



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Northwest Region  
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July 18, 2025

City of Wilsonville  
ATTN: Delora Kerber  
City Engineer  
29799 SW Town Center Loop E  
Wilsonville, OR 97070

RE: Warning Letter with Opportunity to Correct  
City of Wilsonville WWTP  
2025-WLOTC-9960  
EPA ID #OR0022764  
Facility ID #97952 / Permit #101888  
Clackamas County

Dear City of Wilsonville,

The wastewater treatment plant operator has submitted data for Copper BLM determination. DEQ has determined that the data is not usable due to lack of a sufficiently detailed standard operating procedure for collecting, processing and analyzing the data.

Violations:

Date	Violation	Violation Class
Per permit requirement	SOP did not create confidence in the data collected requiring its rejection as a data set for Copper BLM analysis.	OAR 340-012-0055 (2)(d); Violating any management, monitoring, or operational plan established pursuant to a waste discharge permit, unless otherwise classified.

Class I violations are considered to be the most serious violations; Class III violations are the least serious. This a Class II violation.

The SOP submitted with the Copper BLM data set did not provide sufficient confidence in the reliability of the data. As a result, the data has been rejected pending the submission of an amended SOP and the collection of new data that meets quality assurance standards.

Accurate and consistent data collection is vital for establishing permit limits. Poor-quality or incomplete data collection can result in onerous or unneeded permit limits. Proper and ample

data collection serves the permittee, DEQ and the environment by ensuring limits are both protective and reasonable.

**Comments on the SOP:**

1. The current SOP does not:
  - a. Identify the purpose of the project or intended use of the data.
  - b. Identify the parameters needing to be analyzed. Only pH and E. coli are mentioned. However, E. coli is not a CuBLM parameter and it is unclear why it was included in the BLM SOP.
  - c. Adequately identify all supplies and materials required. Only a bucket and rope are specified for sample collection, but no information as to other equipment needed to collect/analyze the sample (e.g. sample bottles from lab and bottle type, cooler for transportation, pH meter, temperature probe, DI water). It is unclear what material the bucket is made of – metal buckets will contaminate metals samples.
  - d. Adequately identify sample locations. The only reference to the ambient sampling location is “go to end of docks”. It is unclear which docks are intended, or whether there is anything in the vicinity of the docks that may cause sample contamination or otherwise render the sample non-representative of the conditions of the Willamette River. There is no mention of any effluent sampling location.
  - e. Identify the frequency or timing of sampling other than “monthly” in the title of the SOP. There is no reference to the timing of the effluent and ambient sample (they should occur on the same day). There is no mention of conditions under which sampling should not occur (e.g. unusual operational conditions, flood events).
  - f. Identify proper sample handling, preservation, or holding times aside from running the pH sample within 15 minutes of collection and taking the bottles to Edge Lab ASAP. There is no mention of equipment cleaning, proper preservation or filtration of samples (dissolved metals need to be filtered within 15 minutes of sample collection in accordance with 40 CFR 136), sample labelling, or proper storage and transportation of samples (unclear if samples are to be placed in a cooler with ice during transportation). There is no mention of what should happen if the samples cannot be immediately transported to the lab. There are no mentions of PPE required for the staff collecting samples.
  - g. There are no methodology or QA/QC specifications included. No mention of pH calibration, no precision or accuracy requirements outlined. It is unclear what methods are being used for the parameters being analyzed, or whether they are sensitive enough to be adequate for the project purposes. There is no mention of frequency for field duplicates, equipment blanks, or laboratory duplicates for samples or reference to the standard practices of the contract lab for QA/QC.
  - h. There is no reference to how the data will be managed, such as field sheets for pH/temperature, chains of custody for samples analyzed by the laboratory, or what information is expected from contract labs.

**Additional Recommendations:**

1. DEQ provides a template QAPP/SAP that outlines necessary information. While it is not required to use this template, it is recommended that it at least be reviewed as an example

of the types of information expected for these documents (Department of Environmental Quality : Forms and Other Guidance Documents not in Your DEQ Online : Water Quality Permits : State of Oregon – links are at bottom of page under “Guidance Documents”). In doing this, a number of the comments above will likely be able to be adequately addressed.

2. The SAP includes images. This is especially useful for identifying equipment, sampling locations, or hard to describe techniques.

**Actions to correct deficiencies:**

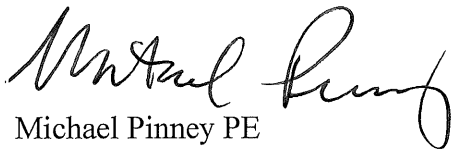
- Revise the SOP. DEQ is available to review the updated version and can provide feedback upon request.
- Collect 24 more samples using the corrected SOP before the next permit renewal for Copper BLM examination.

This notice is a Warning Letter with Opportunity to Correct. DEQ does not intend to take formal enforcement action at this time. However, should the City 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 DEQ order. Civil penalties can be assessed for each day of violation.

If any of the facts in this Warning Letter are believed to be in error, the City may provide written information to me at the address shown at the top of the letter. The Department will consider new information submitted and take appropriate action.

DEQ wants to help permittees comply with their permit conditions and limits. If there are any questions about this letter’s content, please contact me via email at [mark.bentz@deq.oregon.gov](mailto:mark.bentz@deq.oregon.gov) or by phone at 503-869-8264.

Sincerely,



Michael Pinney PE  
Senior Environmental Engineer  
Northwest Region Source Control

ecc: Tiffany Yelton-Bram, WQ Source Control NWR DEQ  
Nathan Dryden, Jacobs