



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

June 27th, 2022

Attn: Mike Pinney, Oregon Dept of Environmental Quality

RE: 5 day Followup Report – Out of Season Discharges, June 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. The likely reason was the fact that the City needed to lower lagoon levels to maximize shoulder month holding capacity since the Wastewater Treatment Plant (“WWTP”) was receiving unusually high rainfall. The City first notified DEQ on May 13th that, despite the City’s additional measures, out-of-season discharges would be necessary. DEQ approved these out-of-season discharges by letter on May 16th and the City began discharging fully treated effluent on May 17. These discharges have continued into the month of June; with discharge ceasing on June 22nd at 2:00pm. The City has stayed in constant contact with DEQ regarding this situation. Additionally, throughout this period the Irrigation Fields were checked every day and remained fully saturated with standing water.

The City, along with the rest of the Willamette Valley, has experienced unusually high rainfall in April, May, and the first half of June. This unusually high rainfall both increased the flows to the City’s WWTP and prevented the City from applying recycled water to the Irrigation Fields. This necessitated the City to discharge fully treated effluent to the Molalla River. The City first notified DEQ that it would lower lagoon levels on May 13th. After evaluating the situation, DEQ classified this heavy rainfall as an “upset” and approved the out-of-season discharges in a letter dated May 16, 2022. The City agrees that this rainfall constitutes an “upset” as defined by Schedule F, section B4.(C) of the City’s NPDES permit. The WWTP received 4.05 and 4.7 inches of rain in April and May, respectively, and the unusual heavy rainfall has continued into the first half of June. Based on precipitation data from NOAA stations in the relative vicinity of the City of Molalla, the precipitation value for May 2022 at the WWTP is considered greater than a 1 out of 10-year value, as is the precipitation already experienced to date for the Month of June.¹ Precipitation probabilities published in the National Oceanic and Atmospheric Administration’s Monthly Precipitation Probabilities and Quintiles confirm that this level of precipitation is highly unusual. Due to this rainfall, flows in the Molalla River were also extremely high, frequently breaking daily records as measured at USGS gage 14200000.

DEQ sent another letter on May 26th, requesting the City take measures to ensure that its WWTP is operated and maintained as efficiently as possible. The City confirms these recent out-of-season discharges are not related to capacity issues. The City has been working hard for several years to increase capacity at the WWTP by both removing inflow and infiltration (“I&I”) from the system and by removing biosolids from the lagoons. The City has not had shoulder month discharges to the River since May and June of 2017. The City’s WWTP has demonstrated its

capability of complying with its National Pollutant Discharge Elimination System (“NPDES”) permit as modified by the Mutual Agreement and Order (“MAO”) when flows and loads are consistent with recent values, from 2018 through 2021. Between now and the time the new Wastewater Treatment Facility is being constructed the City is monitoring the capacity situation carefully, continuing to take steps to reduce I/I², and is removing Biosolids continuously.

RESPONSE MEASURES TAKEN: The City ceased its out-of-season discharges to the River on June 22nd at 2:00pm. This letter is being sent pursuant to paragraph 9 of the City’s Mutual Agreement and Order (written follow up within 5 days) and the request of DEQ in the letter of May 26. The City will continue its I&I and biosolids removal program to further increase capacity.

Respectfully,



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

¹From June 1st through June 19th, the total rainfall received at the Wastewater Treatment Plant was 4.8 inches. The Wastewater Treatment Plant received 4.05 inches and 4.7 inches in April and May, respectively. Monthly precipitation probabilities for April, May, and June are as follows:

Monthly Precipitation Probabilities and Quantiles, 1971 to 2000 (NOAA)

Portland Int. Airport -

Probability Level	April	May	June
0.9	4.26	4.47	3.03
MAX	5.26	5.55	4.06

Salem -

Probability Level	April	May	June
0.9	4.75	4.03	2.72
MAX	5.72	5.56	4.19

Based on precipitation data from NOAA stations in the vicinity of Molalla, the precipitation value for the WWTP in June (4.8 inches month-to-date on June 22nd) is already greater than a 1 out of 10-year value.

²As previously reported, one rehabilitation project (Eckard) is scheduled for construction this summer. In addition, two cured-in-place pipe lining projects – Creamery Creak Underpass on Toliver, and S. Molalla line feeding the lift station, are expected to take place this fall.