



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

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TTY 711

June 4, 2025

Brian Lorimor, Public Works Director
City of Toledo
PO Box 220
Toledo, OR 97391-0220

Re: Warning Letter
City of Toledo Wastewater Treatment Facility
2025-WL-9893
NPDES Permit #101713, EPA ID OR0020869
File 89103
WQ-Lincoln County

Dear Mr. Lorimor,

DEQ has completed a records review for the City of Toledo to determine compliance with the conditions of National Pollutant Discharge Elimination System permit number 101713 issued by DEQ on December 27, 2005. The findings are summarized below.

Records Review

I reviewed records from January 2025 through April 2025 and December 2023. City of Toledo has submitted all monthly discharge monitoring reports (DMR) on time in NetDMR. I also reviewed the sanitary sewer overflow submitted on February 27, 2025.

Schedule A Violations

1. Schedule A of the permit requires City of Toledo to meet permit limits as outlined in the permit tables. In December 2023 City of Toledo violated their permit as indicated in the following table.

Table 1: Total Suspended Solids Load Limit Violations

Monitoring Period	Parameter	Permit Limit	Reported Value	Percentage Over Limit	Violation Class
December 2023	BOD loading monthly average	270 lb/d	895.8	232%	I
December 2023	TSS concentration monthly average	20 mg/L	33.3	67%	I

Violating BOD₅ loading limits and TSS concentration limits is a Class I violation if the discharge level exceeds the limit by 50% or more per OAR 340-012-0055(1)(k).

Schedule F Violations

1. Schedule F condition B6 prohibits the City of Toledo of sanitary sewer overflows. On February 25, 2025, City of Toledo notified DEQ that they had experienced an overflow from a location at 722 NW Hwy 20. This SSO reached Depot Slough but was contained to approximately 150 gallons. The public works crew was in the area correcting a different issue when they noted the overflow. They immediately were able to isolate the pumps at the lift station and proceeded to empty the lift station and clean the surrounding pipes. They located and removed a blockage from one of the lines leading to the lift station. Bacteria testing was conducted in the downstream area and continued until bacteria counts returned to a normal level. Crews will continue the flushing and public education programs. This overflow is a violation of OAR 340-012-0055(1)(c).

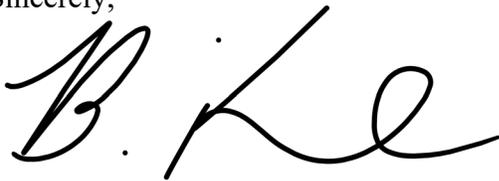
Class I violations are the most serious violations; Class III violations are the least serious. Compliance with your permit is required by Oregon Revised Statute 468B.025(2).

This notice is a warning letter. DEQ does not intend to take formal enforcement action at this time. However, should you repeat any of these violations, 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 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,



Brenda Kuiken
WQ Compliance Specialist

cc: DEQ Salem Office file

ec: Ranei Nomura, Manager, Western Region DEQ
Oregon Records Management Solution
James Spang, Wastewater Treatment Plant Lead Operator