



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 25, 2026

Adam Schmid
City of Hood River
818 Riverside Drive
Hood River, Oregon 97031

RE: **Pre-Enforcement Notice**
City of Hood River
2025-PEN-10114
NPDES Permit #101729
YDO FIS ID# 213583
Hood River County

Dear Adam Schmid:

The City of Hood River operates a municipal wastewater (sewage) treatment facility and discharges treated effluent to the Columbia River under National Pollutant Discharge Elimination System (NPDES) Permit #101729.

Based on the review of the City's 2025 Discharge Monitoring Reports (DMRs) and a letter notifying DEQ (Appendix 1) of a daily single sample *E. coli* exceedance on August 5, 2025, DEQ has documented the following three (3) violations of Oregon environmental law. With these violations, the City of Hood River failed to comply with the terms and conditions of NPDES Permit #101729, which is a violation of ORS 468B.025(2).

Violations: Effluent Limit Exceedances for *E. coli*

Schedule A, Condition 1, Table A1 of the NPDES permit establishes effluent limits for the number of *E. coli* organisms per 100ml. The City failed to meet the single sample effluent limit on the violation dates shown in the table below.

Exceedance of a bacteria limit by less than five is a Class III violation (OAR 340-012-0055(3)(b)).

Effluent Limit	Reported Result (% over limit)	Violation Date	Violation Class
No single sample may exceed 406 org/100ml	521 org/100ml (28%)	August 5, 2025	III

The email notification stated the primary cause of the *E. coli* exceedance was the UV system bank failed during runtime. Two of the three banks lost communication, and operators could not power up additional

system banks. Based on DEQ guidance, this is not considered beyond reasonable control for the facility. As authorized by the NPDES permit, the City conducted five resampling events, these results are as follows:

August 8, 2025	Geometric Mean (#/100mL)
Sample 1	488.4
Sample 2	1986.3
Sample 3	1299.7
Sample 4	25.9
Sample 5	816.4

The results of resampling data do not disqualify the single sample bacteria violation documented on August 5, 2025.

Corrective Action Required

The City must ensure that all effluent limitations are met, including Schedule A effluent limits.

Violations: Quality Assurance/Quality Control (QA/QC) Failures

The facility reported QA/QC failures for parameters required by Schedule B of the assigned NPDES permit in a cover letter with the submitted DMRs. There are five (5) occurrences of QA/QC failures.

Per the City’s October 2025 DMR report, the influent and effluent BOD₅ samples on October 20th and 21st were reported as “NODI code P-Laboratory Error or Invalid Test”. The cover letter states, “BOD samples ran for October 20 and 21 were over depleted seed bottles, we will report as follows: with a “P” qualifier on Net DMR and include the data in monthly calculations”. Additionally, the cover letter with the November DMR states, “results reported with a “>” qualifier causing a red flag on DMR submission. Will report with a “>” qualifier and include data in the monthly calculations”. The data were useable in the calculations for permit compliance per DEQ’s NetDMR Guidance. These are listed in the table below.

Parameter	Date	Required Frequency	Violation Class
Influent BOD ₅	October 20, 2025	2/week	II
Effluent BOD ₅	October 20, 2025	2/week	II
Influent BOD ₅	October 21, 2025	2/week	II
Effluent BOD ₅	October 21, 2025	2/week	II
Effluent BOD ₅	November 11, 2025	2/week	II

These failures constitute a violation of the quality assurance plan required for permit compliance monitoring. Violating any management, monitoring, or operational plan established pursuant to a waste discharge permit is a Class II violation (OAR 340-012-0055(2)(d)). The City was cited for similar violations in 2025-PEN-9780 issued on January 6, 2025.

Violations: Sanitary Sewer Overflows

Oregon Revised Statute (ORS) 468B.025(1)(b) prohibits discharge into waters of the state if the discharge reduces the quality of such waters below water quality standards. OAR 340-041-0009(3) prohibits discharge of untreated sewage into waters of the State.

Sanitary Sewer Overflow of December 18, 2025

According to a December 23, 3035 report, the City of Hood River wastewater collection system discharged untreated domestic sewage to Phelps Creek (a tributary of the Columbia River) and ultimately discharged to Columbia River as detailed in a submitted Sanitary Sewer Overflow (SSO) report (Appendix 2).

The following summary was provided by the City regarding the overflow and mitigation actions:

The pump station influent flow exceeded the maximum design flow rate of the pumps. Although the recent storm event was within 1-in-5-year rainfall amount, the pump station could not prevent the overflow event.

This was determined to not be beyond reasonable control for the facility. In accordance with DEQ's Enforcement Rules, causing pollution of waters of the state is a Class I violation (OAR 340-012-0055(1)(a)). There are 10 violations of this type. Class I violations are considered to be the most serious violations; Class III violations are the least serious.

Corrective Action Required

The City of Hood River must ensure compliance with the terms and conditions of the issued NPDES permit and must take steps where possible to avoid overflows of untreated sewage to waters of the state. The permittee is expected to ensure appropriate system maintenance occurs to prevent sanitary sewer overflows to the extent possible.

Summary:

This matter has been referred to the DEQ's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of civil penalties and/or a Department order. A formal enforcement action may include a civil penalty assessment 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 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 blair.edwards@deq.oregon.gov or (971) 990-2216.

Sincerely,

Blair Edwards

Blair Edwards
Senior Environmental Engineer
Eastern Region, DEQ

cc: Mike Hiatt, DEQ
Alyssa Witt, DEQ
Anna Morgan-Hayes, DEQ
Louie Hooks, JACOBS
Jeff Houchin, JACOBS
DEQ Enforcement Section

DEQ WQ Data Team

Appendix 1-August 11, 2025 Letter to DEQ



Riverside Drive
818 Hood River, OR 97031
Tel 541.386.2432
Fax 541.386.6236

August 11, 2025

Blair Edwards
Oregon State DEQ
475 NE Bellevue Dr., Suite 110
Bend, OR 97701

Re: City of Hood River WWTP August 5, 2025, E. coli Exceedance – NPDES Permit #101729

Dear Mr. Edwards:

I am sending you this letter as a follow-up to email to your office on August 26, 2025, at approximately 3:37 P.M., to inform you that we had a daily E. coli exceedance at the City of Hood River WWTP.

The sample we collected on August 5, 2025, failed and after 5 re-samplings on August 8, 2025, the result was 484 counts /ml.

The primary cause was our UV system failed UV system bank failure during runtime. Two out of three UV banks lost communications and operators could not power up additional banks on the system. UV Control Center lost communication with the lamp drivers that power the lamps. Communications were lost between the controls and lamps on two of the three banks.

We contacted the manufacturer for solutions. During that process, we switched to the old UV system and had settings up to 90% power to see if that would help. That was not in time for our final test result, however. Since then, we were able to get the system powered up after researching the problems. We have the system back online and have set up a plan with the manufacturer to come out and check the system and perform training on the system.

If you have any questions, please contact me at 541.386.2432.

Respectfully,

Louie Hooks
Plant Manager, JACOBS

City of Hood River WWTP
 5-Resampling For the August 5, 2025 High E. coli event.
 8/5/2025 Reading 521 mpn/100 mL

> than 5 samples		Geometric Mean Calculator	
	Sample Data	Unit (CFU or MPN/100 ml)	
Sample 1	488.4		
Sample 2	1986.3		
Sample 3	1299.7		
Sample 4	25.9		
Sample 5	816.4		
Sample 6			
Sample 7			
Sample 8			
Sample 9			
Sample 10			
Sample 11			
Sample 12			
Sample 13			
Sample 14			
Sample 15			
Sample 16			
Sample 17			
Sample 18			
Sample 19			
Sample 20			
Sample 21			
Sample 22			
Sample 23			
Sample 24			
Sample 25			
Sample 26			
Sample 27			
Sample 28			
Sample 29			
Sample 30			
Sample 31			
Geometric mean =		484	CFU or MPN/100 ml (number to enter in DMR)

Appendix 2-SSO of December 18, 2025



Oregon Department of Environmental Quality SSO Reporting Form



This information must be submitted within 5 days of becoming aware of the overflow.
Please complete online and print for signature. Be sure to fill out all fields.

FACILITY/CONTACT INFORMATION		
Name of Permittee: City of Hood River		
Contact Name: Louie Hooks		
Phone:	Email:	County:
541-386-2432	louie.hooks@jacobs.com	Hood River
DEQ Permit # (see permit face page): 101729		DEQ File #:39694
OERS Incident #: 2025-3193	Date Reported to OERS: 12/18/2025	
Date Reported To DEQ: 12/18/2025	Today's Date: 12/23/2025	
Date SSO Started (if known): 12/18/2025	Time Started (if known): 3:21 pm	
Date SSO Stopped (if known): 12/18/2025	Time Stopped (if known): 8:30 pm	
SSO Location: Pump Station		
SSO Nearest Address: 175 Country Club Road		
City: Hood River	Zip Code: 97031	
SSO Latitude (if known): 45.709736	Longitude (if known): -121.555485	
Estimate of Quantity Overflowed: 69,525		(Gallons) Link to estimation method
Did the SSO discharge to surface water? Yes		
Name of waterbody: Phelps Creek then Columbia River		
PUBLIC NOTIFICATION		
Notified downstream drinking water sources (List Below)? N/A		
Name of drinking water facility:		
Signs Posted? N/A		
Media contacted? No		
Who?		
List any other steps taken to notify the public or state/federal agencies: Talked with the Hood River County Environmental Health Department		
CAUSES		
Cause or suspected cause of the overflow: Rainfall less than the 5 years, 24 hour storm <i>If needed, attach additional sheets</i>		
Rainfall in the 24 hours prior to SSO (for storm-related overflows): 2.55		(inches)
Source of rainfall data: Other (explain): <i>If needed, attach additional sheets</i>		

1-in-5 year 24 hour rainfall for the sewerage system area (if known): (in/24hr)
 Hood River WWTP Rain Gauge

EMERGENCY RESPONSE AND MIGRATION

List actions taken to stop and mitigate the impact of the SSO.

For overland flow:	Taped off affected area? Yes
	Cleaned up affected area? Yes
For SSO to surface water:	Bacteria samples taken to confirm impact? Yes
	Follow up bacteria samples taken to confirm end of impact? Yes

Describe monitoring and results:
 Collected samples on the 18th above and below the station, but the test did not get read within the allowed time and new samples had to be collected on the 22nd and the E. coli results above Country Club PS = 58.3 MPN/ 100 mL and below Country Club PS 83.9 MPN / 100 mL.

For SSOs that impact buildings:	Pumped out flooded buildings? N/A
	Disinfected? N/A

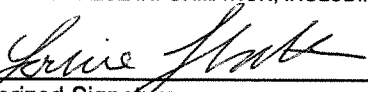
Other measures taken (describe):
 Crews on the scene worked with tanker truck and Vac-All trucks to keep the wet well down but with no avail. Only able to wait out the storm flows in the area before the station was able to keep up with the flow.

Steps taken or planned to reduce, eliminate, and prevent the reoccurrence of the overflow and schedule for those steps:
 At this time the station pumps can only keep up with the maximum design flow of the pumps in the station. Only upgrading the station pumps and volume of the wet well in the future can help.

COMMENTS

Given the circumstances of the storm in the area and the flooding of the rivers and creeks all personal did all they could to prevent the overflow at the station. Given that we had to be mindful of our response personal safety and the safety of the public during the storm.

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 FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

	12/23/2025
_____ Authorized Signature	_____ Date
Louie Hooks	1(541) 386-2432
_____ Name (print)	_____ Phone Number

*You may attach additional information to this report before sending to DEQ as needed to explain the circumstances of the overflow. This information may include but is not limited to: maintenance records and bacteria monitoring results.

Upon completion, print out this form and send to the appropriate DEQ Address:

Portland-Permit Coordinator
700 NE Multnomah St., Suite 600
Portland, OR 97232

Salem-Permit Coordinator
4026 Fairview Industrial Dr. SE
Salem, OR 97302

Pendleton-Permit Coordinator
700 SE Emigrant, #330
Pendleton, OR 97801

FOR DEQ PERSONNEL ONLY

Pre-Enforcement Notice

Warning Letter

No enforcement action was warranted because:

The SSO was caused by unpreventable vandalism or similar force majeure; or

The SSO is allowed as an exception to the permit as maintenance; or

The cause of the current SSO was beyond reasonable control AND we do not expect the permittee to prevent similar SSOs in the future; or

The SSO was 400 gallons or less, spilled to the ground and not reaching surface water; permittee properly reported, cleaned up, and took appropriate public notice measures; and the SSO was not part of a chronic problem.

COMMENTS

Country Club PS Overflow Point

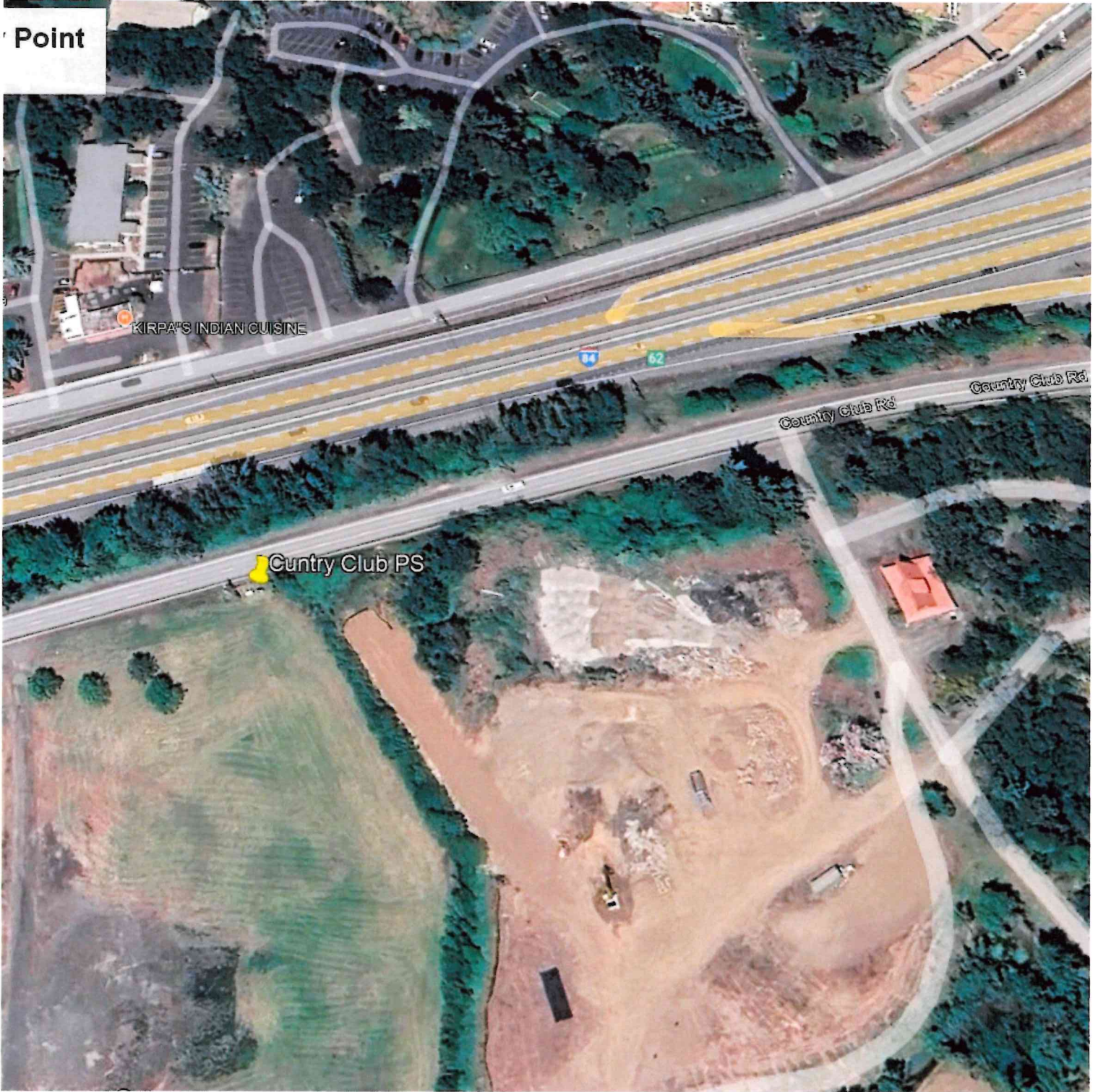
Write a description for your map

Legend

Country Club PS



Point



KIRPA'S INDIAN CUISINE

Cuntry Club PS

Country Club Rd

Country Club Rd

84

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