



Public Works Division
315 Kennel Ave
Molalla, Oregon 97038
Phone: (503) 829-6855

May 10th, 2022

Attn: Mike Pinney, Oregon Dept of Environmental Quality

RE: 5 day Followup Report – BOD5 Violation, April 2022

Dear DEQ Permit Coordinator,

SITUATION DESCRIPTION: During the week of April 22nd through April 29th the City experienced a violation of the NPDES Permit conditions as modified by the March 2021 MAO for the month of April 2022 as follows: Weekly Average BOD5 loading (NPDES limit 240 lbs, MAO limit 600): 609 lbs. The approximate volume of discharge flow was 19.16 MG. That means the lbs of BOD discharged to the Molalla river in excess of the MAO limit was a total of 42 lbs. This April the Plant received record breaking rainfall, and according to the City's RWUP Lagoon levels must be lowered to an average of 7ft by the end of April every year in order to provide 30 days of shoulder month storage capacity to prevent out of season discharges in May. However, the dredge placed in Lagoon 1 for continuous biosolids removal prevents that lagoon from being lowered below 10ft. Therefore, the City lowered Lagoon 2 to 3ft to achieve that storage capacity. The tradeoff associated with BOD loading increases from the lowering of lagoon 2 and shoulder month storage was taken into account, and since the MAO provides relief in terms of BOD the City's current operating procedures specify that the plant should be operated for maximum shoulder month storage under these circumstances.

RESPONSE MEASURES TAKEN: Pursuant to the MAO paragraph 9 a voice-message was left to notify DEQ (Mike Pinney) verbally on May 4th. This letter is being sent pursuant to paragraph 9's requirement for a follow up within 5 days. The Canby Utility was also notified by phone pursuant to the agreement mentioned in the NPDES permit.

CORRECTIVE ACTION TO BE TAKEN: As for avoiding the situation next year, the city has 3 options. Option 1: if the upcoming November sludge judge shows that sufficient biosolids have been removed, then the dredge can be removed. If not, then Option 2: draw lagoon 2 down at 4 feet instead of 3 feet as was done this year. That, however, would mean less storage and higher risk of out-of-season discharge. Option 3: include a temperature allocation into the basin TMDL that would allow for shoulder month discharge under this condition.

Respectfully,

Andy Peters, Public Works Div Manager
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CC: Mac Corthell, Community Development Director
Dan Huff, City Manager