



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

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TTY 711

February 11, 2026

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

Re: Warning Letter with Opportunity to Correct
Coburg Wastewater Reclamation Facility
2026-WLOTC-10130
NPDES Permit #102979, EPA ID OR0044628
File 115851, YDO Site RID 21671
WQ-Lane County

Dear Mr. Harmon,

DEQ has completed a records review for the City of Coburg to determine compliance with the conditions of the National Pollutant Discharge Elimination System permit number 102979 issued on July 20, 2009. The findings are summarized below.

Records Review

I previously reviewed records which contain excess thermal load limit violations in June, July and August 2025. Those violations will be addressed in this letter.

Schedule A Violations

The city is required to meet excess thermal load limits as listed in Schedule A of the permit. Coburg failed to meet these limits as listed below:

Table 1 – Excess Thermal Load Limit (ETLL) Violations (WQBEL)

Exceeded excess thermal load limit based on the calculation in Schedule A of the permit when the rolling 7-day average effluent temperature exceeds 18°C, for a single sample, as follows:

Monitoring Period	Parameter	Reported Value	Violation Class
June 30, 2025	Excess Thermal Load Limit, million Kcals/day	0.52	I
July 1, 2025	Excess Thermal Load Limit, million Kcals/day	0.92	I
July 2, 2025	Excess Thermal Load Limit, million Kcals/day	0.88	I
July 3, 2025	Excess Thermal Load Limit, million Kcals/day	0.84	I

Monitoring Period	Parameter	Reported Value	Violation Class
July 4, 2025	Excess Thermal Load Limit, million Kcals/day	0.64	I
August 29, 2025	Excess Thermal Load Limit, million Kcals/day	0.47	I

WQBEL means Water Quality Based Effluent Limit, exceeding a WQBEL is a Class I violation per OAR 340-012-0055(1)(1).

City of Coburg permit limits for excess thermal load is calculated with the equation:

$$ETLL = ((Q_E + Q_R) / 6.188) * 0.3 * 3.785$$

Where: Q_E = rolling 7-day average effluent flow in MGD

Q_R = rolling 7-day average EIC flow in cfs

EIC = East Irrigation Canal

The city exceeded the thermal load limit from June 30 to July 4 due to the groundwater pump failure to run. On August 29, 2025, there was a thermal load limit violation due to lack of water in the irrigation canal where the city discharges its effluent. Thermal load limits are considered water quality-based effluent limits, and violations thereof would normally be referred for formal enforcement action and civil penalty.

On the Friday evening of June 27, 2025, the groundwater pump which brings cool water to the treatment plant failed. City staff realized the pump was shut off immediately and began the replacement process. A new pump was located, purchased and installed and was fully operational on July 1.

Late in August the Irrigation District which operates the canal which supplies water to the ditch in which the city discharges, slowed the flow of water to the canal. This in turn lowered the City's dilution factor in their excess thermal load calculation and in turn created an event in which the city did not have enough dilution to maintain their thermal loading.

These are exceptional circumstances that led to the excess thermal load limit violations. Given that the city has maintained the groundwater pump on a regular basis per the manufacturer's recommendations, they could not have reasonably anticipated that the pump would fail, leading to the June to July ETL violations. And the city has no control over the flow of water in the irrigation canal nor prior knowledge that the irrigation district was planning on reducing the canal flow. It was beyond their reasonable control for the city to maintain the dilution needed to meet their thermal load in August.

Requested Corrective Actions

By June 1, 2026, please submit a plan to prevent excess thermal load permit limit violations which might be caused by low flows in the EIC and groundwater pump failures.

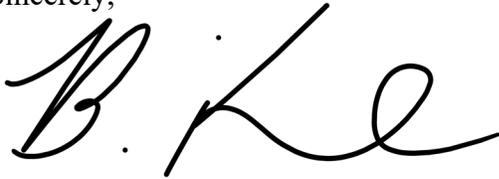
This notice is a warning letter with opportunity to correct. DEQ does not intend to take formal enforcement action at this time. However, should you fail to submit documentation that the

corrective actions have been completed by the date requested or repeat any of these violations, the matter may be referred to DEQ's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a DEQ order. Civil penalties can be assessed for each day of violation.

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Kuiken', with a stylized flourish at the end.

Brenda Kuiken
WQ Compliance Specialist

cc: DEQ Salem Office file

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