



Oregon

Tina Kotek, Governor

Department Environmental Quality
Eastern Region Pendleton Office
800 SE Emigrant Ave., Suite 330
Pendleton, OR 97801
541-276-4063

July 8, 2025

Mayor Carlos Mendoza
City of Adrian
PO Box 226
Adrian, OR 97901

RE: **Pre-Enforcement Notice**
City of Adrian
2025-PEN-9929
File #600, WPCF Permit #101380
Malheur County

Dear Mayor Carlos Mendoza:

The City of Adrian (City) operates a domestic wastewater treatment facility under Water Pollution Control Facilities (WPCF) Permit #101380. DEQ conducted a review of required monitoring and reporting in accordance with your permit for the following monitoring period: July 2022 – February 2025. Based on the water quality permit file review and discharge monitoring report (DMR) review DEQ has documented the following 688 violations of Oregon environmental law.

Schedule B.1(c) requires the City to monitor the lagoon perimeter daily and record observations on the monthly DMR. During the reporting period (thirty-two months), the City monitored at least twice weekly but failed to monitor daily as required.

<u>Item or Parameter</u>	<u>Minimum Frequency</u>	<u>Type of Sample</u>
Cell Depth (each cell)	Weekly	Measurement
Perimeter Inspection (See note 3/)	Daily	Observation

Schedule B.3 and B.4 requires the City to submit a Reclaimed Water Use Report by no later than March 15 of each year, and an Inflow and Infiltration Report by no later than April 2 of each year. During the reporting period (three years) the City failed to submit these reports.

Monitoring and Reporting Violations

In accordance with Schedule B.1 of the City's WPCF permit the City of Adrian is responsible for the following reporting violations:

Reporting Month	Violation	Violation Class	Number of Violations
July 2022 – February 2025 (32 months) (See Attachment 1)	Failure to monitor lagoon perimeter, as required by Schedule B of the permit; OAR 340-012-0055(1)(o).	I	682
March 15, 2022, 2023 and 2024 (3 years)	Failure to submit Reclaimed Water Use Annual Report	I	3
April 2, 2022, 2023 and 2024 (3 years)	Failure to submit Inflow and Infiltration Annual Report	I	3

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

Environmental Impact of Violations

Fulfilling the mandatory monitoring and reporting conditions is an important obligation. Without monitoring and/or timely submittal of reports, the City, DEQ, and the public are unable to evaluate the effectiveness of the City's wastewater treatment system. An ineffective treatment system can cause water quality impairments and/or public health hazards.

Required Corrective Actions:

To maintain compliance with DEQ's water quality regulations, please implement the following corrective action:

1. **July 8, 2025** Monitor lagoon perimeter daily as required in Schedule B of the permit.

This matter is being referred to DEQ's Office of Compliance and Enforcement for formal enforcement action, including assessment of potential civil penalties and/or a DEQ order. Civil penalties may be assessed for each day of violation. DEQ will take into consideration your timely and responsive action on these items in any civil penalty assessment.

If you believe any of the facts in this notice are in error, you may provide information to me at the address shown at the top of this letter. I will consider any new information you submit and take appropriate action.

If you have any questions, please contact me in writing, at alyssa.witt@deq.oregon.gov, or at 458-329-7327.

City of Adrian
July 8, 2025
Page 3 of 4

Sincerely,

A handwritten signature in black ink, appearing to read 'Alyssa Witt', with a long horizontal line extending to the right.

Alyssa Witt
Water Quality Permit Inspector
Eastern Region – Water Quality Permitting

cc: Water Quality Permit Compliance, Eastern Region, DEQ
ec: Anna Morgan-Hayes, Water Quality Permitting and Compliance, Eastern Region, DEQ
Mike Hiatt, Manager, Eastern Region, DEQ
Oregon Records Management Solution

Attachment 1: City of Adrian, Missed Monitoring Events: Lagoon Perimeter Inspection

Monitoring Month (Day-YY)	Number of Missed Events
Jul-22	22
Aug-22	21
Sep-22	22
Oct-22	21
Nov-22	20
Dec-22	22
Jan-23	21
Feb-23	17
Mar-23	21
Apr-23	22
May-23	22
Jun-23	21
Jul-23	21
Aug-23	21
Sep-23	22
Oct-23	20
Nov-23	18
Dec-23	23
Jan-24	21
Feb-24	25
Mar-24	21
Apr-24	23
May-24	21
Jun-24	23
Jul-24	21
Aug-24	22
Sep-24	23
Oct-24	21
Nov-24	23
Dec-24	21
Jan-25	22
Feb-25	18