 28, 2024	Daily Maximum 8.6 S.U.	
	April 29, 2024	Daily Maximum 8.7 S.U.	
	April 30, 2024	Daily Maximum 8.9 S.U.	
	May 1, 2024	Daily Maximum 9.0 S.U.	
	May 2, 2024	Daily Maximum 9.0 S.U.	
	May 3, 2024	Daily Maximum 9.1 S.U.	
	May 4, 2024	Daily Maximum 9.1 S.U.	

Permit Limit	Date Observed	Reported Violation	Number of Violations
	May 5, 2024	Daily Maximum 9.1 S.U.	
	May 6, 2024	Daily Maximum 9.1 S.U.	
	May 7, 2024	Daily Maximum 9.1 S.U.	
	May 8, 2024	Daily Maximum 9.0 S.U.	
	May 9, 2024	Daily Maximum 9.0 S.U.	
	May 10, 2024	Daily Maximum 8.9 S.U.	
	May 11, 2024	Daily Maximum 8.9 S.U.	
	May 12, 2024	Daily Maximum 8.9 S.U.	
	May 13, 2024	Daily Maximum 8.9 S.U.	

Hydro must ensure that all permit requirements are met, including Schedule A effluent limits. In subsequent sampling, the permittee has demonstrated a return to compliance within pH limits as of the time of this letter issuance – and has replaced the meter that was potentially faulty that provided the high pH results.

Per DEQ’s enforcement guidance, violating a technology based effluent limitation (TBEL) in an NPDES permit if the discharge is outside the permitted pH range by 1 pH unit or less is a Class III violation (OAR 340-012-0055(3)(b)). Class I violations are considered to be the most serious violations; Class III violations are the least serious.

## Violations: Failure to Monitor

Schedule B.3(a), Table B2 of the NPDES permit requires the facility to monitor the Columbia River Intake as shown below:

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type / Required Action <sup>a</sup>	Report Statistic <sup>b</sup>
Flow (50050)	MGD	Year-round	Daily	Metered	Daily Maximum Monthly Average
Temperature (00010)	°C	Year-round	Daily	Continuous/Grab	Daily Maximum
pH (00400)	SU	Year-round	Daily	Continuous/Grab	Monthly Maximum Monthly Minimum
Notes: a. In the event of equipment failure or loss, the permittee must notify DEQ and deploy new equipment to minimize interruption of data collection. If new equipment cannot be immediately deployed, the permittee must perform grab measurements. b. When submitting DMRs electronically, the permittee must submit all data used to determine summary statistics in a DEQ-approved format as a spreadsheet via electronic reporting unless otherwise directed by DEQ. c. If temperature is monitored with grab measurements, the permittee must perform grab measurements between 12 PM and 4 PM.					

The facility reported failing to monitor for intake water pH due to a failed pH probe in October 2024. A replacement probe was installed upon discovery, however, per the permit Table B2, note a, the facility is to perform grab measurements in the event of an equipment failure or loss. These instances are listed in the table below. Failing to collect monitoring data required in Schedule B of the permit is a Class I violation (OAR 340-012-0055(1)(o)). There are four (4) occurrences of this violation.

Parameter	Date	Violation Class	Number of Violations
Intake pH (SU) daily continuous/grab	October 27, 28, 29, 30, 2024	I	4

The City must ensure that all Schedule B monitoring requirements are met and reported to DEQ as required by the assigned permit.

## Violations: Failure to submit complete discharge monitoring reports (DMRs)

DEQ reviewed the discharge monitoring reports for the period of 2024. The facility DMRs that were reviewed contained inconsistencies in reporting as listed below and cannot be considered complete submittals.

- July 2024 DMR:
  - 001-I Monthly average flow reported (0.8 MGD) in NetDMR is not consistent with attached Excel value (0.9 MGD)

Please review and correct the NetDMR submittal or Excel spreadsheet as appropriate. Failure to submit a complete discharge monitoring report is a Class III violation per OAR 340-015-0055(3)(a).

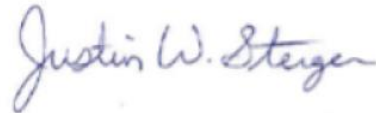
### Corrective Action Required:

- 1) By **February 10, 2025**, revise and resubmit the June 2024 DMR electronically via NetDMR.

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 Department 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) 633-2016.

Sincerely,



Justin W. Sterger  
Senior Water Quality Permit Writer

cc: Mike Hiatt, Eastern Region WQ Permitting Manager  
Alyssa Witt, DEQ Compliance Specialist  
Anna Morgan-Hayes, DEQ Permit Writer  
DEQ Enforcement Section  
Water Quality Data Team

**Appendix I: Letter from Hydro regarding April 2024 and May 2024 pH Exceedances**

## Hydro

May 20, 2024

**Via Electronic Mail**

Justin Sterger  
Senior Water Quality Permit Writer  
Justin.Sterger@deq.state.or.us

HYDRO EXTRUSION USA, LLC – 5 DAY WRITTEN FOLLOW UP TO UPSET CONDITION

Dear Mr. Sterger,

Hydro Extrusion USA, LLC (Hydro), National Pollutant Discharge Elimination System permit number 101759 (the permit), is providing this letter as a follow up to the timely 24 hour notification made on May 14, 2024 per permit condition D5 regarding the upset condition related to the continuous pH (cpH) probe at Outfall 001. The morning of May 14, 2024, during a routine check of the cpH probe at Outfall 001 the cpH probe was found to be reading outside of the permit compliance range of 6-8.5 at approximately 8.7. The probe was unable to be calibrated indicating that the cpH probe had failed. A new cpH probe was immediately installed and calibrated at Outfall 001 and was reading within the permit compliance range at approximately 7.5. Investigation showed that the cpH probe began to read outside of permit parameters at 5:57 PM on April 27, 2024 and continued until a new probe was installed at approximately 8:30 AM on May 14, 2024.

Hydro will continue to maintain critical spares on site for necessary monitoring equipment. Hydro is also further evaluating the ability to make improvements to the monitoring equipment at compliance points so that mobile alerts can be received when potential issues occur.

Hydro continues to take compliance with all applicable regulations seriously, in addition to our commitment to protecting the health and environment of our community. Please feel free to contact me at 570-574-1840 or via email at [dave.bolich@hydro.com](mailto:dave.bolich@hydro.com) if you have questions or need additional information.

Sincerely,



David Bolich JR  
HSE Manager  
Dave.Bolich@hydro.com

**Appendix II: Email from Hydro regarding October 2024 pH probe failure**

**From:** David Bolich <[Dave.Bolich@hydro.com](mailto:Dave.Bolich@hydro.com)>  
**Sent:** Friday, November 1, 2024 9:24 AM  
**To:** STERGER Justin \* DEQ <[Justin.STERGER@deq.oregon.gov](mailto:Justin.STERGER@deq.oregon.gov)>  
**Subject:** Hydro Extrusion USA LLC Notification

Mr. Sterger,

Hydro Extrusion USA, LLC (Hydro) is submitting the following notification and follow up to the voicemail left on 11/1/2024 at approximately 9:20 AM under NPDES Permit 101579 per permit Schedule B, Section 3, Table B2 Columbia River Intake Monitoring Requirements.

On October 31, 2024, at 2:50 PM the continuous pH (cPH) probe at the Columbia River intake monitoring point was observed to be showing a reading of “-2.0” indicating failure of the equipment. The cpH probe was promptly replaced with a spare and was in good working condition at 3:26 PM. The cpH probe failure and data collection interruption occurred from 3:50 AM on October 27, 2024 to 3:26 PM on October 31, 2024 .

The cpH intake probe failure and data collection interruption did not impact effluent discharge monitoring or endanger health or the environment.

Hydro will document the above incident in the CDX Reporting system with the October DMR Submission.

Please reach if there are any further questions.

Thanks,

**David Bolich JR**  
*HSE Manager*

M: [570-574-1840](tel:570-574-1840)  
E: [dave.bolich@hydro.com](mailto:dave.bolich@hydro.com)