



Oregon

Tina Kotek, Governor

Department of Environmental Quality
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March 11, 2026

Gordon Zimmerman, Interim City Administrator
City of Cascade Locks
PO Box 308
Cascade Locks, OR 97014

RE: **Warning Letter with Opportunity to Correct**
WQ NPDES Permit No. 101328
2025-WLOTC-10154
FIS #213259
WQ-Hood River County

Mr. Zimmerman,

On March 6, 2026, the Oregon Department of Environmental Quality (DEQ) became aware of two residential subdivisions, Lilac Village and Windsong Terrace Phase 2, that had begun construction before undergoing the required technical review process performed by DEQ as required per OAR 340-052. DEQ did not receive plans or specifications for the developments nor provide technical review and approval for the developments.

Oregon Administrative Rule (OAR) 340-052-0015 states the following:

“Except where exempted under OAR 340-052-0040, all plans and specifications along with other data submitted for a proposed construction, installation, or modification project involving disposal systems, treatment works, sewerage systems or common sewers shall first be submitted to the Department for review. No construction, installation or modification shall be commenced until the plans and specifications submitted to the Department are approved.”

Therefore, as the permittee for the receiving wastewater treatment system, the City of Cascade Locks is responsible for violating an Oregon Administrative Rule, which is considered a Class I violation. There are two occurrences of this violation:

Violation 1: OAR 340-012-0055(1)(g): Making unauthorized changes, modifications, or alterations to a facility operating under a National Pollution Discharge Elimination System (NPDES) permit. The City of Cascade Locks began construction without approval for the Lilac Village residential subdivision.

Violation 2: OAR 340-012-0055(1)(g): Making unauthorized changes, modifications, or alterations to a facility operating under a National Pollution Discharge Elimination System (NPDES) permit. The City of Cascade Locks began construction without approval for the Windsong Terrace Phase 2 residential subdivision.

Corrective Actions Required:

DEQ cannot approve projects that have already been constructed prior to approval; however, an acceptance letter for the project will be issued by DEQ only if the following Corrective Actions are completed and satisfy technical review guidelines:

1. The applicable fee of \$1,065.00 is required to cover the technical reviews associated with a major system expansion project. The payment of the technical review fee and plan documents must be submitted separately for each project, Lilac Village and Windsong Terrace Phase 2, via Your DEQ On-Line (YDO), DEQ's electronic data management system. Each project's submittal package must include the following:
2. A completed and signed Land Use Compatibility Statement (LUCS).
3. A completed and signed Capacity Statement Form from the City of Cascade Locks.
4. A completed and signed Inspection and Certification of Proper Construction Form.
5. All relevant sewer manhole and pipeline test results.

The above Corrective Actions must be completed in 30 days (**April 10, 2026**) from the date of this letter. Once these corrective actions are completed and upon DEQ acceptance, the facility should review the comments provided in the acceptance letter prior to any further proposed modifications of the system.

In accordance with rule and permit language cited above, in the absence of an exemption, the facility must attain plans and specifications approval from DEQ for future wastewater infrastructure projects under the assigned NPDES permit.

Summary:

This notice is a Warning Letter with Opportunity to Correct. DEQ does not intend to take formal enforcement action currently. However, should you repeat this violation or fail to take the required corrective actions, 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 Department order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this Warning Letter 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 (503) 990-2216 or blair.edwards@deq.oregon.gov.

Sincerely,

Blair Edwards

Blair Edwards
Senior Environmental Engineer
Eastern Region - Water Quality

ECC: Mike Hiatt, DEQ
Anna Morgan-Hayes, DEQ
Sheldon Price, City of Cascade Locks
WQ file-Pendleton Office