



# 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

October 30, 2025

CERTIFIED MAIL: 9589 0710 5270 3236 6720 24

City of St. Helens  
c/o John Walsh, City Administrator  
265 Strand St  
St. Helens, OR 97051

Re: Notice of Civil Penalty Assessment and Order  
Case No. WQ-SW-NWR-2024-541

This letter is to inform you that the Oregon Department of Environmental Quality (DEQ) has issued you a civil penalty of \$33,090 for violations of your National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit No. 1200-C at the site located at the intersection of S 1st and Strand Street, and for violations of your NPDES Industrial Stormwater General Permit No. 1200-Z at the St. Helens Mill.

DEQ issued this penalty because your failure to implement the Erosion and Sediment Control Plan at the construction site located at S 1st and Strand Street posed a risk of harm to the Columbia River. The 1200-C Permit requires that registrants implement and maintain best management practices to prevent the discharge of sediment and turbid stormwater from the site into waters of the state. Additionally, you failed to implement the Stormwater Pollution Control Plan required by the 1200-Z Permit at the St. Helens Mill. Compliance with the SWPCP is essential to reducing pollutant concentrations in stormwater discharge. Implementation of stormwater control measures and management practices in the SWPCP reduce pollutant loads in stormwater discharge. By failing to comply with the requirements of the SWPCP and other requirements of the 1200-Z, you posed a risk of harm to waters of the state.

DEQ appreciates your efforts to correct the violations by bringing both locations into compliance with their respective permits. DEQ considered these efforts 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](mailto: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 <http://www.oregon.gov/deq/Regulations/Pages/Statutes.aspx> or by calling the number below.

If you have any questions, please contact Emily Knobbe at (971) 300-9770 or [emily.knobbe@deq.oregon.gov](mailto:emily.knobbe@deq.oregon.gov).

Sincerely,



Erin Saylor, Interim Manager  
Office of Compliance and Enforcement

Enclosures

cc: Aaron Kunders, Water Quality Manager, City of St. Helens, [akunders@sthelensoregon.gov](mailto:akunders@sthelensoregon.gov)  
Trevor Ureno, Northwest Region  
Michael Kennedy, Northwest Region  
Benjamin Benninghoff, DEQ

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION  
OF THE STATE OF OREGON

IN THE MATTER OF: ) NOTICE OF CIVIL PENALTY  
CITY OF ST. HELENS, ) ASSESSMENT AND ORDER  
Respondent. ) CASE NO. WQ-SW-NWR-2024-541

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, and 045.

II. FINDINGS OF FACT

S. 1st and Strand Street Road and Utility Extensions

1. Respondent operates the road and utility extension project located at S 1st and Strand Street in St. Helens, Oregon (the Construction Site).
2. The Site runs alongside the west bank of the Columbia River.
3. Respondent has coverage under the National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit No. 1200-C for a total disturbed area of 12 acres, which authorizes Respondent to discharge only in conformance with the Permit.
4. Pursuant to Schedule A.4 of the Permit, “the registrant must implement the [Erosion and Sediment Control Plan (ESCP)] at all times. . . Failure to implement any of the control measures or practices described in the ESCP is a permit violation.”
5. Respondent’s ESCP requires the following:
  - a. The ESCP must be accurate and reflect site conditions. (6)
  - b. Create smooth surfaces between soil surface and erosion and sediment controls to prevent stormwater from bypassing controls and ponding. (9)
  - c. Install perimeter sediment control, including storm drain inlet protection as well as all sediment basins, traps, and barriers prior to land disturbance. (13)

- d. Apply temporary and/or permanent soil stabilization measures immediately on all disturbed areas as grading progresses. (17)
- e. Establish material and waste storage areas, and other non-stormwater controls. (18)
- f. Keep waste container lids closed when not in use and close lids at the end of the business day for those containers that are actively used throughout the day. For waste containers that do not have lids, provide either (1) cover (e.g., a tarp, plastic sheeting, temporary roof) to prevent exposure of wastes to precipitation, or (2) a similarly effective means designed to prevent the discharge of pollutants (e.g., secondary containment). (19)
- g. Catch basins: clean before retention capacity has been reduced by fifty percent. Sediment basins and sediment traps: remove trapped sediments before design capacity has been reduced by fifty percent and at completion of project. (37)
- h. Within 24 hours, significant sediment that has left the construction site must be remediated. Investigate the cause of the sediment release and implement steps to prevent a recurrence of the discharge within the same 24 hours. Any in-stream clean-up of sediment shall be performed according to the Oregon Department of State Lands timeframe. (38)
6. On November 2, 2023, DEQ inspected the Site. At the time of the inspection:
- a. Earth was disturbed beyond the limits of disturbance mapped by the ESCP, and stormwater controls were not adjusted to accommodate the change in site conditions. The BMPs used at the site were not reflective of the ESCP;
- b. There was ponding on site;
- c. There was a lack of perimeter control—sediment fences were collapsed and straw wattles were not secured and improperly installed;
- d. Stockpiles were uncovered and stabilization measures such as straw matting were only partially implemented;
- e. There were hazardous materials placed without containment or covering;
- f. Construction materials were contained in uncovered bins and and were placed on

1 the ground next to the bins;

2 g. Storm drain inlets were not sufficiently protected. Some catch basins lacked bio  
3 bags or compost socks, and others were occluded with sediment and required maintenance;

4 h. There was sediment deposited on the pavement in tracks leading off the site and  
5 into the vegetation that slopes down to the Columbia River.

6 7. Respondent brought the Site into compliance with the ESCP on November 8, 2023.

7 8. Pursuant to Schedule A.4.8 of the Permit, “the ESCP and the site maps must be revised  
8 within seven days . . . to accurately reflect site conditions and BMPs used onsite.” Pursuant to Schedule  
9 A.4.9 of the Permit, “revisions to the ESCP that require submission are a reporting requirement. The  
10 registrant must submit a revised version of the completed ESCP to DEQ or Agent within ten calendar  
11 days of the revision.” Pursuant to Schedule A.4.9.iii and iv, ESCP revisions must be submitted if they  
12 are made due to an increase or decrease in the project size or the size or location of disturbed area.

13 9. Respondent did not revise the ESCP to reflect the change in the size and location of the  
14 disturbed area and the BMPs used onsite.

15 St. Helens Mill

16 10. Respondent owns the mill located at 1300 Kaster Road in St. Helens, Oregon (the  
17 Facility).

18 11. Respondent has coverage under the National Pollutant Discharge Elimination System  
19 (NPDES) Industrial Stormwater General Permit No. 1200-Z (the Permit) for industrial activities that  
20 are classified under Standard Industrial Classification (SIC) Code 2621, which authorizes Respondent  
21 to discharge from the Facility only in conformance with the Permit.

22 12. Pursuant to Schedule A.8.d of the Permit, “the permit registrant must implement the  
23 [stormwater pollution control plan (SWPCP)] and any revisions to the plan. Failure to implement any  
24 narrative technology-based effluent limits, other control measures or operational practices described in  
25 the SWPCP is a violation of this permit.”

26 13. Respondent’s SWPCP requires the following:

27 \\\

1           a.        “This SWPCP must be kept current and updated to reflect any substantial  
2 changes to the site controls or industrial activities. This SWPCP will be updated 30 days of making  
3 changes. . . . Revisions to the SWPCP will be submitted to DEQ only if the revisions are made for any  
4 of the following reasons: . . . Changes to the site, operations, or control measures that may significantly  
5 change the nature of pollutants present in stormwater discharge or significantly increase the pollutant(s)  
6 levels, discharge frequency, volume or flow rate, changes to the monitoring points or discharge points.”

7 (1.1 Revisions and Reviews)

8           b.        “Quadrant 1 stormwater catch basins are equipped with inserts to keep debris out  
9 of the stormwater system.” (3.5 Debris Control)

10          c.        “Catch basins cleaning annually. Catch basin inserts removed and replaced  
11 annually and per manufacturer recommendations. Pavement sweeping to maintain sediment- and  
12 debris-free surfaces. Pavement is swept annually or as needed.” (3.9 Preventative Maintenance)

13          d.        “Monthly inspections of the facility stormwater system and drainage areas are  
14 conducted to evaluate the condition of site control measures.” (3.9.1 Monthly Stormwater Inspections)

15          e.        “A continuing program of employee orientation and education is implemented to  
16 raise awareness about site-specific control measures and prompt and [sic] safe response to a spill or  
17 accident. . . . This training is included with new-employee orientation (within 30 days of the start of  
18 employment) and is repeated annually as part of the facility safety training program.” (3.10 Employee  
19 Education)

20          14.       On March 12, 2024, DEQ inspected the Facility. At the time of the inspection:

21               a.       The Facility had ceased operations in December 2023, however no updates were  
22 made to the SWPCP to reflect the change in activity;

23               b.       There were catchbasins at the Facility and a roof drain on the north side of the  
24 building that were missing from the SWPCP;

25               c.       There were several points of potential discharge in Quadrant 3 that were not  
26 identified in the SWPCP;

27               d.       Catchbasins in Quadrant 1 lacked oil-absorbent socks;

1 e. At least two catchbasins were not properly maintained and were clogged,  
2 resulting in significant ponding around the basin;

3 f. There was industrial debris on the pavement accumulated around unprotected  
4 catchbasins;  
5

6 g. Respondent had not conducted monthly visual monitoring inspections for at least  
7 36 months; and

8 h. Respondent had not conducted employee education for at least 36 months.

### 9 III. CONCLUSIONS

#### 10 S. 1st and Strand Street Road and Utility Extensions

11 1. From at least November 2 to 8, 2023, Respondent violated Schedule A.4 of the 1200-C  
12 Permit and ORS 468B.025(2) by failing to implement the ESCP as described in Section II, Paragraphs  
13 3-6, above. Specifically, BMPs were nonfunctional and installed incorrectly, there was loose debris set  
14 next to uncovered waste containers, and slopes were uncovered and unstabilized. Additionally, there  
15 was sediment deposition on top of vegetation and straw wattles, evidence of past bypass flows of turbid  
16 stormwater that had not been corrected. This is a Class I violation, according to OAR 340-012-  
17 0055(1)(r). DEQ hereby assesses a \$7,200 civil penalty for this violation.

18 2. Respondent violated Schedule A.4.8 of the 1200-C Permit and ORS 468B.025(2) by failing to  
19 revise the ESCP, as described in Section II, Paragraphs 8 and 9, above. This is a Class II violation,  
20 according to OAR 340-012-0055(2)(b). DEQ has not assessed a penalty for this violation.

#### 21 St. Helens Mill

22 3. On at least March 12, 2024, Respondent violated Schedule A.8.d of the 1200-Z Permit and  
23 ORS 468B.025(2) by failing to implement the SWPCP as described in Section II, Paragraphs 11-14,  
24 above. Specifically, the SWPCP did not reflect the conditions of the Facility, catchbasins were missing  
25 filters or were clogged, causing ponding, and there was debris accumulated on the pavement. Visual  
26 monitoring and employee education had not been conducted at the Facility for at least 36 months. This is  
27 a Class I violation pursuant to OAR 340-012-0055(1)(r). DEQ hereby assesses a \$25,890 penalty for this

violation.

#### IV. ORDER TO PAY CIVIL PENALTY

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

1. Pay a total civil penalty of \$33,090. The determination of the civil penalties are attached as Exhibits 1-2 and are 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 FIMS 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.

#### 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 exhibits, you must do so in your request for hearing, as factual matters not denied will be considered admitted, and failure to raise a defense will be a waiver of the defense. (See OAR 340-011-0530 for further information about requests for hearing.) You must send your request to: **DEQ, Office of Compliance and Enforcement, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232**, fax it to **503-229-6762** or email it to [DEQappeals@deq.oregon.gov](mailto:DEQappeals@deq.oregon.gov). An administrative law judge employed by the Office of Administrative Hearings will conduct the hearing, according to ORS Chapter 183, OAR Chapter 340, Division 011 and OAR 137-003-0501 to 0700. You have a right to be

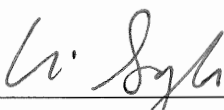


1 represented by an attorney at the hearing, however you are not required to be. If you request a hearing,  
2 you will be notified of the time and place of the hearing and you will be given information on the  
3 procedures, and other rights of parties relating to the conduct of the hearing before commencement of  
4 the hearing. If you are an individual, you may represent yourself. If you are a corporation, partnership,  
5 limited liability company, unincorporated association, trust or government body, you must be  
6 represented by an attorney or a duly authorized representative, as set forth in OAR 137-003-0555.

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

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

18  
19  
20  
21 10/30/2025  
22 Date

23  
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25  
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 NO. 1: Violating Schedule A.4 of the 1200-C Permit and ORS 468B.025(2) by failing to implement the Erosion and Sediment Control Plan.

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

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 has coverage under the NPDES Construction Stormwater General Permit No. 1200-C for a site of 12 acres.

"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. Each day of violation is a separate occurrence. Respondent failed to implement the ESCP from at least November 2 to 8, 2023, six days of violation.

"M" is the mental state of the Respondent, and receives a value of 8 according to OAR 340-012-0145(5)(d) because Respondent's conduct was reckless. According to OAR 340-012-0030(20), reckless means the respondent consciously disregarded a substantial and unjustifiable risk that the result would occur or that the circumstance existed. The risk must be of such a nature and degree that disregarding that risk constituted a gross deviation from the standard of care a reasonable person would observe in that situation. Respondent's 1200-C Permit and ESCP clearly describe requirements for implementation, including stabilization of disturbed areas, use and maintenance of waste containers, and maintenance of erosion and sediment controls. Respondent disregarded a substantial risk that conditions

of the Permit would be violated if Respondent did not implement the ESCP. Further, Respondent failed to implement the ESCP to the extent that there was significant ponding and surface flow containing sediment that was leaving the Site. There was sediment buildup on the pavement and on the vegetation on the slopes leading down to the Columbia River. Failing to implement the ESCP to such a degree was a gross deviation from the standard of care that a reasonable person would observe in that situation.

"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. On November 8, 2023, six days after DEQ's inspection, Respondent brought the Site into compliance with the ESCP.

"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 because the amount Respondent gained was de minimis.

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

$$\begin{aligned} &= \$4,000 + [(0.1 \times \$4,000) \times (0 + 0 + 2 + 8 + -2)] + \$0 \\ &= \$4,000 + (\$400 \times 8) + \$0 \\ &= \$4,000 + \$3,200 + \$0 \\ &= \$7,200 \end{aligned}$$

## EXHIBIT 2

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

- VIOLATION NO. 3: Violating Schedule A.8.d of the 1200-Z Permit and ORS 468B.025(2) by failing to implement the SWPCP.
- CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0055(1)(r).
- 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).
- "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. Each day of violation is a separate occurrence. Respondent failed to implement portions of the SWPCP, including monthly visual monitoring inspections, once per month for at least 36 months for a total of 36 occurrences.
- "M" is the mental state of the Respondent, and receives a value of 8 according to OAR 340-012-0145(5)(d) because Respondent's conduct was reckless. According to OAR 340-012-0030(20), reckless means the respondent consciously disregarded a substantial and unjustifiable risk that the result would occur or that the circumstance existed. The risk must be of such a nature and degree that disregarding that risk constituted a gross deviation from the standard of care a reasonable person would observe in that situation. Respondent's 1200-Z Permit and SWPCP clearly describe requirements for implementation, including maintenance of stormwater control measures. Respondent disregarded a substantial risk that conditions of the 1200-Z Permit would be violated if Respondent did not implement the

SWPCP. Respondent failed to implement the SWPCP to the extent that there was significant ponding around clogged catchbasins and industrial debris accumulated around unprotected catchbasins. Respondent failed to conduct employee training and education and visual monitoring inspections for at least the previous 36 months. Failing to implement the SWPCP to such a degree was a gross deviation from the standard of care that a reasonable person would observe in that situation.

"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 there is insufficient information to make a finding under paragraphs (6)(a) through (6)(e), or (6)(g). While Respondent did eventually correct some elements of the violation by implementing some portions of the SWPCP, other elements, such as employee education, could not be corrected. Therefore there is insufficient information to find that Respondent corrected the violation.

"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 \$17,090. This is the amount Respondent gained by avoiding spending \$16,698 to implement the SWPCP, including \$9,000 to conduct monthly visual monitoring inspections for 36 months. 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 + 8 + 0)] + \$17,090  
= \$4,000 + (\$400 x 12) + \$17,090  
= \$4,000 + \$4,800 + \$17,090  
= \$25,890

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 30, 2025
RESPONSE DATE*:	January 8, 2026
TOTAL PENALTY:	\$33,090.00

Account Name:	CITY OF ST. HELENS, OREGON <CITY OF ST. HELENS, OREGON> <9582>		
Account Type:	Government Local	Reference Number:	CPGFD2600037
SubSystem ID:	190761	FIMS Acct. ID:	2316

**Penalty Summary**

Penalty Amount	Interest	Adjustment	Amount Paid	Total Penalty
\$ 33,090.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 33,090.00

\*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.	CPGFD2600037		
PAYCODE:	00401 7400 10040 74001 0500 000000 00		
FEE PROGRAM ID:	950	RESPONSE DATE:	January 8, 2026
FIMS ACCT. ID:	2316	TOTAL PENALTY DUE:	\$33090.00

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 0095000023169CPGFD260003700033090006



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
10/29/2025	2024-541 WQ-SW-NWR-2024-541	\$33,090.00

### 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-SW-NWR-2024-541 upon:

42 0229 6720 24  
9589 0710 5270 3236

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT <small>Domestic Mail Only</small>	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>	
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	
City of St. Helens c/o John Walsh, City Administrator 365 Strand St St. Helens, OR 97051	
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 30, 2025

Isaac Griffith

Isaac Griffith, Case Coordinator

Office of Compliance & Enforcement

Department of Environmental Quality