

2nd Quarter 2022, Compliance Specialist Report
Report Period – Feb 01, 2022, through April 31, 2022
V. 1.01 5/16/22

Join us June 1st, 2022 at 12:00 p.m,
Call into the conference by [dialing 503-759-0001](tel:503-759-0001)
Enter [participant code 320136](#)
For more info please visit
<https://www.cityofmolalla.com/publicworks/page/wastewater-compliance-meeting-5>

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.

This report consists of three parts. Part 1 addresses activities completed in the specified quarter. Part 2 addresses any violations associated with the quarter. Part 3 addresses scheduled activities for the next quarter. Each part cites the applicable sections of the Amended Consent Decree. 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.

Part 1 - Activities Completed in the Specified Quarter

Section 11– *Defendant shall post on its website copies of communications with DEQ.*

The Discharge Monitoring Reports (DMR) for February 2022, March 2022, and April 2022, and all other formal communications with DEQ have also been posted to the website¹.

Section 12 – *The City shall host quarterly meetings.*

The 1st Quarterly meeting was held by conference call on March 2nd, 2022.

Section 13 – *City shall post a report of operations summary, including any Statements of Capacity issued in the Previous 3 Months.*

1. The City continued winter discharge during the quarter, and ceased winter discharge on April 30th 2022.
2. The City received approval of the 30% Predesign Report from the DEQ this quarter and has moved into the Design Phase. Bidding is still scheduled for next spring (2023).
3. The City met with commercial lending agencies and bond brokers during this quarter in order to compare options for Project Financing.
4. The City completed its Environmental Report for the purpose of pursuing USDA funding options.
5. The City recalibrated its Rate Model with the latest growth numbers in order to confirm its existing rate structure will be sufficient to cover costs of Plant Construction.
6. The City issued a Statement of Capacity that covers development of private project #22-07 Cascade Place Apartments, and #22-09 1000 W. Main St Affordable Apartments.

Section 14 – *City shall post an update on their website each month.*

The Monthly Compliance Report was posted to the City’s website for February 2022, March 2022, and April 2022. Postings are available for viewing on the website¹.

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. An average daily removal rate of 1.7 dry tons was achieved.

Section 36 – *Seven high priority I&I projects.*

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: at 100% design, construction begins this summer. The other half is TBD

Project 5: (Sweigle) TBD

Project 6: Completed 2021

Project 7: Completed 2019

Part 2 - Violations

Section 40 – *Violations and Stipulated Payments*

1. There were no violations February 2022.

2. In March 2022, effluent did exceed unmodified NPDES Permit limits, though remained within the limits of the 2021 MAO, as follows:
 - a. *Monthly Average BOD5 loading (limit 160 lbs): 202lbs*
 - b. *Daily Max BOD5 loading (limit 320 lbs): 322 lbs (dates 3/24)*
 - c. *Weekly Average BOD5 loading (limit 240 lbs): 261 lbs (dates 3/23-3/31)*
 - d. *Weekly Average BOD5 concentration (limit 15 mg/L): 16 mg/L (dates 3/23-3/31)*A stipulated Payment of \$15,500 was made in April 2022 for these violations.

3. In April 2022, effluent did exceed limits, as follows:
 - a. Violations of the unmodified NPDES permit:
 - i. *Monthly Average BOD5 lbs loading (NPDES limit 160 lbs): 296 lbs (4/1-4/29)*
 - ii. *Daily Maximum BOD5 lbs loading (NPDES limit 320 lbs): 615 lbs (4/26); 602 lbs (4/27)*
 - iii. *Monthly Average BOD5 mg/L (NPDES limit 10mg/L): 15mg/L (4/1-4/29)*
 - iv. *Weekly Average BOD5 mg/L (NPDES limit 15 mg/L): 29 mg/L (4/22-4/29)*
 - b. Of the MAO as follows:

- i. Weekly Average BOD5 loading (limit 240 lbs): 609 lbs. (dated 4/22-4/29)
- c. Explanation: The City's WWTP received record breaking rainfall in April 2022. 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.
- d. Stipulated Payments were made in May 2022 for these violation.

Part 3 - Next Quarter projects and plans

1. The City has scheduled next quarter to begin the process of a bypass-and-CCTV of the portion of the Toliver Trunk Line which runs under Creamery Creek for the purpose of specifying Cured-In-Place Pipe Lining of that section to address previously obtained Smoke Testing results.
2. The City has scheduled next quarter to begin studying the feasibility of completing both the remainder of I/I Project 3, and Project 5 using Cured-in-Place Pipe Lining.
3. The City has scheduled next quarter to submit its final application to USDA for financing.

This completes my report for the Second quarter of 2022.



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

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