



# Oregon

Kate Brown, Governor

Department of Environmental Quality  
Northwest Region  
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May 26, 2022

**Andrew Peters**  
**City of Molalla**  
**P.O. Box 248**  
**Molalla, OR 97038**

RE: **Warning Letter**  
**Molalla STP**  
**2022- WL-7179**  
**Facility ID #57613/ Permit #101514**  
**Clackamas County**

Dear Mr. Peters:

Molalla's Sewage Treatment Plant's (STP) March 2022 Daily Monitoring Report (DMR) indicated a violation of the City's NPDES permit but allowed by MAO 2016-246. Based upon self-reported violation in the March DMR, the Department has concluded that the City of Molalla STP is responsible for the following violations of Oregon environmental law:

**VIOLATIONS:**

(1) WQ 0055(1)(l): Violating water quality based effluent limits (WQBEL) for the following violations:

- March Montly Average BOD loading; Limit 160 lbs/day : actual 202 lbs/day : MAO limit 400;
- March 23-24 Weekly Average BOD loading; Limit 240 lbs/day : actual 261 lbs/day : MAO limit 600;
- March 29-30 Weekly Average BOD loading; Limit 240 lbs/day : actual 279 lbs/day : MAO limit 600.

**These are Class III Violations.** Class I violations are the most serious violations; Class III violations are the least serious.

Excess Biological Oxygen Demand (BOD) released into the Molalla River may result in depleted oxygen levels that can affect fish health. Dissolved oxygen (DO) in the effluent appears to have been at a good level based on the DMR. River flow data shows (USGS station 14200000) there was ample river flow for effluent dilution during the discharge period.

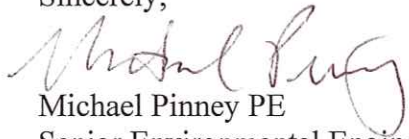
From the DMR, the cause seems to have been high discharge volumes of treated wastewater due to precipitation, not the lack of sufficient BOD removal by the lagoons. BOD concentration in the wastewater was within permit limits.

Should these violations persist, this matter may be referred to the Department'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. The Department will consider new information you submit and take appropriate action.

The Department endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter, please feel free to contact me in writing or by phone at 971-227-1765.

Sincerely,



Michael Pinney PE  
Senior Environmental Engineer  
DEQ -NWR-WQ

Cc: Office of Compliance and Enforcement

Ec: Tiffany Yelton-Bram, WQ NWR DEQ