



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Western Region Salem Office

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Salem, OR 97302

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FAX (503) 373-7944

TTY 711

October 29, 2025

Brian Harmon, Public Works Director  
City of Coburg  
PO Box 8316  
Coburg, OR97408

Re: Warning Letter with Opportunity to Correct  
Coburg Wastewater Reclamation Facility  
2025-WLOTC-10046  
NPDES Permit #102979, EPA ID OR0044628  
File 115851, YDO Site RID 21671  
WQ-Lane County

Dear Mr. Harmon,

On August 13, 2025, DEQ conducted a compliance evaluation inspection at the Coburg wastewater reclamation facility. The purpose of the inspection was to determine compliance with the condition so Nation Pollutant Discharge Elimination System permit number 102979, issued by DEQ on July 20, 2009. The findings are summarised below. I have enclosed a copy of the inspection report checklist that provides additional information.

### **Records Review**

I reviewed records from July 2022 through September 2025. City of Coburg has submitted all monthly discharge monitoring reports (DMR) on time in NetDMR.

### **Schedule A Violations**

There were several days of excess thermal load limit violations in June, July, and August 2025. These will be addressed in a separate notification at a later date.

### **Schedule F Violations**

1. Schedule F condition C6 of the permit requires that if the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR part 136, or as specified in the permit, the results of this monitoring must be included in the calculation and reporting of the data submitted in the DMR. Failure to submit a complete discharge monitoring report is a Class III violation per OAR 340-012-0055(3)(a).
2. Schedule F condition B8 of the permit requires the permittee to develop and implement an emergency response and public notification plan as listed in this section of the permit and as listed in the guidelines in the Inspection Checklist. The City of Coburg has not created this plan. Failure to complete a plan is a Class II violation per OAR 340-012-0055 (2)(b).

### **Requested Corrective Actions**

1. Please submit the Emergency Response and Public Notification Plan as described in Schedule F of your permit and including the list in the Inspection Checklist. This was submitted 8/13/2025 prior to the warning letter being sent.
2. A NIST certified thermometer should be used to calibrate the thermometers used in both composite samplers and the laboratory refrigerator. The NIST thermometer needs to be re-certified or replaced when its due date is reached. The calibration of the other thermometers should be conducted annually or the thermometers replaced as needed.
3. Temperatures of the composite samplers need to be documented when the samplers are in use.
4. Record the temperature of the lab refrigerator daily when the refrigerator is holding lab samples.
5. Please check the cBOD holding time of the standard method test you and your lab are using and ensure that the lab samples stored in the refrigerator are not stored longer than the holding time listed in the standard method.
6. Update QA/QC lab manual to include the equipment currently being used in the lab and ensure that the manual includes all of the items listed on the Inspection Checklist on page 8 of 19.
7. Install signs at the gates and perimeter of the facility where recycled water is used.

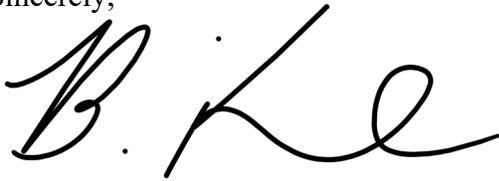
This notice is a warning letter with opportunity to correct. DEQ does not intend to take formal enforcement action at this time. However, should you fail to submit documentation that the corrective actions have been completed by the date requested or repeat any of these violations,

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 with opportunity to correct 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](mailto:brenda.kuiken@deq.oregon.gov) or by phone at (503) 893-0924.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Kuiken', with a stylized, cursive script.

Brenda Kuiken  
WQ Compliance Specialist

cc: DEQ Salem Office file

ec: Ranei Nomura, Manager, Western Region DEQ  
Oregon Records Management Solution  
Steve Jackson, Wastewater Treatment Plant Operator  
Grant Richardson, Water Operator