



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

May 26th, 2022

Attn: Mike Pinney, Oregon Dept of Environmental Quality

RE: 5 day Followup Report – Out of season discharge and temperature exceedances, May 2022

Dear DEQ Permit Coordinator,

SITUATION DESCRIPTION: As previously reported, During the week of April 22nd through April 29th the City experienced a violation of the NPDES Permit limits for BOD. As previously reported, the likely reason was the fact that the City needed to lower lagoon levels to maximize shoulder month holding capacity since the Plant was receiving record breaking rainfall. Subsequently, record rainfalls continued and the City notified DEQ on May 13th that despite these extra steps, lagoons were becoming full and out of season discharge would soon need to occur. DEQ approved that out of season discharge by letter on May 16th, and the City began discharging clean effluent on May 17th at a rate of 2.5 MGD. The receiving stream was flowing at 2080 CFS (NPDES limit 350 cfs) with a temperature of 9.9 degrees C, and the effluent temperature was 17.9 degrees C. The NPDES permit specifies that discharge must cease when the 7-day moving average effluent temperature exceeds 18.0 degrees C, and the MAO specifies that during out of season discharge that average becomes effective only after the 7th day of discharge. On the 5th day of discharge the effluent temperatures began to rise. In order to operate the plant to meet the average temperatures, flows were throttled back to 1.9 MGD, knowing that the tradeoff in doing so was to slow the plant's ability to lower its critical lagoon levels. But on the 7th day (May 24th) temperatures rose to 19.5 degrees C, making the first day of 7-day rolling average calculation 18.1 degrees C. DEQ was immediately notified, and through the conversation it was determined that, with more rain in the forecast for Saturday May 28th, and the lagoon levels still high, the City should continue to discharge. Throughout this period the Irrigation Fields were checked every day and remain fully saturated with standing water.

RESPONSE MEASURES TAKEN: Pursuant to the MAO paragraph 9 a voice-message was left to notify DEQ (Mike Pinney) verbally on May 24th, and a followup conversation by phone occurred on May 24th at 3:14pm. This letter is being sent pursuant to paragraph 9 (written follow up within 5 days), and is being sent earlier than the 5th day at DEQs request. The Canby Utility was also notified pursuant to the agreement mentioned in the NPDES permit.

Respectfully,

Andy Peters, Public Works Div Manager
315 Kennel Ave. | PO Box 248 | Molalla, OR 97038
Phone – [503.759.0220](tel:503.759.0220)
Email – apeters@cityofmolalla.com
Website – <http://www.cityofmolalla.com>

CC: Mac Corthell, Community Development Director
Dan Huff, City Manager