



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

4026 Fairview Industrial Dr SE

Salem, OR 97302

(503) 378-8240

FAX (503) 373-7944

TTY 711

February 20, 2026

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

Re: Pre-Enforcement Notice
Westfir Wastewater Treatment Plant
2026-PEN-10107
NPDES Permit #100811, EPA ID OR0028282
File 94805, Site RID 21388
WQ-Lane County

Dear Ms. Tritten,

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

Records Review

I reviewed records from June 2025 through January 2026. The city has submitted all monthly discharge monitoring reports (DMR) on time in NetDMR. Based upon this review, DEQ has concluded that the city is responsible for the following Schedule A violations.

Schedule A Violations

Schedule A of your NPDES permit requires the city to meet effluent discharge limits. The city failed to meet permit limits as outlined below.

1. Your NPDES permit requires the city to meet *E. coli* bacteria limits of 126 organisms per 100 mL monthly geometric mean and no single sample may exceed 406 organisms per 100 mL. The city violated their permit limit multiple times as indicated in Table 1 on page 4 of this notice.
2. Your NPDES permit requires the city to meet BOD₅ concentration limits of 20 mg/L per month and 30 mg/L weekly. The city violated their permit limits in January 2026 by reporting a monthly average and weekly average of 76 m/L which is 280% higher than the monthly limit and 153% higher than the weekly limit. These are class I violations of OAR-012-0055(1)(k).

3. Your NPDES permit requires the city to meet percent removal efficiencies of 85% per month. In January 2026 the city reported a BOD₅ removal efficiency of 77.6% which is less than the permit limit. This is a class III violation per OAR 340-012-0055(3)(c).

Requested Corrective Actions

1. By April 1, 2026, begin sampling for bacteria within 10 feet of the end of the UV system.
2. By July 1, 2026, using a third-party, evaluate the operation of the treatment facility, including ultraviolet (UV) disinfection system to ensure proper operation and maintenance.
3. By August 1, 2026, submit the third-party evaluation to DEQ along with a description of how the city intends to address any deficiencies noted in the evaluation and the timeframe for completion.
4. By August 1, 2026, track and record the following to improve operation of the treatment facility:
 - a. The amount of solids held within the treatment system to determine when to remove solids to maintain the correct operational mixed liquor suspended solids as designed for the system.
 - b. Date and amount of solids removed and location of disposal.
5. By January 31, 2027, evaluate the outfall piping system to determine why bacterial regrowth is occurring. For example, the city could use a closed circuit television system to determine if the outfall piping is broken and allowing inflow and infiltration downstream of the ultraviolet light disinfection system.

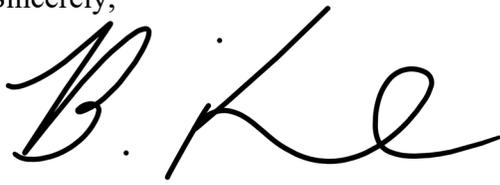
These are serious violations. The discharge of improperly disinfected wastewater with *E. coli* levels above permit limits can pose a public health hazard. Contact with this wastewater can lead to ear or skin infections, digestive problems, or respiratory problems when inhaled. Accordingly, they are being referred to DEQ's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of a civil penalty and/or DEQ order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this pre-enforcement notice are in error, you may provide information to me at the office at the address shown at the top of this letter. DEQ will consider the new information you submit and take appropriate action.

If you have any questions, please contact me in writing at brenda.kuiken@deq.oregon.gov or by phone at (503) 893-0924.

City of Westfir
February 20, 2026
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Sincerely,

A handwritten signature in black ink, appearing to read "B. Kuiken". The signature is fluid and cursive, with a large initial "B" and a long, sweeping underline.

Brenda Kuiken
WQ Compliance Specialist

cc: DEQ Salem Office file

ec: Ranei Nomura, Manager, Western Region DEQ
Oregon Records Management Solution
Max Baker, Middle Fork Consulting

Table 1 – *E. coli* Limit Violations

Monitoring Period	Parameter	Reported Value	Limit	Less than factor of 5?	Violation Class
October 2025	Monthly geomean, #/100 mL	1410	126	No	II
October 10, 2025	Daily maximum, #/100 mL	1410	406	Yes	III
November 2025	Monthly geomean, #/100 mL	260	126	Yes	III
December 11, 2025	Daily maximum, #/100 mL	5170	406	No	II
December 2025	Monthly geomean, #/100 mL	5170	126	No	II

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