

3rd Quarter 2022, Compliance Specialist Report  
Report Period – May 01, 2022, through July 31, 2022  
V. 1.01 8/11/22

Join us Sept 7th, 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 May 2022, June 2022, and July 2022, and all other formal communications with DEQ have also been posted to the City’s website<sup>1</sup>.

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

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

The 2nd quarterly meeting was held by conference call on June 1st, 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 began summer irrigation during the quarter.
2. The City received continued wastewater treatment plant design this quarter. Bidding is still scheduled for next spring (2023).
3. The City continued to meet with USDA throughout the quarter to complete its application materials for plant funding. The USDA determined that a more extensive environmental assessment process is needed for this project, in addition to the environmental report already submitted, and the City has initiated section 7 consultations.
4. No new Statement of Capacity was issued during the quarter.

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

The Monthly Compliance Report was posted to The City's website for May 2022, June 2022, and July 2022. Postings are available for viewing on the website<sup>1</sup>.

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 approximately 1.5 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: This project has been released to a contractor and a Notice to Proceed given.

The other half is TBD

Project 5: (Sweigle) TBD

Project 6: Completed 2021

Project 7: Completed 2019

In addition, the City repaired another I&I deficiency identified on the Master Plans' Smoke Testing Report by pipe lining of **218 LF from manholes TL-21 to TL-23 on Toliver Road**, which spans under Creamy Creek. The planning for this project was mentioned in Part 3 of the last compliance report and has been completed this quarter. Before and After screen shot of the CCTV inspection are shown below.



Part 2 - Violations

Section 40 – *Violations and Stipulated Payments*

The City experienced violations of the NPDES permit conditions (as modified by the March 2021 MAO) for the month of May 2022 as follows:

- Weekly BOD Loading 260 lbs. for week of 5/22/22 (Weekly Limit is 240 lbs.)
- Weekly BOD Loading 251 lbs. for week of 5/29/22 (Weekly Limit is 240 lbs.)
- Monthly BOD Loading 241 lbs. (Monthly Limit is 160 lbs.)
- Monthly BOD Concentration 13mg/L (Monthly Limit is 10 mg/L)
- 7-day average temperature > 18 °C 5/23/22 – 55/31/22 (NPDES limit 18 18 °C)
- Out of season discharge 5/17/22 – 5/31/22

During the month of June 2022, the City exceeded the monthly BOD loading and concentration limits contained in the Permit, but the City remained in compliance with its MAO over 22 days of discharge.

- Daily BOD loading 500 lbs. on 6/1/22 (Daily Limit is 320 lbs.)
- Daily BOD loading 600 lbs. on 6/14/22 (Daily Limit is 320 lbs.)
- Daily BOD loading 592 lbs. on 6/15/22 (Daily Limit is 320 lbs.)
- Weekly BOD loading 500 lbs. for week of 6/1/22 (Weekly Limit is 240 lbs.)
- Weekly BOD loading 596 lbs. for week of 6/13/22 (Weekly Limit is 240 lbs.)
- Weekly BOD loading 362 lbs. for week of 6/19/22 (Weekly Limit is 240 lbs.)
- Weekly BOD concentration 24 mg/L for week of 6/1/22 (Weekly Limit is 15 mg/L)
- Weekly BOD concentration 22 mg/L for week of 6/13/22 (Weekly Limit is 15 mg/L)
- Weekly BOD concentration 18 mg/L for week of 6/19/22 (Weekly Limit is 15 mg/L)
- Monthly BOD loading 381 lbs. (Monthly Limit is 160 lbs.)
- Monthly BOD concentration 17 mg/L (Monthly Limit is 10 mg/L)
- BOD average daily limit 362 lbs. on 6/21/22 (Daily Limit 320 lbs.)
- Out of season discharge 6/1/22 – 6/22/22

In addition, The City’s discharges did not comply with the following limit, which is not covered by the City’s MAO:

- Monthly removal efficiency 84% (Monthly Minimum is 85%)

The City experienced no violations of the NPDES permit conditions (as modified by the March 2021 MAO) for the month of July 2022.

All of the above violations were determined by review of the engineering team to be directly related to record rainfalls received throughout the quarter. The City took every effort to mitigate

the situations, and communicated with the DEQ throughout the quarter. Summaries of each situation can be found in the required 5-day follow up reports online.<sup>1</sup>

### Part 3 - Next Quarter projects and plans

1. Next Quarter the City plans to re-evaluate the crossing under Creamery Creek just pipelined with a second round of smoke testing. The City intends to also further evaluate pipelining opportunities as identified in the Master Plans' Flow Poking Report.
2. The next sludge judge is scheduled for November 2022.
3. The City expects to be able to secure underwriting from the USDA for WWTP Funding during the next quarter.

This completes my report for the second quarter of 2022.

A handwritten signature in cursive script that reads "Holly DeRamus".

Holly DeRamus, Compliance Specialist

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

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