



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Eastern Region Bend Office
475 NE Bellevue Drive, Suite 110
Bend, OR 97701
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FAX (541) 388-8283
TTY 711

July 8th, 2025

Brett Blofsky
South Suburban Sanitary District
2201 Laverne Avenue
Klamath Falls, OR 97603-4570

RE: Warning Letter
South Suburban Sanitary District
2025-WL-9921
File #83316, NPDES Permit #100700
Klamath County

Dear Mr. Blofsky:

The South Suburban Sanitary District (District) operates a municipal wastewater (sewage) treatment facility and discharges treated effluent to the Klamath River under National Pollutant Discharge Elimination System (NPDES) Permit #100700 with modifications #1 and #2. DEQ has conducted a review of NetDMR submittals required under your permit and reviewed reports of non-compliance you have provided.

Based on review of the discharge monitoring reports (DMRs) and reports of non-compliance for the monitoring period of October 2024 to April 2025, DEQ has documented the following violation of Oregon environmental law. With this violation, the South Suburban Sanitary District failed to comply with the terms and conditions of NPDES Permit #100700, which is a violation of ORS 468B.025(2).

Violation #1: Effluent exceedances for Technology Based Effluent Limits

Schedule A, Condition 1 of the District's NPDES permit establishes year-round effluent limits for discharges to the Klamath River:

Parameter (Year-Round unless otherwise noted)	Units	Average Monthly	Average Weekly	Daily Maximum	Semiannual Average
BOD ₅ (Year-round)	mg/L	30	45	N/A	N/A
	lbs/day	500	750	1000	N/A
	% removal	65	N/A	N/A	N/A

The District failed to meet the required monthly average effluent limit for five-day biochemical oxygen demand (BOD₅) on the violation date shown in the table below. The District cites an increase in effluent discharge due to higher than normal precipitation for the month of January.

Table 1 - Effluent Limit Exceedances for BOD₅

Reporting Month	Violation	Permit Limit	Dilution	Class
January 2025	BOD ₅ exceedance reported of 527.6 lbs/day; monthly avg (5.5% exceedance)	500.0 lbs/day	>10	III

Per DEQ's enforcement guidance, exceedance of a technology-based effluent limit (TBEL), including BOD and TSS, by less than 20% is a Class III violation (OAR 340-012-0055(3)(b)). Class I violations are considered to be the most serious violations; Class III violations are the least serious.

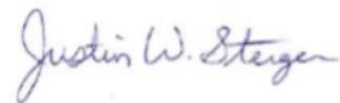
The District must ensure that all permit requirements, including Schedule A effluent limits, are met.

Summary:

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 new information you submit and take appropriate action. DEQ endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter or desire any follow-up technical assistance, please contact me at (541) 714-0206.

Sincerely,



Justin W. Sterger
Senior WQ Permit Writer

cc: Water Quality Data Team,
Alyssa Witt, DEQ
Sally Bratton, SSSD
Mike Hiatt, DEQ
Anna Morgan-Hayes, DEQ

Enclosure: January 2025 NetDMR Cover Letter



South Suburban Sanitary District
2201 Laverne Avenue
Klamath Falls, OR. 97603
Phone 541.882.5744 Fax 541.882.5013

Board of Directors

Position 1 - Joe Spendolini

Board Chairman

Position 2 - Kenneth DeCrans

Position 3 - Michael Koger

District Manager/Secretary

Brett Blofsky

February 12, 2025

Oregon DEQ – Eastern Region Bend Office
Justin Sterger, Senior Water Quality Permit Writer
475 NE Bellevue, Suite 110
Bend, OR 97701

Enclosed is the January 2025 DMR. There was a BOD loading violation of 527.6 lbs. The cause of the violation was due to high precipitation, 1.68 inches, for the month of January. SSSD WWTF was required to increase effluent discharge due to rising pond levels within the facility.

South Suburban Sanitary District January 2025 data attachment(s) and weekly and monthly analyte results/reports from Neilson Research Corp along with EDD formats have been submitted.

If you have any questions concerning the information, please contact me at your earliest convenience.

Respectfully,

A handwritten signature in black ink that reads "Sally Bratton". The signature is written in a cursive, flowing style.

Sally Bratton, Treatment Supervisor
South Suburban Sanitary District WWTF