

First Quarter 2022, Compliance Specialist Report

Report Period – Nov 01, 2021, through Jan 31, 2022

Introduction and Background

This report is in response to and in compliance with Section 17 of the Consent Decree issued to the City of Molalla. It is the intent of this report to cover the previous three months. Future reports will be provided each quarter going forward until the Consent Decree has been satisfied and/or terminated.

These reports will consist of three sections, the first section will list and address all activities completed in the specified quarter, the second section will address any violations associated with the quarter, and finally a section on scheduled activities for the next quarter.

Last Quarter Completed Projects

Using the Amended Consent Decree, the following items have been addressed this quarter. Each section references the Consent Decree section, and the entire section is not printed here, I have used a sentence or two for reference, please refer to the full Consent Decree for full section descriptions.

Section 11– *Defendant shall post on its website copies of communications with DEQ.*
The Discharge Monitoring Reports (DMR) for November 2021, December 2021, and January 2022 were posted to the City’s website. All other formal communications with DEQ have also been posted to the website.¹

Section 12 – *The City shall host quarterly meetings.*
The 4th Quarterly meeting was held by conference call on December 01, 2021.

Section 13 – *City shall post a report of operations summary.*
The City began winter discharge operations throughout the quarter.

Section 14 – *City shall post an update on their website each month.*
The Monthly Compliance Report was posted to the City’s website for November 2021, December 2021, and January 2022. Postings are available for viewing on the website.¹

Section 33 – *City shall conduct a survey of the aeration basin and treatment lagoons to evaluate level of solids build-up.*
There is nothing to report for this quarter.

Section 34 – *City shall conduct an annual biosolids removal.*

The City continued Biosolids Removal throughout the quarter, and submitted the 2021 Annual Biosolids Report to DEQ on January 19, 2022. The report has been posted to the website.²

Section 36 – The seven I&I projects are listed.

The following is an update on each of the 7 projects listed in the Consent Decree:

Project 1: Completed 2019

Project 2: Completed 2020

Project 3: Half of this Project will be completed with Project 4 in 2022

Project 4: Currently at 70% design, construction begins this summer. The other half is TBD

Project 5: TBD

Project 6: Completed 2021

Project 7: Completed 2019

The City also ensured the last of infiltrating manholes under the ODOT Highways were grout sealed in mid-November 2021 as planned.

Section 39 – City shall adopt a budget to include biosolids removal and I&I removal.

The City continued Biosolids Removal throughout the quarter, and submitted the 2021 Annual Biosolids Report to DEQ on January 19, 2022. The report has been posted to the website.²

Section 40 – Payments for violations.

In the early hours of November 5, 2021, an individual operating a motor vehicle drove onto a field and struck an old irrigation effluent lateral, which resulted in a clean effluent leak on the former Mandan Nursery Site. In compliance with its NPDES Waste Discharge Permit (the “Permit”), the City notified the Oregon Department of Environmental Quality (“DEQ”) within 24 hours and submitted a follow-up written report within 5 days. In response, City Crews abandoned the lateral at the Main on 12/6/21 (reference work order #16763). The City treated this incident as a violation of the permit and made the corresponding payment under the Consent Decree. However, the City believes the November 5th event constitutes an “upset” as defined in the Permit under Schedule F, Section B4. The City reserves the right to withdraw the payment at a later date if DEQ and the City subsequently determine the incident does not violate the Permit.

Section 2 – Violations

- There were no violations for the month of November 2021 (other than the Auto incident outlined above, for which the City made a precautionary payment).
- There were no violations for the month of December 2021.
- During the month of January 2022, the City exceeded the monthly BOD loading limits contained in the Permit, but the City remained in compliance with its MAO. The City will issue a stipulated payment for this violation.

Section 3 – Next Quarter projects and plans

- The City submitted the Design Acceptance Package for the Wastewater Treatment Plant to DEQ during this quarter and expects to incorporate that Department's Comments in the next Quarter.
- The City submitted Value Engineering of the Wastewater Treatment Plant Predesign Report during this quarter to DEQ and expects to incorporate that Department's Comments in the next Quarter.
- The City intends to continue the process of seeking funding opportunities to cover construction costs of the new Wastewater Treatment Facility, through a combination of requests at the Federal and State Agency level, through ARPA related funding possibilities, and through direct communication with both our area's State and Federal Representatives. The City is also reaching out to local consulting firms who specialize in assisting Municipalities structure the debt service of Water and Wastewater Treatment Facilities through the Federal WIFIA program.

This completes my report for the First quarter of 2022.

A handwritten signature in black ink, appearing to read "Kelly Demus". The signature is written in a cursive style with a large initial "K".

¹<https://www.cityofmolalla.com/publicworks/page/dmrs-and-other-documents>

²<https://www.cityofmolalla.com/publicworks/page/permit-plans-annual-reports>