



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Eastern Region Bend Office
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February 18, 2025

Morgan Olson, Plant Manager
Kronospan La Grande, LLC
62621 Oregon Hwy 82
La Grande, OR 97850

RE: Pre-Enforcement Notice
Kronospan La Grande, LLC Particleboard Plant
2025-PEN-9837
Permit No. 103044
Union County

Dear Mr. Olson:

Kronospan La Grande, LLC (Kronospan) is authorized to collect, store, and treat stormwater and industrial wastewater effluent for the particleboard plant located in 62621 Oregon Hwy 82, La Grande, Oregon under a Water Pollution Control Facilities (WPCF) permit No. 103044. The permit was renewed and became effective on August 1, 2024. On January 13, 2025, representatives of Kronospan notified DEQ of noncompliance of the WPCF permit since the issuance of the permit, citing a misunderstanding of effective date (Attachment 1).

Schedule B.3, Tables B2 through B4 of the permit provide minimum monitoring requirements at the ROD, Cooling Water, and Process Water Ponds:

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type / Required Action See note b.	Report Statistic See note a.
Inspect pond dike and freeboard	n/a	Year-round	Weekly	Record	Record Observation
pH	Standard Units (SU)	Year-round	Monthly	Grab	Daily Value Monthly Maximum Monthly Minimum
Total Dissolved Solids (see note c.)	mg/L	Year-round	Monthly	Grab	Monthly Average
Manganese (Mn)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Sodium, (Na)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Solids removed	lbs	Upon Removal	Each occurrence	Estimate	Total volume removed

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type/ Required Action See note b.	Report Statistic See note a.
Inspect pond dike and freeboard	n/a	Year-round	Weekly	Record	Record Observation
pH (See note c.)	Standard Units (SU)	May 1 – October 31	2/week	Grab	Daily Value Monthly Maximum Monthly Minimum
		November 1 – April 30	2/month	Grab	Daily Value Monthly Maximum Monthly Minimum
Total Dissolved Solids (TDS)	mg/L	Year-round	Monthly	Grab	Monthly Average
Total Kjeldahl Nitrogen (TKN)	mg/L	Year-round when irrigating	Monthly	Grab	Monthly Average
Nitrate (NO ₃) Plus Nitrite (NO ₂) NO ₃ +NO ₂ -N Nitrogen	mg/L	Year-round when irrigating	Monthly	Grab	Monthly Average
Calcium (Ca)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Iron (Fe)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Magnesium (Mg)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Total Phosphorus (P)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Solids removed	cubic yards of dry weight volume	Upon removal	Each occurrence	Estimate	Record date Estimated volume removed Final destination of solids

Table B4: Process Water Pond Monitoring Requirements

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type/ Required Action	Report Statistic See note a.
Inspect pond dike and freeboard	n/a	Year-round	Weekly	Record	Record Observation
pH (See note b.)	Standard Units (SU)	May 1 – October 31	2/week	Grab	Daily Value Monthly Maximum Monthly Minimum
		November 1 – April 30	2/month	Grab	Daily Value Monthly Maximum Monthly Minimum
Total Dissolved Solids (TDS)	mg/L	Year-round	Monthly when irrigating	Grab	Monthly Average
Total Kjeldahl Nitrogen (TKN)	mg/L	Year-round when irrigating	Monthly when irrigating	Grab	Monthly Average
Nitrate (NO3) Plus Nitrite (NO2) NO ₃ +NO ₂ -N Nitrogen	mg/L	Year-round when irrigating	Monthly when irrigating	Grab	Monthly Average
Solids removed	cubic yards of dry weight volume	Upon Removal	Each occurrence	Estimate	Total volume removed

Based upon review of the memo submitted to DEQ, the Department has concluded that Kronospan is responsible for the following sixty-five (65) violations of Oregon environmental law:

VIOLATIONS:

Monitoring Period	Violation	Class	Number of Violations
Q3 2024, Q4 2024 (2 Quarters)	Kronospan did not collect quarterly Manganese (Mn) from the ROD Pond. Failing to collect monitoring data required in Schedule B of the permit; OAR 340-012-0055(1)(o).	I	2
Q3 2024, Q4 2024 (2 Quarters)	Kronospan did not collect quarterly Sodium (Na) from the ROD Pond. Failing to collect monitoring data required in Schedule B of the permit; OAR 340-012-0055(1)(o).	I	2
Q3 2024, Q4 2024 (2 Quarters)	Kronospan did not collect quarterly Iron (Fe) from the Cooling Water Pond. Failing to collect	I	2

	monitoring data required in Schedule B of the permit; OAR 340-012-0055(1)(o).		
August – December 2024 (5 months)	Kronospan did not collect pH from the cooling water pond required 2/weekly (May – October) and 2/monthly (November – April). Failing to collect monitoring data required in Schedule B of the permit; OAR 340-012-0055(1)(o).	I	27
August – December 2024 (5 months)	Kronospan did not collect pH from the Process Water Pond required 2/weekly (May – October) and 2/monthly (November – April). Failing to collect monitoring data required in Schedule B of the permit; OAR 340-012-0055(1)(o).	I	32


Class I violations are the most serious violations; Class III violations are the least serious.

The violations cited above caused significant environmental harm or posed the risk of significant environmental harm, and the matter is being referred to the Department’s Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of civil penalties and/or a Department order. A formal enforcement action may include a civil penalty assessment for each day of violation.

If you believe any of the facts in this Pre-Enforcement Notice are in error, you may provide written information to me at the address shown at the top of the letter. The Department will consider new information you submit and take appropriate action.

The Department endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter, feel free contact me in writing or by phone at 541-246-4562. In addition, if you desire any follow-up technical assistance, please contact Anna.Morgan-Hayes@deq.oregon.gov.

Sincerely,



Anna Morgan-Hayes
 DEQ Water Quality Permitting & Compliance

ec: Mike Hiatt, DEQ Water Quality Permitting
 Carl Makepeace, DEQ Water Quality Permitting



Attachment 1: Letter of Noncompliance, Kronospan, January 13, 2025

Kronospan La Grande, LLC
Particleboard Plant
62621 Oregon Hwy 82; LaGrande, OR 97850
T 541-962-2100
F 208-452-1982



Dear Mike Hiatt *Water Quality Permitting Manager Eastern region,*

The Kronospan La Grande Facility, as of the date shown upon my signing, is in substantial compliance with the Schedules and Conditions included in WPCF 103044, issued August 1, 2024.

The Kronospan La Grande Facility did not fully comply with the following Schedules and Conditions of WPCF 103044 from August 1, 2024 through December 31, 2024:

- 1) Monitoring and reporting: pH testing twice a month from August 1st to December 31st for our Cooling water pond and Process water ponds. Kronospan at that time was following our old permit and testing pH once a month. Kronospan environmental now understands that pH testing will take place 2/month from November 1-April 30 & 2/week from May 1- October 31.
- 2) Monitoring and reporting: Quarterly reporting ROD pond metals Manganese (Mn) and Sodium (Na). This did not take place on reporting Q3 or Q4.
- 3) Monitoring and reporting: Quarterly reporting CWP (cooling water pond) metals Iron (Fe). This did not take place on reporting Q3 or Q4.

Steps taken to reduce reoccurrence of the noncompliance are:

- 1) Assignment to at least two (2) staff to monitor and assure completion of all monitoring and data collection as well as training of all staff with responsibility to complete and oversee actions.
- 2) Written documentation to me that monitoring required was completed mid-month and before month-end—so time is available to act if needed.
- 3) Review of all monitoring data collected, timely, to ensure compliance with the WPFC Permit and to allow appropriate corrective actions to be taken.

Kronospan acquired this site from Woodgrain on May 22nd 2024. I want to emphasize that many activities were happening throughout the buyout and transition. I hope you consider those factors in your understanding.

X 
Morgan Olson
Plant Manger
Jan 13th 2025

