



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

May 9, 2025

James Cleavenger, City Administrator
City of Oakridge
PO Box 1410
Oakridge, OR 97463-1410

Re: Pre-Enforcement Notice
City of Oakridge Wastewater Treatment Plant
2025-PEN-6288605092025
NPDES Permit #102443, EPA ID OR0022314
File 62886
WQ-Lane County

Dear Mr. Cleavenger,

DEQ has completed a records review for the City of Oakridge to determine compliance with the conditions of the National Pollutant Discharge Elimination System permit number 102443 issued by DEQ on May 29, 2007. The findings are summarized below.

Records Review

I reviewed records from July 2022 through December 2024. The city 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 city to monitor effluent for the items listed and at the frequency listed in condition b. The city failed to monitor for CBOD₅, TSS, and ammonia during effluent discharge during the week of October 20 and the week of October 27, 2024. 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 city to report monitoring results. The city failed to submit complete daily data attachment (DDA) for July 2024. Failing to submit complete discharge monitoring reports as required by the permit is a Class III violation per OAR 340-012-0055(3)(a).
3. Schedule B, condition 3a of the permit requires the city to annually report activities completed to identify and reduce inflow and infiltration in the sewage collection system. The city failed to submit the I&I report for calendar year 2022 that was due on February

1, 2023. Failing to timely submit reports as required by the permit is a Class II violation per OAR 340-012-0055(2)(b).

Requested Corrective Actions:

By July 1, 2025, please submit documentation the at the following issues have been corrected:

1. Submit the missing DDA in NetDMR.
2. Submit the I&I report for calendar year 2022.
3. Correct NetDMR entries as indicated in Table 1 below.

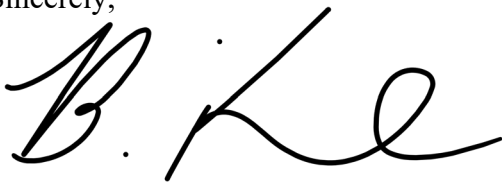
Please note that Class I violations are the most serious violations; Class III violations are the least serious.

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
Clint Whitney, Operator

Table 1 – Incorrect Calculations and Reporting in NetDMR

Monitoring Period	Parameter	Reported Value	Correct Value	Violation Y/N
July 2022	Row R, <i>E. coli</i> , monthly geomean, #/100 mL	#s entered	NODI Code 9	N
Week of Jul 10, 22	Effluent BOD loading, weekly average, lb/d	10.2	11.8	N
Aug 30, 2022	Effluent flow, daily total, MGD	2.09	Unknown	N
August 2022	Effluent TSS loading – all		Unknown	N
August 2022	Effluent flow total, MGD		Unknown	N
August 2022	Row R, <i>E. coli</i> , monthly geomean, #/100 mL	#s entered	NODI Code 9	N
August 2022	Effluent BOD concentration, monthly average, mg/L	5.7	4.4	N
August 2022	Influent BOD concentration, monthly average, mg/L	214.6	124.1	N
November 2022	Row R, <i>E. coli</i> , monthly geomean, #/100 mL	#s entered	NODI Code 9	N
January 18, 23	Effluent pH, daily maximum, SU	6.4	6.8	N
January 2023	Influent TSS concentration, mg/L	72.2	124.9	N
January 2023	Row R, <i>E. coli</i> , monthly geomean, #/100 mL	#s entered	NODI Code 9	N
May 2023	Row R, <i>E. coli</i> , monthly geomean, #/100 mL	#s entered	NODI Code 9	N
Week of June 25, 2023	Effluent TSS loading, weekly average, lb/d	12.4	21.5	N
June 2023	Influent TSS concentration, monthly average, mg/L	124.6	188.1	N
June 2023	Effluent flow, monthly average, MGD	6.712	Unknown	N
Week of Jul 22, 23	Effluent TSS concentration, weekly average, mg/L	8.6	22.2	N
July 2023	Influent TSS concentration, monthly average, mg/L	118.3	191.0	N
Week of Jul 9, 23	Effluent BOD loading, weekly average, lb/d	7.21	8.6	N
Week of Nov 19, 2023	Effluent TSS loading, weekly average, lb/d	25.55	31.9	N
Nov 21, 2023	Effluent TSS loading, daily maximum, lb./d	25.55	31.9	N
December 2023	Effluent TSS concentration, monthly average, mg/L	7.8	5.3	N
Week of Dec 3, 2023	Effluent TSS concentration, weekly average, mg/L	7.8	9.1	N
December 2023	Effluent Flow, monthly average, MGD	24.951	0.8	N
Dec 11, 2023	Effluent flow, daily maximum, MGD	1.598	1.411	N
Dec 26, 2023	Effluent BOD loading, daily maximum, lb/d	80.1	43.5	N

Monitoring Period	Parameter	Reported Value	Correct Value	Violation Y/N
Week of Dec 24, 2023	Effluent BOD loading, weekly average, lb/d	80.1	43.5	N
December 2023	Effluent BOD concentration, monthly average, mg/L	7.8	5.8	N
Week of Dec 24, 2023	Effluent BOD concentration, weekly average, mg/L	4.73	11.6	N
March 4, 2024	Influent pH, daily minimum, SU	6.0	3.67	N
March 21, 2024	Influent pH, daily maximum, SU	6.7	6.5	N
Week of Mar 10, 2024	Effluent cBOD loading, weekly average, lb/d	33.1	55.4	N
March 2024	Effluent cBOD concentration, monthly average, mg/L	4.1	5.0	N
Week of Mar 10, 2024	Effluent cBOD concentration, weekly average, mg/L	4.1	7.9	N
April 29, 2024	Influent pH, daily maximum, SU	7.4	7.2	N
April 11, 2024	<i>E. coli</i> , daily maximum, #/100 mL	13.0	22	N
April 2024	Influent cBOD, monthly average, lb/d	148.9	124.3	N
May 2024	Effluent TSS loading, monthly average, lb/d	34.7	29.6	N
May 2024	Influent TSS concentration, mg/L	65.7	87.8	N
Sep 26, 2024	Influent pH, daily minimum, SU	6.0	6.5	N
Sep 10, 2024	Effluent TSS loading, daily maximum, lb/d	39.2	21.3	N
Week of Sep 5, 2024	Effluent TSS loading, weekly average, lb/d	39.2	21.3	N
Sep 2024	Effluent TSS concentration, monthly average, mg/L	9.5	8.7	N
Week of Sep 15, 2024	Effluent cBOD concentration, weekly average, mg/L	7.78	7.3	N
Oct 2024	Effluent TSS concentration and loading		Unknown	Y
Oct 2024	Influent TSS concentration		Unknown	Y
Oct 2024	Ammonia (NH ₃ -N)		Unknown	Y
Oct 2024	Effluent cBOD loading and concentration		Unknown	Y
Oct 2024	Influent cBOD concentration		Unknown	Y
Nov 2024	BOD % Removal	94.1	94.6	N
Nov 2024	TSS % Removal, Row T	88.2	93.1	N
Dec 2024	Influent pH, daily minimum, SU	5.6	6.3	N
Dec 2024	BOD % Removal	93.4	93.6	N
Dec 2024	TSS % Removal	93.0	96.1	N