



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

February 26, 2021

Dan Huff
City of Molalla
P.O. Box 248
Molalla, OR 97038

RECEIVED
MAR 08 2021

BY:

RE: **Warning Letter**
Molalla STP
2021- WL-6114
Facility ID #57613/ Permit #101514
Clackamas County

Dear Mr.Huff:

Molalla's Sewage Treatment Plant's (STP) January 2021 Daily Monitoring Report (DMR) indicated multiple violations of the City's NPDES permit. Based upon self-reported violations in the January 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:

January 12 Daily BOD loading;	Limit 320 lbs/day : actual 399 lbs/day
January 12-14 Weekly Average BOD loading;	Limit 240 lbs/day : actual 301 lbs/day
January Monthly Average BOD loading;	Limit 160 lbs/day : actual 182 lbs/day

These are Class I 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. Aerators were re-installed in the lagoons last summer and the lagoons are now operating as designed.

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,

A handwritten signature in cursive script, appearing to read "Michael Pinney".

Michael Pinney PE
Senior Environmental Engineer
DEQ -NWR-WQ

Cc: Office of Compliance and Enforcement

Ec: Tiffany Yelton-Bram, WQ NWR DEQ