



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Medford Office

221 Stewart Avenue, Suite 201

Medford, OR 97501

(541) 776-6010

FAX (541) 776-6262

TTY 711

March 11, 2025

Aaron Cubic, Grants Pass City Manager
City of Grants Pass
101 NW A Street
Grants Pass, OR 97526

Re: **PRE-ENFORCEMENT NOTICE**
Grants Pass Water Restoration Plant
2025-PEN-9860
WQ-Josephine County
NPDES Permit 101985/OR0028843
Permit Violation
File 34630

Dear Mr. Cubic:

Background

I have reviewed the monitoring reports submitted for the Grants Pass Water Restoration Plant through February 2025.

Violations

Schedule A

Based upon this review, DEQ has concluded that the City is responsible for the following violation of *Schedule A* of your NPDES permit:

Month Year	Parameter	Limit	Result	Exceedance Amount	Violation Class*
Week of Dec. 22, 2024	TSS Weekly load	2,400 lbs/day	4,679 lbs/day	96%	I ¹
Week of Dec. 29, 2024	TSS Weekly load	2,400 lbs/day	2,983 lbs/day	24%	II ²
December, 2024	TSS Monthly load	1,600 lbs/day	2,077 lbs/day	30%	II ²
December, 2024	TSS percent removal	85% minimum	79.7%	N/A	III ³

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Month Year	Parameter	Limit	Result	Exceedance Amount	Violation Class*
*Notes: <ol style="list-style-type: none">1. Exceeding a TSS limit by 50% or more is a Class I violation per OAR 340-012-0055(1)(k)(A).2. Exceeding a TSS limit by 20% or more, but less than 50% is a Class II violation per OAR 340-012-0055(2)(a)(A).3. Failing to achieve a removal efficiency is a Class III violation per OAR 340-012-0055(3)(c).					

Schedule F

Schedule F, Condition D6 requires the submission of a report for all instances of non-compliance. You may use the form found at:

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

Failure to submit a report as required by your permit is a Class II violation per OAR 340-012-0055(2)(b).

Sanitary sewer overflows (SSOs)

SSOs are discharges not authorized by permit in violation of ORS 458B.050(a). They are Class I violations per OAR 340-012-0055(1)(c). The City has reported the following SSO:

1. December 29th, 2024 – OERS 2024-3328: Redwood pump station bypassed due to high flows. The bypass was open for 19.5 hours, releasing approximately 585,000 gallons of untreated sewage and stormwater to the Rogue River.

Class I violations are the most serious violations; Class III violations are the least serious. Compliance with your permit is required by Oregon Revised Statute 468B.025(2).

Requested corrective action

Upload the completed notice of noncompliance form to NetDMR for your December 2024 NetDMR submission.

Referral for DEQ Formal Enforcement Action

The violations cited above 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 notice 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.

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If you have any questions about this notice or the permit requirements, please contact me at (541) 776-6189.

Sincerely,



E. Andrew Ullrich
Compliance Engineer
Water Quality Division

EAU

cc: Grants Pass WRP, compliance folder, DEQ Medford Office file

ecc: Ranei Nomura, Manager, Western Region, DEQ
Gary Brelinski, Grants Pass Water Restoration Plant Superintendent
Oregon Records Management Solution

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