



Oregon

Tina Kotek, Governor

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

February 13, 2026

Charles Case
Public Works
City of Chiloquin
P.O. Box 196
Chiloquin, OR 97624

RE: Pre-Enforcement Notice
City of Chiloquin
2026-PEN-10099
File #16310, NPDES Permit #101029
YDO FID#213385
Klamath County

Dear Mr. Case:

The City of Chiloquin operates a domestic wastewater treatment plant and discharges treated effluent to the Williamson River under National Pollutant Discharge Elimination System (NPDES) Permit #101029.

Based on review of monitoring reports provided by the facility since 2023, DEQ concluded that the City of Chiloquin was responsible for twenty-five (25) violations of your NPDES permit and Oregon environmental law—and was cited in a Warning Letter (2025-WLOTC-9828) on February 5, 2025. The corrective actions required by the prior warning letter still have not been completed by the city as of the date of this letter.

DEQ has reviewed additional reporting required by the permit from 2023 through 2025 and as a result, has documented additional corrections necessary for your DMRs and violations of the assigned permit. With each violation of the permit, the city failed to comply with the terms and conditions of NPDES Permit #101029, which is a violation of ORS 468B.025(2).

Violations: Incomplete Discharge Monitoring Reports (DMRs)

The facility DMRs submitted for the period of January 2023 to December 2025 (35 months) were reviewed by DEQ compliance staff. Schedule B of the NPDES permit requires the city to submit complete discharge monitoring reports, including all required monitoring and summary statistics.

DEQ compliance staff have identified instances for each reviewed month of incomplete or inaccurate reporting (see the attached Appendices I and II).

Reporting Period(s)	Violation	# of Violations	Class
January 2023 – December 2025 (35 months)	Failing to submit a complete discharge monitoring report.	35	III

Failure to submit a complete discharge monitoring report is a Class III violation per OAR 340-012-0055(3)(a). There are thirty-five documented violations for incomplete DMRs.

Violations: Failure to Submit Required Reports

Reporting Period(s)	Violation	# of Violations	Class
2023, 2024, 2025	Schedule B, Table B3 of the NPDES permit requires the City to submit an annual Inflow and Infiltration (I/I) Report by February 1 each year. To date, the facility has not submitted the required reports for the 2023-2025 reporting periods.	3	II
2023, 2024	Schedule B, Table B3 of the NPDES permit requires the City to submit a Wastewater Solids Report by February 19 each year. To date, the facility has not submitted the required reports for the 2023 and 2024 reporting periods.	2	II

Failing to timely submit a report or plan as required by rule, permit, or license unless otherwise classified is a Class II violation (OAR 340-012-0055(2)(b)). There are five (5) occurrences of this violation. Please also note that the 2025 Wastewater Solids Report is due by February 19th, 2026 and has not yet been received by DEQ.

Violations: Effluent Limit Discharge Exceedances

The city’s NPDES permit contains effluent limitations required for the treated water discharged to the Williamson River. Schedule A, Table A3 of the permit establishes effluent limits for Temperature-Thermal Load in the facility discharge for Outfall 001. The limit table is shown below:

b. Additional Parameters- Permittee must comply with the limits in the following table:

Year-round	Limits
BOD ₅ and TSS Removal Efficiency	Must not be less than 85% monthly average for BOD ₅ and TSS
Temperature-Thermal Load Limit (Hwla)	Must not exceed 11.1 x 10 ⁶ kcal/day.

The Temperature-Thermal Load limit is a water-quality based effluent limit (WQBEL) in the NPDES permit. The city is required to control the heat in the discharge so there is no measurable increase outside the regulatory mixing zone.

Thermal Load Violations

Date Reported	Reported Value –Daily Maximum (mkcal/day)	Permit Limit (Daily Maximum) (mkcal/day)	Mean Daily River Flow (lowest value in month) (cfs)	7Q10 Flow Data (cfs)
January 2024	16.3 (47% exceedance)	11.1	295	130
January 2025	28.9 (160% exceedance)		297	130
December 2025	12.4 (12% exceedance)		321	130

The mean daily river flow values were derived from the Oregon Water Resources gage station ID #11494510 “Williamson R AB Sprague R NR Chiloquin OR”.

Per DEQ’s enforcement guidance, violating a WQBEL is a Class I violation (OAR 340-012-0055(1)(1)) and there are three (3) violations for this limit. Class I violations are considered to be the most serious violations; Class III violations are the least serious.

Violations: Sanitary Sewage Overflow and Failure to Complete Required Reporting

On February 24, 2025, DEQ received a report of a release of 10,000-15,000 gallons of sewage overflow from the aeration basin at the wastewater treatment plant. The cause was a reported electrical failure that impacted the lift station pumps and alarm systems, causing sewage to back up in the system and overflow onto site soils at the wastewater plant. The facility completed OERS reporting (incident number OERS 2025-0489) but did not complete the required sanitary sewer overflow (SSO) report to DEQ in response to additional request by DEQ by email on March 4, 2025 (See Appendix III).

Causing any wastes to be placed in a location where such wastes are likely to be carried to waters of the state by any means is a Class II violation (OAR 340-012-0055(2)(c)). There is one (1) violation for this classification.

Schedule F, Condition D5 requires reporting for overflows to include written reporting within 5 days. While the facility made the required notification to OERS, no follow-up written report was completed as required by the permit and in response to DEQ’s request. Failing to timely submit a report or plan as required by rule, permit, or license is a Class II violation per OAR 340-0055(2)(b). There is one (1) violation for this classification.

CORRECTIVE ACTIONS:

1. **By March 13, 2026**, amend and resubmit all of the incomplete DMRs identified in Violation #1 for each of the issues noted in Appendix II. Future DMR submittals must be completed on-time and with complete and accurate reporting information.
 - a. Each DMR will need to be reviewed, corrected by the City and resubmitted in accordance with DEQ's NetDMR User's Guidance: [WQP-guide-NETDMR-Useguide.pdf](#).
 - b. Upon resubmittal of the DMRs, confirm in writing to DEQ by email to justin.sterger@deq.oregon.gov that the amendments have been completed.

DEQ will review the resubmittals and if additional violations are identified, to include any exceedances above permitted limits, will follow-up with additional correspondence.

2. **By March 13, 2026**, submit to DEQ the following required reports by email to justin.sterger@deq.oregon.gov:
 - a. 2023, 2024, and 2025 Inflow and Infiltration Reports
 - b. 2023, 2024, and 2025 Wastewater Solids and Biosolids Reports
 - c. Sanitary Sewer Overflow report for the February 2025 overflow incident.

Templates for these reports have been provided in Appendix III.

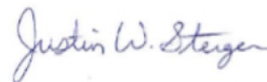
Summary

The violations cited above have been referred to DEQ's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of civil penalties for each day of violation and/or a Department order.

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 new information you submit and take appropriate action.

DEQ endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter or desire any follow-up technical assistance, please contact me at (541) 714-0206.

Sincerely,



Justin W. Sterger
Senior Water Quality Permit Writer

ec: Mike Hiatt, DEQ
Fred Jackson, City of Chiloquin
Martinne Ingram, City of Chiloquin
Alyssa Witt, DEQ
Anna Morgan-Hayes, DEQ
DEQ Water Quality Data Team
Oregon Records Management System

Appendix I: DMR Review – List of issues and corrections

- January 2023 DMR:
 - 001-A Effluent/RW max 7D average temperature monitoring reported vs xlsx ss inconsistent, *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (9.0/8.0mg/L) not consistent w/xlsx ss values (10.0/11.0mg/L) *possible confusion between conc/load
 - 001-A Effluent BOD load monthly/weekly avg reported (5.7/11.0lb/day) not consistent w/xlsx ss values (9.0/10.4lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (12.9/14.3mg/L) not consistent w/xlsx ss values (14.3/17.0mg/L)
 - 001-A Effluent TSS load monthly/weekly avg reported (9.2/17.0lb/day) not consistent w/xlsx ss values (12.9/15.6lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-A Effluent Thermal load *verify formula/calculation on xlsx ss
- February 2023 DMR:
 - 001-A Effluent temp daily max reported (50.8°F) not consistent w/xlsx ss value (51.7°F)
 - 001-A Effluent temp max 7D avg reported (49.1°F) not consistent w/xlsx ss value (50.7°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (38.1°F) not consistent w/xlsx ss value (39.0°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc weekly avg reported (7.1mg/L) not consistent w/xlsx ss value (14.0mg/L) *possible confusion between conc/load, weekly avg report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly avg/daily max reported (10.0/14.0lb/day) not consistent w/xlsx ss values (7.1/8.4lb/day)
 - 001-A Effluent TSS conc weekly avg reported (8.9mg/L) not consistent w/xlsx ss value (17.0mg/L) *possible confusion between conc/load
 - 001-A Effluent TSS load monthly avg/daily max reported (13.0/17.0lb/day) not consistent w/xlsx ss values (8.9/12.1lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-A Effluent Thermal load *verify formula/calculation on xlsx ss
- March 2023 DMR:
 - 001-G Influent BOD conc monthly avg reported (12.6mg/L) not consistent w/xlsx ss value (287.0mg/L)
 - 001-A Effluent temp daily max reported (51.6°F) not consistent w/xlsx ss value (51.3°F)
 - 001-A Effluent temp max 7D avg reported (48.4°F) not consistent w/xlsx ss value (49.6°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (37.7°F) not consistent w/xlsx ss value (38.6°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly avg reported (10.0mg/L) not consistent w/xlsx ss value (12.6mg/L)
 - 001-A Effluent BOD load daily max reported (5.9lb/day) not consistent w/xlsx ss value (17.2lb/day)
 - 001-A Effluent TSS conc weekly avg reported (14.0mg/L) not consistent w/xlsx ss value (20.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (10.8/9.9lb/day) not consistent w/xlsx ss values (14.0/21.5lb/day)

- 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- 001-Q Effluent Q1 quarterly ammonia and phosphorous totals reported, sampled in January, results reported (17.2/1.42mg/L) not consistent with xlsx ss values (11.2/2.1mg/L), *P conc/load value duplicate load not calculated/no sample date to match w/flow value – request lab results
- April 2023 DMR:
 - 001-A Effluent temp max 7D avg reported (48.7°F) not consistent w/xlsx ss value (50.9°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (49.5°F) not consistent w/xlsx ss value (46.1°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (6.7/8.0mg/L) not consistent w/xlsx ss values (8.0/11.0mg/L)
 - 001-A Effluent BOD load monthly avg/daily max reported (9.2/3.6lb/day) not consistent w/xlsx ss values (6.7/9.2lb/day)
 - 001-A Effluent TSS conc weekly avg reported (8.5mg/L) not consistent w/xlsx ss value (14.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (14.0/6.0lb/day) not consistent w/xlsx ss values (8.5/10.0lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- May 2023 DMR:
 - 001-B Effluent Phosphorous annual avg exceedance – 757.0lb/day reported, 730.0lb/day limit (4% exceedance) ***permit limit violation**
 - 001-A Effluent temp daily max reported (48.5°F) not consistent w/xlsx ss value (62.8°F)
 - 001-A RW temp max 7D avg reported (47.1°F) not consistent w/xlsx ss value (52.8°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc weekly avg reported (9.8mg/L) not consistent w/xlsx ss value (13.0mg/L) *weekly avg report max weekly value when sampling once/week
 - 001-A Effluent BOD load daily max reported (13.0lb/day) not consistent w/xlsx ss value (9.8lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (10.8/11.4mg/L) not consistent w/xlsx ss values (15.6/20.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (8.0/13.0lb/day) not consistent w/xlsx ss values (11.4/15.0lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- June 2023 DMR:
 - 001-A Effluent temp max 7D avg reported (61.6°F) not consistent w/xlsx ss value (62.7°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (53.3°F) not consistent w/xlsx ss value (57.8°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (6.8/9.0mg/L) not consistent w/xlsx ss values (9.0/11.0mg/L) *weekly avg report max weekly value when sampling once/week
 - 001-A Effluent BOD load daily max reported (4.3lb/day) not consistent w/xlsx ss value (6.8lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (9.5/11.0mg/L) not consistent w/xlsx ss values (14.3/16.0mg/L)
 - 001-A Effluent TSS load monthly/weekly avg reported (14.3/16.0lb/day) not consistent w/xlsx ss values (9.5/10.9lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-Q Effluent Q2 quarterly ammonia and phosphorous totals reported, sampled in April *P conc/load value duplicate load not calculated/no sample date to match w/flow value
- July 2023 DMR:
 - 001-A RW temp max 7D avg reported (64.2°F) not consistent w/xlsx ss value (53.7°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc weekly avg reported (8.1mg/L) not consistent w/xlsx ss value (17.0mg/L) *weekly avg – report max weekly value when sampling once/week

- 001-A Effluent BOD load daily max/weekly avg reported (6.0/17.0lb/day) not consistent w/xlsx ss values (10.3/10.3lb/day)
- 001-A Effluent TSS conc weekly avg reported (10.6mg/L) not consistent w/xlsx ss value (18.0mg/L)
- 001-A Effluent TSS load monthly/weekly avg/daily max reported (18.0/18.0/14.0lb/day) not consistent w/xlsx ss values (10.6/11.5/11.5lb/day)
- 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- August 2023 DMR:
 - 001-A Effluent temp max 7D avg reported (64.8°F) not consistent w/xlsx ss value (65.4°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (64.8°F) not consistent w/xlsx ss value (56.0°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (7.9/5.5mg/L) not consistent w/xlsx ss values (12.0/15.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly avg/daily max reported (12.0/9.0lb/day) not consistent w/xlsx ss values (7.9/10.4lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (6.4/8.1mg/L) not consistent w/xlsx ss value (12.4/16.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (12.4/10.0lb/day) not consistent w/xlsx ss values (8.1/11.1lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- September 2023 DMR:
 - 001-A RW temp max 7D avg reported (62.7°F) not consistent w/xlsx ss value (54.1°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (12.6/10.1mg/L) not consistent w/xlsx ss values (15.3/18.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly/weekly avg/daily max reported (15.3/18.0/14.0lb/day) not consistent w/xlsx ss values (10.1/12.6/12.6lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (8.5/10.3mg/L) not consistent w/xlsx ss values (13.0/16.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (13.0/11.0lb/day) not consistent w/xlsx ss values (8.5/10.3lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-Q Effluent Q3 quarterly ammonia and phosphorous totals reported, sampled in July *P conc/load value duplicate load not calculated/no sample date to match w/flow value
- October 2023 DMR:
 - 001-A Effluent temp max 7D avg reported (58.7°F) not consistent w/xlsx ss value (61.7°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (61.3°F) not consistent w/xlsx ss value (49.9°F) *confirm ss 7D avg calculations
 - 01-A Effluent BOD conc weekly avg reported (9.3mg/L) not consistent w/xlsx ss value (16.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly avg/daily max reported (16.0/10.0lb/day) not consistent w/xlsx ss values (9.3/10.9lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (8.6mg/L) not consistent w/xlsx ss value (15.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (10.0/15.0lb/day) not consistent w/xlsx ss values (8.6/10.3lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- November 2023 DMR:
 - 001-A Effluent temp daily max reported (57.2°F) not consistent w/xlsx ss value (59.1°F)

- 001-A Effluent temp max 7D avg reported (59.1°F) not consistent w/xlsx ss value (57.3°F) *confirm ss 7D avg calculations
- 001-A Effluent BOD conc monthly/weekly avg reported (7.7/9.2mg/L) not consistent w/xlsx ss values (13.8/16.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
- 001-A Effluent BOD load monthly/weekly avg/daily max reported (13.8/16.0/10.0lb/day) not consistent w/xlsx ss values (7.7/9.2/9.2lb/day)
- 001-A Effluent TSS conc weekly avg reported (8.3mg/L) not consistent w/xlsx ss value (18.0mg/L)
- 001-A Effluent TSS load monthly avg/daily max reported (18.0/12.0lb/day) not consistent w/xlsx ss values (8.3/9.8lb/day)
- 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- December 2023 DMR:
 - 001-A Effluent temp daily max reported (50.7°F) not consistent w/xlsx ss value (53.7°F)
 - 001-A Effluent temp max 7D avg reported (49.4°F) not consistent w/xlsx ss value (52.1°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (41.5°F) not consistent w/xlsx ss value (41.9°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (6.7/5.7mg/L) not consistent w/xlsx ss values (11.8/15.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly avg/daily max reported (11.8/9.0lb/day) not consistent w/xlsx ss values (6.7/8.6lb/day)
 - 001-A Effluent TSS conc weekly avg reported (7.1mg/L) not consistent w/xlsx ss value (15.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (15.0/15.0lb/day) not consistent w/xlsx ss values (7.1/8.2lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
 - 001-Q Effluent Q4 quarterly ammonia and phosphorous totals reported, values not consistent w/xlsx ss values, sampled in October *P conc/load value duplicate load not calculated/no sample date to match w/flow value

- January 2024 DMR:
 - 001-A ETL daily max exceedance reported, 16.3Mkcal/day reported, 11.1Mkcal/day limit (47% exceedance) ***permit limit violation – need to confirm formula/calculation**
 - 001-A Influent BOD/TSS conc monthly avg reported (13.2/11.7mg/L) not consistent w/xlsx ss values (253/250mg/L)
 - 001-A Effluent temp max 7D avg reported (50.1°F) not consistent w/xlsx ss value (52.4°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (41.8°F) not consistent w/xlsx ss value (42.0°F) *confirm ss 7D avg calculations
 - 001-A Effluent BOD conc monthly/weekly avg reported (12.6/12.6mg/L) not consistent w/xlsx ss values (13.2/19.0mg/L) *confusion between load/conc, weekly avg – report max weekly value when sampling once/week
 - 001-A Effluent BOD load monthly avg/daily max reported (13.2/9.0lb/day) not consistent w/xlsx ss values (12.6/21.4lb/day)
 - 001-A Effluent TSS conc weekly avg reported (11.7mg/L) not consistent w/xlsx ss value (16.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (16.0/11.0lb/day) not consistent w/xlsx ss values (11.7/16.9lb/day)
 - 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- February 2024 DMR:
 - 001-A Effluent temp max 7D avg reported (52.1°F) not consistent w/xlsx ss value (51.2°F) *confirm ss 7D avg calculations
 - 001-A RW temp max 7D avg reported (41.8°F) not consistent w/xlsx ss value (41.4°F) *confirm ss 7D avg calculations

- 001-A Effluent BOD conc weekly avg reported (13.7mg/L) not consistent w/xlsx ss value (15.0mg/L)
*weekly avg – report max weekly value when sampling once/week
- 001-A Effluent BOD load monthly avg/daily max reported (12.0/15.0lb/day) not consistent w/xlsx ss values (13.7/18.8lb/day)
- 001-A Effluent TSS conc weekly avg reported (15.9mg/L) not consistent w/xlsx ss value (18.0mg/L)
- 001-A Effluent TSS load monthly avg/daily max reported (11.0/18.0lb/day) not consistent w/xlsx ss values (15.9/25.1lb/day)
- 001-A Effluent E. coli monitoring report incorrectly on both rows Q and R, *report E. coli value on row Q with NODI Code 9 in row R
- March 2024 DMR:
 - 001-A Effluent temp daily max reported (50.5°F) not consistent w/xlsx ss value (52.3°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (9.0/15.0lb/day) not consistent w/xlsx ss values (13.0/18.5lb/day)
 - 001-A Effluent BOD conc. weekly avg max reported (13 mg/L) not consistent w/xlsx ss values (15 mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (13.0/17.0lb/day) not consistent w/xlsx ss values (16.7/25.5lb/day)
 - 001-A Effluent TSS conc weekly avg reported (16.7mg/L) not consistent w/xlsx ss value (17.0mg/L)
 - 001-Q Effluent Q1 quarterly ammonia and phosphorous totals reported. Samples taken in January. Phosphorus load value not calculated in xlsx ss; no sample date given to match flow value for calculation.
- April 2024 DMR:
 - 001-A Effluent temp daily max reported (54.5°F) not consistent w/xlsx ss value (57.1°F)
 - 001-A Effluent temp max 7D avg reported (51.5°F) not consistent w/xlsx ss value (57.1°F)
 - 001-A RW temp max 7D avg reported (44.5°F) not consistent w/xlsx ss value (45.8°F)
 - 001-A Effluent BOD conc weekly avg reported (12.0mg/L) not consistent w/xlsx ss value (16.0mg/L)
 - 001-A Effluent BOD load monthly avg reported (16.0lb/day) not consistent w/xlsx ss values (10.4lb/day)
 - 001-A Effluent TSS load monthly avg/daily max reported (19.0/19.0lb/day) not consistent w/xlsx ss values (11.8/14.3lb/day)
 - 001-A Effluent TSS conc weekly avg reported (11.8mg/L) not consistent w/xlsx ss value (19.0mg/L)
- May 2024 DMR:
 - 001-A Effluent temp daily max reported (55.3°F) not consistent w/xlsx ss value (57.8°F)
 - 001-A RW temp max 7D avg reported (45.8°F) not consistent w/xlsx ss value (46.9°F)
 - 001-A Effluent temp max 7D avg reported (56.8°F) not consistent w/xlsx ss value (57.8°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (13.2/7.0lb/day) not consistent w/xlsx ss values (11.8/13.0lb/day)
 - 001-A Effluent BOD conc weekly avg reported (9.9mg/L) not consistent w/xlsx ss value (18.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (13.0/10.0lb/day) not consistent w/xlsx ss values (8.8/10.8lb/day)
 - 001-A Effluent TSS conc weekly avg reported (8.8mg/L) not consistent w/xlsx ss value (13.0mg/L)
- June 2024 DMR:
 - 001-A RW temp max 7D avg reported (52.9°F) not consistent w/xlsx ss value (51.5°F)
 - 001-A Effluent temp max 7D avg reported (65.5°F) not consistent w/xlsx ss value (64.6°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (12.3/9.0lb/day) not consistent w/xlsx ss values (8.2/10.3lb/day)
 - 001-A Effluent BOD conc weekly avg reported (8.2mg/L) not consistent w/xlsx ss value (15.0mg/L)
 - 001-A Effluent BOD load weekly avg reported (15.0lb/day) not consistent w/xlsx ss value (10.3lb/day)
 - 001-A Effluent TSS load monthly avg/daily max reported (11.0/8.0lb/day) not consistent w/xlsx ss values (7.4/10.7lb/day)
 - 001-A Effluent TSS conc weekly avg reported (7.4mg/L) not consistent w/xlsx ss value (16.0mg/L)
 - 001-A Effluent TSS load weekly avg reported (16.0lb/day) not consistent w/xlsx ss value (10.7lb/day)
 - 001-Q Effluent Q2 quarterly ammonia and phosphorous totals reported. Samples taken in April. Phosphorus load value not calculated in xlsx ss; no sample date given to match flow value for calculation.
- July 2024 DMR:
 - 001-A Effluent temp max 7D avg reported (64.2°F) not consistent w/xlsx ss value (66.9°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (10.6/7.0lb/day) not consistent w/xlsx ss values (7.1/10.9lb/day)
 - 001-A Effluent BOD conc monthly avg reported (7.1mg/L) not consistent w/xlsx ss value (10.6mg/L)

- 001-A Effluent BOD load weekly avg reported (15.0lb/day) not consistent w/xlsx ss value (10.9lb/day)
- 001-A Effluent BOD conc weekly avg reported (10.9mg/L) not consistent w/xlsx ss value (15.0mg/L)
- 001-A Effluent TSS load monthly avg/daily max reported (12.4/9.0lb/day) not consistent w/xlsx ss values (8.3/9.5lb/day).
- 001-A Effluent TSS conc weekly avg reported (8.3mg/L) not consistent w/xlsx ss value (14.0mg/L)
- August 2024 DMR:
 - 001-A Effluent temp max 7D avg reported (64.5°F) not consistent w/xlsx ss value (66.3°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (12.8/15.0lb/day) not consistent w/xlsx ss values (7.4/9.4lb/day)
 - 001-A Effluent BOD conc monthly avg reported (7.4mg/L) not consistent w/xlsx ss value (12.8mg/L)
 - 001-A Effluent BOD conc weekly avg reported (7.4mg/L) not consistent w/xlsx ss value (15.0mg/L)
 - 001-A Effluent TSS load monthly avg reported (12.3lb/day) not consistent w/xlsx ss values (7.1lb/day).
 - 001-A Effluent TSS conc weekly avg reported (7.1mg/L) not consistent w/xlsx ss value (16.0mg/L)
- September 2024 DMR:
 - 001-A Effluent temp max 7D avg reported (62.2°F) not consistent w/xlsx ss value (64.2°F)
 - 001-A Effluent BOD load daily max reported (7.4lb/day) not consistent w/xlsx ss value (9.1lb/day)
 - 001-A Effluent BOD conc monthly/weekly avg reported (8.3/14.0mg/L) not consistent w/xlsx ss values (14.0/15.0mg/L)
 - 001-A Effluent pH daily min/max reported (6.7/6.9 SU) not consistent w/xlsx ss values (6.8/7.2 SU)
 - 001-G Influent pH daily min reported (7.1 SU) not consistent w/xlsx ss value (6.7 SU)
 - 001-A Effluent TSS load daily max reported (6.1lb/day) not consistent w/xlsx ss values (9.9lb/day).
 - 001-A Effluent TSS conc monthly/weekly avg reported (7.9/13.3mg/L) not consistent w/xlsx ss values (13.3/16.0mg/L)
 - 001-Q Effluent Q3 quarterly ammonia and phosphorous totals reported. Samples taken in July. Phosphorus load value not calculated in xlsx ss; no sample date given to match flow value for calculation.
- October 2024 DMR:
 - 001-A Effluent BOD load monthly avg/daily max reported (13.2/16.0lb/day) not consistent w/xlsx ss values (7.7/10.0lb/day)
 - 001-A Effluent BOD conc monthly/weekly avg reported (10.0/7.7mg/L) not consistent w/xlsx ss values (13.2/16.0mg/L)
 - 001-A Effluent BOD load weekly avg reported (7.7lb/day) not consistent w/xlsx ss value (10.0lb/day)
 - 001-A Effluent TSS load monthly avg/daily max reported (11.6/15.0lb/day) not consistent w/xlsx ss values (6.8/9.4lb/day)
 - 001-A Effluent TSS load weekly avg reported (6.8lb/day) not consistent w/xlsx ss value (9.4lb/day)
 - 001-A Effluent TSS conc weekly avg reported (6.8mg/L) not consistent w/xlsx ss value (15.0mg/L)
- November 2024 DMR:
 - 001-A Effluent temp max 7D avg reported (52.1°F) not consistent w/xlsx ss value (55.1°F)
 - 001-A Effluent BOD load monthly avg/daily max reported (13.0/16.1lb/day) not consistent w/xlsx ss values (8.6/10.4lb/day)
 - 001-A Effluent BOD conc weekly avg reported (8.6mg/L) not consistent w/xlsx ss values (16.0mg/L)
 - 001-A Effluent TSS load monthly avg/daily max reported (12.0/15.0lb/day) not consistent w/xlsx ss values (7.8/9.8lb/day)
 - 001-A Effluent TSS conc weekly avg reported (7.8mg/L) not consistent w/xlsx ss values (15.0mg/L)
- December 2024 DMR:
 - 001-A Effluent flow rate reported (0.129 MGD) not consistent w/xlsx ss value (0.126MGD)
 - 001-A Effluent BOD load monthly avg/daily max reported (13.3/15.0lb/day) not consistent w/xlsx ss values (11.1/18.0lb/day)
 - 001-A Effluent BOD conc monthly/weekly avg reported (15.0/11.1mg/L) not consistent w/xlsx ss values (13.3/15.0mg/L)
 - 001-A Effluent BOD load weekly avg reported (11.1lb/day) not consistent w/xlsx ss values (18.0lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (11.7/11.7mg/L) not consistent w/xlsx ss values (14.5/17.0mg/L)
 - 001-Q Effluent Q4 quarterly ammonia and phosphorous totals reported. Sample collected in October. Phosphorus load value not calculated in xlsx ss; no sample date given to match flow value for calculation.




- January 2025 DMR:
 - 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
 - 001-A Effluent BOD conc monthly/weekly avg reported (13.3/10.6 mg/L) not consistent w/xlsx ss values (10.6/14.0 mg/L)
 - 001-A Effluent BOD load weekly avg reported (14.0 lb/day) not consistent w/xlsx ss values (22.4 lb/day)
 - 001-A Effluent TSS load weekly avg reported (13.6 lb/day) not consistent w/xlsx ss values (28.8 lb/day)
 - 001-A Effluent TSS conc monthly/weekly avg reported (17.4/13.6 mg/L) not consistent w/xlsx ss values (13.6/18.0 mg/L)
 - 001-A ETL daily max exceedance of permit limit, 28.9 mkcal/day reported, permit limit 11.1 mkcal/day (160% exceedance). ***permit limit violation – need to confirm formula/calculation**
- February 2025 DMR:
 - Note included in DMR that states “Explanation (if needed):On 2-24-25 at 1210am we lost a 100amp breaker on our main electrical panel, it shut all power off to the three lift stations in town, we were able to get power on at 9am, we had our collection system backed up for 9 hrs, do to 60 inches of snow the previous week leading up to the weekend and rain all weekend caused excessive flows to the plant, I filled drying beds and recirclet flows through the system, maybe had 10k to 15kgals overflow from tank over a 24 hr period, none of it reached the river, spread lime over area where over flow was on the ground, we are still over 200k gals coming into the plant, no over flows since Feb 24,2025.” **Need to submit an SSO report for this overflow.**
 - 001-A Effluent Excess Thermal Load max – unclear how this is being calculated.
 - 001-A Effluent max 7D avg temperature reported value (47.9°F) inconsistent with excel value (48.8°F).
 - 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
 - 001-A Effluent BOD load monthly avg and daily max reported values (7.8/10.0 lb/d) not consistent w/xlsx ss values (10.6/17.7 lb/d)
 - 001-A Effluent BOD conc weekly avg conc reported value (10.6 mg/L) inconsistent w/ xlsx ss value (10.0 mg/L).
 - 001-A Effluent TSS load monthly avg, daily max, and weekly avg reported values (11.8, 15.0, 22.8 lb/day) not consistent w/xlsx ss values (15.7, 22.8, 22.8 lb/day)
 - 001-A Effluent TSS conc weekly avg reported value (15.7 mg) not consistent w/xlsx ss value (15.0 mg/L)
- March 2025 DMR:
 - 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
 - 001-A Effluent BOD load monthly avg and daily max reported values (8.3/ 11.0 lb/d) not consistent w/xlsx ss values (15.6 / 23.0 lb/d)
 - 001-A Effluent BOD conc weekly avg conc reported value (15.6 mg/L) inconsistent w/ xlsx ss value (11.0 mg/L).
 - 001-A Effluent TSS load monthly avg and daily max reported values (12.0/ 17.0 lb/d) not consistent w/xlsx ss values (22.4 / 35.6 lb/d)
 - 001-A Effluent TSS conc weekly avg conc reported value (22.4 mg/L) inconsistent w/ xlsx ss value (17.0 mg/L).
 - 001-Q1 Quarterly ammonia and phosphorus results not provided in xlxs ss.
- April 2025 DMR: Complete – (see DMR xlsx in shared folder)
 - 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
 - 001-A Effluent BOD load max weekly avg reported value (130 lb/d) not consistent w/xlsx ss value (13.6 lb/d)
 - 001-A Effluent BOD conc monthly avg and max weekly avg conc reported value (11.4 / 9.6 mg/L) inconsistent w/ xlsx ss values (9.6 / 13.0 mg/L).
 - 001-A Effluent TSS load monthly avg and daily max reported values (12.4/ 17.0 lb/d) not consistent w/xlsx ss values (14.7 / 17.7 lb/d)
 - 001-A Effluent TSS conc monthly avg and max weekly avg conc reported value (12.04 / 14.7 mg/L) inconsistent w/ xlsx ss values (12.4 / 17.0 mg/L).
- May 2025 DMR:






- 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
- 001-A Effluent BOD load monthly avg and daily max reported values (8.5 / 10.0 lb/d) not consistent w/xlsx ss values (8.4 / 10.8 lb/d)
- 001-A Effluent BOD conc max weekly avg reported value (8.4 mg/L) inconsistent w/ xlsx ss values (10.0 mg/L).
- 001-A Effluent TSS load monthly avg and daily max reported values (14.0 / 16.0 lb/d) not consistent w/xlsx ss values (13.8 / 15.5 lb/d)
- 001-A Effluent TSS conc max weekly avg reported value (13.8 mg/L) inconsistent w/ xlsx ss values (16.0 mg/L).
- 001-A Effluent Chlorine usage monthly avg reported value (2.6 lb/d) inconsistent w/ xlsx ss value (1.6 lb/d)
- June 2025 DMR:
 - 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
 - 001-A Effluent BOD load monthly avg, daily max, and max weekly avg reported values (10.8 / 9.0 / 13.0 lb/d) not consistent w/xlsx ss values (8.8 / 10.2 / 10.2 lb/d)
 - 001-A Effluent BOD conc max weekly avg reported value (8.7 mg/L) inconsistent w/ xlsx ss values (13.0 mg/L).
 - 001-A Effluent TSS load monthly avg and daily max reported values (12.8 / 9.0 lb/d) not consistent w/xlsx ss values (10.3 / 11.2 lb/d)
 - 001-A Effluent TSS conc max weekly avg reported value (10.3 mg/L) inconsistent w/ xlsx ss values (14.0 mg/L).
 - 001-Q2 Quarterly ammonia and phosphorus results not provided in xlxs ss.
- July 2025 DMR:
 - 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
 - 001-A Effluent BOD load monthly avg and daily max reported values (12.0 / 15.0 lb/d) not consistent w/xlsx ss values (8.5 / 10.3 lb/d)
 - 001-A Effluent BOD conc max weekly avg reported value (8.5 mg/L) inconsistent w/ xlsx ss values (10.3 mg/L).
 - 001-A Effluent TSS load monthly avg and daily max reported values (14.6 / 18.0 lb/d) not consistent w/xlsx ss values (10.4 / 13.1 lb/d)
 - 001-A Effluent TSS conc max weekly avg reported value (10.4 mg/L) inconsistent w/ xlsx ss values (18.0 mg/L).
 - 001-A Effluent Chlorine usage monthly avg reported value (3.0 lb/d) inconsistent w/ xlsx ss value (1.8 lb/d)
- August 2025 DMR:
 - 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
 - 001-A Effluent BOD load monthly avg and daily max reported values (10.5 / 14.0 lb/d) not consistent w/xlsx ss values (7.2 / 9.1 lb/d)
 - 001-A Effluent BOD conc max weekly avg reported value (7.2 mg/L) inconsistent w/ xlsx ss values (14.0 mg/L).
 - 001-A Effluent TSS load monthly avg reported value (16.0 lb/d) not consistent w/xlsx ss values (10.9 lb/d)
 - 001-A Effluent TSS conc max weekly avg reported value (10.9 mg/L) inconsistent w/ xlsx ss values (18.0 mg/L).
- September 2025 DMR:
 - 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
 - 001-A Effluent BOD load monthly avg and daily max reported values (10.6 / 14.0 lb/d) not consistent w/xlsx ss values (7.1 / 8.9 lb/d)

- 001-A Effluent BOD conc max weekly avg reported value (7.1 mg/L) inconsistent w/ xlsx ss values (14.0 mg/L).
- 001-A Effluent TSS load monthly avg and daily max reported values (14.6 / 18.0 lb/d) not consistent w/xlsx ss values (9.8 / 11.4 lb/d)
- 001-A Effluent TSS conc max weekly avg reported value (9.8 mg/L) inconsistent w/ xlsx ss values (18.0 mg/L).
- 001-Q3 Quarterly ammonia and phosphorus results not provided in xlxs ss.
- October 2025 DMR:
 - 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
 - 001-A Effluent BOD load monthly avg, daily max, and max weekly avg reported values (10.8 / 14.0 / 6.5 lb/d) not consistent w/xlsx ss values (6.5 / 7.6 / 7.6 lb/d)
 - 001-A Effluent BOD conc max weekly avg reported value (6.5 mg/L) inconsistent w/ xlsx ss values (14.0 mg/L).
 - 001-A Effluent TSS load monthly avg, daily max, and max weekly avg reported values (14.0 / 18.0 / 8.3 lb/d) not consistent w/xlsx ss values (8.3 / 9.8 / 9.8 lb/d)
 - 001-A Effluent TSS conc max weekly avg reported value (8.3 mg/L) inconsistent w/ xlsx ss values (18.0 mg/L).
- November 2025 DMR:
 - 7D avg temperature for effluent and receiving water does not appear to be calculated in ss, values are the exact same as daily temp values.
 - 001-A Effluent BOD load monthly avg and daily max reported values (12.5 / 16.0 lb/d) not consistent w/xlsx ss values (7.1 / 8.5 lb/d)
 - 001-A Effluent BOD conc max weekly avg reported value (7.1 mg/L) inconsistent w/ xlsx ss values (16.0 mg/L).
 - 001-A Effluent TSS load monthly avg and daily max reported values (13.8 / 12.0 lb/d) not consistent w/xlsx ss values (7.9 / 9.1 lb/d)
 - 001-A Effluent TSS conc max weekly avg reported value (7.9 mg/L) inconsistent w/ xlsx ss values (15.0 mg/L).
- December 2025 DMR:
 - 001-A Effluent Excess Thermal Load exceedance of permit limit, 12.4 mkcal/day reported, permit limit 11.1 mkcal/day (12% exceedance). ***permit limit violation – need to confirm formula/calculation**
 - 7D avg temperature for effluent and receiving water does not appear to be calculated, values are the exact same as daily temp values.
 - 001-A Effluent BOD load monthly avg and daily max reported values (11.2 / 8.0 lb/d) not consistent w/xlsx ss values (9.1 / 15.5 lb/d)
 - 001-A Effluent BOD conc max weekly avg reported value (9.1 mg/L) inconsistent w/ xlsx ss values (17.0 mg/L).
 - 001-A Effluent TSS load monthly avg and daily max reported values (14.8 / 12.0 lb/d) not consistent w/xlsx ss values (11.7 / 18.6 lb/d)
 - 001-A Effluent TSS conc max weekly avg reported value (11.7 mg/L) inconsistent w/ xlsx ss values (22.0 mg/L).
 - 001-Q4 Quarterly ammonia and phosphorus results not provided in xlxs ss.


Appendix II: Email from DEQ staff regarding January 2024 ETL Correction Needed

re: Chiloquin STP / NPDES #101029 / January 2024 DMR - ETL

 COSSEL Shane * DEQ
To  c.case44@gmail.com
Cc  STERGER Justin * DEQ

 Reply  Reply All  Forward  

Thu 4/25/2024 12:01 PM

 Follow up. Completed on Thursday, April 25, 2024.

 ETL_Example_Chiloquin.xlsx 22 KB

Hello Charles,


Per our previous conversation, this email is regarding the January 2024 DMR where an Excess Thermal Load (ETL) exceedance was reported and flagged as a violation. I was able to review your ETL calculations and confirm that the daily maximum reported is incorrect and a corrected DMR is required to resolve the flagged violation in NetDMR.

The column on page two of your spreadsheet attachment for Thermal Load to River has the correct formula from the permit to calculate daily ETL, but the Daily thermal limit value is incorrect, and I am unable to see how that value is being calculated. Additionally, it is unclear if the temperature columns on page two used for the ETL formula are running 7-day temperature averages for effluent and the Williamson River, they are the same values entered on page one of the spreadsheet. I attached an Excel example of an ETL calculation method using running 7-day temperature averages for January with the daily max ETL value to report in NetDMR. Feel free to provide the example to the staff who assists you with your Excel template.

Once you've had a chance to look over the attached ETL example, please submit an amended DMR for the January 2024 monitoring period reporting the correct ETL daily maximum to resolve the violation in NetDMR by **Friday, May 10th, 2024**. You will also need to implement changes to your current spreadsheet so that future ETL calculations and resulting daily maximum ETL is reported accurately.


If you have any questions or need assistance submitting corrected DMRs in NetDMR, feel free to contact me directly on my cell at 971-263-1095 or via email. I appreciate your time and assistance, have a good day.

Thanks,



Shane J. Cossel
Water Quality Compliance Specialist
Oregon Department of Environmental Quality
400 E Scenic Dr., Suite 307
The Dalles, OR 97058
Mobile: (971) 263-1095
Email: shane.cossel@deq.oregon.gov

Appendix III: OERS Report for SSO and DEQ Email



OREGON DEPARTMENT OF EMERGENCY MANAGEMENT

Oregon Emergency Response System (OERS)

Mailing Address:
3565 Trelstad Ave SE
Salem, OR 97317

Nationwide: 800-452-0311
Local: 503-378-6377
E-mail: oers.staff@osp.oregon.gov
Fax: (503) 588-1378

OERS Incident Number: **2025-0489** Incident Type: **SEWAGE**







Received:	02/24/2025	at	1657	Taken By:	Fuhrman, James
Occurred:	02/24/2025	at	0000		





Location:	122 S Klamath Ave		Coordination Time:
City:	Chiloquin		15
County:	Klamath		

Contact Type:	Paged:	Answered:	Contact Name	Organization:	Phone
Caller			Charles Case	City of Chiloquin	541-891-9234
Comments					
Email	1702		DEQ Sewage	DEQ	
Comments					
Email	1702		AGRI	AGRI	
Comments					
Pager	1702		AGRI	AGRI	
Comments					
Email	1702		OHA	OHA	
Comments					
Pager	1702		OHA	OHA	
Comments					
Email	1703		ODFW	FWD	
Comments					
Pager	1707		ODFW	FWD	
Comments					
Email	1707		SCC	OSP	
Comments					
Email	1707		OSP F&G	OSP/FG	
Comments					


Incident Description:
City of Chiloquin reported the release of 10-15000 gallons of raw sewage to the ground, possibly affecting the Williamson River. Caller reported that an electrical failure took their lift pumps offline as well as their alarms, causing sewage to back up through the system. The failure occurred at midnight, crews discovered it at 0415 hrs. An electrician restored power by 0900 hrs. The sewage will likely wash into the river before it can be cleaned up. Alternate Contact is Fred Jackson 541-591-6287


RE: 101029-Warning Letter with Opportunity to Correct - City of Chiloquin 2025-WLOTC-9828


 **STERGER Justin * DEQ**
To:  Dan Scalas;  c.case44@gmail.com;  Chiloquin City Hall
Cc:  Fred Jackson;  WITT Alyssa * DEQ


 Reply  Reply All  Forward  ...

Tue 3/4/2025 3:34 PM

 7D-Avg_Example_Chiloquin.xlsx
16 KB

 101029-WLOTC-CITYOFCHILQUIN-20250205.pdf
448 KB

 OERS 2025-0489.pdf
995 KB


 SSORreportFormF.pdf
332 KB

Hi Dan, Charles, Teresa, and Fred,

I'm circling back as a reminder that the WLOTC provided a corrective action date of March 7th, 2025 to provide the required DMR corrections.

Also, Charles and I had discussed by phone the high flow incident that occurred last week that caused the plant aeration basin to overtop and as reported to OERS. My understanding is that incident is no longer occurring, but we will need a written report to be submitted also. I've attached the SSO report template that is best used to provide the written report requirement, along with any photos or supporting information you can provide. This is the form I discussed with Charles. Please complete and submit by c.o.b. on Tuesday, March 11th. If you have any questions or wish to discuss next steps, please give me a call or email.

Thank you.

 Justin W. Sterger
Senior Water Quality Permit Writer
Oregon Department of Environmental Quality
475 NE Bellevue Dr., Suite 110
Bend, OR 97701
Direct: (541) 714-0206
Email: Justin.Sterger@deq.oregon.gov

Appendix IV: Annual Report Templates for I/I and Wastewater Solids



Wastewater Solids and Biosolids Annual Report

Part I: Wastewater solids production and disposition

Part I: Must be completed by all domestic wastewater facilities.

A. REPORTING PERIOD

1. This report is for biosolids produced during the calendar year:

B. PERMIT INFORMATION

1.	Permit Type (select one): <input type="checkbox"/> NPDES or <input type="checkbox"/> WPCF	DEQ File No.:
	DEQ Permit No.:	EPA Permit No.:

C. FACILITY INFORMATION

1. Legal name of facility:

Physical address

2. Street Address:

City:	State:	Zip code:
-------	--------	-----------

Mailing address Same as physical address.

3. Mailing Address:

City:	State:	Zip code:
-------	--------	-----------

Facility Type (check all that apply)

4. Major or Tier 1 facility (design flow of 1 mgd or greater, or serving a population of 10,000 or greater)
 Minor or Tier 2 facility (design flow less than 1 mgd or serving a population less than 10,000)
 Class I wastewater treatment facility (i.e., facility with a pre-treatment program)
 Biosolids only facility
 Lagoon treatment system
 Other, please specify:

D. CONTACT INFORMATION

1. Responsible official

Name:	Title:	
Email Address:	Telephone:	
Mailing Address:		
City:	State:	Zip code:

2. Biosolids contact Same as responsible official

Name:	Title:	
Email Address:	Telephone:	
Mailing Address:		
City:	State:	Zip code:

E. WASTEWATER SOLIDS RECEIVED

Please indicate if you received wastewater solids or hauled from other facilities for processing.

Did you receive wastewater solids or hauled waste from other facilities? Yes No

If you received unprocessed wastewater solids, please list sources below. All weight values should be reported in US tons. (US ton= 2,000 lbs) Attach additional pages if necessary.

1.	Name	Type	Quantity	Units (choose one)	% solids
		<input type="checkbox"/> septage <input type="checkbox"/> sludge		<input type="checkbox"/> gallons <input type="checkbox"/> wet tons <input type="checkbox"/> dry tons	
		<input type="checkbox"/> septage <input type="checkbox"/> sludge		<input type="checkbox"/> gallons <input type="checkbox"/> wet tons <input type="checkbox"/> dry tons	
		<input type="checkbox"/> septage <input type="checkbox"/> sludge		<input type="checkbox"/> gallons <input type="checkbox"/> wet tons <input type="checkbox"/> dry tons	
		<input type="checkbox"/> septage <input type="checkbox"/> sludge		<input type="checkbox"/> gallons <input type="checkbox"/> wet tons <input type="checkbox"/> dry tons	
		<input type="checkbox"/> septage <input type="checkbox"/> sludge		<input type="checkbox"/> gallons <input type="checkbox"/> wet tons <input type="checkbox"/> dry tons	

F. WASTEWATER SOLIDS TREATMENT PROCESSES

Please indicate the solids treatment processes used at your facility (mark all that apply)

1.	Thickening technology	Stabilization Technology	Dewatering technology
	<input type="checkbox"/> Gravity <input type="checkbox"/> DAF <input type="checkbox"/> Centrifugation <input type="checkbox"/> Other:	<input type="checkbox"/> Aerobic digestion <input type="checkbox"/> Anaerobic digestion <input type="checkbox"/> Lime stabilization <input type="checkbox"/> ATAD <input type="checkbox"/> Composting <input type="checkbox"/> Thermal <input type="checkbox"/> Lagoon <input type="checkbox"/> Other:	<input type="checkbox"/> Belt press <input type="checkbox"/> Plate and frame press <input type="checkbox"/> Screw press <input type="checkbox"/> Centrifuge <input type="checkbox"/> Vacuum filter <input type="checkbox"/> Drying beds <input type="checkbox"/> Heat drying <input type="checkbox"/> Other:

$$\text{Dry tons} = \text{wet tons} \times \% \text{solids} \qquad \text{Dry tons} = \frac{(\text{gal} \times \% \text{solids} \times 8.34)}{100} \times 0.0005$$

G. WASTEWATER SOLIDS DISPOSITION

Please indicate how wastewater solids were managed at your facility. Please specify reporting units. All weight values should be reported in US tons. US ton.= 2,000 lbs

1.	Disposition of wastewater solids	Quantity (choose one)			% solids
	<input type="checkbox"/> Treated and land applied, sold, or given-away as biosolids or biosolids-derived products	Gallons	Wet tons	Dry Tons	
	<input type="checkbox"/> Sent to landfill. Name:	Gallons	Wet tons	Dry Tons	
	<input type="checkbox"/> Sent to another permitted facility for treatment. Name:	Gallons	Wet tons	Dry Tons	
	<input type="checkbox"/> Long-term storage at treatment facility (e.g., lagoon, drying bed, etc.)*	Gallons	Wet tons	Dry Tons	
	<input type="checkbox"/> Other. Please specify:	Gallons	Wet tons	Dry Tons	

* If you operate a lagoon system and do not have accurate data on the quantity of solids in your lagoon, please check the box for long-term storage, but you may leave the quantity and other information blank.

H. LAGOON SYSTEM OPERATION and MAINTENANCE

The following section is required for facilities that operate wastewater treatment lagoons.

1. A survey of wastewater solids have been completed within the last year: Y N

2. In what year were solids last removed from the lagoon:

3. When do you estimate the next solids removal? Select only one of the following:

- Within the next calendar year
 Within the next 5 years
 Greater than 5 years from present

I. SIGNATURE OF LEGALLY AUTHORIZED REPRESENTATIVE

I certify that the information in this report is true and correct to the best of my knowledge and belief. Information and records used or referenced with this report will be maintained and made available to the Oregon Department of Environmental Quality on request.

Signature

Title

Date

Print Name:



Wastewater Solids and Biosolids Annual Report
Part II: Biosolids production and quality

Part II: Must be completed by facilities that produced Class A or Class B biosolids for land application, or sold or gave away biosolids derived products for distribution and marketing.

J. BIOSOLIDS PRODUCTION and DISPOSITION

Please specify quantity (in dry US tons) of finished biosolids stored or produced at your facility.			
		Class A	Class B
1.	Produced during reporting period		
	Total biosolids production		
Please indicate how finished biosolids were managed (i.e., land applied, sold, stored, or other).			
		Class A	Class B
2.	Land applied in bulk to agricultural land		
	Land applied in bulk to forest land		
	Land applied in bulk to reclamation site		
	Land applied in bulk to a public contact site (e.g., park, roadside golf course)		
	Sold or given away as feedstock for a biosolids-derived product		
	Sold or given away in bags or other containers		
	Carried-over into next year (i.e., onsite storage)		
	Sent to landfill		
	Other, please specify:		
Total biosolids disposition (add above lines)			

K. BIOSOLIDS SAMPLING

Select your facility's minimum regulatory monitoring frequency (select only one box):							
1.	Monitoring frequency	<input type="checkbox"/> Once per year	<input type="checkbox"/> Once per quarter (four times per year)	<input type="checkbox"/> Once per 60 days (six times per year)	<input type="checkbox"/> Once per month (12 times per year)		
	Metric tons	<290	290 > 1,500	1,500 > 15,000	≥ 15,000		
	US Tons	<319	319 > 1,650	1,650 > 16,500	≥ 16,500		
	Provide details on compliance sampling.						
2.	Sample type - Annual - Quarterly - 60 days - Monthly	Class	Processes (select all that apply)			Sampling date	
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		
		<input type="checkbox"/> A <input type="checkbox"/> B	<input type="checkbox"/> Aerobic dig. <input type="checkbox"/> Anaerobic dig. <input type="checkbox"/> Compost	<input type="checkbox"/> Air-dried <input type="checkbox"/> Heat dried <input type="checkbox"/> Lagoon	<input type="checkbox"/> Alkaline stabil. <input type="checkbox"/> Soil prod/blend <input type="checkbox"/> Other		

N. BIOSOLIDS PATHOGEN REDUCTION MONITORING and RECORDS

**Identify alternative(s) used to meet Class A or Class B pathogen reduction (PR): 40 CFR §503.32
Attach documentation on pathogen reduction.**

	Class A Alternatives	Class B Alternatives
1.	<p>Biosolids have been tested for (select one or both):</p> <p><input type="checkbox"/> fecal coliform</p> <p><input type="checkbox"/> salmonella</p> <hr/> <p><input type="checkbox"/> Alternative 1: Thermally treated biosolids</p> <p><input type="checkbox"/> Alternative 2: Biosolids treated in a high pH-high temperature process</p> <p><input type="checkbox"/> Alternative 3: Biosolids treated in other processes that meet enteric virus and helminth ova criteria.</p> <p><input type="checkbox"/> Alternative 4: Biosolids treated in unknown processes that meet enteric virus and helminth ova criteria.</p> <p><input type="checkbox"/> Alternative 5: Use of a Process to Further Reduce Pathogens (PFRP) (select all that apply)</p> <p><input type="checkbox"/> (a) Composting</p> <p><input type="checkbox"/> (b) Heat drying</p> <p><input type="checkbox"/> (c) Heat treatment</p> <p><input type="checkbox"/> (d) Thermophilic aerobic digestion</p> <p><input type="checkbox"/> (e) Beta ray irradiation</p> <p><input type="checkbox"/> (f) Gamma ray irradiation</p> <p><input type="checkbox"/> (g) Pasteurization</p> <p><input type="checkbox"/> Alternative 6: Use of a Process equivalent to a PFRP.</p> <p style="padding-left: 20px;">Identify:</p>	<p><input type="checkbox"/> Alternative 1: Monitoring of fecal coliform as the geometric mean of the density of fecal coliform of seven representative samples (select option met):</p> <p><input type="checkbox"/> < 2 million Most Probable Number (MPN) per gram of solids (dry wt. basis)</p> <p><input type="checkbox"/> < 2 million Colony Forming Units (CFU) per gram of total solids (dry wt. basis)</p> <p><input type="checkbox"/> Alternative 2: Biosolids treated in one of the Processes to Significantly Reduce Pathogens (PSRP) described below:</p> <p><input type="checkbox"/> (a) Aerobic digestion</p> <p><input type="checkbox"/> (b) Air drying</p> <p><input type="checkbox"/> (c) Anaerobic digestion</p> <p><input type="checkbox"/> (d) Composting</p> <p><input type="checkbox"/> (e) Lime stabilization</p> <p><input type="checkbox"/> Alternative 3: Biosolids treated in a process that is equivalent to a PSRP.</p> <p style="padding-left: 20px;">Identify:</p>

O. BIOSOLIDS VECTOR ATTRACTION REDUCTION and RECORDS

Identify option(s) used to meet vector attraction reduction (VAR): 40 CFR §503.33
Attach documentation demonstrating compliance.

In-plant options:

1. Option 1: 38% reduction in volatile solids content. Select method used for determining volatile solids reduction:
- Full mass balance equation
 - Approximate mass balance equation
 - Van Kleeck equation
 - Volatile solids loss across all sewage sludge treatment processes
- Option 2: Bench-scale anaerobic digestion for 40 additional days at 30 °C to 37 °C.
- Option 3: Bench-scale aerobic digestion for 30 additional days at 20 °C.
- Option 4: SOUR at 20 °C. (Only for material <2% solids with no dilution.)
- Option 5: Aerobic treatment for at least 14 days over 40 °C with an average temperature of over 45 °C.
- Option 6: Alkali addition to raise pH to at least 12 at 25 °C and maintain a pH ≥ 12 for 2 hours and a pH ≥ 11.5 for 22 more hours.
- Option 7: Drying with no unstabilized (primary) solids to at least 75% solids.
- Option 8: Drying with unstabilized (primary) solids to at least 90% solids.

Site management options:

- Option 9: Injection with no biosolids present on land surface 1 hour after injection. (Class A biosolids only: Injection within 8 hours of pathogen reduction.)
- Option 10: Incorporation within 6 hours of application. (Class A biosolids only: Incorporation within 8 hours of pathogen reduction.)

If VAR was met through Option 1, a 38% reduction in volatile solids, report the average reduction percentage found.

	Biosolid Type	Average Volatile Solid Reduction
2.	Class A	
	Class B	

P. VIOLATIONS OF 40 CFR §503 or OAR CHAPTER 340 DIVISION 50

Did any violations of 40 CFR §503 or OAR Chapter 340 Division 50 occur during the reporting period?

- No.
- Yes. Provide a detailed description of the violation(s) and remedial actions taken to prevent reoccurrences in the future. If this was a spill, please include the OARS report #.

Q. SUMMARY OF PART II ATTACHMENTS

Information DEQ requests with all annual reports:	
1.	<input type="checkbox"/> Analytical laboratory reports for pollutant monitoring. <u>No lab QA/QC</u> <input type="checkbox"/> Analytical laboratory reports for nutrient monitoring. <u>No lab QA/QC</u> <input type="checkbox"/> Documentation to demonstrate compliance with pathogen reduction requirements. <input type="checkbox"/> Documentation to demonstrate compliance with vector attraction reduction requirements.
Information required if pollutants in Section L exceed Table 3 values:	
2.	<input type="checkbox"/> Annual and cumulative pollutant additions to land application sites, if any pollutant concentration exceeds the Table 3 values.
Optional and supplemental information:	
3.	<input type="checkbox"/> Other information on changes to solids handling or land application site management. <input type="checkbox"/> Other information on biosolids violations and remedial actions. <input type="checkbox"/> Other. Please specify:

R. SIGNATURE OF LEGALLY AUTHORIZED REPRESENTATIVE

I certify, under penalty of law, that the information that will be used to determine compliance with the pathogen requirements in 40 CFR §503.32 (identified in Section P of this report) and the vector attraction reduction requirements in 40 CFR §503.33 (identified in Section Q of this report) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.		
Signature _____	Title _____	Date _____
Print Name: _____		



Wastewater Solids and Biosolids Annual Report
Part III: Biosolids land application site information

Part III: Must be completed by facilities that land applied Class B biosolids during the reporting period.
Add additional pages as needed.

S. LAND APPLICATION SITE INFORMATION

	Site ID	Owner (Last Name)	Location, PLSS (Township, Range, Section, Tax Lot)	Crop(s)	Appl. rate (lbs N/ac)	Total applied (DT/site)*	Total area applied (acres)	Was site applied to the previous year?	Soil test**
1.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
2.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
3.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
4.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
5.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
6.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
7.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
8.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
9.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
10.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
11.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
12.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
13.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
14.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>
15.								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>

Attach additional pages as required to report on all sites that received class B biosolids during the reporting period.

* Please report in units of dry US tons (US ton = 2,000 lbs)
 ** Please attach laboratory report showing sample results only. No lab QA/QC.

T. SUMMARY OF PART III ATTACHMENTS

	Information required with some annual reports:
1.	<input type="checkbox"/> Additional copies of Table S for additional land application. <input type="checkbox"/> Analytical results from soil testing
	Example of documentation held by the permittee and available upon request:
2.	<input type="checkbox"/> Additional land application site information. <input type="checkbox"/> Figures showing where biosolids were applied. <input type="checkbox"/> Nitrogen loading calculations

U. SIGNATURE OF LEGALLY AUTHORIZED REPRESENTATIVE

	<p>I certify, under penalty of law, that the information that will be used to determine compliance with the site restrictions in Sec. 503.32(b)(5) for each site on which Class B sewage sludge was applied was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.</p>		
	Signature	Title	Date
	Print Name:		



State of Oregon
Department of
Environmental
Quality

Inflow and Infiltration Reduction Annual Report

(Submit a separate form for each satellite collection system)

Year:.....

Facility Name:.....

DEQ File #:.....

Facility Location:.....

Permit #:.....

Miles of Common Sewer:.....

EPA ID#:.....

Number of Pump Stations:.....

Date of most recent I and I Study:.....

Number of storm caused SSOs last year:.....

Flow	Design Values	Observed Last Year
Average Dry Weather Flow		
Average Wet Weather Flow		
Maximum Month Wet Weather Flow		
Peak Day Flow		

Inspection, Maintenance, and Construction Activities

Enter activities completed in prior 5 years, completed last year, planned for upcoming year

Activity	Last 5 Years	Last Year	Planned
Smoke Testing* (miles & percent of total)			
Cleaning & TV inspection* (miles & percent of total)			
Cleaning w/o TV inspection* (miles & percent of total)			
Main line repaired (miles & percent of total)			
Main line replaced (miles & percent of total)			
Manholes repaired (number & percent of total)			
Manholes replaced (number & percent of total)			
Cross-connections** (number discovered & eliminated)			

* - Do not double report activities done in the same section during the same time period.

** - Include storm drains, area drains, and roof drains.

ATTACHMENTS: Please attach additional information regarding collection system repair and replacement work done last year and planned for the current year.

Signature Requirement

I certify, under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature of Responsible Official:_____

Name and Title (Please Print):_____

Date of Signature:_____ Telephone:_____