



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Office of Compliance and Enforcement

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5382

FAX (503) 229-5787

TTY 711

October 2, 2025

CERTIFIED MAIL: 9589 0710 5270 3236 6719 59

Douglas County Public Works Department
c/o Nick Frisinger, Douglas County Solid Waste Director
1036 S.E. Douglas Avenue, Room 308
Roseburg, OR 97470

Re: Notice of Civil Penalty Assessment and Order
Case No. AQ/V-WR-2024-069

This letter is to inform you that DEQ has issued Douglas County Public Works Department (Douglas County) a \$35,270 civil penalty for failing to conduct quarterly methane instantaneous surface emission monitoring (SEM) at your landfill ("Roseburg Landfill") at 384 McLain West Avenue in Roseburg in violation of DEQ's Landfill Gas Emissions Rules. Douglas County was required to conduct its first quarterly methane SEM by December 30, 2022, and to continue quarterly monitoring thereafter, until the monitoring results showed a methane concentration at or greater than 200 parts per million by volume, or the landfill operator reports a methane generation rate of 7,755 or greater metric tons per year, which triggers additional requirements.

DEQ issued this penalty because failure to monitor the landfill's methane emissions is a serious violation. The quarterly methane SEM events are integral to determining whether the landfill's methane emissions comply with DEQ's landfill methane standards in OAR, Chapter 340, Division 239. Failure to monitor may delay taking corrective actions or making required upgrades to the landfill's gas collection and control system to ensure methane emissions are kept to minimum levels to protect the public's health and the environment. Excess methane emissions increase greenhouse gases and impacts climate change. Methane is also a hazardous air pollutant (HAP). Many HAPs are known or suspected carcinogens and can cause other serious health effects.

By failing to conduct quarterly methane SEM monitoring from December 2022 to April 2024, you gained an economic advantage over other landfills. \$27,470 of the total civil penalty is the amount of economic benefit Douglas County derived by avoiding the costs to conduct the monitoring over six quarters. The purpose of the economic benefit portion of the civil penalty is to ensure a "level playing field," such that a facility does not gain a competitive advantage by failing to invest in compliance with the law over facilities subject to the same requirements. By estimating the economic benefit, DEQ removes the cost savings associated with Douglas County's avoided methane monitoring expenditures.

DEQ cited, but did not assess penalties for, additional violations in the enclosed Notice. Those violations include failing to submit an annual Instantaneous Surface Emissions Monitoring Report for 2023, and failing to document corrective actions taken as a result of methane SEM readings exceeding a limit.

DEQ appreciates your efforts to eventually correct or minimize the effects of the methane SEM violations by conducting a methane SEM event in April 2024. DEQ considered this effort when determining the amount of 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.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 www.oregon.gov/deq/Regulations/Pages/SEP.aspx.

DEQ's rules are available at www.oregon.gov/deq/Regulations/Pages/Administrative-Rules.aspx or by calling the number below.

If you have any questions, please contact Jenny Root at 503-229-5874.

Sincerely,



Erin Saylor, Interim Manager
Office of Compliance and Enforcement

Enclosures

cc: Janice Tacconi, Western Region, Medford Office, DEQ
Laura McWhorter, Western Region, Eugene Office, DEQ
Zach Loboy, Western Region, Eugene Office, DEQ
Accounting, DEQ
Donald Hendrix, AQ, DEQ

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

IN THE MATTER OF:) NOTICE OF CIVIL PENALTY
DOUGLAS COUNTY PUBLIC WORKS) ASSESSMENT AND ORDER
DEPARTMENT,)
Respondent.) CASE NO. AQ/V-WR-2024-069

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 and 468.126 through 468.140, ORS Chapters 183 and 468A, and Oregon Administrative Rules (OAR) Chapter 340, Divisions 011, 012, 200, 218 and 239.

II. FINDINGS OF FACT

1. Respondent, Douglas County Public Works Department, owns and operates a municipal solid waste facility (MSW landfill) as “Roseburg Landfill” at 384 McLain West Avenue in Roseburg, Oregon (the Landfill). Douglas County has owned the Landfill since 1975. The Landfill includes a voluntary gas collection and control system to control landfill gas emissions.

2. The Facility:

- a. Has greater than 200,000 tons of waste-in-place,
- b. Accepts both decomposable and nondecomposable wastes; and
- c. Is not regulated under the Federal Resource Conservation and Recovery Act Subtitle C or the Comprehensive Environmental Response, Compensation and Liability Act.

3. On October 4, 2021, the Environmental Quality Commission adopted new Landfill Gas Emissions rules as OAR Chapter 340, division 239.

4. According to OAR 340-239-0100(4) and OAR 340-239-0700(3)(f)(A), owners and operators of existing landfills that are subject to OAR 340-239-0100(1), (2), (3) or (4), and whose landfills had at least 200,000 tons of waste in place as of October 4, 2021 (effective date of rule), were required to calculate the current annual methane generation rate (MGR) from the landfill and report the results to DEQ by October 1, 2022.

1 5. On January 19, 2022, Respondent submitted its initial Methane Generation Rate Report
2 to DEQ, reporting an MGR at the Facility of 35,058 metrics tons per year.

3 6. On April 24, 2024, Respondent submitted a revised Methane Generation Rate Report to
4 DEQ, reporting an annual MGR at the Facility of 4,412.76 metric tons per year.

5 7. According to OAR 340-239-0100(6), if an owner or operator of a landfill reports an
6 annual MGR to DEQ that is greater than or equal to 664 metric tons of methane per year but less than
7 7,755 metric tons of methane per year, the owner or operator must either:

8 a. Comply with the gas collection and control system requirements in OAR 340-239-
9 0110 through 340-239-0800; or

10 b. Demonstrate that there is no measured concentration of methane of 200 parts per
11 million by volume (ppmv) or greater using the instantaneous surface emission monitoring (SEM)
12 procedures in OAR 340-239-0800(3) (SEM). The owner or operator must begin quarterly methane
13 SEM within 90 days after the Methane Generation Rate Report is due and continue performing
14 quarterly methane SEM thereafter until the SEM monitoring results show a measured concentration of
15 methane at the landfill is 200 ppmv or greater or the owner or operator submits an annual MGR that
16 shows methane generation of the landfill is 7,755 metric tons per year or greater, at which time the
17 owner or operator must comply with the requirements in OAR-340-239-0110 through OAR 340-239-
18 0800. OAR 340-239-0100(6)(B)(i), OAR 340-239-0100(7) and OAR 340-239-0600(1).

19 8. Respondent initially attempted to demonstrate compliance with OAR 340-239-
20 0100(6)(b) instead of OAR 340-239-0100(6)(a). However, Respondent did not conduct its first
21 quarterly methane SEM within 90 days of the October 1, 2022, due date to submit its Methane
22 Generation Rate Report, nor did it conduct quarterly methane SEMs for the five immediate calendar
23 quarters that followed.

24 9. Respondent conducted its first quarterly methane SEM during the second quarter (April
25 and May) of 2024 and submitted its first Instantaneous Surface Emission Monitoring Report on May
26 17, 2024.

27 \\\

10. OAR 340-239-0100(6)(b)(B)(i) requires that the owner or operator of active landfills must prepare and submit to DEQ an annual Instantaneous Surface Emission Monitoring Report according to OAR 340-239-0700(3)(I). OAR 340-239-0700(3)(I)(A) requires submittal of a Instantaneous Surface Emission Monitoring Report to DEQ within 30 days after the fourth consecutive monitoring quarters or within 30 days after a measured concentration of methane is 200 ppmv or greater, whichever is first.

11. In accordance with OAR 340-239-0700(3)(l)(B)(1), Instantaneous Surface Emission Monitoring Reports must include documentation of any corrective action taken as a result of a methane SEM reading exceeding the limit in OAR 340-239-0100(6)(b). [See OAR 340-239-0600(1)(a)(B).]

12. Respondent did not submit to DEQ an annual Instantaneous Surface Emission Monitoring Report for 2023.

13. During the initial methane SEM conducted on April 8th and 9th, 2024, Respondent recorded methane SEM readings of the Landfill that exceed the methane concentration limit in OAR 340-239-0100(6)(b) limit of 200 ppmv. However, in Respondent's Instantaneous Surface Emission Monitoring Report, Respondent only generally noted that during the 10-day methane SEM remonitoring event (OAR 340-0600(1)(a)(C)), "all areas returned to below regulatory compliance limits following system adjustments and remediation by site personnel." The report did not include documentation of these corrective actions or correlate the action to the area where the methane SEM reading exceeded the methane concentration limit in OAR 340-239-0100(6)(b).

III. CONCLUSIONS

1. Respondent is subject to OAR 340-239-0100(6) because the Landfill is an existing landfill that has greater than 200,000 tons of waste in place, Respondent reported an annual MGR of 4,412.76 metric tons of methane per year, and the Landfill meets the applicability requirements in OAR 340-239-0010(1) as further described in Section II, Paragraphs 2.a through 2.c above.

2. Respondent was required to begin quarterly methane SEM by December 30, 2022, [within 90 days of the October 1, 2022, Methane Generation Report due date, in accordance with 340-

239-0100(6)(b)], because Respondent's reported methane generation rate of the Landfill is 4,412.76 metric tons per year, and Respondent chose to demonstrate compliance with the 200 ppmv methane concentration limit of OAR 340-239-0100(6)(b) instead of demonstrating that its current gas collection and control system complied with the requirements in OAR 340-239-0100(6)(a).

3. Respondent was required to continue quarterly methane SEM monitoring after December 30, 2022, in accordance with OAR 340-239-0600(1) and OAR 340-239-0100(6)(a)(B)(I), at least until methane SEM readings at the Landfill showed a measured methane concentration of or greater than 200 ppmv, or Respondent reported an annual MGR of 7,755 or greater metric tons of methane per year, because the Landfill is an active landfill.

Violations:

1. Respondent violated OAR 340-239-0600(1) and OAR 340-239-340-0100(6)(b) as further described in Section II, Paragraphs 7 and 9 above by failing to conduct quarterly SEM monitoring within 90 days (December 30, 2022) of the October 1, 2022, due date to submit its Methane Generation Report to DEQ that reported methane emissions from the landfill greater than or equal to 664 metric tons per year but less than 7,755 metric tons per year and to continue quarterly methane SEM monitoring until Respondent's monitoring results showed a methane concentration of 200 ppmv or Respondent reported an annual MGR of 7,755 metric tons per year of methane. These are Class I violations according to OAR 340-012-0054(1)(tt). DEQ hereby assesses a \$35,270 civil penalty for these violations.

2. Respondent violated OAR 340-239-0100(6)(b)(B)(i) and OAR 340-239-0700(3)(l) by failing to submit an annual Instantaneous Surface Emission Monitoring Report to DEQ for 2023. Because Respondent chose to try to demonstrate compliance with OAR 340-239-0100(6)(b), Respondent was required to begin quarterly SEM monitoring on or before December 30, 2022 (fourth calendar quarter of 2022). Therefore, Respondent would have completed its fourth quarterly consecutive methane SEM by the end of the third calendar quarter of 2023 and would be required to submit its annual Instantaneous Surface Emission Monitoring Report within 30 days thereafter. However, Respondent did not submit an annual Instantaneous Surface Emission Monitoring Report for

2023 to DEQ. This is a Class I violation according to OAR 340-012-0054(1)(nn). DEQ has not assessed a civil penalty for this violation.

3. Respondent violated OAR 340-239-0700(3)(l)(B)(i) by failing to include documentation in Respondent's May 17, 2024, Instantaneous Surface Emission Monitoring Report of corrective actions taken as a result of methane SEM readings exceeding the limit in OAR 340-239-0100(6)(b) as further described in Section II, Paragraphs 11 and 13 above. This is a Class II violation according to OAR 340-012-0054(2)(w). DEQ has not assessed a civil penalty for this violation.

IV. ORDER TO PAY CIVIL PENALTY

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

Pay a total civil penalty of \$35,270. The determination of the civil penalty is attached as Exhibit 1 and is incorporated as part of this Notice.

If you do not file a request for hearing as set forth in Section V below, please pay the 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 reference 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, or

Pay by check or money order: Make check 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 and note the case number on your check.

V. NOTICE OF RIGHT TO REQUEST A CONTESTED CASE HEARING

You have a right to a contested case hearing on this Notice, if you request one in writing. DEQ must receive your request for hearing **within 20 calendar days** from the date you receive this Notice. If you have any affirmative defenses or wish to dispute any allegations of fact in this Notice or attached exhibit, you must do so in your request for hearing, as factual matters not denied will be considered

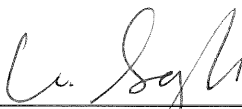
1 admitted, and failure to raise a defense will be a waiver of the defense. (See OAR 340-011-0530 for
2 further information about requests for hearing.) You must send your request to: **DEQ, Office of**
3 **Compliance and Enforcement, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232**, fax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

11 Active-duty service members have a right to stay proceedings under the federal Service
12 Members Civil Relief Act. For more information contact the Oregon State Bar at 1-800-
13 452-8260, the Oregon Military Department at 503-584-3571, or the nearest United States Armed
14 Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military
15 Department does not have a toll-free telephone number.

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

22
23
24 10/2/2025

25 Date

26
27 

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 1: Failing to conduct quarterly methane SEM monitoring of the landfill's methane emissions in violation of OAR 340-239-0600(1) and OAR 340-239-340-0100(6)(b).

CLASSIFICATION: These are Class I violations pursuant to OAR 340-012-0054(1)(tt) because Respondent failed to conduct methane SEM monitoring on a quarterly basis in accordance with OARs 340-239-600(1) and 340-239-100(6)(b) that resulted in a failure to demonstrate compliance with the 200 ppmv methane concentration threshold in OAR 340-239-100(6)(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)(A) because Respondent operates the Facility under an Oregon Title V Operating Permit.

"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 Respondent and receives an initial value of 2 according to OAR 340-012-0145(2)(a)(C), because Respondent had three Class II violations in Mutual Agreement and Order No. AQ/V-WR-2018-087 issued February 11, 2019. According to OAR 340-012-0145(2)(d)(A)(i), DEQ will reduce the value of "P" by 2 if all the formal enforcement actions containing prior significant actions were issued more than three years before the date the current violation occurred. According to OAR 340-012-0145(2)(e), in applying subsection (2)(d)(A), the value of "P" may not be reduced below zero. Therefore, the value of "P" is 0.

"H" is Respondent's history of correcting prior significant actions and receives an initial value of -2 according to OAR 340-012-0145(3)(a) because Respondent corrected all violations cited as prior significant actions. According to OAR 340-012-0145(3)(d), this value is increased to 1 because the sum of the "P" and "H" factors may not be less than 1 unless Respondent took extraordinary efforts to correct or minimize the effects of all PSAs. Respondent took

reasonable but not extraordinary efforts to correct or minimize the effects of the prior significant actions.

- "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. Respondent failed to begin quarterly methane SEM during the fourth quarter of 2022. Respondent failed to continue conducting quarterly methane SEMs during the first through the fourth quarters of 2023 and during the first quarter of 2024 for a total of six occurrences.
- "M" is the mental state of Respondent and receives a value of 2 according to OAR 340-012-0145(5)(b), because Respondent reasonably should have known of the requirement to begin quarterly methane SEMs by no later than December 30, 2022. In an August 10, 2022, email, DEQ notified Respondent that Respondent needed to conduct the first quarterly methane SEM within 90 days of October 1, 2022.
- "C" is Respondent's efforts to correct or minimize the effects of the violation and receives a value of -2 according to OAR 340-012-0145(6)(d) because Respondent eventually made some efforts to correct or minimize the effects of the violation by conducting its first methane SEM event in April 2024.
- "EB" is the approximate dollar value of the benefit gained, and the costs avoided or delayed as a result of 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 \$27,470. This is the amount of economic benefit Respondent gained by avoiding spending approximately \$4,500* per quarter for each of the six missed quarterly methane SEM events. This "EB" was calculated pursuant to OAR 340-012-0150(1) using the U.S. Environmental Protection Agency's BEN computer model.

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

$$\begin{aligned} &= \$6,000 + [(0.1 \times \$6,000) \times (0 + 1 + 2 + 2 + -2)] + \$27,470 \\ &= \$6,000 + (\$600 \times 3) + \$27,470 \\ &= \$6,000 + \$1,800 + \$27,470 \\ &= \$35,270 \end{aligned}$$

*Estimate from SCS Engineers – environmental consulting firm

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:	October 2, 2025
RESPONSE DATE*:	December 11, 2025
TOTAL PENALTY:	\$35,270.00

Account Name:	DOUGLAS COUNTY PUBLIC WORKS DEPARTMENT		
Account Type:	Vendor/Organization/Company	Reference Number:	CPGFD2600030
SubSystem ID:	216700	FIMS Acct. ID:	27182

Penalty Summary

Penalty Amount	Interest	Adjustment	Amount Paid	Total Penalty
\$ 35,270.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 35,270.00

*This is the date the penalty is due if you do not exercise your right to appeal the attached order. 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.	CPGFD2600030		
PAYCODE:	00401 7400 10040 74001 0500 000000 00		
FEE PROGRAM ID:	950	RESPONSE DATE:	December 11, 2025
FIMS ACCT. ID:	27182	TOTAL PENALTY DUE:	\$35270.00

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 0095000271822CPGFD260003000035270005



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
10/1/2025	2024-069 AQ-V-ER-2024-069	\$35,270.00

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. AQ/V-WR-2024-069 upon:

9589 0710 5270 3236 6719 59

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)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postmark Here	
Postage	
Douglas County Public Works Department c/o Nick Frisinger, Douglas County Solid Waste Director 1036 SE Douglas Avenue, Room 308 Roseburg, OR 97470	
PS Form 3800, January 2023 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 October 2, 2025

Isaac Griffith

Isaac Griffith, Case Coordinator

Office of Compliance & Enforcement

Department of Environmental Quality