



Oregon

Tina Kotek, Governor

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February 5, 2025

Charles Case
Public Works
City of Chiloquin
P.O. Box 196
Chiloquin, OR 97624

RE: Warning Letter with Opportunity to Correct
City of Chiloquin
2025-WLOTC-9828
File #16310, NPDES Permit #101029
Klamath County

Dear Mr. Case:

The City of Chiloquin operates a domestic wastewater treatment plant and discharges treated effluent to the Williamson River under National Pollutant Discharge Elimination System (NPDES) Permit #101029. DEQ conducts routine reviews of permit compliance and has completed a review of discharge monitoring reports (DMRs) provided by the City as required by Schedule B of the assigned permit.

Based on this review, DEQ has concluded that the City of Chiloquin is responsible for the following twenty-four (25) violations of your NPDES permit and Oregon environmental law. With each violation, the facility failed to comply with the terms and conditions of NPDES Permit #101029, which is a violation of ORS 468B.025(2).

Violations: Incomplete DMRs

The facility DMRs submitted for the period of January 2023 to December 2024 were reviewed. DEQ compliance staff have identified instances each reviewed month of inaccurate reporting (**see the attached Appendix I**). Failure to submit a complete discharge monitoring report is a Class III violation per OAR 340-012-0055(3)(a).

Each DMR will need to be reviewed, corrected by the City and resubmitted in accordance with DEQ's NetDMR User's Guidance: [WQP-guide-NETDMR-Useguide.pdf](#)

Violation: Effluent Limit Discharge Exceedance

The city's NPDES permit contains effluent limitations required for the treated water discharged to the Williamson River. Schedule A, Table A3 of the permit establishes effluent limits for Total Phosphorus in the facility discharge for Outfall 001. The limit table is shown below:

Table A3: Limits for Additional Parameters

Year-round	Limits
<i>E. coli</i> Bacteria (see Note a.)	Monthly geometric mean must not exceed 126 organisms per 100 ml. No single sample may exceed 406 organisms per 100 ml.
pH	Must not be outside the range of 6.0 to 9.0 S.U.
Total Residual Chlorine	Must not exceed a maximum daily limit of 0.27 mg/l. Must not exceed an average monthly limit of 0.21 mg/l.
Total Phosphorus (see Note b.)	Must not exceed an annual average of 730 lbs/year.
Notes:	
a. No single <i>E. coli</i> sample may exceed 406 organisms per 100 mL; however, DEQ will not cite a violation of this limit if the permittee takes at least 5 consecutive re-samples at 4 hour intervals beginning within 28 hours after the original sample was taken and the geometric mean of the 5 re-samples is less than or equal to 126 <i>E. coli</i> organisms/100 mL. b. The total annual discharge of total phosphorus shall be the annual average daily discharge of total phosphorus multiplied by 365 days. Daily phosphorus load should be calculated using the average daily flow rate (mgd) x effluent concentration (mg/L) x 8.34 using the average daily flow on the date of sampling.	

The Total Phosphorus limit is a water-quality based effluent limit (WQBEL) in the NPDES permit based upon a waste load allocation under the TMDL (total maximum daily load) established for the Upper Klamath Lake subbasin, the Williamson River subbasin, and the Sprague River subbasin.

Table 1: Total Phosphorus – Annual Average Exceedance

Date Reported	Reported Value – Annual Average	Permit Limit – Annual Average
May 2023	757.0 lbs/year	730.0 lbs/year

The reason for the phosphorus exceedance was not given but could be due to the aging wastewater treatment plant, which is planned to be replaced. Per DEQ's enforcement guidance, violating a water quality-based effluent limitation is a Class I violation (OAR 340-012-0055(1)(I)). Class I violations are considered to be the most serious violations; Class III violations are the least serious.

CORRECTIVE ACTIONS REQUIRED

1. **By March 7, 2025**, amend and resubmit the incomplete DMRs identified in Violation #1 for each of the issues noted in Appendix I. Future DMR submittals must be completed on-time and with complete and accurate reporting information.

Each DMR will need to be reviewed, corrected by the City and resubmitted in accordance with DEQ's NetDMR User's Guidance: [WQP-guide-NETDMR-Useguide.pdf](#).

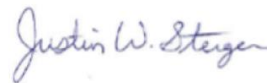
See Appendix II and the attached Excel Template for correction of the 7-day rolling average reporting for temperature-thermal load as required by your permit.

Upon resubmittal of the DMRs, confirm in writing to DEQ by email to justin.sterger@deq.oregon.gov that the amendments have been completed. DEQ will review the resubmittals and if additional violations are identified will follow-up with additional correspondence.

This notice is a warning letter. DEQ does not intend to take formal enforcement action at this time provided the corrective actions are completed by the deadline provided in this letter. However, should you repeat any of these violations, or fail to complete the required corrective actions, 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 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) 714-0206.

Sincerely,



Justin W. Sterger
Senior Water Quality Permit Writer

cc: Mike Hiatt, DEQ
Fred Jackson, City of Chiloquin
Alyssa Witt, DEQ
DEQ Water Quality Data Team
Oregon Records Management System

Appendix I: DMR Review – List of issues and corrections

- January 2023 DMR:
 - 001-A Effluent/RW max 7D average temperature monitoring reported vs xlsx ss inconsistent, *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (9.0/8.0mg/L) not consistent w/xlsx ss values (10.0/11.0mg/L) *possible confusion between conc/load
 - 001-A Effluent BOD load monthly/weekly avg reported (5.7/11.0lb/day) not consistent w/xlsx ss values (9.0/10.4lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (12.9/14.3mg/L) not consistent w/xlsx ss values (14.3/17.0mg/L)
 - 001-A Effluent TSS load monthly/weekly avg reported (9.2/17.0lb/day) not consistent w/xlsx ss values (12.9/15.6lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-A Effluent Thermal load *verify formula/calculation on xlsx ss
- February 2023 DMR:
 - 001-A Effluent temp daily max reported (50.8°F) not consistent w/xlsx ss value (51.7°F)
 - 001-A Effluent temp max 7D avg reported (49.1°F) not consistent w/xlsx ss value (50.7°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (38.1°F) not consistent w/xlsx ss value (39.0°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc weekly avg reported (7.1mg/L) not consistent w/xlsx ss value (14.0mg/L) *possible confusion between conc/load, weekly avg report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly avg/daily max reported (10.0/14.0lb/day) not consistent w/xlsx ss values (7.1/8.4lb/day)
 - 001-A Effluent TSS conc weekly avg reported (8.9mg/L) not consistent w/xlsx ss value 17.0mg/L) *possible confusion between conc/load
 - 001-A Effluent TSS load monthly avg/daily max reported (13.0/17.0lb/day) not consistent w/xlsx ss values (8.9/12.1lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-A Effluent Thermal load *verify formula/calculation on xlsx ss
- March 2023 DMR:
 - 001-G Influent BOD conc monthly avg reported (12.6mg/L) not consistent w/xlsx ss value (287.0mg/L)
 - 001-A Effluent temp daily max reported (51.6°F) not consistent w/xlsx ss value (51.3°F)
 - 001-A Effluent temp max 7D avg reported (48.4°F) not consistent w/xlsx ss value (49.6°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (37.7°F) not consistent w/xlsx ss value (38.6°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly avg reported (10.0mg/L) not consistent w/xlsx ss value (12.6mg/L)
 - 001-A Effluent BOD load daily max reported (5.9lb/day) not consistent w/xlsx ss value (17.2lb/day)
 - 001-A Effluent TSS conc weekly avg reported (14.0mg/L) not consistent w/xlsx ss value (20.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (10.8/9.9lb/day) not consistent w/xlsx ss values (14.0/21.5lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-Q Effluent Q1 quarterly ammonia and phosphorous totals reported, sampled in January, results reported (17.2/1.42mg/L) not consistent with xlsx ss values (11.2/2.1mg/L), *P conc/load value duplicate load not calculated/no sample date to match w/flow value – request lab results
- April 2023 DMR:
 - 001-A Effluent temp max 7D avg reported (48.7°F) not consistent w/xlsx ss value (50.9°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (49.5°F) not consistent w/xlsx ss value (46.1°F) *confirm ss 7D avg calculations

- 001-A Effluent BOD conc monthly/weekly avg reported (6.7/8.0mg/L) not consistent w/xlsx ss values (8.0/11.0mg/L)
- 001-A Effluent BOD load monthly avg/daily max reported (9.2/3.6lb/day) not consistent w/xlsx ss values (6.7/9.2lb/day)
- 001-A Effluent TSS conc weekly avg reported (8.5mg/L) not consistent w/xlsx ss value (14.0mg/L)
- 001-A Effluent TSS load monthly avg/daily max reported (14.0/6.0lb/day) not consistent w/xlsx ss values (8.5/10.0lb/day)
- 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- May 2023 DMR:
 - 001-B Effluent Phosphorous annual avg exceedance – 757.0lb/day reported, 730.0lb/day limit (4% exceedance) ***permit limit violation**
 - 001-A Effluent temp daily max reported (48.5°F) not consistent w/xlsx ss value (62.8°F)
 - 001-A RW temp max 7D avg reported (47.1°F) not consistent w/xlsx ss value (52.8°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc weekly avg reported (9.8mg/L) not consistent w/xlsx ss value (13.0mg/L) *weekly avg report max weekly value when sampling once/week
 - 001-A Effluent BOD load daily max reported (13.0lb/day) not consistent w/xlsx ss value (9.8lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (10.8/11.4mg/L) not consistent w/xlsx ss values (15.6/20.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (8.0/13.0lb/day) not consistent w/xlsx ss values (11.4/15.0lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- June 2023 DMR:
 - 001-A Effluent temp max 7D avg reported (61.6°F) not consistent w/xlsx ss value (62.7°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (53.3°F) not consistent w/xlsx ss value (57.8°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (6.8/9.0mg/L) not consistent w/xlsx ss values (9.0/11.0mg/L) *weekly avg report max weekly value when sampling once/week
 - 001-A Effluent BOD load daily max reported (4.3lb/day) not consistent w/xlsx ss value (6.8lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (9.5/11.0mg/L) not consistent w/xlsx ss values (14.3/16.0mg/L)
 - 001-A Effluent TSS load monthly/weekly avg reported (14.3/16.0lb/day) not consistent w/xlsx ss values (9.5/10.9lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-Q Effluent Q2 quarterly ammonia and phosphorous totals reported, sampled in April *P conc/load value duplicate load not calculated/no sample date to match w/flow value
- July 2023 DMR:
 - 001-A RW temp max 7D avg reported (64.2°F) not consistent w/xlsx ss value (53.7°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc weekly avg reported (8.1mg/L) not consistent w/xlsx ss value (17.0mg/L) *weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load daily max/weekly avg reported (6.0/17.0lb/day) not consistent w/xlsx ss values (10.3/10.3lb/day)
 - 001-A Effluent TSS conc weekly avg reported (10.6mg/L) not consistent w/xlsx ss value (18.0mg/L)
 - 001-A Effluent TSS load monthly/weekly avg/daily max reported (18.0/18.0/14.0lb/day) not consistent w/xlsx ss values (10.6/11.5/11.5lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- August 2023 DMR:
 - 001-A Effluent temp max 7D avg reported (64.8°F) not consistent w/xlsx ss value (65.4°F) *confirm ss 7D avg calculations

- 001-A RW temp max 7D avg reported (64.8°F) not consistent w/xlsx ss value (56.0°F) *confirm ss 7D avg calculations
- 001-A Effluent BOD conc monthly/weekly avg reported (7.9/5.5mg/L) not consistent w/xlsx ss values (12.0/15.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
- 001-A Effluent BOD load monthly avg/daily max reported (12.0/9.0lb/day) not consistent w/xlsx ss values (7.9/10.4lb/day)
- 001-A Effluent TSS conc monthly/weekly avg reported (6.4/8.1mg/L) not consistent w/xlsx ss value (12.4/16.0mg/L)
- 001-A Effluent TSS load monthly avg/daily max reported (12.4/10.0lb/day) not consistent w/xlsx ss values (8.1/11.1lb/day)
- 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- September 2023 DMR:
 - 001-A RW temp max 7D avg reported (62.7°F) not consistent w/xlsx ss value (54.1°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (12.6/10.1mg/L) not consistent w/xlsx ss values (15.3/18.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly/weekly avg/daily max reported (15.3/18.0/14.0lb/day) not consistent w/xlsx ss values (10.1/12.6/12.6lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (8.5/10.3mg/L) not consistent w/xlsx ss values (13.0/16.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (13.0/11.0lb/day) not consistent w/xlsx ss values (8.5/10.3lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-Q Effluent Q3 quarterly ammonia and phosphorous totals reported, sampled in July *P conc/load value duplicate load not calculated/no sample date to match w/flow value
- October 2023 DMR:
 - 001-A Effluent temp max 7D avg reported (58.7°F) not consistent w/xlsx ss value (61.7°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (61.3°F) not consistent w/xlsx ss value (49.9°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc weekly avg reported (9.3mg/L) not consistent w/xlsx ss value (16.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly avg/daily max reported (16.0/10.0lb/day) not consistent w/xlsx ss values (9.3/10.9lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (8.6mg/L) not consistent w/xlsx ss value (15.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (10.0/15.0lb/day) not consistent w/xlsx ss values (8.6/10.3lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- November 2023 DMR:
 - 001-A Effluent temp daily max reported (57.2°F) not consistent w/xlsx ss value (59.1°F)
 - 001-A Effluent temp max 7D avg reported (59.1°F) not consistent w/xlsx ss value (57.3°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (7.7/9.2mg/L) not consistent w/xlsx ss values (13.8/16.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly/weekly avg/daily max reported (13.8/16.0/10.0lb/day) not consistent w/xlsx ss values (7.7/9.2/9.2lb/day)
 - 001-A Effluent TSS conc weekly avg reported (8.3mg/L) not consistent w/xlsx ss value (18.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (18.0/12.0lb/day) not consistent w/xlsx ss values (8.3/9.8lb/day)

- 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- December 2023 DMR:
 - 001-A Effluent temp daily max reported (50.7°F) not consistent w/xlsx ss value (53.7°F)
 - 001-A Effluent temp max 7D avg reported (49.4°F) not consistent w/xlsx ss value (52.1°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (41.5°F) not consistent w/xlsx ss value (41.9°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (6.7/5.7mg/L) not consistent w/xlsx ss values (11.8/15.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly avg/daily max reported (11.8/9.0lb/day) not consistent w/xlsx ss values (6.7/8.6lb/day)
 - 001-A Effluent TSS conc weekly avg reported (7.1mg/L) not consistent w/xlsx ss value (15.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (15.0/15.0lb/day) not consistent w/xlsx ss values (7.1/8.2lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-Q Effluent Q4 quarterly ammonia and phosphorous totals reported, values not consistent w/xlsx ss values, sampled in October *P conc/load value duplicate load not calculated/no sample date to match w/flow value

- January 2024 DMR:
 - 001-A ETL daily max exceedance reported, 16.3Mkcal/day reported, 11.1Mkcal/day limit (47% exceedance) ***permit limit violation – need to confirm formula/calculation**
 - 001-A Influent BOD/TSS conc monthly avg reported (13.2/11.7mg/L) not consistent w/xlsx ss values (253/250mg/L)
 - 001-A Effluent temp max 7D avg reported (50.1°F) not consistent w/xlsx ss value (52.4°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (41.8°F) not consistent w/xlsx ss value (42.0°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (12.6/12.6mg/L) not consistent w/xlsx ss values (13.2/19.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly avg/daily max reported (13.2/9.0lb/day) not consistent w/xlsx ss values (12.6/21.4lb/day)
 - 001-A Effluent TSS conc weekly avg reported (11.7mg/L) not consistent w/xlsx ss value (16.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (16.0/11.0lb/day) not consistent w/xlsx ss values (11.7/16.9lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- February 2024 DMR:
 - 001-A Effluent temp max 7D avg reported (52.1°F) not consistent w/xlsx ss value (51.2°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (41.8°F) not consistent w/xlsx ss value (41.4°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc weekly avg reported (13.7mg/L) not consistent w/xlsx ss value (15.0mg/L) *weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly avg/daily max reported (12.0/15.0lb/day) not consistent w/xlsx ss values (13.7/18.8lb/day)
 - 001-A Effluent TSS conc weekly avg reported (15.9mg/L) not consistent w/xlsx ss value (18.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (11.0/18.0lb/day) not consistent w/xlsx ss values (15.9/25.1lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- March 2024 DMR:

- 001-A Effluent temp daily max reported (50.5°F) not consistent w/xlsx ss value (52.3°F)
- 001-A Effluent BOD load monthly avg/daily max reported (9.0/15.0lb/day) not consistent w/xlsx ss values (13.0/18.5lb/day)
- 001-A Effluent BOD conc. weekly avg max reported (13 mg/L) not consistent w/xlsx ss values (15 mg/L)
- 001-A Effluent TSS load monthly avg/daily max reported (13.0/17.0lb/day) not consistent w/xlsx ss values (16.7/25.5lb/day)
- 001-A Effluent TSS conc weekly avg reported (16.7mg/L) not consistent w/xlsx ss value (17.0mg/L)
- 001-Q Effluent Q1 quarterly ammonia and phosphorous totals reported. Samples taken in January. Phosphorus load value not calculated in xlsx ss; no sample date given to match flow value for calculation.
- April 2024 DMR:
 - 001-A Effluent temp daily max reported (54.5°F) not consistent w/xlsx ss value (57.1°F)
 - 001-A Effluent temp max 7D avg reported (51.5°F) not consistent w/xlsx ss value (57.1°F)
 - 001-A RW temp max 7D avg reported (44.5°F) not consistent w/xlsx ss value (45.8°F)
 - 001-A Effluent BOD conc weekly avg reported (12.0mg/L) not consistent w/xlsx ss value (16.0mg/L)
 - 001-A Effluent BOD load monthly avg reported (16.0lb/day) not consistent w/xlsx ss values (10.4lb/day)
 - 001-A Effluent TSS load monthly avg/daily max reported (19.0/19.0lb/day) not consistent w/xlsx ss values (11.8/14.3lb/day)
 - 001-A Effluent TSS conc weekly avg reported (11.8mg/L) not consistent w/xlsx ss value (19.0mg/L)
- May 2024 DMR:
 - 001-A Effluent temp daily max reported (55.3°F) not consistent w/xlsx ss value (57.8°F)
 - 001-A RW temp max 7D avg reported (45.8°F) not consistent w/xlsx ss value (46.9°F)
 - 001-A Effluent temp max 7D avg reported (56.8°F) not consistent w/xlsx ss value (57.8°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (13.2/7.0lb/day) not consistent w/xlsx ss values (11.8/13.0lb/day)
 - 001-A Effluent BOD conc weekly avg reported (9.9mg/L) not consistent w/xlsx ss value (18.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (13.0/10.0lb/day) not consistent w/xlsx ss values (8.8/10.8lb/day)
 - 001-A Effluent TSS conc weekly avg reported (8.8mg/L) not consistent w/xlsx ss value (13.0mg/L)
- June 2024 DMR:
 - 001-A RW temp max 7D avg reported (52.9°F) not consistent w/xlsx ss value (51.5°F)
 - 001-A Effluent temp max 7D avg reported (65.5°F) not consistent w/xlsx ss value (64.6°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (12.3/9.0lb/day) not consistent w/xlsx ss values (8.2/10.3lb/day)
 - 001-A Effluent BOD conc weekly avg reported (8.2mg/L) not consistent w/xlsx ss value (15.0mg/L)
 - 001-A Effluent BOD load weekly avg reported (15.0lb/day) not consistent w/xlsx ss value (10.3lb/day)
 - 001-A Effluent TSS load monthly avg/daily max reported (11.0/8.0lb/day) not consistent w/xlsx ss values (7.4/10.7lb/day)
 - 001-A Effluent TSS conc weekly avg reported (7.4mg/L) not consistent w/xlsx ss value (16.0mg/L)
 - 001-A Effluent TSS load weekly avg reported (16.0lb/day) not consistent w/xlsx ss value (10.7lb/day)
 - 001-Q Effluent Q2 quarterly ammonia and phosphorous totals reported. Samples taken in April. Phosphorus load value not calculated in xlsx ss; no sample date given to match flow value for calculation.
- July 2024 DMR:
 - 001-A Effluent temp max 7D avg reported (64.2°F) not consistent w/xlsx ss value (66.9°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (10.6/7.0lb/day) not consistent w/xlsx ss values (7.1/10.9lb/day)
 - 001-A Effluent BOD conc monthly avg reported (7.1mg/L) not consistent w/xlsx ss value (10.6mg/L)
 - 001-A Effluent BOD load weekly avg reported (15.0lb/day) not consistent w/xlsx ss value (10.9lb/day)
 - 001-A Effluent BOD conc weekly avg reported (10.9mg/L) not consistent w/xlsx ss value (15.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (12.4/9.0lb/day) not consistent w/xlsx ss values (8.3/9.5lb/day).
 - 001-A Effluent TSS conc weekly avg reported (8.3mg/L) not consistent w/xlsx ss value (14.0mg/L)
- August 2024 DMR:
 - 001-A Effluent temp max 7D avg reported (64.5°F) not consistent w/xlsx ss value (66.3°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (12.8/15.0lb/day) not consistent w/xlsx ss values (7.4/9.4lb/day)

- 001-A Effluent BOD conc monthly avg reported (7.4mg/L) not consistent w/xlsx ss value (12.8mg/L)
- 001-A Effluent BOD conc weekly avg reported (7.4mg/L) not consistent w/xlsx ss value (15.0mg/L)
- 001-A Effluent TSS load monthly avg reported (12.3lb/day) not consistent w/xlsx ss values (7.1lb/day).
- 001-A Effluent TSS conc weekly avg reported (7.1mg/L) not consistent w/xlsx ss value (16.0mg/L)
- September 2024 DMR:
 - 001-A Effluent temp max 7D avg reported (62.2°F) not consistent w/xlsx ss value (64.2°F)
 - 001-A Effluent BOD load daily max reported (7.4lb/day) not consistent w/xlsx ss value (9.1lb/day)
 - 001-A Effluent BOD conc monthly/weekly avg reported (8.3/14.0mg/L) not consistent w/xlsx ss values (14.0/15.0mg/L)
 - 001-A Effluent pH daily min/max reported (6.7/6.9 SU) not consistent w/xlsx ss values (6.8/7.2 SU)
 - 001-G Influent pH daily min reported (7.1 SU) not consistent w/xlsx ss value (6.7 SU)
 - 001-A Effluent TSS load daily max reported (6.1lb/day) not consistent w/xlsx ss values (9.9lb/day).
 - 001-A Effluent TSS conc monthly/weekly avg reported (7.9/13.3mg/L) not consistent w/xlsx ss values (13.3/16.0mg/L)
 - 001-Q Effluent Q3 quarterly ammonia and phosphorous totals reported. Samples taken in July. Phosphorus load value not calculated in.xlsx ss; no sample date given to match flow value for calculation.
- October 2024 DMR:
 - 001-A Effluent BOD load monthly avg/daily max reported (13.2/16.0lb/day) not consistent w/xlsx ss values (7.7/10.0lb/day)
 - 001-A Effluent BOD conc monthly/weekly avg reported (10.0/7.7mg/L) not consistent w/xlsx ss values (13.2/16.0mg/L)
 - 001-A Effluent BOD load weekly avg reported (7.7lb/day) not consistent w/xlsx ss value (10.0lb/day)
 - 001-A Effluent TSS load monthly avg/daily max reported (11.6/15.0lb/day) not consistent w/xlsx ss values (6.8/9.4lb/day)
 - 001-A Effluent TSS load weekly avg reported (6.8lb/day) not consistent w/xlsx ss value (9.4lb/day)
 - 001-A Effluent TSS conc weekly avg reported (6.8mg/L) not consistent w/xlsx ss value (15.0mg/L)
- November 2024 DMR:
 - 001-A Effluent temp max 7D avg reported (52.1°F) not consistent w/xlsx ss value (55.1°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (13.0/16.1lb/day) not consistent w/xlsx ss values (8.6/10.4lb/day)
 - 001-A Effluent BOD conc weekly avg reported (8.6mg/L) not consistent w/xlsx ss values (16.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (12.0/15.0lb/day) not consistent w/xlsx ss values (7.8/9.8lb/day)
 - 001-A Effluent TSS conc weekly avg reported (7.8mg/L) not consistent w/xlsx ss values (15.0mg/L)
- December 2024 DMR:
 - 001-A Effluent flow rate reported (0.129 MGD) not consistent w/xlsx ss value (0.126MGD)
 - 001-A Effluent BOD load monthly avg/daily max reported (13.3/15.0lb/day) not consistent w/xlsx ss values (11.1/18.0lb/day)
 - 001-A Effluent BOD conc monthly/weekly avg reported (15.0/11.1mg/L) not consistent w/xlsx ss values (13.3/15.0mg/L)
 - 001-A Effluent BOD load weekly avg reported (11.1lb/day) not consistent w/xlsx ss values (18.0lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (11.7/11.7mg/L) not consistent w/xlsx ss values (14.5/17.0mg/L)
 - 001-Q Effluent Q4 quarterly ammonia and phosphorous totals reported. Sample collected in October. Phosphorus load value not calculated in.xlsx ss; no sample date given to match flow value for calculation.

Appendix II: Email from DEQ staff regarding January 2024 ETL Correction Needed

re: Chiloquin STP / NPDES #101029 / January 2024 DMR - ETL



COSSEL Shane * DEQ
To  c.case44@gmail.com
Cc  STERGER Justin * DEQ

← Reply ← Reply All → Forward  ...

Thu 4/25/2024 12:01 PM

 Follow up. Completed on Thursday, April 25, 2024.

 ETL_Example_Chiloquin.xlsx 22 KB ▾

Hello Charles,

Per our previous conversation, this email is regarding the January 2024 DMR where an Excess Thermal Load (ETL) exceedance was reported and flagged as a violation. I was able to review your ETL calculations and confirm that the daily maximum reported is incorrect and a corrected DMR is required to resolve the flagged violation in NetDMR.

The column on page two of your spreadsheet attachment for Thermal Load to River has the correct formula from the permit to calculate daily ETL, but the Daily thermal limit value is incorrect, and I am unable to see how that value is being calculated. Additionally, it is unclear if the temperature columns on page two used for the ETL formula are running 7-day temperature averages for effluent and the Williamson River, they are the same values entered on page one of the spreadsheet. I attached an Excel example of an ETL calculation method using running 7-day temperature averages for January with the daily max ETL value to report in NetDMR. Feel free to provide the example to the staff who assists you with your Excel template.

Once you've had a chance to look over the attached ETL example, please submit an amended DMR for the January 2024 monitoring period reporting the correct ETL daily maximum to resolve the violation in NetDMR by **Friday, May 10th, 2024**. You will also need to implement changes to your current spreadsheet so that future ETL calculations and resulting daily maximum ETL is reported accurately.

If you have any questions or need assistance submitting corrected DMRs in NetDMR, feel free to contact me directly on my cell at 971-263-1095 or via email. I appreciate your time and assistance, have a good day.

Thanks,



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