



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
Office of Compliance and Enforcement  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232-4100  
(503) 229-5696  
FAX (503) 229-5100  
TTY 711

November 7, 2023

CERTIFIED MAIL: 9589 0710 5270 0110 6012 31

Gregory Management LLC  
c/o Michael Gregory  
365 NE Palmsblad Drive  
Gresham, OR 97030

Re: Notice of Civil Penalty Assessment and Order  
Case No. WQ/SW-NWR-2023-548

This letter is to inform you that the Oregon Department of Environmental Quality (DEQ) has issued you a civil penalty of \$30,634 for water quality violations stemming from your development of six contiguous properties located on E. Brightwood Loop Road in Brightwood, Oregon. Specifically, you engaged in construction activities without first obtaining coverage under the 1200-C National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (the 1200-C General Permit), discharged large amounts of woody debris into waters of the state without a permit, and failed to conduct road building activities in a manner that would keep waste materials out of public waters, thereby violating state water quality standards.

DEQ issued this penalty because your failure to conduct construction activities in compliance with the 1200-C General Permit and your widespread discharge of large amounts of woody debris into the wetlands and stream channel on your properties posed a significant risk of environmental harm.

DEQ appreciates your efforts to correct the violations by submitting an application for 1200-C General Permit coverage, installing some erosion and sediment controls, and restoring the area where the access road had been constructed. DEQ considered these efforts when determining the amount of the civil penalty.

You may pay the civil penalty as follows:

Pay online with e-check (ACH) or Credit Card. Go to Your DEQ Online here: <https://ydo.oregon.gov>. Select Register Account or Login, then select Pay Invoices/Fees on your account dashboard. Enter the Invoice number and Account ID included on the attached payment slip. Note: US Bank charges a 2.3% convenience charge for credit card transactions. ACH payments have no additional charges.

Pay by check or money order: Make checks payable to "Department of Environmental Quality" and mail to the address on the enclosed payment slip. Please make sure to include the payment slip with your check or money order.

If you wish to appeal this matter, DEQ must receive a request for a hearing within 20 calendar days from your receipt of this letter. The hearing request must be in writing. Send your request to DEQ Office of Compliance and Enforcement:

Via mail – 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232

Via email – [DEQappeals@deq.state.or.us](mailto:DEQappeals@deq.state.or.us)

Via fax – 503-229-5100

Once DEQ receives your request, we will arrange to meet with you to discuss this matter. If DEQ does not receive a timely written hearing request, the penalty will become due.

The attached Notice further details DEQ's reasons for issuing the penalty and provides further instructions for appealing the penalty. Please review and refer to it when discussing this case with DEQ.

DEQ may allow you to resolve part of your penalty through the completion of a Supplemental Environmental Project (SEP). SEPs are environmental improvement projects that you sponsor instead of paying a penalty. Further information is available by calling the number below or at <http://www.oregon.gov/deq/Regulations/Pages/SEP.aspx>.

DEQ's rules are available at <http://www.oregon.gov/deq/Regulations/Pages/Statutes.aspx> or by calling the number below.

If you have any questions, please contact Erin Saylor at 503-229-5422 or toll free in Oregon at 800-452-4011, extension 5422.

Sincerely,



Kieran O'Donnell, Manager  
Office of Compliance and Enforcement

Enclosures

cc: Benjamin Benninghoff, DEQ NWR  
Hannah Smiley, DEQ NWR  
Accounting, DEQ

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION  
OF THE STATE OF OREGON

IN THE MATTER OF:

GREGORY MANAGEMENT, LLC

Respondent.

NOTICE OF CIVIL PENALTY  
ASSESSMENT AND ORDER

CASE NO. WQ/SW-NWR-2023-548

I. AUTHORITY

The Department of Environmental Quality (DEQ) issues this Notice of Civil Penalty Assessment and Order (Notice) pursuant to Oregon Revised Statutes (ORS) 468.100, ORS 468.126 through 468.140, ORS Chapter 468B, ORS Chapter 183 and Oregon Administrative Rules (OAR) Chapter 340, Divisions 011, 012, 041 and 045.

II. FINDINGS OF FACT

1. Respondent owns six contiguous properties located on E. Brightwood Loop Road in Brightwood, Clackamas County, Oregon (the Properties). Together, the properties encompass 5.97 acres in the floodplain of the Sandy River.

2. The Sandy River is a water of the state, pursuant to ORS 468B.005(10). The wetland and spring present at the Properties are also waters of the state, pursuant to ORS 468B.005(10).

3. On January 28, 2022, representatives from the Department of State Lands (DSL) conducted an inspection at the Properties. At the time of DSL's inspection, Respondent had begun excavating the Properties and had constructed a crossing across the wetland and spring channel using fill.

4. On May 18, 2023, DSL representatives conducted another inspection at the Properties. At the time of DSL's inspection, tree stumping, clearing, and grading work had been conducted by Respondent on the Properties. Respondent had placed large amounts of woody debris generated from his clearing and grading of the Properties into the spring channel and throughout the surrounding wetland. Additionally, although Respondent had removed the crossing noted during the January 28,

1 2022, inspection, Respondent had constructed a second unauthorized road across a spring channel and  
2 through the wetland using woody debris, rocks, and native sandy soil. No erosion controls were in  
3 place on the unauthorized road that would prevent erosion of the road surface into the spring channel  
4 and surrounding wetland.

5 5. On August 24, 2023, DEQ conducted an inspection at the Properties. At the time of the  
6 inspection, active construction was occurring on four single-family home sites at the Properties. Two  
7 additional home sites had been cleared of trees and graded for future development. Large amounts of  
8 woody debris remained throughout the wetland, as did the unauthorized road through the spring  
9 channel and wetland.

10 6. Placement of woody debris in wetlands creates filled areas that impair the wetlands'  
11 natural functions and decrease habitat for wildlife, fish, and other aquatic life.

12 7. Pursuant to ORS 468B.050(1)(d) and OAR 340-045-0015(1)(d), without first obtaining  
13 a permit from DEQ, no person may “[c]onstruct, install, operate or conduct any industrial, commercial,  
14 confined animal feeding operation or other establishment or activity . . . the operation or conduct of  
15 which would cause an increase in the discharge of wastes into the waters of the state or which would  
16 otherwise alter the physical, chemical or biological properties of any waters of the state in any manner  
17 not already lawfully authorized.”

18 8. Pursuant to OAR 340-045-0015(2), “[a] person must [ ] obtain a valid [National  
19 Pollutant Discharge Elimination System (NPDES)] permit before that person discharges stormwater  
20 subject to permit requirements in 40 C.F.R. § 122.26 or § 122.33, including . . . stormwater associated  
21 with industrial or construction activity.”

22 9. Before any person engages in any “construction activity and materials or equipment  
23 staging and stockpiling that will disturb one or more acres of land,” they must obtain permit coverage  
24 under DEQ’s 1200-C NPDES Construction Stormwater Discharge General Permit (the 1200-C General  
25 Permit).

26 10. “Construction activity” is defined in Section 7.5.1.i. of the 1200-C General Permit as  
27 “including but not limited to; clearing, grading, excavating, grubbing, stumping, demolition, and land

1 disturbing activities.”

2 11. Pursuant to ORS 468B.025(1)(b), no person shall “[d]ischarge any wastes into the  
3 waters of the state if the discharge reduces the quality of such waters below the water quality standards  
4 established by rule for such waters . . . .”

5 12. Pursuant to Oregon’s statewide narrative water quality criteria at OAR 340-041-0007(7),  
6 “[r]oad building and maintenance activities must be conducted in a manner so as to keep waste  
7 materials out of public waters and minimize erosion of cut banks, fills, and road surfaces.”

8 13. Pursuant to ORS 468B.050(1)(a), without first obtaining a permit from DEQ, no person  
9 may “[d]ischarge any wastes into the waters of the state from any industrial or commercial  
10 establishment or activity or any disposal system.”

11 14. “Wastes” is defined in ORS 468B.005(9) as “sewage, industrial wastes, and all other  
12 liquid, gaseous, solid, radioactive or other substances which will or may cause pollution or tend to  
13 cause pollution of any waters of the state.”

14 15. “Pollution” is defined in ORS 468B.005(5) as “such alteration of the physical, chemical,  
15 or biological properties of any waters of the state, including change in temperature, taste, color,  
16 turbidity, silt or odor of the waters, or such discharge of any liquid, gaseous, solid, radioactive or other  
17 substance into any waters of the state, which will or tends to, either by itself or in connection with any  
18 other substance, create a public nuisance or which will or tends to render such waters harmful,  
19 detrimental or injurious to public health, safety or welfare, or to domestic, commercial, industrial,  
20 agricultural, recreational or other legitimate beneficial uses or to livestock, wildlife, fish or other  
21 aquatic life or the habitat thereof.”

22 16. Respondent applied for coverage under the 1200-C General Permit on October 4, 2023.

### 23 III. CONCLUSIONS

24 1. Respondent violated ORS 468B.050(1)(d) and OAR 340-045-0015(2) by engaging in  
25 construction activities that disturbed more than one acre of land, as described in Section II, Paragraphs  
26 3–5 above, without first obtaining coverage under the 1200-C General Permit. This is a Class I  
27 violation pursuant to OAR 340-012-0055(1)(d). DEQ hereby assesses a \$12,634 civil penalty for this

1 violation.

2 2. Respondent violated ORS 468B.050(1)(a) by discharging wastes into waters of the state  
3 from a construction activity without permit coverage, as described in Section II above. Specifically,  
4 Respondent discharged large amounts of woody debris from clearing and grading activities into a  
5 spring channel and the surrounding wetlands at the Properties. The woody debris is waste which tends  
6 to cause pollution to waters of the state by altering the physical properties of those waters in such a way  
7 that is detrimental to the habitat of wildlife, fish and other aquatic life. This is a Class I violation  
8 pursuant to OAR 340-012-0055(1)(c). DEQ hereby assesses a \$9,600 civil penalty for this violation.

9 3. Respondent violated ORS 468B.025(1)(b) and OAR 340-041-0007(7) by discharging  
10 wastes into waters of the state that reduces the water quality of those waters below state water quality  
11 standards, as described in Section II above. Specifically, Respondent failed to conduct road building  
12 activities in a manner that would keep waste materials out of public waters. Respondent placed woody  
13 debris and sandy soil directly into a spring channel to create a road crossing and failed to install any  
14 erosion control measures that would minimize erosion of the road surface into the spring. This is a Class I  
15 violation pursuant to OAR 340-012-0055(1)(b). DEQ hereby assesses a \$8,400 civil penalty for this  
16 violation.

#### 17 IV. ORDER TO PAY CIVIL PENALTY

18 Based upon the foregoing FINDINGS OF FACTS AND CONCLUSIONS, Respondent is  
19 hereby ORDERED TO:

- 20 1. Pay a total civil penalty of \$30,634. The determination of the civil penalty is attached as Exhibits  
21 Nos.1–3 and is incorporated as part of this Notice.

22 If you do not file a request for hearing as set forth in Section V below, please pay the penalty as follows:

23 Pay online with e-check (ACH) or Credit Card. Go to Your DEQ Online here:

24 <https://ydo.oregon.gov>. Select Register Account or Login, then select Pay Invoices/Fees on your account  
25 dashboard. Enter the Invoice number and Account ID included on the attached payment slip. Note: US  
26 Bank charges a 2.3% convenience charge for credit card transactions. ACH payments have no additional  
27 charges.

1 Pay by check or money order: Make checks payable to "Department of Environmental  
2 Quality" and mail to the address on the enclosed payment slip. Please make sure to include the payment  
3 `slip with your check or money order.

#### 4 V. NOTICE OF RIGHT TO REQUEST A CONTESTED CASE HEARING

5 You have a right to a contested case hearing on this Notice, if you request one in writing. DEQ  
6 must receive your request for hearing **within 20 calendar days** from the date you receive this Notice. If  
7 you have any affirmative defenses or wish to dispute any allegations of fact in this Notice or attached  
8 exhibits, you must do so in your request for hearing, as factual matters not denied will be considered  
9 admitted, and failure to raise a defense will be a waiver of the defense. (See OAR 340-011-0530 for  
10 further information about requests for hearing.) You must send your request to: **DEQ, Office of**  
11 **Compliance and Enforcement, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232**, fax  
12 it to **503-229-5100** or email it to [DEQappeals@deq.state.or.us](mailto:DEQappeals@deq.state.or.us). An administrative law judge  
13 employed by the Office of Administrative Hearings will conduct the hearing, according to ORS  
14 Chapter 183, OAR Chapter 340, Division 011 and OAR 137-003-0501 to 0700. You have a right to be  
15 represented by an attorney at the hearing, however you are not required to be. If you are an individual,  
16 you may represent yourself. If you are a corporation, partnership, limited liability company,  
17 unincorporated association, trust or government body, you must be represented by an attorney or a duly  
18 authorized representative, as set forth in OAR 137-003-0555.

19 Active duty Service members have a right to stay proceedings under the federal Service  
20 Members Civil Relief Act. For more information contact the Oregon State Bar at 1-800-  
21 452-8260, the Oregon Military Department at 503-584-3571, or the nearest United States Armed  
22 Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military  
23 Department does not have a toll free telephone number.

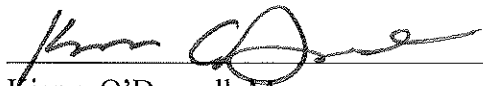
24 If you fail to file a timely request for hearing, the Notice will become a final order by default  
25 without further action by DEQ, as per OAR 340-011-0535(1). If you do request a hearing but later  
26 withdraw your request, fail to attend the hearing or notify DEQ that you will not be attending the  
27 hearing, DEQ will issue a final order by default pursuant to OAR 340-011-0535(3). DEQ designates

1 the relevant portions of its files, including information submitted by you, as the record for purposes of  
2 proving a prima facie case.

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11/7/2023

Date



Kieran O'Donnell, Manager  
Office of Compliance and Enforcement



EXHIBIT 1

FINDINGS AND DETERMINATION OF RESPONDENT'S CIVIL PENALTY  
PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-012-0045

- VIOLATION: Respondent violated ORS 468B.050(1)(d) and OAR 340-045-0015(2) by engaging in construction activity without first obtaining coverage under the 1200-C General Permit.
- CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0055(1)(d).
- MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0130(1) as there is no selected magnitude specified in OAR 340-012-0135 applicable to this violation, and the information reasonably available to DEQ does not indicate a minor or major magnitude.
- CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is:  $BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB$
- "BP" is the base penalty, which is \$4,000 for a Class I, moderate magnitude violation in the matrix listed in OAR 340-012-0140(3)(b)(A)(ii) and applicable pursuant to OAR 340-012-0140(3)(a)(E)(iii) because Respondent should have applied for coverage under the 1200-C General Permit for a project that is 5.97 acres in size.
- "P" is whether Respondent has any prior significant actions (PSAs), as defined in OAR 340-012-0030(19), in the same media as the violation at issue that occurred at a facility owned or operated by the same Respondent, and receives a value of 0 according to OAR 340-012-0145(2) because the Respondent has no prior enforcement history.
- "H" is Respondent's history of correcting prior significant actions and receives a value of 0 according to OAR 340-012-0145(3)(c) because there is no prior history.
- "O" is whether the violation was repeated or ongoing, and receives a value of 4 according to OAR 340-012-0145(4)(d) because there were more than 28 occurrences of the violation. Each day of violation is a separate occurrence. Respondent engaged in construction activities at the Properties from at least January 28, 2022, through October 4, 2023, without applying for coverage under the 1200-C General Permit.
- "M" is the mental state of the Respondent and receives a value of 2 according to OAR 340-012-0145(5)(b) because Respondent has been engaged in the residential construction business since at least 2017 and reasonably should have known that stormwater permit coverage was required.

"C" is Respondent's efforts to correct or mitigate the violation and receives a value of -2 according to OAR 340-012-0145(6)(d) because Respondent eventually made some efforts to correct the violation by submitting a permit application on October 4, 2023.

"EB" is the approximate dollar value of the benefit gained and the costs avoided or delayed as a result of the Respondent's noncompliance. It is designed to "level the playing field" by taking away any economic advantage the entity gained and to deter potential violators from deciding it is cheaper to violate and pay the penalty than to pay the costs of compliance. In this case, "EB" receives a value of \$7,034. By failing to apply for permit coverage before construction activities began, Respondent delayed spending \$1,348 on the permit application fee. Respondent also avoided spending \$1,386 on the 2022 annual permit fee. By failing to install the erosion and sediment controls required by the 1200-C General Permit, Respondent avoided spending approximately \$6,396 to install sediment fencing, a construction entrance, and a covered waste receptacle. By avoiding the visual monitoring required under the 1200-C General Permit, Respondent avoided spending approximately \$2,120 to conduct 106 inspections during 2022/2023. This "EB" was calculated pursuant to OAR 340-012-0150(1) using the U.S. Environmental Protection Agency's BEN computer model.

PENALTY CALCULATION:  $\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (\text{P} + \text{H} + \text{O} + \text{M} + \text{C})] + \text{EB}$   
= \$4,000 + [(0.1 x \$4,000) x (0 + 0 + 4 + 2 + -2)] + \$7,034  
= \$4,000 + [\$400 x 4] + \$7,034  
= \$4,000 + \$1,600 + \$7,034  
= \$12,634

EXHIBIT 2

FINDINGS AND DETERMINATION OF RESPONDENT'S CIVIL PENALTY  
PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-012-0045

VIOLATION: Respondent violated ORS 468B.050(1)(a) by discharging large amounts of woody debris into waters of the state without a permit.

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0055(1)(c).

MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0130(1) as there is no selected magnitude specified in OAR 340-012-0135 applicable to this violation, and the information reasonably available to DEQ does not indicate a minor or major magnitude.

CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is:  $BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB$

"BP" is the base penalty, which is \$6,000 for a Class I, moderate magnitude violation in the matrix listed in OAR 340-012-0140(2)(b)(A)(ii) and applicable pursuant to OAR 340-012-0140(2)(a)(D) because Respondent violated ORS 468B.050(1)(a).

"P" is whether Respondent has any prior significant actions (PSAs), as defined in OAR 340-012-0030(19), in the same media as the violation at issue that occurred at a facility owned or operated by the same Respondent, and receives a value of 0 according to OAR 340-012-0145(2) because the Respondent has no prior enforcement history.

"H" is Respondent's history of correcting prior significant actions and receives a value of 0 according to OAR 340-012-0145(3)(c) because there is no prior history.

"O" is whether the violation was repeated or ongoing, and receives a value of 2 according to OAR 340-012-0145(4)(b) because there were more than one but less than seven occurrences of the violation. Each day of violation constitutes a separate offense. Respondent discharged wastes to waters of the state on or before at least two days: January 28, 2022 and May 18, 2023. Therefore, there were at least two occurrences of the violation.

"M" is the mental state of the Respondent and receives a value of 2 according to OAR 340-012-0145(5)(b) because Respondent's reasonably should have known that discharging large amounts of woody debris into the wetlands and stream channel on the Properties was prohibited.

"C" is Respondent's efforts to correct or mitigate the violation and receives a value of 2 according to OAR 340-012-0145(6)(g) because Respondent has not addressed the violation and the facts do not support a finding under paragraph (6)(f).

"EB" is the approximate dollar value of the benefit gained and the costs avoided or delayed as a result of the Respondent's noncompliance. It is designed to "level the playing field" by taking away any economic advantage the entity gained and to deter potential violators from deciding it is cheaper to violate and pay the penalty than to pay the costs of compliance. In this case, "EB" receives a value of 0 pursuant to OAR 340-012-0150(4) because there is insufficient information on which to make an estimate under the rule.

PENALTY CALCULATION:  $\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (\text{P} + \text{H} + \text{O} + \text{M} + \text{C})] + \text{EB}$

$$\begin{aligned} &= \$6,000 + [(0.1 \times \$6,000) \times (0 + 0 + 2 + 2 + 2)] + \$0 \\ &= \$6,000 + [\$600 \times 6] + \$0 \\ &= \$6,000 + \$3,600 + \$0 \\ &= \$9,600 \end{aligned}$$

EXHIBIT 3

FINDINGS AND DETERMINATION OF RESPONDENT'S CIVIL PENALTY  
PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-012-0045

VIOLATION: Respondent violated ORS 468B.025(1)(b) and OAR 340-041-0007(7) by violating the state's narrative water quality standard that requires road building activities to be conducted in a manner that would keep waste materials out of public waters.

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0055(1)(b).

MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0130(1) as there is no selected magnitude specified in OAR 340-012-0135 applicable to this violation, and the information reasonably available to DEQ does not indicate a minor or major magnitude.

CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is:  $BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB$

"BP" is the base penalty, which is \$6,000 for a Class I, moderate magnitude violation in the matrix listed in OAR 340-012-0140(2)(b)(A)(ii) and applicable pursuant to OAR 340-012-0140(2)(a)(D) because Respondent violated ORS 468B.025(1)(b).

"P" is whether Respondent has any prior significant actions (PSAs), as defined in OAR 340-012-0030(19), in the same media as the violation at issue that occurred at a facility owned or operated by the same Respondent, and receives a value of 0 according to OAR 340-012-0145(2) because the Respondent has no prior enforcement history.

"H" is Respondent's history of correcting prior significant actions and receives a value of 0 according to OAR 340-012-0145(3)(c) because there is no prior history.

"O" is whether the violation was repeated or ongoing, and receives a value of 4 according to OAR 340-012-0145(4)(d) because there were more than 28 occurrences of the violation. Each day of violation is a separate occurrence. The road was in place for at least 98 days. Respondent constructed the road on or before May 18, 2023, and as of at least August 24, 2023, the road remained in place with no erosion controls in place.

"M" is the mental state of the Respondent and receives a value of 2 according to OAR 340-012-0145(5)(b) because Respondent reasonably should have known that placing woody debris and sandy soil directly into a stream channel to construct a road across that stream channel would be detrimental to water quality.

"C" is Respondent's efforts to correct or mitigate the violation and receives a value of -2 according to OAR 340-012-0145(6)(d) because Respondent eventually made some efforts to

correct the violation by removing some of the woody debris and sandy soil and placing straw on the surface.

"EB" is the approximate dollar value of the benefit gained and the costs avoided or delayed as a result of the Respondent's noncompliance. It is designed to "level the playing field" by taking away any economic advantage the entity gained and to deter potential violators from deciding it is cheaper to violate and pay the penalty than to pay the costs of compliance. In this case, "EB" receives a value of 0 pursuant to OAR 340-012-0150(4) because there is insufficient information on which to make an estimate under the rule.

PENALTY CALCULATION:  $\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (\text{P} + \text{H} + \text{O} + \text{M} + \text{C})] + \text{EB}$

$$\begin{aligned} &= \$6,000 + [(0.1 \times \$6,000) \times (0 + 0 + 4 + 2 + -2)] + \$0 \\ &= \$6,000 + [\$600 \times 4] + \$0 \\ &= \$6,000 + \$2,400 + \$0 \\ &= \$8,400 \end{aligned}$$

Oregon Department of Environmental Quality  
 700 NE Multnomah Street, Suite 600  
 Portland, OR 97232-4100



State of Oregon  
 Department of Environmental Quality

Phone: 503-229-5437  
 Fax: 503-229-5850

CIVIL PENALTY - ORS 468.135(2)

DATE:	November 7, 2023
RESPONSE DATE :	January 16, 2024
TOTAL PENALTY:	\$30,634.00

Account Name:	GREGORY MANAGEMENT LLC		
Account Type:	Vendor/Organization/Company	Reference Number:	CPGFD2400020
SubSystem ID:	214783	FIMS Acct. ID:	14365

Penalty Summary

Penalty Amount	Interest	Adjustment	Amount Paid	Total Penalty
\$ 30,634.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 30,634.00

Payment of this penalty is subject to the exercise of your options or right to appeal as described in the enclosed enforcement documents.

To Pay Online with ACH or Credit Card Visit <https://ydo.oregon.gov> and select 'Register Account'



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 PLEASE RETURN THIS PORTION WITH YOUR PAYMENT



REFERENCE NO.:	CPGFD2400020		
PAYCODE:	00401 7400 10040 74001 0500 000000 00		
FEE PROGRAM ID:	950	RESPONSE DATE:	January 16, 2024
FIMS ACCT. ID:	14365	TOTAL PENALTY DUE:	\$30634.00

AMOUNT ENCLOSED:

MAKE CHECK PAYABLE TO: Department of Environmental Quality

DEQ FINANCIAL SERVICES - LBX4244  
 PO BOX 4244  
 PORTLAND OR 97208-4244

Check this box if updated address information has been provided on the back of the form.

00401 7400 10040 74001 0500 000000 0095000143657(CPGF)240002000030634001



State of Oregon  
Department of  
Environmental  
Quality

# State of Oregon Department of Environmental Quality

CIVIL PENALTY - ORS 468.135(2)

700 NE Multnomah Street, Suite 600  
Portland, OR 97232-4100  
Phone: 503-229-5437  
Fax: 503-229-5850

## Penalty Detail

Transaction Date	Description	Amount
11/6/2023	2023-548 WQ-SW-NWR-2023-548	\$30,634.00

## SFMS Agencies Use:

Trans Code	Treasury Fund	SFMS	Index	PCA (5)	Agency Object	Project #	Phase
723	00401	7400	10040	74001	0500	00000	00

## Address Changes

Please visit <https://ydo.oregon.gov> to update your mailing address online or provide the following information:

Name \_\_\_\_\_  
Address \_\_\_\_\_  
City, State, Zip \_\_\_\_\_