



# 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

February 5, 2026

CERTIFIED MAIL: 9589 0710 5270 3236 6723 69

University of Oregon  
c/o Steven Stuckmeyer, Environmental Health & Safety Director  
1715 Franklin Blvd., Suite 2A  
Eugene OR 97403-1260

Re: Notice of Civil Penalty Assessment and Order  
Case No. LQ/HW-WR-2024-583

This letter is to inform you that the Oregon Department of Environmental Quality (DEQ) has issued you a civil penalty of \$21,900 for hazardous waste violations stemming from a renovation at the University of Oregon campus in Eugene in January 2024. The project generated lead-containing D008 hazardous waste. You failed to conduct an accurate hazardous waste determination on two waste streams, failed to properly label containers of hazardous washwater, and offered waste for transport by a subcontractor without a hazardous waste manifest. You were also cited, without penalty, for failing to train employees and personnel on hazardous waste management.

DEQ issued this penalty because as a generator of hazardous waste, you are responsible for making accurate hazardous waste determinations on residues and for ensuring that hazardous wastes are managed, transported and disposed in compliance with hazardous waste regulations. Your failure to comply with these requirements created a risk of harm to employees and contractors who transported and stored the waste, and to public health and the environment.

DEQ appreciates your efforts to correct the violations by properly characterizing the waste and labeling hazardous waste containers with accumulation start dates. 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, or

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 <https://www.oregon.gov/deq/Regulations/Pages/Administrative-Rules.aspx> or by calling the number below.

If you have any questions, please contact Esther Westbrook at 503-229-5374 or toll free in Oregon at 800-452-4011, extension 5374.

Sincerely,



Erin Saylor, Manager  
Office of Compliance and Enforcement

Enclosures

cc: Adam Jones, Environmental Services Manager, University of Oregon: [asjones@uoregon.edu](mailto:asjones@uoregon.edu)  
Douglas Park, Deputy General Counsel, University of Oregon: [dougpark@uoregon.edu](mailto:dougpark@uoregon.edu)  
Killian Condon, Eugene Office, DEQ  
Becky Williams, Western Region, DEQ  
Audrey O'Brien, Northwest Region, DEQ  
Accounting, DEQ

1 BEFORE THE ENVIRONMENTAL QUALITY COMMISSION  
2 OF THE STATE OF OREGON

3 )  
4 IN THE MATTER OF: ) NOTICE OF CIVIL PENALTY  
UNIVERSITY OF OREGON, ) ASSESSMENT AND ORDER  
5 )  
Respondent. ) CASE NO. LQ/HW-WR-2024-583  
6 )

7 I. AUTHORITY

8 The Department of Environmental Quality (DEQ) issues this Notice of Civil Penalty Assessment  
9 and Order (Notice) pursuant to Oregon Revised Statutes (ORS) 468.100, ORS 468.126 through 468.140,  
10 ORS 465.900, ORS 466.990, ORS Chapter 183 and Oregon Administrative Rules (OAR) Chapter 340,  
11 Divisions 011, 012, and 100-102.

12 II. FINDINGS OF FACT

13 1. At all material times, Respondent owned and operated a university located in Eugene,  
14 Lane County, Oregon (the Facility).

15 2. At all material times, Respondent generated more than 2,200 pounds of hazardous waste  
16 in any calendar month at the Facility. Respondent is a large quantity generator (LQG) registered under  
17 RCRA ID# ORQ000005348.

18 3. In fall/winter of 2023, Respondent and its contractors began a renovation project at  
19 Villard Hall, located at 1109 Old Campus Lane, and University Hall, located directly to the south of  
20 Villard Hall (no street address), at the Facility. As part of the renovation project, Respondent's  
21 subcontractor, Technical Waterproofing, Inc., power washed the masonry exteriors of these buildings to  
22 prepare them for restoration. The exterior surfaces included mortar, stucco, paint, and surfacing, which  
23 contained lead. Power washing the exteriors created washwater and debris, which are solid waste.

24 4. The regulatory threshold for solid waste containing lead to be considered hazardous  
25 waste due to the toxicity characteristic is 5.0 mg/L, as set forth in 40 CFR 261.24(b). This waste is  
26 identified by hazardous waste code D008.

27 ///

1           5.       On or about April 13, 2023, prior to beginning the renovation project, Respondent  
2 collected samples of the building exteriors and conducted Toxicity Characteristic Leaching Procedure  
3 (TCLP) analysis of those samples. The results were <0.5 mg/L for lead, which was below the  
4 regulatory threshold described above. However, the collection of the samples did not approximate the  
5 method used to treat the exterior surfaces, including use of a binder agent and power washing.

6           6.       In January 2024, Respondent and its contractors generated the following residues:

- 7           a.       Solid debris from the exterior surface removal and treatment process, including dirt,  
8           sediment, poly used for containment, and workers' PPE, totaling approximately 1,200  
9           pounds, which was stored in 14 plastic contractor bags.
- 10          b.       Washwater generated from power washing, which was stored in eleven 275-gallon totes.
- 11          c.       Solid waste generated by filtering washwater from power washing to remove lead,  
12          which was stored in four 55-gallon drums.

13          7.       Respondent conducted the following sampling and analysis of the washwater described  
14 in Paragraph 6(b) above:

- 15          a.       On or about January 22, 2024, Respondent collected a sample of washwater from  
16          Villard Hall and conducted TCLP analysis. The results were 12.0 mg/L for lead.
- 17          b.       On or about February 1, 2024, Respondent collected three samples of washwater from  
18          Villard Hall that had been filtered to remove lead and conducted TCLP analysis. The  
19          results were 61.6 mg/L, 92.8 mg/L, and 119 mg/L for lead.
- 20          c.       On or about February 13, 2024, Respondent collected two additional samples of  
21          washwater from Villard Hall that had been further filtered to remove lead and conducted  
22          TCLP analysis. The results were 76.2 mg/L, and 59.7 mg/L for lead.

23          8.       On February 14, 2024, DEQ inspected the renovation project at the Facility.

24          9.       As of February 14, 2024, Respondent had not performed accurate hazardous waste  
25 determinations on the residues described in Paragraph 6(a) and (c) above.

26       ////

27       ////



1           1. On or before February 14, 2024, Respondent violated OAR 340-102-0011(2) by failing to  
2 completely and accurately determine if residues, as defined in OAR 340-100-0010(2)(hh) and 40 CFR  
3 261.2, generated at the Facility were hazardous waste upon generation, as described in Section II above.  
4 Specifically, Respondent failed to conduct accurate hazardous waste determinations on approximately  
5 1,200 pounds of debris from the exterior surface treatment process, including dirt, sediment, poly used  
6 for containment, and workers' PPE, and four 55-gallon drums of solid waste generated by filtering  
7 washwater from power washing, which were D008 hazardous waste pursuant to 40 CFR 261.24(b). This  
8 is a Class I violation according to OAR 340-012-0068(1)(a). DEQ hereby assesses a civil penalty of  
9 \$8,400 for this violation.

10           2. On or before February 14, 2024, Respondent failed to mark eleven hazardous waste  
11 containers with the words "Hazardous Waste," in violation of 40 CFR 262.17(a)(5)(i)(A), and with an  
12 indication of the hazard of the contents (toxicity), in violation of 40 CFR 262.17(a)(5)(i)(B) as described  
13 in Section II above. These are Class II violations according to OAR 340-012-0068(2)(b). DEQ has not  
14 assessed a civil penalty for these violations.

15           3. On or before February 14, 2024, Respondent failed to place accumulation start dates on eleven  
16 hazardous waste containers, in violation of 40 CFR 262.17(a)(5)(i)(C), as described in Section II above.  
17 This is a Class II violation according to OAR 340-012-0068(2)(a). DEQ hereby assesses a civil penalty  
18 of \$9,000 for this violation.

19           4. The week of February 3, 2024, Respondent offered hazardous waste for transport for offsite  
20 storage or disposal without a manifest, in violation of 40 CFR 262.20(a)(1), as described in Section II  
21 above. Specifically, Respondent offered for transport approximately 1,200 pounds of debris from the  
22 exterior surface treatment process, including dirt, sediment, poly used for containment, and workers'  
23 PPE, which was D008 hazardous waste. This is a Class I violation according to OAR 340-012-  
24 0068(1)(e). DEQ hereby assesses a civil penalty of \$4,500 for this violation.

25           5. On or before February 14, 2024, Respondent failed to ensure that all employees and personnel  
26 were thoroughly familiar with proper waste handling and emergency procedures, relevant to their  
27 responsibilities during normal facility operations and emergencies, in violation of 40 CFR 262.17(a)(7), as

1 described in Section II above. This is a Class II violation according to OAR 340-012-0068(2)(I). DEQ  
2 has not assessed a civil penalty for this violation.

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

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

6 Pay a total civil penalty of \$21,900. The determination of the civil penalty is attached as  
7 Exhibit Nos. 1 – 3, which are incorporated as part of this Notice.

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

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

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

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

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

1 Chapter 183, OAR Chapter 340, Division 011, and OAR 137-003-0501 to 0700. You have a right to be  
2 represented by an attorney at the hearing, however you are not required to be. If you are an individual,  
3 you may represent yourself. If you are a corporation, partnership, limited liability company,  
4 unincorporated association, trust, or government body, you must be represented by an attorney or a  
5 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.

17  
18  
19 2/5/2020  
Date


20   
Erin Saylor, 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 accurately determine if Respondent's residues (as defined in OAR 340-100-0010(2)(hh) and 40 CFR 261.2 as adopted by OAR 340-100-0002) were hazardous waste, in violation of OAR 340-102-0011(2).

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0068(1)(a).

MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0135(4)(a)(B) because Respondent failed to make accurate hazardous waste determinations on two waste streams.

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)(M)(i) because at the time of the hazardous waste rule violation, Respondent was a large quantity generator of hazardous waste.

"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 3, according to OAR 340-012-0030(2)(a)(C) and (D). In Case No. LQ/UST-WR-2022-077, Respondent was cited for two Class I violations.

"H" is Respondent's history of correcting prior significant actions and receives a value of -2 according to OAR 340-012-0145(3)(a) because Respondent corrected all prior violations cited as PSAs.

"O" is whether the violation was repeated or ongoing and receives a value of 2 according to OAR 340-012-0145(4)(b) because there were more than one but less than seven occurrences of the violation. Respondent failed to accurately characterize two waste streams: solid waste generated by filtering washwater from power washing and debris from the exterior surface treatment process, including dirt, sediment, poly used for containment, and workers' PPE.

"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. Respondent is a long-standing LQG and has staff responsible for managing hazardous waste and environmental compliance. Respondent was aware that the buildings being renovated had lead-containing coatings and that it was required to determine whether the waste from the renovation project

was hazardous waste. Although Respondent conducted sampling and analysis of the wastewater generated from the project, it failed to perform accurate hazardous waste determinations of the other waste streams. This failure led to additional hazardous waste management violations. By failing to perform accurate hazardous waste determinations, Respondent failed to take reasonable care to avoid a foreseeable risk that it would violate hazardous waste requirements.

"C" is Respondent's efforts to correct or mitigate the violation and receives a value of -3 according to OAR 340-012-0145(6)(c) because Respondent made reasonable efforts to correct the violation by properly characterizing and disposing of the D008 waste from the renovation project, or ensuring that its contractor did so.

"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 economic benefit received from delaying characterizing the waste, if any, was de minimis.

PENALTY CALCULATION:  $Penalty = BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB$   
= \$6,000 + [(0.1 x \$6,000) x (3 - 2 + 2 + 4 - 3)] + \$0  
= \$6,000 + (\$600 x 4) + \$0  
= \$6,000 + \$2,400 + \$0  
= \$8,400

## EXHIBIT 2

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

VIOLATION 3: Failure to label hazardous waste containers with accumulation start dates, in violation of 40 CFR 262.17(a)(5)(i)(C), as adopted by OAR 340-100-0002.

CLASSIFICATION: This is a Class II violation pursuant to OAR 340-012-0068(2)(a).

MAGNITUDE: The magnitude of the violation is major pursuant to OAR 340-012-0135(4)(c)(B)(i) for a hazardous waste management violation classified in OAR 340-012-0068(2)(a) that involved more than 1,000 gallons of hazardous waste. Respondent failed to label 11 hazardous waste containers, totalling approximately 3,025 gallons.

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 II, major magnitude violation in the matrix listed in OAR 340-012-0140(2)(b)(B)(i) and applicable pursuant to OAR 340-012-0140(2)(a)(M) because Respondent is a large quantity generator of hazardous waste and violated a hazardous waste rule.

"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 3, according to OAR 340-012-0030(2)(a)(C) and (D). In Case No. LQ/UST-WR-2022-077, Respondent was cited for two Class I violations.

"H" is Respondent's history of correcting prior significant actions and receives a value of -2 according to OAR 340-012-0145(3)(a) because Respondent corrected all prior violations cited as PSAs.

"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. Respondent failed to properly label 11 hazardous waste containers, which is 11 occurrences of the violation.

"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. Respondent was aware that the waste in the totes was hazardous due to lead content as it had conducted TCLP testing at least three times prior to DEQ's inspection. However, Respondent failed to properly manage the hazardous waste, including labeling the containers with accumulation start dates. This increased the risk that the waste would be improperly handled or disposed. By failing to

properly label its hazardous waste containers, Respondent failed to take reasonable care to avoid a foreseeable risk of conduct resulting in violations of hazardous waste requirements.

"C" is Respondent's efforts to correct or mitigate the violation and receives a value of -3 according to OAR 340-012-0145(6)(c) because Respondent made reasonable efforts to correct the violation. Respondent promptly labeled its containers after DEQ's inspection.

"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 there is insufficient information to make an estimate of the economic benefit, if any, received by Respondent from this violation.

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

$$\begin{aligned} &= \$6,000 + [(0.1 \times \$6,000) \times (3 - 2 + 3 + 4 - 3)] + \$0 \\ &= \$6,000 + [\$600 \times 5] + \$0 \\ &= \$6,000 + \$3,000 + \$0 \\ &= \$9,000 \end{aligned}$$

### EXHIBIT 3

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

VIOLATION 4: Offering hazardous waste for transport without a uniform hazardous waste manifest, in violation of 40 CFR 262.20(a)(1), as adopted by OAR 340-100-0002.

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0068(1)(e).

MAGNITUDE: The magnitude of the violation is minor pursuant to OAR 340-012-0135(4)(c)(C) because Respondent offered 1,500 pounds or less of hazardous waste and no acutely hazardous waste for transport without a manifest.

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 \$3,000 for a Class I, minor magnitude violation in the matrix listed in OAR 340-012-0140(2)(b)(A)(iii) and applicable pursuant to OAR 340-012-0140(2)(a)(M) because Respondent is a large quantity generator of hazardous waste and violated a hazardous waste rule.

"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 3, according to OAR 340-012-0030(2)(a)(C) and (D). In Case No. LQ/UST-WR-2022-077, Respondent was cited for two Class I violations.

"H" is Respondent's history of correcting prior significant actions and receives a value of -2 according to OAR 340-012-0145(3)(a) because Respondent corrected all prior violations cited as PSAs.

"O" is whether the violation was repeated or ongoing and receives a value of 0 according to OAR 340-012-0145(4)(a) because there was only one occurrence of the violation. Respondent offered one shipment of hazardous waste without a manifest.

"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. When Respondent offered hazardous waste for shipment without a manifest, it failed to take reasonable care to avoid a foreseeable risk that it would violate hazardous waste regulations. Although Respondent's subcontractor transported the waste to its facility, as a generator Respondent had the responsibility to ensure that the hazardous waste was properly characterized, manifested and disposed.

"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. Technical Waterproofing, Inc., the subcontractor that transported the waste, eventually arranged to properly dispose of the hazardous waste.

"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 there is insufficient information to make an estimate of the economic benefit, if any, received by Respondent from this violation.

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

$$\begin{aligned} &= \$3,000 + [(0.1 \times \$3,000) \times (3 - 2 + 0 + 4 + 0)] + \$0 \\ &= \$3,000 + [\$300 \times 5] + \$0 \\ &= \$3,000 + \$1,500 + \$0 \\ &= \$4,500 \end{aligned}$$

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



State of Oregon  
**Department of Environmental Quality**

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

**CIVIL PENALTY - ORS 468.135(2)**

<b>DATE:</b>	February 5, 2026
<b>RESPONSE DATE*:</b>	April 16, 2026
<b>TOTAL PENALTY:</b>	\$21,900.00

Account Name:	UNIVERSITY OF OREGON		
Account Type:	Government State	Reference Number:	CPGFD2600074
SubSystem ID:	202566	FIMS Acct. ID:	825

**Penalty Summary**

Penalty Amount	Interest	Adjustment	Amount Paid	Total Penalty
\$ 21,900.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 21,900.00

\*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.	CPGFD2600074		
PAYCODE:	00401 7400 10040 74001 0500 000000 00		
FEE PROGRAM ID:	950	RESPONSE DATE:	April 16, 2026
FIMS ACCT. ID:	825	TOTAL PENALTY DUE:	\$21900.00

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 0095000008252CPGFD260007400021900009



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
2/4/2026	2024-583 LQ-HW-WR-2024-583	\$21,900.00

### 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. LQ/HW-WR-2024-583 upon:

9589 0710 0710 5270 3236 6723 69

<b>U.S. Postal Service™</b> <b>CERTIFIED MAIL® RECEIPT</b> <i>Domestic Mail Only</i>	
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	\$ _____
Postage	
University of Oregon c/o Steven Stuckmeyer, Environmental Health & Safety Director 1715 Franklin Blvd., Suite 2A Eugene, OR 97403-1260	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

Postmark  
Here

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Isaac Griffith

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