

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

May 22, 2025

CERTIFIED MAIL: 9589 0710 5270 0688 6504 71

Willamette Leadership Academy
c/o Center for Nonprofit Law, PC, Registered Agent
590 W. 13th Ave.
Eugene, OR 97401

Re: Notice of Civil Penalty Assessment and Order
Case No. WQ/D-WR-2024-002

This letter is to inform you that the Oregon Department of Environmental Quality (DEQ) has issued you a civil penalty of \$6,450 for failing to comply with the monitoring and reporting requirements and pollutant limits in your wastewater disposal system permit.

The permit requires you to monitor your effluent and the operation of your system and report the results to DEQ to determine whether you are complying with your pollutant limits and operating your system properly. Pollutant limits are set at levels in permits to minimize pollution and protect water quality.

Included in Section IV of the Notice is an order requiring you to develop and implement a written plan to ensure that you comply with all permit monitoring and reporting requirements.

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.oregon.gov

Via fax – 503-229-6762

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. Alternatively, you can pay the penalty by sending a check or money order to the above address.

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 portion of the 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 Jeff Bachman at 503-229-5950 or toll free in Oregon at 800-452-4011, extension 5950.

Sincerely,



Erin Saylor, Interim Manager
Office of Compliance and Enforcement

Enclosures

cc: Brad Eagleson, PE, DEQ
Ranei Nomura, DEQ
Accounting, DEQ

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

IN THE MATTER OF:)
WILLAMETTE LEADERSHIP ACADEMY,) NOTICE OF CIVIL PENALTY
an Oregon non-profit corporation,) ASSESSMENT AND ORDER
Respondent.) CASE NO. WQ/D-WR-2024-002

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 Chapters 183 and 468B and Oregon Administrative Rules (OAR) Chapter 340, Divisions 011 and 012.

II. FINDINGS OF FACT

1. At all relevant times, Respondent operated a domestic wastewater collection, treatment and disposal system pursuant to a National Pollutant Discharge Elimination System Permit (Permit) issued and administered by DEQ.

2. The Permit authorized Respondent to operate a domestic wastewater collection, control, treatment and disposal system and discharge to Wild Hog Creek adequately treated wastewater only in conformance with the requirements, conditions and limitations of the Permit.

3. Schedule A, Condition 1.a(3) of the Permit limits the daily maximum total residual chlorine (TRC) concentration in Respondent's discharged effluent to 0.19 milligrams per liter (mg/L).

4. Respondent discharged effluent with TRC concentrations as follows: April 18, 2024 – 0.75 mg/L and November 14, 2024 - 0.57 mg/L.

5. Schedule B, Condition 1.a of the Permit requires Respondent to monitor its effluent daily for chlorine residual.

6. Respondent did not monitor its effluent for residual chlorine on March 15 and December 9, 2022; January 9, February 9 and 28, March 1-3 and April 12, 2023, and April 5, 2024.

7. Schedule B, Condition 1.a of the Permit requires Respondent to monitor daily the

1 quantity of chlorine used in treatment of its wastewater.

2 8. Respondent did not monitor the quantity of chlorine used in its wastewater treatment on
3 March 15, 2022; February 28, March 1-3 and April 12, 2023; and April 5, 2024.

4 9. Schedule B, Condition 1.a of the Permit requires Respondent to monitor its effluent
5 daily for total flow.

6 10. Respondent did not monitor its effluent for total flow on March 15, 2022; and February
7 9 and 28, March 1-3 and April 12, 2023.

8 11. Schedule B, Condition 1.a of the Permit requires Respondent to monitor its effluent
9 twice weekly for pH.

10 12. Respondent did not monitor its effluent for pH during the week of February 26, 2023.

11 13. Schedule B, Condition 1.a of the Permit requires Respondent to monitor its lagoon for
12 depth weekly.

13 14. Respondent did not monitor its lagoon depth during the week of November 13, 2022.

14 15. Schedule B, Condition 1.a of the Permit requires Respondent to monitor rainfall at its
15 facility daily.

16 16. Respondent did not monitor rainfall at its facility June 12-30, 2022.

17 17. Schedule F, Section C, Condition 1 of the Permit states that sampling and measurements
18 for monitoring purposes “shall be representative of the volume and nature of the monitored discharge.”

19 18. Respondent restricted effluent flows on the following days that it monitored for
20 biochemical oxygen demand (BOD₅) and total suspended solids (TSS) in an effort to achieve
21 compliance with BOD₅ and TSS loading effluent limits: December 11, 18 and 29, 2020; January 6,
22 February 2, March 2 and April 1, 2021; January 18, February 2 and December 7, 2022; and February
23 21 and April 4, 2023.

24 19 Respondent reported monitoring results based on the inaccurate flow data referenced in
25 Paragraph 18 to DEQ to meet the monitoring and reporting requirements of Schedule B of the Permit.

26 20. Schedule A, Condition 1.a(2) limits the monthly average loading of TSS in
27 Respondent’s discharged effluent during the period November 1 to April 30 to 2.9 pounds per day

1 (ppd).

2 21. Respondent discharged effluent with monthly average TSS loadings as follows:

3 Month	TSS Loading in ppd	Percentage over Limit
4 December 2021	6.5	124%
5 April 2022	3.2	10%
6 November 2022	3.0	3%
7 January 2023	4.9	69%
8 March 2023	5.9	103%
9 April 2023	3.0	3%
10 December 2023	4.6	59%
11 February 2024	3.1	7%
12 November 2024	3.9	34%
13 December 2024	4.5	55%
14 February 2025	4	38%

15
16
17 22. Schedule A, Condition 1.a(2) limits the weekly average loading of TSS in Respondent's
18 discharged effluent during the period November 1 to April 30 to 4.4 ppd.

19 23. Respondent discharged effluent with weekly average TSS loadings as follows:

20 Week	Weekly Average TSS Loading in ppd	Percentage over the Limit
21 December 12, 2021	6.5	48%
22 January 15, 2023	4.9	11%
23 March 5, 2023	8.3	89%
24 March 19, 2023	5.1	16%
25 December 10, 2023	4.6	5%
26 November 10, 2024	5.2	18%
27 December 1, 2024	4.5	2%

24. Schedule A, Condition 1.a(2) limits the maximum daily loading of TSS in Respondent's discharged effluent during the period November 1 to April 30 to 5.8 ppd.

25. Respondent discharged effluent with daily TSS loadings as follows:

Date	TSS Loading in ppd	Percentage over the Limit
December 14, 2021	6.5	12%
March 7, 2023	8.3	43%

26. Schedule A, Condition 1.a(2) of the Permit limits the monthly average loading of BOD₅ in Respondent's discharged effluent during the period November 1 to April 30 to 1.8 ppd.

27. Respondent discharged effluent with monthly average BOD₅ loadings as follows:

Month	Monthly Average BOD ₅ Loading in ppd	Percentage over the Limit
December 2021	2.6	44%
April 2022	2.6	44%
November 2022	2.3	28%
January 2023	5.7	217%
December 2023	3.5	94%
March 2023	3.2	78%
January 2024	2.9	61%
February 2024	3.8	111%
March 2024	2.1	19%
April 2024	3.1	72%
December 2024	3.7	106%
January 2025	3.1	72%
February 2025	3.4	89%

28. Schedule A, Condition 1.a(2) of the Permit limits the weekly average loading of BOD₅

1 in Respondent's discharged effluent during the period November 1 to April 30 to 2.7 ppd.

2 29. Respondent discharged effluent with weekly average BOD₅ loadings as follows:

3 Week	Weekly Average BOD₅	Percentage over the
	Loading in ppd	Limit
4 January 15, 2023	5.7	111%
5 March 5, 2023	5.3	96%
6 December 10, 2023	3.5	30%
7 January 21, 2024	2.9	7%
8 February 11, 2024	3.8	41%
9 March 3, 2024	2.9	7%
10 April 7, 2024	4.1	52%
11 December 1, 2024	3.7	37%
12 December 29, 2024	3.1	15%
13 February 2, 2025	3.4	26%

16 30. Schedule A, Condition 1.a(2) of the Permit limits the maximum daily loading of BOD₅
17 in Respondent's discharged effluent during the period November 1 to April 30 to 3.6 ppd.

18 31. Respondent discharged effluent with daily BOD₅ loadings as follows:

19 Date	BOD₅ Loading in ppd	Percentage over the
		Limit
20 January 17, 2023	5.7	58%
21 March 7, 2023	5.3	47%
22 February 13, 2024	3.8	6%
23 April 7, 2024	4.1	14%
24 December 3, 2024	3.7	3%

26 32. Schedule A, Condition 1.a(3) of the Permit limits pH in Respondent's discharged
27 effluent to a range of 6.0 and 9.0 standard units year-round.

1 33. Respondent discharge effluent with a pH of 5.9 standard units on December 2, 2022.

2 III. CONCLUSIONS

3 1. Respondent violated ORS 468B.025(2) by discharging effluent that exceeded the effluent
4 limit for daily maximum TRC concentration established in Schedule A of the Permit, as described in
5 Section II, paragraphs 3-4, above. These are Class I violations pursuant to OAR 340-012-0055(1)(l).
6 DEQ assesses a \$1,200 civil penalty for these violations.

7 2. Respondent violated ORS 468B.025(2) by failing to collect monitoring data required by
8 Schedule B of the Permit as described in Section II, paragraphs 5-16, above. These are Class I violations
9 pursuant to OAR 340-012-0055(1)(o). DEQ assesses a \$2,700 civil penalty for these violations.

10 3. Respondent violated ORS 468B.025(2) by failing to collect and report accurate monitoring
11 results because the data Respondent reported to DEQ was not based on data representative of its discharge,
12 as described in Section II, paragraphs 17-19, above. These are Class I violations pursuant to OAR 340-
13 012-0053(1)(b). DEQ assesses a \$2,550 civil penalty for these violations.

14 4. Respondent violated ORS 468B.025(2) by discharging effluent that exceeded the TSS loading
15 limits established in Schedule A of the Permit, as described in Section II, paragraphs 20-25, above. Those
16 instances where Respondent exceeded the limit by 50% or more are Class I violations pursuant to OAR
17 340-012-0055(1)(k)(A). Those instances where Respondent exceeded the limit by 20% or more, but less
18 than 50%, are Class II violations pursuant to OAR 340-012-0055(2)(a)(A). Those instances where
19 Respondent exceeded the limit by less than 20% are Class III violations pursuant to OAR 340-012-
20 0055(3)(b)(A). DEQ does not assess a civil penalty for these violations.

21 5. Respondent violated ORS 468B.025(2) by discharging effluent that exceed the BOD₅
22 loading limits established in Schedule A of the Permit, as described in Section II, paragraphs 26-31, above.
23 Those instances where Respondent exceeded the limit by 50% are Class I violations pursuant to OAR 340-
24 012-0055(1)(k)(A). Those instances where Respondent exceeded the limit by 20% or more, but less than
25 50% are Class II violations pursuant to OAR 340-012-0055(2)(a)(A). Those instances where Respondent
26 exceeded the limit by less than 20% are Class III violations pursuant to OAR 340-012-0055(3)(b)(A).
27 DEQ does not assess a civil penalty for these violations.

1 6. Respondent violated ORS 468B.025(2) by discharging effluent with a pH outside the range
2 allowed by the Permit, as described in Section II, paragraphs 32 and 33 above. This is a Class III violation
3 pursuant to OAR 340-012-0055(3)(b)(B). DEQ does not assess a civil penalty for these violations.

4 IV. ORDER TO PAY CIVIL PENALTY AND TO COMPLY

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

7 1. Pay a total civil penalty of \$6,450. The determinations of the civil penalties are attached as
8 Exhibits 1-3 and are incorporated as part of this Notice.

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

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

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

19 2. Within 45 days of this order becoming final by operation of law or on appeal submit to
20 DEQ a written monitoring plan establishing policies and procedures to ensure compliance with the
21 requirements of Schedule B and Schedule F, Section C of the Permit.

22 3. Within 30 days of receiving written comments on the monitoring plan, revise the plan
23 consist with DEQ’s comments and implement the plan.

24 V. NOTICE OF RIGHT TO REQUEST A CONTESTED CASE HEARING

25 You have a right to a contested case hearing on this Notice, if you request one in writing. DEQ
26 must receive your request for hearing **within 20 calendar days** from the date you receive this Notice. If
27 you have any affirmative defenses or wish to dispute any allegations of fact in this Notice or attached

1 exhibits, you must do so in your request for hearing, as factual matters not denied will be considered
2 admitted, and failure to raise a defense will be a waiver of the defense. (See OAR 340-011-0530 for
3 further information about requests for hearing.) You must send your request to: **DEQ, Office of**
4 **Compliance and Enforcement, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232**, fax
5 it to **503-229-6762** or email it to **DEQappeals@deq.oregon.gov**. An administrative law judge
6 employed by the Office of Administrative Hearings will conduct the hearing, according to ORS
7 Chapter 183, OAR Chapter 340, Division 011 and OAR 137-003-0501 to 0700. If you request a
8 hearing, you will be notified of the time and place of the hearing and you will be given information on
9 the procedures, and other rights of parties relating to the conduct of the hearing before commencement
10 of the hearing. You have a right to be represented by an attorney at the hearing, however you are not
11 required to be. If you are an individual, you may represent yourself. If you are a corporation,
12 partnership, limited liability company, unincorporated association, trust or government body, you must
13 be represented by an attorney or a duly authorized representative, as set forth in OAR 137-003-0555.

14 Active duty Service members have a right to stay proceedings under the federal Service
15 Members Civil Relief Act. For more information contact the Oregon State Bar at 1-800-
16 452-8260, the Oregon Military Department at 503-584-3571, or the nearest United States Armed
17 Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military
18 Department does not have a toll free telephone number.

19 If you fail to file a timely request for hearing, the Notice will become a final order by default
20 without further action by DEQ, as per OAR 340-011-0535(1). If you do request a hearing but later
21 withdraw your request, fail to attend the hearing or notify DEQ that you will not be attending the
22 hearing, DEQ will issue a final order by default pursuant to OAR 340-011-0535(3). DEQ designates
23 the relevant portions of its files, including information submitted by you, as the record for purposes of
24 proving a prima facie case.

25
26 5/22/2025
27 Date

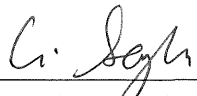

Erin Saylor, Interim Manager
Office of Compliance and Enforcement

EXHIBIT 1

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

VIOLATION NO. 1 Exceeding the Permit's daily TRC concentration limit in violation of ORS 468B.025(2).

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

MAGNITUDE: The magnitude of the violation is minor pursuant to OAR 340-012-0135(2)(a)(C)(ii) because the receiving stream flow at the time of the violation was more than twice than the assumed flow used to calculate the limit.

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 \$750 for a Class I, minor magnitude violation in the matrix listed in OAR 340-012-0140(4)(b)(A)(iii) and applicable pursuant to OAR 340-012-0140(4)(a)(F)(i) because Respondent operates a domestic wastewater treatment facility with a daily flow of less than 2 million gallons per day.

"P" is whether Respondent has any prior significant actions, 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)(a)(A), because there are no prior significant actions.

"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 was more than one but less than seven occurrences of the violation. There were two occurrences of the violation as detailed in the Notice.

"M" is the mental state of the Respondent and receives a value of 4 according to OAR 340-012-0145(5)(c) because Respondent's conduct was negligent. The chlorine effluent limit is an express condition of Respondent's permit. By failing to take the actions necessary to ensure compliance with the limit, Respondent failed to exercise reasonable care to avoid the foreseeable risk of committing the violation.

"C" is Respondent's efforts to correct or mitigate the violation and receives a value of 0 according to OAR 340-012-0145(6)(f) because the violation or the effects of the violation could not be corrected or minimized.

"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 as DEQ has insufficient information on which to base another finding.

PENALTY CALCULATION: $\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (\text{P} + \text{H} + \text{O} + \text{M} + \text{C})] + \text{EB}$
= \$750 + [(0.1 x \$750) x (0 + 0 + 2 + 4 + 0)] + \$0
= \$750 + (\$75 x 6) + \$0
= \$750 + \$450 + \$0
= \$1,200

EXHIBIT 2

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

VIOLATION NO. 2 Failing to conduct wastewater and system monitoring as required by Schedule B of the Permit in violation of ORS 468B.025(2).

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

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 \$1,500 for a Class I, moderate magnitude violation in the matrix listed in OAR 340-012-0140(4)(b)(A)(ii) and applicable pursuant to OAR 340-012-0140(4)(a)(F)(i) because Respondent operates a domestic wastewater treatment facility with a daily flow of less than 2 million gallons per day.

"P" is whether Respondent has any prior significant actions, 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)(a)(A), because there are no prior significant actions.

"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. There were 44 occurrences of the violations as detailed in the Notice.

"M" is the mental state of the Respondent and receives a value of 4 according to OAR 340-012-0145(5)(c) because Respondent's conduct was negligent. The monitoring requirements are express conditions of Respondent's permit. By failing to take the actions necessary to conduct the required monitoring, Respondent failed to exercise reasonable care to avoid the foreseeable risk of committing the violation.

"C" is Respondent's efforts to correct or mitigate the violation and receives a value of 0 according to OAR 340-012-0145(6)(f) because the violation or the effects of the violation could not be corrected or minimized.

"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 as Respondent received no more than a de minimis economic benefit as a result of the violations.

PENALTY CALCULATION: $\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (\text{P} + \text{H} + \text{O} + \text{M} + \text{C})] + \text{EB}$
= \$1,500 [(0.1 x \$1,500) x (0 + 0 + 4 + 4 + 0)] + \$0
= \$1,500 + (\$150 x 8) + \$0
= \$1,500 + \$1,200 + \$0
= \$2,700

EXHIBIT 3

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

VIOLATION NO. 3 Submitting inaccurate monitoring information required by Schedule B of the Permit to DEQ in violation of ORS 468B.025(2).

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 \$1,500 for a Class I, moderate magnitude violation in the matrix listed in OAR 340-012-0140(4)(b)(A)(ii) and applicable pursuant to OAR 340-012-0140(4)(a)(F)(i) because Respondent operates a domestic wastewater treatment facility with a daily flow of less than 2 million gallons per day.

"P" is whether Respondent has any prior significant actions, 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)(a)(A), because there are no prior significant actions.

"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 3 according to OAR 340-012-0145(4)(c) because there were from seven to 28 occurrences of the violation. There were 12 occurrences of the violations as detailed in the Notice.

"M" is the mental state of the Respondent and receives a value of 4 according to OAR 340-012-0145(5)(c) because Respondent's conduct was negligent. The requirement to collect representative monitoring data is an express condition of Respondent's permit. By failing to take the actions necessary to collect representative data, Respondent failed to exercise reasonable care to avoid the foreseeable risk of committing the violation.

"C" is Respondent's efforts to correct or mitigate the violation and receives a value of 0 according to OAR 340-012-0145(6)(f) because the violation or the effects of the violation could not be corrected or minimized.

"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 as Respondent received no more than a de minimis economic benefit as a result of the violations.

PENALTY CALCULATION: $\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (\text{P} + \text{H} + \text{O} + \text{M} + \text{C})] + \text{EB}$
= \$1,500 [(0.1 x \$1,500) x (0 + 0 + 3 + 4 + 0)] + \$0
= \$1,500 + (\$150 x 7) + \$0
= \$1,500 + \$1,050 + \$0
= \$2,550

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:	May 22, 2025
RESPONSE DATE :	July 31, 2025
TOTAL PENALTY:	\$6,450.00

Account Name:	WILLAMETTE LEADERSHIP ACADEMY, (PREV. GOSHEN ELEMENTARY SCHOOL STP)		
Account Type:	Vendor/Organization/Company	Reference Number:	CPGFD2500048
SubSystem ID:	213275	FIMS Acct. ID:	11612

Penalty Summary

Penalty Amount	Interest	Adjustment	Amount Paid	Total Penalty
\$ 6,450.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 6,450.00

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'



 PLEASE RETURN THIS PORTION WITH YOUR PAYMENT



REFERENCE NO.	CPGFD2500048		
PAYCODE:	00401 7400 10040 74001 0500 000000 00		
FEE PROGRAM ID:	950	RESPONSE DATE:	July 31, 2025
FIMS ACCT. ID:	11612	TOTAL PENALTY DUE:	\$6450.00

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 0095000116128CPGFD250004800006450005



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
5/21/2025	2024-002 WQ-D-WR-2024-002	\$6,450.00

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 _____

CERTIFICATE OF MAILING

I hereby certify that I served DEQ Case No. WQ/D-WR-2024-002 upon:

9589 0710 5270 0688 6504 71

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT <i>Domestic Mail Only</i>	
For delivery information, visit our website at www.usps.com ®	
OFFICIAL USE	
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Willamette Leadership Academy c/o Center for Nonprofit Law, PC, Registered Agent 590 W. 13th Ave. Eugene, OR 97401	
\$	
Sent To	
Street and Apt. No., or PO Box No.	
City, State, ZIP+4®	
PS Form 3800, January 2023 PSN 7530-02-000-9087 See Reverse for Instructions	

By mailing a true copy of the above by placing it in a sealed envelope, with postage prepaid at the DEQ/DAS mail services in Portland, Oregon on May 22, 2025

Isaac Griffith
Isaac Griffith, Case Coordinator
Office of Compliance & Enforcement
Department of Environmental Quality