

# **Department of Environmental Quality**

Eastern Region Bend Office 475 NE Bellevue Drive, Suite 110 Bend, OR 97701 (541) 388-6146 FAX (541) 388-8283

TTY 711

July 16, 2025

Ryan Escobar, EHS Manager Kronospan La Grande, LLC 62621 Oregon Hwy 82 La Grande, OR 97850

RE: Warning Letter

Kronospan La Grande, LLC Particleboard Plant

2025-WL-9923 **Permit No. 103044**Union County

Dear Mr. Escobar:

Kronospan La Grande, LLC (Kronospan) is authorized to collect, store, and treat stormwater and industrial wastewater effluent for the particleboard plant located in 62621 Oregon Hwy 82, La Grande, Oregon under a Water Pollution Control Facilities (WPCF) permit No. 103044. On July 2, 2025, Kronospan notified DEQ of noncompliance at the facility (Attachment 1). Schedule A.4, Table A1 of the WPCF permit provides effluent limits for pH of the discharge into the Cooling Pond:

**Table A1: Pond Effluent Limits** 

Parameter	Limitation
Minimum Freeboard	1 foot
pH (Cooling Pond only)	Must be within the range of 6.5 to 8.5 SU for effluent discharged into the pond

According to the noncompliance report, the facility has documented the following results of the pH sampling at the Cooling Pond:

Date	Result	Rounded Value (See note a.)	Excursion
June 20, 2025	8.59	8.6	0.1
June 24, 2025	8.58	8.6	0.1

Date	Result	Rounded Value (See note a.)	Excursion
June 27, 2025	8.58	8.6	0.1
June 30, 2025	8.55	8.5	0.0

### Note:

a. Conventions for reporting results of calculated or measured values can be found in Table 2: DEQ's Conventions for Rounding for Calculated and Measured Values of the Significant Figures and Rounding Conventions in Permitting IMD (DEQ, 2013) <a href="https://www.oregon.gov/deq/Filtered%20Library/SigFigsIMD.pdf">https://www.oregon.gov/deq/Filtered%20Library/SigFigsIMD.pdf</a>

Kronospan stated that their staff responded immediately to the pH exceedances by pumping fresh water to the Cooling Pond but was limited by capacity. On July 2, 2025, the facility reported results of 8.03 SU, returning to compliance with permit. Further corrective actions described include:

- Diverting all incoming water (primarily boiler blowdown) to the lined pond
- Recirculating the water in the Cooling Pond
- Installation of an aerator in the Cooling Pond

The facility continues to develop strategies for managing pH in the pond, and attributes higher temperatures and low precipitation in the area as environmental factors impacting levels.

Based upon review of the report submitted to DEQ, the Department has concluded that Kronospan is responsible for the following three (3) violations of Oregon environmental law:

## **VIOLATIONS:**

Monitoring Period	Violation	Class	Number of Violations
June 20, 2025	Violating a technology based effluent limitation,	III	1
	in a WPCF Permit if: (B) the discharge is outside		
	the permitted pH range by 1 pH unit or less;		
	OAR 340-012-0055(3)(b).		
June 24, 2025	Violating a technology based effluent limitation,	III	1
	in a WPCF Permit if: (B) the discharge is outside		
	the permitted pH range by 1 pH unit or less;		
	OAR 340-012-0055(3)(b).		
June 27, 2025	Violating a technology based effluent limitation,	III	1
	in a WPCF Permit if: (B) the discharge is outside		
	the permitted pH range by 1 pH unit or less;		
	OAR 340-012-0055(3)(b).		

Class I violations are the most serious violations; Class III violations are the least serious.



### **SUMMARY:**

This notice is a Warning Letter. DEQ does not intend to take formal enforcement action at this time. However, should you repeat this violation, 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 Department 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. The Department endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter, feel free contact me in writing or by phone at 541-246-4562. In addition, if you desire any follow-up technical assistance, please contact <a href="mailto:Anna.Morgan-Hayes@deq.oregon.gov">Anna.Morgan-Hayes@deq.oregon.gov</a>.

Sincerely,

Anna Morgan-Hayes

Anna Dayes

DEQ Water Quality Permitting & Compliance

ec: Mike Hiatt, DEQ Water Quality Permitting
Alyssa Witt, DEQ Water Quality Permit Compliance



Attachment 1: Letter of Noncompliance, Kronospan, July 2, 2025



#### **KRONOSPAN LA GRANDE LLC**

62621 Oregon Hwy 82 La Grande, OR 97850 Tel.: +1 (541) 962-2109

July 2, 2025

Anna Morgan-Hayes
Eastern Region Water Quality Permitting and Compliance
Oregon Department of Environmental Quality
475 NE Bellevue Dr., Suite 110
Bend, OR 97701

RE: WPCF 103044 Issued January 9th, 2025 Schedule A, Condition 4

Dear Ms. Morgan-Hayes,

On June 19, 2025 Kronospan informed the Oregon DEQ of an exceedance of its permit requirements relative to pH levels in its Cooling Water Pond (CWP). Due to a large algae bloom in the pond, the pH values were over the limit on successive tests during the most recent 11 day period. A subsequent test on 7/2/2025 resulted in a compliant pH level of 8.03 (see below):

Date	Time	pH Level	
6/20/2025	7:18	8.59	
6/24/2025	10:20	8.58	
6/27/2025	8:28	8.58	
6/30/2025	8:52	8.55	
7/2/2025	9:51	8.03	

Another test is scheduled for 7/3/2025. We believe we have taken all reasonable measures, allowed by our WPCF Permit, to mitigate the pH problems. Corrective actions taken include:

- · diverting all incoming water (primarily boiler blowdown) to the lined pond,
- using the CWP pump to move water from the bottom to the top of the CWP for recirculation,
- installing an aerator on July 26<sup>th</sup> for further aeration of the water in the CWP



We believe low rainfall and higher than average air temperatures and wind travel (mi/day) are major contributors to the high pH values in the CWP. The estimated time to reach consistent compliance pH levels via aeration is difficult to determine. In the meantime, we will continue to explore options to remain in compliance with our permit.

This letter is to satisfy conditions for Schedule F, Section D.4 reporting requirements. If you have any questions or concerns my contact, information is below.

Sincerely,

Ryan Escobar EHS Manager

Kronospan La Grande LLC

+1 (541) 962-2126