



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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July 03, 2025

Georgia-Pacific Wauna LLC
ATTN: Keith Seal
92326 Taylorville Rd
Clatskanie, OR 97016-8264

RE: Pre-Enforcement Notification
GEORGIA-PACIFIC CONSUMER PRODUCTS LP/ GP - WAUNA MILL
2025-PEN-9931 ENF RID 4006
Permit # 101172 EPA ID# OR0000795
File # 21328 Site RID 7145
Clatsop County

Dear Georgia-Pacific Wauna LLC,

In February 2025, the Department of Environmental Quality (DEQ) learned of a NPDES permit violation at Georgia-Pacific Wauna Mill. According to self-reporting, the samples from December 8th, 2024 indicated a pH below permit limits which persisted into the next day. During the excursion, the plant was shut down and pH was mitigated without additional discharge.

DEQ has concluded that Georgia-Pacific Wauna LLC is responsible for the following violations of Oregon environmental law:

Violations:

Date	Violation	Violation Class
December 08, 2024	The reported daily minimum pH of 3.9 s.u. violates the permit limit of 6.0 s.u. by 2.1 s.u.	Class I Violating a technology based effluent limitation (TBEL) the discharge is outside the permitted pH range by more than 2 pH units OAR 340-012-0055 (1)(k)

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

GP Wauna communicated their steps taken or planned to reduce, eliminate and prevent reoccurrence of the noncompliance as follows: Redundant pH monitoring is planned for installation on the aeration basin inlet and outlet. Flow indication is planned for installation on the aeration basin inlet pH probes to ensure probes are receiving representative samples. Changes to process control logic are being investigated to improve automatic metering of acid into the wastewater

treatment system. Until longer term corrective measures are implemented, the Mill is actively monitoring the acid addition system to prevent a recurrence. Public notification steps taken, pursuant to General Condition B7: The mill deployed their Western Star tugboat and conducted a river survey to verify that no impact to wildlife occurred from this event. Public notifications were not made as the pH exceedance did not endanger public health per General Condition B7.

This Pre-Enforcement Notice is being sent to DEQ'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 or via email. The Department will consider new information you submit and take appropriate action. Please submit any additional information within 30 days of receiving this letter.

DEQ wants to help you comply with your permit conditions and limits. If you have any questions about this letter's content, please contact me preferably via email @ mark.bentz@deq.oregon.gov or by phone at 503-869-8264.

Sincerely,



Mark Bentz
Water Quality Source Control Compliance Specialist
Northwest Region, Water Quality Source Control Section

Ecc: Tiffany Yelton-Bram WQ-NWR
Travis Babikoff GP Wauna
Angela Aalbers GP Wauna