



# 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

March 13, 2025

Steven Shrewsbury, General Manager  
Best Western Pier Point Inn  
PO Box 2097  
Florence, OR 97439-0137

Re: Inspection Report  
BW Pier Point Inn, LLC  
NPDES Permit #102276, EPA ID OR0028568  
File 69500  
WQ-Lane County

Dear Mr. Shrewsbury,

On February 20, 2025, DEQ conducted a compliance evaluation inspection of the wastewater treatment process for the Best Western Pier Point Inn. The purpose of the inspection was to determine compliance with the conditions of National Pollution Discharge Elimination System permit number 102276, issued by DEQ on June 5, 2020. The findings are summarized below. I have enclosed a copy of the inspection report checklist that provides additional information.

### Records Review

I reviewed records from March 2020 through January 2025. BWPPI has submitted all monthly discharge monitoring reports (DMR) on time in NetDMR except the January 2024 DMR which was submitted 8 days late. This was addressed during the inspection when it was discovered that at that time, Tony Church the Director of Maintenance and the sole individual responsible for submitting the DMRs, was in the hospital. In general, the plant is operated and maintained well.

Based on the inspection of the treatment plant DEQ recommends that the facility make the corrections listed below.

### Requested Corrective Actions:

By October 20, 2025, please submit documentation that the following improvements to the facility plans and procedures are completed:

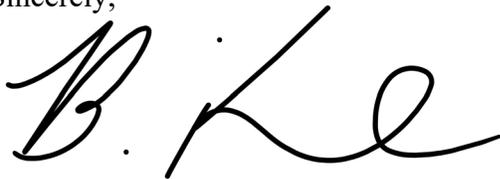
1. Register a second person able to sign and submit DMRs in the absence of Tony.
2. Continue to plan and fund an aeration header project that can be completed in an emergency.
3. Store a copy of all documentation currently in the possession of Delta Operations at the facility. These can be stored electronically but need to be accessible as needed.
  - a. Annual calibration of flow meter.

- b. O&M Manual
  - c. Verification of thermometer.
  - d. At least 3 years of submitted DMRs.
  - e. QA/QC Manual – must contain quality assurance and quality control procedures for any analysis completed on-site including composite sampling setup and handling. Please see the Inspection Report checklist on page 9 of 19 for further information on what needs to be included in the manual.
4. Follow QA/QC guidelines for composite sampler set up and sample holding procedures.
    - a. Temperatures of all samples should be documented before, during and after sample collection to ensure QA measures are met.
    - b. If a refrigerator is used to store samples, the refrigerator temperature must be documented during use.
    - c. Thermometers used in sampling procedures must meet the NIST standards.
  5. Sample containers must be cleaned properly with distilled water.
  6. Buffer for pH sampling need to be changed out on a more frequent basis.
  7. Follow QA/QC guidelines for pH and chlorine residual sampling including using blanks, duplicates and spiked samples.
  8. Chlorine standards should be purchased and kept on site.
  9. Update or develop written procedures for dealing with emergencies for the wastewater treatment facility including procedures for responding to chlorine compound spills and ascorbic acid spills.

There are no violations to be noted at this time and the facility seems to be running as designed.

If you have any questions, please contact me in writing at [brenda.kuiken@deq.oregon.gov](mailto: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  
Tony Church, Director of Maintenance  
Jay Chinn, Chief Engineer  
Mel Stiner, Delta Operations  
Garren Friedmann, Delta Operations