



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

January 22, 2025

Lisa Scott, Technical Manager
Cascade Pacific Pulp, LLC
30480 American Drive
Halsey, OR 97348-9750

RE: **Warning Letter with Opportunity to Correct**
Cascade Pacific Pulp, LLC
NPDES permit #101114, EPA ID No. OR0001074
WQ file #36335
WLOC-2025-9809
WQ – Linn County

Dear Lisa Scott:

I recently reviewed the April 2024 and May 2024 discharge monitoring reports for the above referenced facility. Cascade Pacific Pulp, LLC (Permittee) reported violating permit limits for biochemical oxygen demand (BOD). Also, the Permittee failed to include noncompliance reports with the DMRs.

Violations

Effluent Limit Violations

Based on this review, DEQ has concluded that the Permittee is responsible for the following violations of Schedule A of its permit. Class I violations are considered to be the most serious violations; Class III violations are the least serious. Compliance with your permit is required by Oregon Revised Statute 468B.025(2).

Date	Violation	Permit Limit	Type	Percent Over	Class
April 2024	5939 lb/day maximum BOD loading	≤5000 lb/day	TBEL	19%	Class III ¹
May 2024	4931 lb/day maximum BOD loading	≤3700 lb/day	TBEL	33%	Class II ²

Notes:

1. BOD limits are technology based effluent limitations (TBELs). Exceeding a TBEL in an NPDES permit by less than 20 percent is a Class III violation per OAR 340-012-0055(3)(b)(A).
2. BOD limits are TBELs. Exceeding a TBEL in an NPDES permit by 20 percent or more, but less than 50 percent is a Class II violation per OAR 340-012-0055(2)(a)(A).

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Failure to Submit Complete Reports

Schedule F, condition D6 of your NPDES permit requires you to submit a written report of all instances of noncompliance. Submitting an incomplete report is a Class III violation per OAR 340-012-0055(3)(a).

1. The city exceeded BOD loading limits on April 17, 2024 and May 21, 2024 but did not include a complete noncompliance report with the discharge monitoring report.

Environmental Impact of Violations

Biochemical oxygen demand measures the amount of dissolved oxygen that aquatic microorganisms consume over a specific time period. BOD quantifies the mass of organic material in the effluent. Exceeding BOD permit limits can negatively impact stream habitat and aquatic species due to reduced in-stream dissolved oxygen concentrations.

Requested Corrective Action

By February 21, 2025, please submit complete noncompliance reports for each of the violations cited above. A noncompliance report form is available at:

<https://www.oregon.gov/deq/FilterDocs/NoncomplianceReportForm.pdf>

This notice is a warning letter. DEQ does not intend to take formal enforcement action at this time. However, should you fail to submit the requested report 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 may be assessed for each day of violation.

If you believe any of the facts in this notice are in error, you may provide information to me at Kenzie.Billings@deq.oregon.gov by February 21, 2025. I will consider any new information you submit and take appropriate action.

If you have any questions, please contact me in writing, or at 971-344-1055.

Sincerely,



Kenzie Billings, P.E.
Senior Environmental Engineer

cc: compliance folder, DEQ Salem Office file

ecc: Ranei Nomura, Manager, Western Region, DEQ
Cecilia Mitchell, Permit Data Specialist, DEQ
Oregon Records Management Solution