



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

June 17, 2025

CERTIFIED MAIL: 7018 1830 0001 6172 6649

City of Stanfield
c/o Darla Linker, City Manager
P.O. Box 369
Stanfield, OR 97875

Re: Notice of Civil Penalty Assessment and Order
Case No. WQ/M-ER-2024-037

This letter is to inform you that the Oregon Department of Environmental Quality (DEQ) has issued you a civil penalty of \$6,825 for exceeding the pollution limits for ammonia, *E. coli* bacteria and biochemical oxygen demand in your DEQ-issued and administered wastewater disposal permit. These limits are set at levels protective of human health and water quality. Your failure to comply with these limits created a risk of harm to human health and water quality.

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.

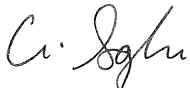
The attached Notice further details DEQ's reasons for issuing the penalty and provides further instructions for appealing the penalty. Please review and refer to it when discussing this case with DEQ.

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 your 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 <https://www.oregon.gov/deq/Regulations/Pages/Administrative-Rules.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: Justin Sterger, DEQ
Mike Hiatt, DEQ
Accounting, DEQ

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

IN THE MATTER OF:
CITY OF STANFIELD,

Respondent.

NOTICE OF CIVIL PENALTY
ASSESSMENT AND ORDER
CASE NO. WQ/M-ER-2024-037

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 468B and 183 and Oregon Administrative Rules (OAR) Chapter 340, Divisions 011, 012, and 045.

II. FINDINGS OF FACT

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

2. The Permit authorized Respondent to: 1) operate a wastewater collection, treatment, control and disposal system; and 2) discharge adequately treated wastewater to waters of the state only from the authorized discharge point or points in Schedule A in conformance with the requirements, limits, and conditions set forth in the Permit.

3. Schedule A, Condition 1 of the Permit limits the concentration of ammonia in Respondent's discharged effluent during the period November 1 to April 30 to a daily maximum of 48 milligrams per liter (mg/L).

4. On November 19, 2024, Respondent discharged effluent with an ammonia concentration of 55 mg/L.

5. Schedule A, Condition 1 of the Permit limits the concentration of ammonia in Respondent's discharged effluent during the period November 1 to April 30 to a monthly average of 28 mg/L.

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6. During the month of November 2024 Respondent discharged effluent with a monthly average ammonia concentration of 29 mg/L.

7. Schedule A, Table A.2 of the Permit limits the concentration of *E. coli* bacteria in any sample of Respondent's land applied recycled water to 406 organisms per 100 milliliters (mL).

8. Respondent land applied recycled water with *E. coli* bacteria concentrations as follows:

Date	<i>E. coli</i> concentration in organisms per 100 mL	Times over the Limit
July 23, 2024	>2,420	>6
July 24, 2024	>2,420	>6
July 25, 2024	665	1.6

9. Schedule A, Condition 1 of the Permit limits the loading of biochemical oxygen demand (BOD₅) in its discharged effluent during the period November 1 to April 30 to a monthly average of 56 pounds per day (lbs/day).

10. During the month of November 2023, Respondent discharged effluent with a monthly average BOD₅ loading of 115 lbs/day or 105% over the limit.

11. Schedule A, Condition 1 of the Permit limits the loading of BOD₅ in its discharged effluent during the period November 1 to April 30 to a weekly average of 84 lbs/day.

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

Week	Weekly average BOD ₅ loading in lbs/day	Percentage over the Limit
November 5, 2023	206	145%
November 12, 2023	136	62%
January 14, 2024	95	13%

13. Schedule A, Condition 1 of the Permit limits the loading of BOD₅ in its discharged effluent during the period November 1 to April 30 to a daily maximum of 110 pounds.

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14. Respondent discharged effluent with BOD₅ loadings in lbs/day as follows:

Date	BOD ₅ loading in pounds	Percentage over the Limit
November 7, 2023	194	76%
November 8, 2023	218	98%
November 14, 2023	119	8%
November 15, 2023	152	38%
January 16, 2024	136	24%

15. Schedule A, Condition 1 of the Permit limits the concentration of BOD₅ in its discharged effluent during the period November 1 to April 30 to a monthly average of 30 mg/L.

16. During the month of November 2023 Respondent discharged effluent with a monthly average BOD₅ concentration of 38 mg/L or 27% over the limit.

17. Schedule A, Condition 1 of the Permit limits the concentration of BOD₅ in its discharged effluent during the period November 1 to April 30 to a weekly average of 45 mg/L.

18. During the week of January 14, 2024, Respondent discharged effluent with a weekly average BOD₅ concentration of 51 mg/L or 13% over the limit.

19. Schedule B, Table B.5 of the Permit requires Respondent to monitoring its recycled water quarterly for total phosphours when irrigating its two land application sites.

20. Respondent did not monitor its recycled water for total phosphorous when irrigating its two land application sites during the second, third, and fourth quarters of 2023.

21. Schedule B, Table B.7 of the Permit requires Respondent to monitor soil at its two irrigation sites twice annually, prior to commencing irrigation in the spring and in the fall after crop harvest/prior to being tilled under, for total kjedahl nitrogren, ammonia, nitrate-nitrogen, electrical conductivity and pH.

22. Respondent did not monitor soil at its two irrigation sits for total kjedahl nitrogren, ammonia, nitrate-nitrogen, electrical conductivity and pH prior to commencing irrigation in the spring and in the fall after crop harvest in 2023.

23. Schedule B, Table B.7 of the Permit requires Respondent to monitor its two irrigation sites for water holding capacity prior to use each irrigation season.

24. Respondent did not monitor its two irrigation sites for water holding capacity in 2023.

25. Schedule A, Condition 1 of the Permit limits the monthly average loading of total suspended solids (TSS) in Respondent's discharged effluent during the period November 1 to April 30 to 84 lbs/day.

26. During the month of November 2023, Respondent discharged effluent with a monthly average TSS loading of 106 lbs/day, or 26% over the limit.

27. Schedule A, Condition 1 of the Permit limits the weekly average loading of TSS in Respondent's discharged effluent during the period November 1 to April 30 to 130 lbs/day.

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

Date	Weekly average TSS loading in lbs/day	Percentage over the Limit
November 5, 2023	194	49%
November 12, 2023	137	5%

29. Schedule A, Condition 1 of the Permit limits the daily maximum loading of TSS in Respondent's discharged effluent during the period November 1 to April 30 to 170 pounds.

30. Respondent discharged effluent with TSS loadings in lbs/day as follows:

Date	TSS loading in pounds	Percentage over the Limit
November 8, 2023	236	39%
November 15, 2023	190	12%

31. Schedule A, Condition 1 of the Permit limits the concentration of *E. coli* bacteria in any single sample of Respondent's discharged effluent during the period November 1 to April 30 to 406 organisms per 100 mL.

32. On February 4, 2025, a sample of discharged effluent contained *E. coli* bacteria at a concentration of 437 organisms per 100 mL.

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III. CONCLUSIONS

1. Respondent violated ORS 468B.025(2) by exceeding ammonia effluent limits established in Schedule A of the Permit as described Section II, Paragraphs 3-6, above. These are Class I violations pursuant to OAR 340-012-0055(1)(l). DEQ assesses a \$2,700 civil penalty for these violations.

2. Respondent violated ORS 468B.025(2) by exceeding the *E. coli* bacteria effluent limits for recycled water established in Schedule A of the Permit, as described in Section II, Paragraphs 7 and 8, above. Those instances where Respondent exceeded the limit by a factor of five or more are Class I violations pursuant to OAR 340-012-0055(1)(k)(D). The instance where Respondent exceeded the limit by a factor less than five is a Class II violation pursuant to OAR 340-012-0055(2)(a)(D). DEQ assesses a \$2,700 civil penalty for these violations.

3. Respondent violated ORS 468B.025(2) by exceeding the BOD₅ effluent limits established in Schedule A of the Permit, as described in Section II, Paragraphs 9-18, above. Those instances where Respondent exceeded the limit by 50% or more are Class I violations pursuant to OAR 340-012-0055(1)(k)(A). Those instance where Respondent exceeded the limit by 20% or more but less than 50% of the limit are Class II violations pursuant to OAR 340-012-0055(2)(a)(A). Those instances where Respondent exceeded the limit by less than 20% are Class III violations pursuant to OAR 340-012-0055(3)(b)(A). DEQ assesses a \$1,425 civil penalty for these violations.

4. Respondent violated ORS 468B.025(2) by failing to conduct monitoring required by Schedule B of the Permit as described in Section II, Paragraphs 19-24, above. These are Class I violations pursuant to OAR 340-012-0055(1)(o). DEQ has not assessed a civil penalty for these violations.

5. Respondent violated ORS 468B.025(2) by exceeding the TSS effluent limits established in Schedule A of the Permit, as described in Section II, Paragraphs 25-30, above. These are Class II violations pursuant to OAR 340-012-0055(2)(a)(A). DEQ has not assessed a civil penalty for these violations.

6. Respondent violated ORS 468B.025(2) by exceeding an *E. coli* bacteria effluent limit established Schedule A of the Permit, as described in Section II, Paragraphs 31 and 32, above. This is a Class III violation pursuant to OAR 340-012-0055(3)(b)(C). DEQ has not assessed a civil penalty for

1 this violation.

2 IV. ORDER TO PAY CIVIL PENALTY

3 Based upon the foregoing FINDINGS OF FACTS AND CONCLUSIONS, Respondent is
4 hereby ORDERED TO: Pay a total civil penalty of \$6,825. The determinations of the civil penalties are
5 attached as Exhibits 1-3 are incorporated as part of this Notice.

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

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

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

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

17 You have a right to a contested case hearing on this Notice, if you request one in writing. DEQ
18 must receive your request for hearing **within 20 calendar days** from the date you receive this Notice. If
19 you have any affirmative defenses or wish to dispute any allegations of fact in this Notice or attached
20 exhibits, you must do so in your request for hearing, as factual matters not denied will be considered
21 admitted, and failure to raise a defense will be a waiver of the defense. (See OAR 340-011-0530 for
22 further information about requests for hearing.) You must send your request to: **DEQ, Office of**
23 **Compliance and Enforcement, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232**, fax
24 it to **503-229-6762** or email it to DEQappeals@deq.oregon.gov. An administrative law judge
25 employed by the Office of Administrative Hearings will conduct the hearing, according to ORS
26 Chapter 183, OAR Chapter 340, Division 011 and OAR 137-003-0501 to 0700. You have a right to be
27 represented by an attorney at the hearing, however you are not required to be. If you request a hearing,

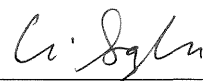
1 you will be notified of the time and place of the hearing and you will be given information on the
2 procedures, and other rights of parties relating to the conduct of the hearing before commencement of
3 the hearing. If you are an individual, you may represent yourself. If you are a corporation, partnership,
4 limited liability company, unincorporated association, trust or government body, you must be
5 represented by an attorney or a duly authorized representative, as set forth in OAR 137-003-0555.

6 Active duty Service members have a right to stay proceedings under the federal Service
7 Members Civil Relief Act. For more information contact the Oregon State Bar at 1-800-
8 452-8260, the Oregon Military Department at 503-584-3571, or the nearest United States Armed
9 Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military
10 Department does not have a toll free telephone number.

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

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20 6/17/2025

21 Date

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22 Erin Saylor, Interim Manager
23 Office of Compliance and Enforcement
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EXHIBIT 1

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

<u>VIOLATION NO. 1</u>	Exceeding Permit effluent limits for ammonia in violation of ORS 468B.025(2).
<u>CLASSIFICATION:</u>	These are Class I violations pursuant to OAR 340-012-0055(1)(I) because ammonia is a water quality-based effluent limit.
<u>MAGNITUDE:</u>	The magnitude of the violation is moderate pursuant to OAR 340-012-0135(2)(a)(B) and OAR 340-012-0145(4)(e) because the receiving stream flow at the time of the violation was more than, but less than twice, the stream flow used to calculate the limit.
<u>CIVIL PENALTY FORMULA:</u>	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 the permitted flow of Respondent's facility is 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 2 pursuant to OAR 340-012-0145(2)(a) as Respondent has a prior significant action consisting of one Class I violation stemming from Case No. WQ/M-ER-2022-004.
"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 insufficient information on which to base a finding under paragraphs (3)(a) or (b).
"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 ammonia limits are express conditions of Respondent's Permit. By failing to take the actions necessary to ensure compliance with the limits, Respondent failed to exercise reasonable care to avoid the foreseeable risk of a violation. According to OAR 340-012-0030(15), negligent means the respondent failed to take reasonable care to avoid a foreseeable risk of conduct constituting or resulting in a 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 to arrive at a reasonable estimate of avoided or delayed compliance costs.

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

$$\begin{aligned} &= \$1,500 + [(0.1 \times \$1,500) \times (2 + 0 + 2 + 4 + 0)] + \$0 \\ &= \$1,500 + (\$150 \times 8) + \$0 \\ &= \$1,500 + \$1,200 + \$0 \\ &= \$2,700 \end{aligned}$$

EXHIBIT 2

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

- VIOLATION NO. 2 Exceeding Permit recycled water limits for *E. coli* bacteria in violation of ORS 468B.025(2).
- CLASSIFICATION: These are Class I violations pursuant to OAR 340-012-0055(1)(k)(D) and OAR 340-012-0145(4)(e) because Respondent exceeded the limit by five times or more.
- 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 the permitted flow of Respondent's facility is 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 2 pursuant to OAR 340-012-0145(2)(a) as Respondent has a prior significant action consisting of one Class I violation stemming from Case No. WQ/M-ER-2022-004.
- "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 insufficient information on which to base a finding under paragraphs (3)(a) or (b).
- "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 three 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 *E. coli* 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 to arrive at a reasonable estimate of avoided or delayed compliance costs.

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

$$\begin{aligned} &= \$1,500 + [(0.1 \times \$1,500) \times (2 + 0 + 2 + 4 + 0)] + \$0 \\ &= \$1,500 + (\$150 \times 8) + \$0 \\ &= \$1,500 + \$1,200 + \$0 \\ &= \$2,700 \end{aligned}$$

EXHIBIT 3

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

<u>VIOLATION NO. 3</u>	Exceeding Permit effluent limits for BOD ₅ in violation of ORS 468B.025(2).
<u>CLASSIFICATION:</u>	These are Class I violations pursuant to OAR 340-012-0055(1)(k)(a) and OAR 340-012-0145(4)(e) because Respondent exceeded the limit by 50% or more.
<u>MAGNITUDE:</u>	The magnitude of the violation is minor pursuant to OAR 340-012-0135(2)(a)(C)(i) because Respondent's effluent at the time of the violation was diluted by a factor of 10 or more in the receiving stream.
<u>CIVIL PENALTY FORMULA:</u>	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, moderate 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 the permitted flow of Respondent's facility is 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 2 pursuant to OAR 340-012-0145(2)(a) as Respondent has a prior significant action consisting of one Class I violation stemming from Case No. WQ/M-ER-2022-004.
"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 insufficient information on which to base a finding under paragraphs (3)(a) or (b).
"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 seven or more but less than 29 occurrences of the violation. There were 11 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 BOD ₅ limits are express conditions 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 to arrive at a reasonable estimate of avoided or delayed compliance costs.

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 (2 + 0 + 3 + 4 + 0)] + \$0
= \$750 + (\$75 x 9) + \$0
= \$750 + \$675 + \$0
= \$1,425

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



State of Oregon
DEQ Department of Environmental Quality

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

CIVIL PENALTY - ORS 468.135(2)

DATE:	June 17, 2025
RESPONSE DATE :	August 26, 2025
TOTAL PENALTY:	\$6,825.00

Account Name:	STANFIELD, CITY OF		
Account Type:	Vendor/Organization/Company	Reference Number:	CPGFD2500057
SubSystem ID:	213483	FIMS Acct. ID:	11503

Penalty Summary

Penalty Amount	Interest	Adjustment	Amount Paid	Total Penalty
\$ 6,825.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 6,825.00

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.	CPGFD2500057		
PAYCODE:	00401 7400 10040 74001 0500 000000 00		
FEE PROGRAM ID:	950	RESPONSE DATE:	August 26, 2025
FIMS ACCT. ID:	11503	TOTAL PENALTY DUE:	\$6825.00

AMOUNT ENCLOSED:

MAKE CHECK PAYABLE TO: Department of Environmental Quality

☐

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

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

00401 7400 10040 74001 0500 000000 0095000115038CPGFD250005700006825003



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
6/16/2025	2024-037 WQ-M-ER-2024-037	\$6,825.00

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/M-ER-2024-037 upon:

7018 1830 0001 6172 6649

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT <i>Domestic Mail Only</i>	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
City of Stanfield c/o Darla Linker, City Manager PO Box 369 Stanfield, OR 97875	
Sent To	
Street and Apt. No., or PO Box No.	
City, State, ZIP+4®	
PS Form 3800, April 2015 PSN 7530-02-000-9047 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 June 17, 2025

Isaac Griffith

Isaac Griffith, Case Coordinator

Office of Compliance & Enforcement

Department of Environmental Quality