



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

4026 Fairview Industrial Dr SE

Salem, OR 97302

(503) 378-8240

FAX (503) 373-7944

TTY 711

January 31, 2025

Greg Hansen, Manager
Grand Ronde Sanitary District
850 Main Street
Dallas, OR 97338-3128

Re: Pre-Enforcement Notice
Grand Ronde Wastewater Treatment Plant
2025-PEN-9821
NPDES Permit #101429, EPA ID OR0031453
File 100050
WQ-Polk County

Dear Mr. Hansen,

DEQ has completed a records review for the Grand Ronde Sanitary District to determine compliance with the conditions of the National Pollutant Discharge Elimination System permit number 101429 issued by DEQ on November 30, 2010. The findings are summarized below.

Records Review

I reviewed records from November 2019 through December 2024. The district has submitted all monthly discharge monitoring reports (DMR) on time in NetDMR. Based upon this review, DEQ has concluded that the district is responsible for the following violations.

Schedule B Violations

Compliance with your permit is required by Oregon Revised Statute 468B.025(2).

1. Schedule B condition 1 of the permit requires the district to monitor effluent for the items listed and at the frequency listed in condition b. The district failed to monitor for BOD₅, TSS, *E.coli*, and percent removal efficiency during effluent discharge in November 2019. Failure to monitor is a Class I violation per OAR 340-012-0055(1)(o).
2. Schedule B condition 2 of the permit requires the district to report monitoring results. In April 2022 the District failed to report any monitoring conducted at the wastewater treatment facility. Failing to timely submit reports as required by the permit is a Class II violation per OAR 340-012-0055(2)(b).
3. Schedule B condition 1.c of the permit requires the district to monitor for total coliform during recycled wastewater use. The district failed to monitor for total coliform in May 2022. Failing to collect correct monitoring as required by the permit is a Class I violation per OAR 340-012-0055(1)(o).

Schedule F Violations

Schedule F Condition D6 of the permit requires that the permittee must report all instances of noncompliance at the time monitoring reports are submitted. The district failed to submit a noncompliance report for the missed monitoring in April 2022. Failing to timely submit a report as required by permit is a Class II violation per OAR 340-012-0055(2)(b).

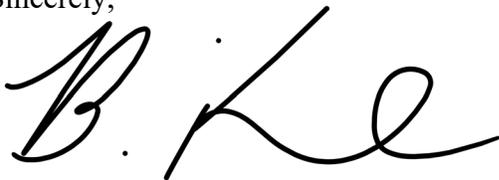
Please note that Class I violations listed in the attached tables are the most serious violations; Class III violations are the least serious.

These are serious violations and, accordingly, 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', with a stylized flourish at the end.

Brenda Kuiken
WQ Compliance Specialist

cc: DEQ Salem Office file

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