



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

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Salem, OR 97302

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TTY 711

July 14, 2025

Nicole Tritten, City Recorder
City of Westfir
PO Box 296
Westfir, OR 97492

Re: Pre-Enforcement Notice
Westfir Wastewater Treatment Plant
2025-PEN-9938
NPDES Permit #100811, EPA ID OR0028282
File 94805
WQ-Lane County

Dear Ms. Tritten,

DEQ has completed a records review for the City of Westfir to determine compliance with the conditions of the National Pollutant Discharge Elimination System permit number 100811, issued on November 5, 2010. The findings are summarized below.

Records Review

I reviewed records from December 2024 through May 2025. The city has submitted all monthly discharge monitoring reports (DMR) on time in NetDMR. Based upon this review, DEQ has concluded that the city is responsible for Schedule A violations.

Prior Corrective Actions

The city received a warning letter (2025-WLOTC-9782) from DEQ in January 2025 for exceeding bacteria permit limits. DEQ requested the city complete two corrective actions: 1. Develop and implement a written standard operating procedure pertaining to the quantity of solids within the treatment process and 2. Develop and implement a UV system cleaning schedule. The city completed these actions within the timeframe as indicated in the warning letter. However, neither of these actions prevented the recurring bacteria permit limit exceedances.

Since these corrective actions were taken, the city has taken further action by inviting OAWU and Orenco on-site to help troubleshoot the problem and changing the standard operating procedure to include using a sterile sample bottle for each analysis. The city has also ensured that the UV bulbs are new, the system has been thoroughly cleaned, and the detention time is within the suggested range for the engineered disinfection rate. The city has also contacted the UV system manufacturer, Trojan Technologies, for suggestions.

Schedule A Violations

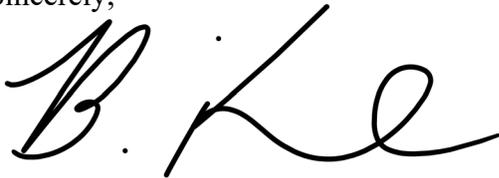
1. Schedule A, condition 3 of your NPDES permit requires the city to meet *E. coli* bacteria limits of 126 organisms per 100 mL monthly geometric mean and no single sample may exceed 406 organisms per 100 mL. The city violated their permit limit multiple times as indicated in Table 1 on p.3 of this notice.
2. Schedule A, condition 3 of your NPDES permit requires the city to meet a BOD₅ removal efficiency of 85% monthly average. In March 2025, Westfir reported a removal efficiency of 83.3%. This is a Class III violation per OAR 340-012-0055(3)(c).

These are serious violations and, accordingly, they are being referred to DEQ's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of a civil penalty and/or DEQ order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this pre-enforcement notice 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
Max Baker, Middle Fork Consulting

Table 1 – *E. coli* Limit Violations

Monitoring Period	Parameter	Reported Value	Limit	Less than factor of 5?	Violation Class
December 2024	Monthly geometric mean, #/100 mL	340.6	630	No	II
December 2024	Resample monthly geomean, #/100 mL	180.9	630	No	II
December 2, 2024	Single sample, #/100 mL	2000	2030	Yes	III
December 24, 2024	Single sample, #/100 mL	1300	2030	Yes	III
February 2025	Monthly geometric mean, #/100 mL	2419.6	630	No	II
February 27, 2025	Single sample, #/100 mL	2419.6	2030	No	II
April 2025	Monthly geometric mean, #/100 mL	240	126	Yes	III

If the discharge exceeds a bacteria limit by a factor of five or more, it is a Class II violation per OAR 340-012-0055(2)(a). If the discharge exceeds a bacteria limit by less than 5 times the limit, it is a Class III violation per OAR 340-012-0055(3)(b).