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October 14, 2025

Managing Agent
Pacific Bio Products — Warrenton, LLC
16797 SE 130th Avenue
Clackamas, OR 97015

Managing Agent
Pacific Bio Products — Warrenton, LLC
1935 NW Warrenton Dr.
Warrenton, OR 97146

Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT

Dear Managing Agent(s):

This letter provides you with 60 days' notice of Center for Food Safety and Northwest Environmental Defense Center's intent to file a citizen suit against Pacific Bio Products — Warrenton, LLC ("Pacific") under section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below.

Pacific owns and operates a facility used to manufacture bulk products including fishmeal and shrimp and crab shell products that are used as (or in) pet food additives, livestock and aquaculture feed, and fish oils located at or about 1935 NW Warrenton Drive, Warrenton, Oregon 97146 (46.1948°N, 123.9354°W) (the "Facility"). The Facility discharges effluent directly into the lower Columbia River, a water of the United States, from three separate outfalls.¹ This effluent consists of boiler blowdown and stormwater (from Outfall 001), fish meal, crab shell, and shrimp shell process effluent, cooling effluent, and stormwater (from Outfall 002), and wet scrubber effluent (from Outfall 003).

The Facility is authorized to discharge effluent within the limits and under the conditions detailed in its National Pollutant Discharge Elimination System ("NPDES") Permit No. 101804 (the "Permit") issued by the Oregon Department of Environmental Quality ("ODEQ").² The NPDES is the mechanism by which much of the CWA is administered. 33 U.S.C. § 1342. The U.S. Environmental Protection Agency ("EPA") may delegate this permitting system to states, and EPA has done so with Oregon. *See id.* § 1342(b); 40 C.F.R. § 123.61. ODEQ is the state

¹ At the point the Facility discharges to the Columbia River, it has the state waterbody ID OR_LK_1708000605_04_100323. The Columbia River at this location is listed on Oregon's CWA section 303(d) impaired waterway list, as it fails to meet water quality standards for several designated uses (Fish and Aquatic Life, Fishing, Private Domestic Water Supply, and Public Domestic Water Supply).

² In the current amended iteration of the Permit, the Facility location is listed as Bio-OREGON Protein, Inc., PO Box 429, Warrenton, Oregon 97146. Bio-OREGON Protein, Inc. changed its name to Pacific Bio Products — Warrenton, LLC on November 27, 2018.

agency authorized to issue and enforce the NPDES permitting program in Oregon. The Permit was issued by ODEQ on February 17, 2022, has an effective date of April 1, 2022, was amended on October 9, 2024, and has an expiration date of January 31, 2027.³

Pacific is required to strictly adhere to the numeric effluent limits and other terms and conditions in the Permit. But, over the past several years, Pacific has consistently failed to do so. Pacific has violated, and continues to violate, the terms and conditions of the Permit, including effluent standards and limitations under section 505(a)(1)(A) and (f)(7) of the CWA, 33 U.S.C. §§ 1365(a)(1)(A), f(7). Pacific has also violated and continues to violate section 301(a) of the CWA, 33 U.S.C. § 1311(a), by discharging pollutants from the Facility to waters of the United States in a manner unauthorized by its Permit.

I. CENTER FOR FOOD SAFETY AND NORTHWEST ENVIRONMENTAL DEFENSE CENTER ARE COMMITTED TO PROTECTING ECOSYSTEMS AND COMMUNITIES FROM HARMFUL AQUACULTURE PRACTICES

Center for Food Safety’s mission is to empower people, support farmers, and protect the Earth from the harmful impacts of industrial agriculture, including aquaculture. Center for Food Safety is dedicated to protecting public health and the environment from the harms of industrial aquaculture. Northwest Environmental Defense Center’s mission is to preserve and protect the natural environment of the Pacific Northwest, which it accomplishes, in part, by enforcing environmental laws to hold regulators and companies accountable. Center for Food Safety and Northwest Environmental Defense Center are non-profit membership organizations with members who live, recreate, and work throughout the Columbia River Basin, including near and downstream of the Facility’s discharges into the lower Columbia River.

II. PACIFIC’S ONGOING VIOLATIONS OF THE PERMIT

A. Pacific’s Violations of the Permit’s Numeric Effluent Limits

Schedule A of the Permit requires Pacific to comply with numeric effluent limits at all times. Schedule F.A1 also states that Pacific “must comply with all conditions of this permit.” Schedule C.1 of the Permit requires Pacific to achieve compliance with the final effluent limits for total residual chlorine in Schedule A of the Permit by December 1, 2024. The Permit sets the following numeric effluent limits (among others):⁴

Outfall 001

- total residual chlorine: monthly average 0.01 mg/L, daily maximum 0.02 mg/L (*limit effective December 1, 2024*)
- pH: instantaneous limit between a daily minimum of 6.0 SU and daily maximum of 9.0 SU

³ The only amendments to the Permit on October 9, 2024, were the removal of numerical effluent limits for mercury for Outfalls 002 and 003.

⁴ The italicized sections note Permit limits that are included in the Compliance Schedule at Schedule C of the Permit.

Outfall 002

- total residual chlorine: monthly average 0.05 mg/L, daily maximum 0.09 mg/L (*limit effective December 1, 2024*)
- pH: instantaneous limit between a daily minimum of 6.0 SU and daily maximum of 9.0 SU

Outfall 003

- total residual chlorine: monthly average 0.01 mg/L, daily maximum 0.02 mg/L (*limit effective December 1, 2024*)
- pH: instantaneous limit between a daily minimum of 6.0 SU and daily maximum of 9.0 SU

As shown in the table below, Pacific has repeatedly violated the numeric effluent limits imposed by Schedule A the Permit, and Pacific has violated the requirement of Schedule C.1 of the Permit to achieve compliance with the final effluent limits for total residual chlorine in Schedule A of the Permit by December 1, 2024:

Violations of the Permit's Numeric Effluent Limit Reported by Pacific						
Date of Violation	Outfall	Pollutant	Limit Type	Unit	Limit	Result
August 13, 2022	002	pH	Instantaneous Maximum	SU	9	9.77
August 14, 2022	003	pH	Instantaneous Maximum	SU	9	9.44
August 28, 2022	001	pH	Instantaneous Minimum	SU	6	5.40
January 22, 2023	001	pH	Instantaneous Maximum	SU	9	10.16
January 25, 2023	001	pH	Instantaneous Maximum	SU	9	9.35
February 7, 2023	003	pH	Instantaneous Maximum	SU	9	9.21
September 26, 2024	001	pH	Instantaneous Maximum	SU	9	9.06
November 10, 2024	001	pH	Instantaneous Maximum	SU	9	9.26
December 3, 2024	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<5.00
December 3, 2024	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.20
December 11, 2024	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<5.00
December 11, 2024	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	1.38
December 19, 2024	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<5.00
December 19, 2024	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.47
December 24, 2024	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	1.00
December 24, 2024	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.20
December 31, 2024	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	2.00
December 31, 2024	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.58
December 2024	002	Chlorine, total residual	Monthly Average	mg/L	0.05	<3.60
December 2024	003	Chlorine, total residual	Monthly Average	mg/L	0.01	2.17
January 7, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<2.00
January 7, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.34

January 14, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<2.00
January 14, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.59
January 21, 2025	001	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.15
January 21, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<2.00
January 21, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.20
January 29, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<2.00
January 29, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.38
January 2025	001	Chlorine, total residual	Monthly Average	mg/L	0.01	<0.08
January 2025	002	Chlorine, total residual	Monthly Average	mg/L	0.05	<2.00
January 2025	003	Chlorine, total residual	Monthly Average	mg/L	0.01	2.38
February 2, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<2.00
February 2, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.67
February 11, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	3.0
February 11, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.41
February 18, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<2.00
February 18, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.71
February 28, 2025	001	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.05
February 28, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	6.0
February 28, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.20
February 2025	001	Chlorine, total residual	Monthly Average	mg/L	0.01	<0.03
February 2025	002	Chlorine, total residual	Monthly Average	mg/L	0.05	<3.25
February 2025	003	Chlorine, total residual	Monthly Average	mg/L	0.01	2.50
March 4, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.20
March 11, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	22.00
March 11, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	1.30
March 20, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	18.00
March 20, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.81
March 26, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	8.00
March 26, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.08
March 2025	002	Chlorine, total residual	Monthly Average	mg/L	0.05	<12.01
March 2025	003	Chlorine, total residual	Monthly Average	mg/L	0.01	1.60
April 1, 2025	001	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.06
April 1, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	1.00
April 1, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.20
April 8, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.10
April 16, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	2.00
April 16, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	1.11
April 23, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	3.00
April 23, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.20
April 30, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	1.00
April 30, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.48

April 2025	001	Chlorine, total residual	Monthly Average	mg/L	0.01	<0.03
April 2025	002	Chlorine, total residual	Monthly Average	mg/L	0.05	1.40
April 2025	003	Chlorine, total residual	Monthly Average	mg/L	0.01	1.62
May 8, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	1.33
May 9, 2025	001	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.34
May 13, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.20
May 14, 2025	001	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.11
May 20, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	2.00
May 20, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.55
May 26, 2025	001	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.14
May 26, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	7.00
May 26, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.75
May 2025	001	Chlorine, total residual	Monthly Average	mg/L	0.01	<0.13
May 2025	002	Chlorine, total residual	Monthly Average	mg/L	0.05	2.26
May 2025	003	Chlorine, total residual	Monthly Average	mg/L	0.01	1.21
June 2, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<2.00
June 2, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.07
June 11, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<2.00
June 11, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	1.31
June 12, 2025	001	Chlorine, total residual	Daily Maximum	mg/L	0.02	0.07
June 16, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<2.00
June 16, 2025	003	Chlorine, total residual	Daily Maximum	mg/L	0.02	2.04
June 24, 2025	002	Chlorine, total residual	Daily Maximum	mg/L	0.09	<2.00
June 28, 2025	001	pH	Instantaneous Maximum	SU	9	10.23
June 29, 2025	001	pH	Instantaneous Maximum	SU	9	9.36
June 2025	001	Chlorine, total residual	Monthly Average	mg/L	0.01	<0.03
June 2025	002	Chlorine, total residual	Monthly Average	mg/L	0.05	<2.00
June 2025	003	Chlorine, total residual	Monthly Average	mg/L	0.01	<0.86
July 2, 2025	002	Chlorine	Daily Maximum	mg/L	0.09	6.00
July 2, 2025	003	Chlorine	Daily Maximum	mg/L	0.02	0.81
July 10, 2025	001	Chlorine	Daily Maximum	mg/L	0.02	0.03
July 10, 2025	003	Chlorine	Daily Maximum	mg/L	0.02	0.07
July 11, 2025	002	Chlorine	Daily Maximum	mg/L	0.09	2.00
July 15, 2025	002	Chlorine	Daily Maximum	mg/L	0.09	<2.00
July 15, 2025	003	Chlorine	Daily Maximum	mg/L	0.02	1.97
July 21, 2025	001	Chlorine	Daily Maximum	mg/L	0.02	0.04
July 21, 2025	002	Chlorine	Daily Maximum	mg/L	0.09	<2.00
July 21, 2025	003	Chlorine	Daily Maximum	mg/L	0.02	0.11
July 27, 2025	002	Chlorine	Daily Maximum	mg/L	0.09	<2.00
July 27, 2025	003	Chlorine	Daily Maximum	mg/L	0.02	0.18
July 2025	001	Chlorine	Monthly Average	mg/L	0.01	0.03

July 2025	002	Chlorine	Monthly Average	mg/L	0.05	<2.80
July 2025	003	Chlorine	Monthly Average	mg/L	0.01	0.63
August 12, 2025	003	Chlorine	Daily Maximum	mg/L	0.02	0.03
August 14, 2025	002	Chlorine	Daily Maximum	mg/L	0.09	66.00
August 19, 2025	002	Chlorine	Daily Maximum	mg/L	0.09	22.00
August 25, 2025	003	Chlorine	Daily Maximum	mg/L	0.02	0.03
August 2025	002	Chlorine	Monthly Average	mg/L	0.05	<22.01
August 2025	003	Chlorine	Monthly Average	mg/L	0.01	<0.03

B. Pacific’s Violations of Discharge Monitoring and Reporting Requirements

The Permit includes several monitoring and reporting requirements, detailed at Schedule B of the Permit. Per Schedules B.1 and B.2.a of the Permit, Pacific is required to submit monthly effluent monitoring and receiving stream results to ODEQ by the 15th of the following month via ODEQ-approved web-based discharge monitoring reports (“DMRs”).

Schedules B.3, B.4, B.5, and B.7 of the Permit prescribe monitoring requirements for Outfall 001, Outfall 002, Outfall 003, and the receiving stream, respectively. These include, but are not limited to, the monitoring requirements identified in the following table:

Effluent and Receiving Stream Monitoring Requirements					
Outfall	Parameter	Units	Time Period	Minimum Frequency	Report Statistic
001	Flow	MGD	Year-round	1/day	Monthly Average & Daily Maximum
001	pH	SU	Year-round	1/day	Daily Maximum & Daily Minimum
001	Chlorine, total residual	mg/L	Year-round	1/week	Daily Maximum & Monthly Average
001	Temperature	°C	Year-round	1/hour	Daily Average & Daily Maximum & 7-day Rolling Average of Daily Maximum
001	Total Lead	mg/L	Year-round	1/month	Daily Maximum & Monthly Average
001	Chlorine Used	lbs/day	Year-round	Daily	Daily Maximum
002	Flow	MGD	Year-round	1/day	Monthly Average & Daily Maximum
002	pH	SU	Year-round	1/day	Daily Maximum & Daily Minimum
002	Chlorine, total residual	mg/L	Year-round	1/week	Daily Maximum & Monthly Average
002	Temperature	°C	Year-round	1/hour	Daily Average & Daily Maximum & 7-day Rolling Average of Daily Maximum
002	Total Ammonia	mg/L	Year-round	1/week	Daily Maximum & Monthly Average
002	Chlorine Used	lbs/day	Year-round	Daily	Daily Maximum

003	Flow	MGD	Year-round	1/day	Monthly Average & Daily Maximum
003	pH	SU	Year-round	1/day	Daily Maximum & Daily Minimum
003	Chlorine, total residual	mg/L	Year-round	1/week	Daily Maximum & Monthly Average
003	Temperature	°C	Year-round	1/hour	Daily Average & Daily Maximum & 7-day Rolling Average of Daily Maximum
003	Total Ammonia	mg/L	Year-round	1/week	Daily Maximum & Monthly Average
003	Hardness	mg/L	Year-round	1/month	Monthly Maximum
003	Chlorine Used	lbs/day	Year-round	Daily	Daily Maximum
Receiving Stream	Alkalinity as CaCO ₃	mg/L	Year-round	1/month	Monthly Maximum

Pacific has violated the Permit’s monitoring and reporting requirements by failing to monitor effluent and the receiving stream and by failing to report the results to ODEQ as required by the Permit. These violations are identified in the tables attached hereto as the Appendix. Specifically, the Appendix identifies every date that Pacific has failed to monitor under Schedules B.3, B.4, B.5, and B.7 of the Permit. Each instance identified in the Appendix is also a violation of Schedules B.1 and B.2a of the Permit. Each violation of Schedules B.1 and B.2.a of the Permit occurred on the 15th of the month following the month in which the monitoring violation occurred (e.g., if Pacific failed to monitor for a parameter on April 1, 2022, Pacific violated the corresponding reporting requirements on May 15, 2022).

Further, Pacific has violated the temperature monitoring and reporting requirements of the Permit. As identified in the table above, Schedules B.3, B.4, and B.5 of the Permit require Pacific to monitor for temperature at Outfalls 001, 002, and 003 hourly year-round. For each outfall, every month Pacific must report three statistics on its monthly DMR: (1) daily average; (2) daily maximum; and (3) 7-day rolling average of daily maximum. Pacific has violated the monitoring and reporting requirements for temperature under Schedules B.1, B.2.a, B.3, B.4, and B.5 of the Permits. For example, and at a minimum, Pacific has failed to monitor and report the daily average, or alternatively the daily maximum, for temperature at Outfalls 001, 002, and 003. All of Pacific’s DMRs since April 2022 indicate that Pacific only monitors and reports for two of those three required statistics. Therefore each and every day since and including April 1, 2022, Pacific has violated the monitoring requirements of Schedules B.3, B.4, and B.5 of the Permit by failing to monitor the daily average, or alternatively the daily maximum, for temperature at Outfalls 001, 002, and 003. For the same reasons, Pacific has violated the reporting requirements in Schedules B.1 and B.2.a of the Permit on the 15 of every month since and including May 15, 2022 by failing to report the daily average, or alternatively the daily maximum, for temperature at Outfalls 001, 002, and 003.

C. Pacific’s Violations of the Wastewater Solids Reporting Requirements

Schedule D.1 of the Permit requires that Pacific submit a Wastewater Solids Annual Report by February 19 of each year documenting the removal of wastewater solids from the

Facility during the previous calendar year using the ODEQ-approved wastewater solids annual report form. The report must include the volume of material removed and the name of the permitted facility that received the solids. Pacific has violated these requirements by failing to timely submit complete and accurate Wastewater Solids Annual Reports using the ODEQ-approved form for each year since and including 2022 (which report was due February 19, 2023).

D. Pacific's Violations of the Permit's Outfall Inspection Requirements

Schedule D.5 of the Permit requires that Pacific inspect Outfalls 001–003, including the submerged portions and diffuser, to document their integrity and to determine whether they are operating as designed. The inspection must determine whether diffuser ports are intact, clear, and fully functional and verify the latitude and longitude of diffusers. Pacific must submit a written report to ODEQ by January 15, 2023, detailing the results of the inspection, including a description of the outfalls as originally constructed, a description of the current condition of the outfalls, and identification of any repairs needed to return the outfalls to satisfactory condition. Pacific has violated these requirements by failing to timely conduct inspections in the manner required and by failing to timely submit a complete and accurate written report that includes all required information.

E. Pacific's Violations of the Quality Assurance and Control Plan Requirements

Schedule B.2.e of the Permit requires that Pacific develop and implement a written Quality Assurance and Quality Control Plan that details the facility sampling procedures, equipment calibration and maintenance, analytical methods, quality control activities and laboratory data handling and reporting. The plan must conform to the requirements of 40 C.F.R. § 136.7. Upon information and belief, including Pacific's repeated violations of the Permit's effluent monitoring and reporting requirements, Pacific has violated the Permit by failing to develop and implement a Quality Assurance and Quality Control Plan in accordance with these requirements.

F. Pacific's Violations of the Chlorine Compliance Schedule Requirements

Schedule C.1 of the Permit requires that Pacific submit to ODEQ for approval an evaluation of the sources of residual chlorine in the effluent for all outfalls by December 1, 2022. The submission must also include a plan and schedule to reduce residual chlorine in the effluent and comply with the final total residual chlorine limits in Schedule A of the Permit. Further, Pacific must submit a status report to ODEQ by January 15 of each year outlining the progress made towards completion of the improvements. Pacific must achieve compliance with the final effluent limits for total residual chlorine in Schedule A of the Permit by December 1, 2024. Pacific violated these requirements by failing to timely submit an evaluation, plan, and schedule that comply with the Permit's requirements, by failing to achieve compliance with the final effluent limits for total residual chlorine in Schedule A of the Permit by December 1, 2024, and by failing to timely submit the status reports due January 15, 2023, January 15, 2024, and January 15, 2025 outlining progress.

Schedule C.2 of the Permit requires that, no later than fourteen days following each compliance date listed in Schedule C.1 of the Permit, Pacific must notify ODEQ in writing of its compliance or noncompliance. Any report of noncompliance must include the cause of noncompliance, any remedial actions taken, and a discussion of the likelihood of meeting the next scheduled requirement(s). Pacific violated Schedule C.2 of the Permit by failing to timely notify ODEQ in writing of compliance or noncompliance, and by failing to timely provide the information required for notifications of noncompliance, for its total residual chlorine evaluation, plan, and schedule due December 1, 2022, for its status reports for total residual chlorine requirements due January 15, 2023, January 15, 2024, and January 15, 2025, and for its compliance with the total residual chlorine final effluent limits due December 1, 2024.

G. Pacific's Violations of the Ammonia and Temperature Compliance Schedule Requirements

Schedule C.1 of the Permit requires that Pacific submit to ODEQ by March 1, 2024, for review and approval a feasibility study designed to identify treatment, source control, and other options to treat the effluent at Outfalls 002 and 003 to meet the final effluent limits of the Permit for total ammonia as N and temperature. The study must identify key activities and milestones, include a preliminary design, and include an estimated timeline to achieve the milestones. By June 1, 2024, Pacific must select treatment, source control, or other options and submit for approval to ODEQ a 30% design of modifications/improvements to implement the selected options. Pacific must also submit a status report to ODEQ by January 15 of each year outlining the progress made towards completion of the improvements. Pacific violated these requirements by failing to timely submit a feasibility study that included all required components, by failing to timely select improvements and to timely submit a 30% design for those improvements, and by failing to timely submit the status report due January 15, 2025 outlining progress.

Schedule C.2 of the Permit requires that, no later than fourteen days following each compliance date listed in Schedule C.1 of the Permit, Pacific must notify ODEQ in writing of its compliance or noncompliance. Any report of noncompliance must include the cause of noncompliance, any remedial actions taken, and a discussion of the likelihood of meeting the next scheduled requirement(s). Pacific violated Schedule C.2 of the Permit by failing to timely notify ODEQ in writing of compliance or noncompliance, and by failing to timely provide the information required for notifications of noncompliance, for its feasibility study due March 1, 2024, for its selection of improvements and submission of a 30% design for those improvements, and for its status report due January 15, 2025.

H. Pacific's Violations of the Noncompliance Notification Requirements

Schedule F.D5 of the Permit requires that Pacific report orally via telephone to ODEQ any Permit noncompliance that may endanger health or the environment within 24 hours of becoming aware of the circumstances. Such incidents include, but are not limited to, any violation of the Permit's maximum daily discharge limits. Pacific must also submit a written report within five days of becoming aware of the circumstances that contains: (1) a description of the noncompliance and its cause; (2) the period of noncompliance, including exact dates and times; (3) the estimated time noncompliance is expected to continue if it has not been corrected;

(4) steps taken on planned to reduce, eliminate and prevent recurrence of the noncompliance; and (5) public notification steps taken in accordance with Permit requirements. Pacific has violated these requirements by failing to timely provide the required 24-hour notice and by failing to timely submit complete and accurate written reports the contain all required information each time since April 1, 2022 that Pacific became aware of Permit noncompliance that may endanger health or the environment. Such incidents include, but are not limited to, the exceedances of maximum daily discharge limits for total residual chlorine and violations of the instantaneous discharge limits for pH, as identified in the table above in section II.A of this notice of intent to letter.

Schedule F.D6 of the Permit requires that Pacific report all other Permit noncompliance at the time its monitoring reports are submitted. The report must include: (1) a description of the noncompliance and its cause; (2) the period of noncompliance, including exact dates and times; (3) the estimated time noncompliance is expected to continue if it has not been corrected; and (4) steps taken on planned to reduce, eliminate and prevent recurrence of the noncompliance. Pacific has violated these requirements by failing to timely submit complete and accurate reports that contain all required information for all violations identified in this notice of intent to sue letter (except those subject to the 24-hour reporting requirements identified above). Such violations that required reporting under Schedule F.D6 of the Permit include, but are not limited to, the exceedances of monthly average discharge limits identified in the table above in section II.A of this notice of intent to letter and the reporting violations identified in the Appendix to this notice of intent to sue letter. Additionally, to the extent that violations of the instantaneous discharge limits for pH do not require 24-hour reporting under Schedule F.D5 of the Permit, those violations required reporting under Schedule F.D6 of the Permit and are identified in the table above in section II.A of this notice of intent to letter.

I. Pacific's Violations of the Requirement to Properly Operate and Maintain Facilities and Systems Used for Permit Compliance

Schedule F.B1 of the Permit requires that Pacific at all times properly operate and maintain all facilities and systems of treatment and control that are installed or used to achieve compliance with the Permit. On information and belief, including knowledge of the numerous effluent limit violations and monitoring and reporting violations identified herein, Pacific has violated these requirements each and every day since April 1, 2022.

J. Pacific's Violations of the Duty to Mitigate

Pacific is also required, per Schedule F.A3 of the Permit, to take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the Permit. Pacific has violated this requirement by failing to take all reasonable steps to minimize or prevent discharges that violate the Permit numeric effluent limits, including all such discharges identified in the table above in section II.A of this notice of intent to letter.

III. PACIFIC HAS VIOLATED SECTION 301(a) OF THE CWA

The Permit authorizes Pacific to discharge wastewater “only from the authorized discharge point or points in Schedule A in conformance with the requirements, limits, and conditions set forth in this permit.” As detailed above, Pacific has repeatedly violated the Permit since at least August 2022, including by exceeding numeric effluent limitations, failing to monitor and report discharges as required, failing to develop and/or implement plans intended to control and prevent pollution, and failing to ensure proper operations and maintenance in the Facility. These and the other violations identified above nullify the Permit’s authorization to discharge.

Accordingly, Pacific has violated section 301(a) of the CWA, 33 U.S.C. § 1311(a), by discharging effluent from the Facility, including from Outfalls 001–003, to the Columbia River, in a manner not authorized by the Permit or any other NPDES permit. The pollutants discharged include, but are not limited to, chlorinated condensed scrubber wastewater and seafood processing wastewater. These illegal discharges have occurred each and every day since August 1, 2022 and they continue to occur.

IV. PARTIES GIVING NOTICE OF INTENT TO SUE

The full names, addresses, and telephone numbers of the parties giving notice are:

Center for Food Safety
2009 NE Alberta Street, Suite 207
Portland, Oregon 97211
(971) 271-7372

Northwest Environmental Defense Center
10101 S. Terwilliger Boulevard
Portland, Oregon 97219
(503) 768-6726

V. ATTORNEYS REPRESENTING CENTER FOR FOOD SAFETY AND NORTHWEST ENVIRONMENTAL DEFENSE CENTER

The attorneys representing Center for Food Safety and Northwest Environmental Defense Center in this matter are:

Holly Bainbridge
Chelsea Bowling*
(202) 595-8816
FarmSTAND
712 H Street NE Suite 2534
Washington, DC 20002
holly@farmstand.org
chelsea@farmstand.org

*Admitted in Tennessee only. Practicing under the supervision of D.C. Bar members.

Brian A. Knutsen
Emma Bruden
Kampmeier & Knutsen, PLLC
1300 S.E. Stark Street, Suite 202
Portland, Oregon 97214
(503) 841-6515 (Knutsen)
(503) 719-5641 (Bruden)
brian@kampmeierknutsen.com
emma@kampmeierknutsen.com

Kingsly Alec McConnell
Center for Food Safety
2009 N.E. Alberta St., Suite 207
Portland, Oregon 97211
(971) 271-7372
kmccconnell@centerforfoodsafety.org

Mary Stites
Northwest Environmental Defense Center
10101 S. Terwilliger Blvd.
Portland, Oregon 97219
(503) 768-6726
mary@nedc.org

VI. CONCLUSION

The above-described violations reflect those indicated by the information currently available to Center for Food Safety and Northwest Environmental Defense Center based on their review of the public record. These violations are continuous and ongoing. Center for Food Safety and Northwest Environmental Defense Center intend to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under section 309(d) of the CWA, 33 U.S.C § 1319(d), Pacific is subject to a separate daily penalty assessment for each violation. The current maximum daily penalty assessment for each violation is \$68,445. 40 C.F.R. § 19.4. In addition to civil penalties, Center for Food Safety and Northwest Environmental Defense Center will seek injunctive relief to prevent further violations under section 505(a) of the CWA, 33 U.S.C. § 1365(a), and such other relief as is permitted by law. Section 505(d) of the CWA, 33 U.S.C. § 1365(d), further authorizes prevailing parties to recover costs, including attorneys' fees.

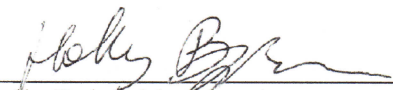
Center for Food Safety and Northwest Environmental Defense Center believe that this Notice of Intent to Sue sufficiently states grounds for filing suit. Center for Food Safety and Northwest Environmental Defense Center intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Pacific Bio Products – Warrenton, LLC under section 505(a) of the CWA for the violations described herein.

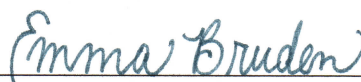
Center for Food Safety and Northwest Environmental Defense Center are willing to discuss effective remedies for the violations described in this letter during the 60-day notice period. If you believe that any of the allegations in this Notice of Intent to Sue are incorrect or based on incomplete information in the public record, please bring those facts to our attention. Thank you for your prompt attention to this matter.

Sincerely,

FARMSTAND

KAMPMEIER & KNUTSEN, PLLC

By: 
Holly Bainbridge
Chelsea Bowling

By: 
Emma A. O. Bruden
Brian A. Knutsen

CERTIFICATE OF SERVICE

I, Emma A. O. Bruden, declare under penalty of perjury of the laws of the State of Oregon and the United States that I am co-counsel for Center for Food Safety and Northwest Environmental Defense Center and that on October 14, 2025, I caused copies of the foregoing Notice of Intent to Sue Under the Clean Water Act and the following Appendix to be served on the following by depositing them with the United States Postal Service, certified mail, return receipt requested, postage prepaid:

Managing Agent
Pacific Bio Products — Warrenton, LLC
16797 SE 130th Avenue
Clackamas, OR 97015

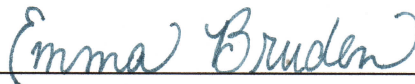
Robert J. Preston
Registered Agent for Pacific Bio Products -
Warrenton, LLC
707 SW Washington Street, Ste 1500
Portland, OR 97205

Regional Administrator Emma Pokon
U.S. Environmental Protection Agency,
Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Managing Agent
Pacific Bio Products — Warrenton, LLC
1935 NW Warrenton Dr.
Warrenton, OR 97146

Administrator Lee Zeldin
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
(Mail Code 1101A)
Washington, DC 20460

Director Leah Feldon
Oregon Department of Environmental Quality
700 NE Multnomah St, Ste 600
Portland, OR 97232



Appendix

Violations of Daily Monitoring Requirements Based on Pacific's DMR Data

DMR Month	Outfall	Parameter	Minimum Frequency	Report Statistic	Dates of Monitoring Violations
April 2022	001	pH	1/day	Daily Maximum & Daily Minimum	April 5, 7, 10, 11, 17, 19, 24
	002	Chlorine Used	Daily	Daily Maximum	April 1, 3, 4, 10, 11, 12, 14, 17, 18, 19, 20, 21, 22, 24, 25, 27, 28, 29, 30
May 2022	002	pH	1/day	Daily Maximum & Daily Minimum	May 7, 8
		Chlorine Used	Daily	Daily Maximum	May 1, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 15, 16, 17, 19, 21, 22, 23, 24, 25, 26, 27, 29, 30, 31
June 2022	002	pH	1/day	Daily Maximum & Daily Minimum	June 7
September 2022	001	Flow	1/day	Monthly Average and Daily Maximum	September 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30
		Chlorine Used	Daily	Daily Maximum	September 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30
	002	Flow	1/day	Monthly Average & Daily Maximum	September 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30
		Chlorine Used	Daily	Daily Maximum	September 30
	003	Flow	1/day	Monthly Average & Daily Maximum	September 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30
		Chlorine Used	Daily	Daily Maximum	September 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30
October 2022	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	October 30
		pH	1/day	Daily Maximum & Daily Minimum	October 30
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	October 25, 26, 30, 31
		pH	1/day	Daily Maximum & Daily Minimum	October 25, 26, 30

	003	Flow	1/day	Monthly Average & Daily Maximum	October 11, 30, 31
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	October 11, 30, 31
		pH	1/day	Daily Maximum & Daily Minimum	October 30, 31
November 2022	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	November 9, 13, 16, 17, 18, 21, 23, 24, 28, 30
		pH	1/day	Daily Maximum & Daily Minimum	November 9, 13, 16, 17, 18, 21, 23, 24, 28, 30
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	November 3, 4, 6, 7, 10, 12, 13, 17, 20, 24
		pH	1/day	Daily Maximum & Daily Minimum	November 2, 6, 7, 10, 12, 13, 14, 17, 20, 24
	003	Flow	1/day	Monthly Average & Daily Maximum	November 4, 6, 10, 12, 13, 17, 20, 24
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	November 4, 6, 7, 10, 12, 13, 17, 20, 24
		pH	1/day	Daily Maximum & Daily Minimum	November 4, 6, 7, 10, 12, 13, 17, 20, 24
December 2022	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	December 3, 4, 5, 7, 9, 10, 11, 17, 18, 22, 23, 24, 25, 26, 27, 28, 29
		pH	1/day	Daily Maximum & Daily Minimum	December 3, 4, 5, 7, 9, 10, 11, 17, 18, 22, 23, 24, 25, 26, 27, 28, 29
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	December 3, 4, 5, 7, 10, 18, 23, 24, 25, 26, 27
		pH	1/day	Daily Maximum & Daily Minimum	December 2, 3, 4, 5, 7, 10, 18, 23, 24, 25, 26, 27
	003	Flow	1/day	Monthly Average & Daily Maximum	December 4, 5, 10, 18, 23, 24, 25, 26, 27

		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	December 4, 5, 7, 10, 18, 23, 24, 25, 26, 27
		pH	1/day	Daily Maximum & Daily Minimum	December 4, 5, 7, 10, 18, 23, 24, 25, 26, 27
January 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	January 1, 2, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 23, 26
		pH	1/day	Daily Maximum & Daily Minimum	January 1, 2, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 23, 26
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	January 1, 2, 8, 9, 14, 15, 16, 23, 24
		pH	1/day	Daily Maximum & Daily Minimum	January 1, 2, 8, 15, 16, 23, 24
	003	Flow	1/day	Monthly Average & Daily Maximum	January 1, 2, 8, 9, 15, 16
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	January 1, 2, 8, 9, 15, 16
pH		1/day	Daily Maximum & Daily Minimum	January 1, 2, 8, 9, 15, 16	
February 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	February 8, 12, 23
		pH	1/day	Daily Maximum & Daily Minimum	February 8, 12, 23
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	February 15, 23
		pH	1/day	Daily Maximum & Daily Minimum	February 15, 23
	003	Flow	1/day	Monthly Average & Daily Maximum	February 23
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	February 23

		pH	1/day	Daily Maximum & Daily Minimum	February 23
March 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	March 1, 2, 6, 12, 23
		pH	1/day	Daily Maximum & Daily Minimum	March 1, 2, 6, 12, 23
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	March 21
		pH	1/day	Daily Maximum & Daily Minimum	March 21
April 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	April 1, 4, 5, 7, 8, 11, 17, 18, 19, 20, 25, 26, 30
		pH	1/day	Daily Maximum & Daily Minimum	April 1, 4, 5, 7, 8, 11, 17, 18, 19, 20, 25, 26, 30
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	April 3, 6, 9, 11, 13, 17, 18, 20, 21, 25
		pH	1/day	Daily Maximum & Daily Minimum	April 11, 17, 21, 25
	003	Flow	1/day	Monthly Average & Daily Maximum	April 11, 17, 25
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	April 11, 17, 25
		pH	1/day	Daily Maximum & Daily Minimum	April 11, 17, 25
		Chlorine Used	Daily	Daily Maximum	April 1
May 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	May 1, 4, 6, 15
		pH	1/day	Daily Maximum & Daily Minimum	May 1, 4, 6, 15

	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	May 1, 5, 6
		pH	1/day	Daily Maximum & Daily Minimum	May 1, 6, 15, 24
	003	Flow	1/day	Monthly Average & Daily Maximum	May 1, 6
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	May 1, 6
		pH	1/day	Daily Maximum & Daily Minimum	May 1, 6, 15
June 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	June 3, 6, 11, 14, 22, 25, 27
		pH	1/day	Daily Maximum & Daily Minimum	June 3, 6, 11, 14, 22, 25, 27
	002	pH	1/day	Daily Maximum & Daily Minimum	June 6
	003	pH	1/day	Daily Maximum & Daily Minimum	June 6
July 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	July 4, 11, 20, 28, 31
		pH	1/day	Daily Maximum & Daily Minimum	July 4, 11, 20, 28, 31
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	July 4
		pH	1/day	Daily Maximum & Daily Minimum	July 4
	003	Flow	1/day	Monthly Average & Daily Maximum	July 4
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	July 4

		pH	1/day	Daily Maximum & Daily Minimum	July 4
August 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	August 1, 6, 8, 22, 23
		pH	1/day	Daily Maximum & Daily Minimum	August 1, 6, 8, 22, 23
September 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	September 14, 17, 25, 26, 27, 29, 30
		pH	1/day	Daily Maximum & Daily Minimum	September 14, 17, 25, 26, 27, 29, 30
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	September 26, 29
		pH	1/day	Daily Maximum & Daily Minimum	September 26, 29
	003	Flow	1/day	Monthly Average & Daily Maximum	September 26
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	September 26
		pH	1/day	Daily Maximum & Daily Minimum	September 26, 29
October 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	October 1, 8, 12, 14, 17, 20, 21, 22, 24, 26, 31
		pH	1/day	Daily Maximum & Daily Minimum	October 1, 8, 12, 14, 17, 20, 21, 22, 24, 26, 31
	002	pH	1/day	Daily Maximum & Daily Minimum	October 1
	003	pH	1/day	Daily Maximum & Daily Minimum	October 1
November 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	November 1, 6, 7, 10, 12, 13, 15, 16, 17, 20, 21, 23, 27, 30

		pH	1/day	Daily Maximum & Daily Minimum	November 1, 6, 7, 10, 12, 13, 15, 16, 17, 20, 21, 23, 27, 30
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	November 5, 7, 10, 12, 13, 16, 17, 19, 20, 21, 23, 25, 26, 27
		pH	1/day	Daily Maximum & Daily Minimum	November 1, 7, 10, 12, 13, 15, 16, 17, 19, 20, 21, 23, 25, 26, 27
	003	Flow	1/day	Monthly Average & Daily Maximum	November 12, 13, 16, 17, 21, 25, 26
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	November 7, 12, 13, 16, 17, 21, 25, 26
		pH	1/day	Daily Maximum & Daily Minimum	November 1, 7, 10, 12, 13, 15, 16, 17, 19, 21, 23, 25, 26, 27
December 2023	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	December 2, 4, 5, 10, 13, 23, 24, 25, 30, 31
		pH	1/day	Daily Maximum & Daily Minimum	December 2, 4, 5, 10, 13, 23, 24, 25, 30, 31
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	December 4, 10, 20, 22, 23, 24, 25, 28, 30, 31
		pH	1/day	Daily Maximum & Daily Minimum	December 4, 10, 11, 13, 14, 17, 19, 20, 22, 23, 24, 25, 28, 30, 31
	003	Flow	1/day	Monthly Average & Daily Maximum	December 10, 20, 23, 24, 25, 30, 31
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	December 10, 20, 23, 24, 25, 30, 31
pH		1/day	Daily Maximum & Daily Minimum	December 4, 10, 13, 20, 23, 24, 25, 28, 30, 31	
January 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	January 1, 7, 8, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30
		pH	1/day	Daily Maximum & Daily Minimum	January 1, 7, 8, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30

	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	January 1, 2, 7, 8, 9, 13, 14, 15, 16, 20, 21, 22, 23, 24, 29, 30
		pH	1/day	Daily Maximum & Daily Minimum	January 1, 2, 7, 8, 9, 13, 14, 15, 16, 20, 21, 22, 23, 24, 28, 29, 30
	003	Flow	1/day	Monthly Average & Daily Maximum	January 1, 2, 7, 8, 9, 13, 14, 22, 30
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	January 1, 2, 7, 8, 9, 13, 14, 22, 30
		pH	1/day	Daily Maximum & Daily Minimum	January 1, 2, 7, 8, 9, 13, 14, 15, 16, 20, 23, 30, 31
February 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	February 1, 2, 3, 4, 5, 8, 11, 13, 15, 21, 23, 25, 28
		pH	1/day	Daily Maximum & Daily Minimum	February 1, 2, 3, 4, 5, 8, 11, 13, 15, 21, 23, 25, 28
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	February 1, 4, 6, 16, 24
		pH	1/day	Daily Maximum & Daily Minimum	February 1, 4, 6, 16, 24
	003	pH	1/day	Daily Maximum & Daily Minimum	February 4
March 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	March 1, 3, 4, 6, 10, 11, 13, 14, 17, 19, 21, 24, 27, 29, 31
		pH	1/day	Daily Maximum & Daily Minimum	March 1, 3, 4, 6, 10, 11, 13, 14, 17, 19, 21, 24, 27, 29, 31
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	March 3, 4, 9, 10, 14, 16, 17, 18, 21, 23, 24, 25, 31
		pH	1/day	Daily Maximum & Daily Minimum	March 3, 4, 9, 10, 14, 16, 17, 18, 21, 23, 24, 25, 31
	003	Flow	1/day	Monthly Average & Daily Maximum	March 10, 17, 18

		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	March 10, 17, 18
		pH	1/day	Daily Maximum & Daily Minimum	March 4, 10, 14, 17, 18, 21, 24
April 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	April 1, 8, 11, 12, 14, 17, 18, 20, 23, 24, 25, 26, 27, 28, 29, 30
		pH	1/day	Daily Maximum & Daily Minimum	April 1, 8, 11, 12, 14, 17, 18, 20, 23, 24, 25, 26, 27, 28, 29, 30
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	April 2, 3, 6, 7, 8, 14, 15, 20, 21
		pH	1/day	Daily Maximum & Daily Minimum	April 2, 3, 6, 7, 8, 14, 15, 20, 21
	003	Flow	1/day	Monthly Average & Daily Maximum	April 8, 14, 15
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	April 7, 8, 14, 15
pH		1/day	Daily Maximum & Daily Minimum	April 2, 3, 7, 8, 14, 15, 20, 28	
May 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	May 1, 3, 5, 6, 8, 9, 10, 11, 12, 13, 16, 17, 19, 26, 28, 29, 31
		pH	1/day	Daily Maximum & Daily Minimum	May 1, 3, 5, 6, 8, 9, 10, 11, 12, 13, 16, 17, 19, 26, 28, 29, 31
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	May 5
		pH	1/day	Daily Maximum & Daily Minimum	May 3, 5
	003	pH	1/day	Daily Maximum & Daily Minimum	May 6
June 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	June 10, 11, 21, 24, 27

	002	pH	1/day	Daily Maximum & Daily Minimum	June 10, 11, 21, 24, 27
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	June 17
		pH	1/day	Daily Maximum & Daily Minimum	June 3, 17
July 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	July 18, 23, 31
		pH	1/day	Daily Maximum & Daily Minimum	July 18, 23, 31
August 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	August 2, 5, 22
		pH	1/day	Daily Maximum & Daily Minimum	August 2, 5, 22
	003	Chlorine Used	Daily	Daily Maximum	August 1
September 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	September 1, 3, 5, 11, 13, 14
		pH	1/day	Daily Maximum & Daily Minimum	September 1, 3, 5, 11, 13, 14
	002	pH	1/day	Daily Maximum & Daily Minimum	September 1
October 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	October 6, 9, 13, 20, 24, 28, 30
		pH	1/day	Daily Maximum & Daily Minimum	October 6, 9, 13, 20, 24, 28, 30
	002	Flow	1/day	Monthly Average & Daily Maximum	October 6, 8, 22, 24, 27, 28, 30
		Temperature	1/hour	Daily Maximum*	October 4, 5, 6, 8, 22, 24, 27, 28, 30
		Temperature	1/hour	7-day Rolling Average of Daily Maximum	October 6, 8, 22, 24, 27, 28, 30

		pH	1/day	Daily Maximum & Daily Minimum	October 6, 8, 22, 24, 27, 28, 30	
	003	Flow	1/day	Monthly Average & Daily Maximum	October 27, 28, 30	
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	October 27, 28, 30	
		pH	1/day	Daily Maximum & Daily Minimum	October 22, 27, 28, 30	
November 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	November 1, 9, 11, 18, 19, 28	
		pH	1/day	Daily Maximum & Daily Minimum	November 1, 9, 11, 18, 19, 28	
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	November 1, 2, 4, 7, 10, 11, 16, 17, 18, 19, 21, 25, 28	
		pH	1/day	Daily Maximum & Daily Minimum	November 1, 2, 4, 7, 10, 11, 16, 17, 18, 19, 21, 25, 28	
	003	Flow	1/day	Monthly Average & Daily Maximum	November 2, 10, 19, 25, 28	
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	November 2, 10, 19, 25, 28	
		pH	1/day	Daily Maximum & Daily Minimum	November 2, 10, 11, 19, 25, 28	
	December 2024	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	December 3, 7, 8, 9, 10, 14, 15, 18, 22, 25, 30
			pH	1/day	Daily Maximum & Daily Minimum	December 3, 7, 8, 9, 10, 14, 15, 18, 22, 25, 30
002		Flow	1/day	Monthly Average & Daily Maximum	December 1, 2, 5, 9, 10, 12, 15, 16, 18, 22, 23, 25, 26, 29, 30	
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	December 1, 2, 5, 9, 10, 12, 15, 16, 18, 22, 23, 25, 26, 29, 30	

		pH	1/day	Daily Maximum & Daily Minimum	December 1, 2, 5, 9, 10, 12, 15, 16, 18, 22, 23, 25, 26, 29, 30
	003	Flow	1/day	Monthly Average & Daily Maximum	December 1, 2, 9, 17, 18, 25, 29
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	December 1, 2, 9, 17, 18, 25, 29
		pH	1/day	Daily Maximum & Daily Minimum	December 1, 2, 9, 10, 12, 16, 18, 23, 25, 29, 30
January 2025	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	January 1, 6, 19
		pH	1/day	Daily Maximum & Daily Minimum	January 1, 6, 19
	002	Flow	1/day	Monthly Average & Daily Maximum	January 4, 5, 6, 13, 19, 20, 28, 30
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	January 1, 2, 4, 5, 6, 13, 19, 20, 28, 30
		pH	1/day	Daily Maximum & Daily Minimum	January 1, 2, 4, 5, 6, 13, 19, 20, 28, 30
	003	Flow	1/day	Monthly Average & Daily Maximum	January 1, 6, 13, 19
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	January 1, 6, 13, 19
		pH	1/day	Daily Maximum & Daily Minimum	January 1, 6, 13, 19, 28, 30
	February 2025	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum
pH			1/day	Daily Maximum & Daily Minimum	February 3, 4, 13, 24
002		Flow	1/day	Monthly Average & Daily Maximum	February 1, 3, 4, 6, 7, 8, 9, 10, 20, 21, 23, 24, 26, 27

		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	February 1, 3, 4, 6, 7, 8, 9, 10, 20, 21, 23, 24, 26, 27	
		pH	1/day	Daily Maximum & Daily Minimum	February 1, 3, 4, 6, 7, 8, 9, 10, 20, 21, 23, 24, 26, 27	
	003	Flow	1/day	Monthly Average & Daily Maximum	February 3, 4, 10, 24, 26, 27	
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	February 3, 4, 10, 24, 26, 27	
		pH	1/day	Daily Maximum & Daily Minimum	February 3, 4, 10, 20, 24, 26, 27	
March 2025	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	March 5, 15, 16, 23	
		pH	1/day	Daily Maximum & Daily Minimum	March 5, 15, 16, 23	
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	March 2, 3, 5, 9, 10, 15, 16, 17, 19, 21, 23, 24, 25, 27, 30, 31	
		pH	1/day	Daily Maximum & Daily Minimum	March 2, 3, 5, 9, 10, 15, 16, 17, 19, 21, 23, 24, 25, 27, 30, 31	
	003	Flow	1/day	Monthly Average & Daily Maximum	March 15, 16, 23, 24	
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	March 15, 16, 23, 24, 31	
		pH	1/day	Daily Maximum & Daily Minimum	March 10, 15, 16, 17, 23, 24, 31	
	April 2025	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	April 3, 6, 7, 9, 13, 14, 15, 18, 20, 21, 22, 26, 27, 28
			pH	1/day	Daily Maximum & Daily Minimum	April 3, 6, 7, 9, 13, 14, 15, 18, 20, 21, 22, 26, 27, 28
002		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	April 3, 6, 7, 9, 10, 13, 14, 15, 18, 20, 21, 22, 26, 27, 28	

		pH	1/day	Daily Maximum & Daily Minimum	April 3, 6, 7, 9, 10, 13, 14, 15, 18, 20, 21, 22, 26, 27, 28
	003	Flow	1/day	Monthly Average & Daily Maximum	April 3, 13, 14, 20, 21, 22, 26, 27, 28
		Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	April 3, 7, 13, 14, 20, 21, 22, 26, 27, 28
		pH	1/day	Daily Maximum & Daily Minimum	April 3, 7, 9, 13, 14, 18, 20, 21, 22, 26, 27, 28
May 2025	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	May 7, 11
		pH	1/day	Daily Maximum & Daily Minimum	May 7, 11
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	May 2, 4, 6, 11, 19
		pH	1/day	Daily Maximum & Daily Minimum	May 2, 4, 6, 11, 19
June 2025	001	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	June 6, 7
		pH	1/day	Daily Maximum & Daily Minimum	June 6, 7
	002	Temperature	1/hour	Daily Maximum* & 7-day Rolling Average of Daily Maximum	June 6
		pH	1/day	Daily Maximum & Daily Minimum	June 6
	003	pH	1/day	Daily Maximum & Daily Minimum	June 6

* Each reference to “Daily Maximum” for the report statistic for temperature in the table above assumes that the “Temperature” column on Pacific’s monthly DMRs refers to the daily maximum for temperature. To the extent the “Temperature” column on Pacific’s monthly DMRs refers to the Daily Average, the report statistic of “Daily Average” is substituted for each reference to “Daily Maximum” for temperature in the table above.

Violations of Weekly and Monthly Monitoring Requirements Based on Pacific's DMR Data				
Outfall	Parameter	Minimum Frequency	Reporting Statistic	Period of Monitoring Violation
Receiving Stream	Alkalinity as CaCO ₃	1/month	Monthly Maximum	August 2022
002	Total Ammonia	1/week	Daily Maximum & Monthly Average	January 29-February 4, 2023
003	Total Ammonia	1/week	Daily Maximum & Monthly Average	January 29-February 4, 2023
003	Total Ammonia	1/week	Daily Maximum & Monthly Average	October 29-November 4, 2023
001	Chlorine, total residual	1/week	Daily Maximum & Monthly Average	January 14-January 20, 2024
001	Chlorine, total residual	1/week	Daily Maximum & Monthly Average	January 21-January 27, 2024
002	Chlorine, total residual	1/week	Daily Maximum & Monthly Average	January 28-February 3, 2024
003	Chlorine, total residual	1/week	Daily Maximum & Monthly Average	January 28-February 3, 2024
002	Total Ammonia	1/week	Daily Maximum & Monthly Average	March 17-March 23, 2024
001	Chlorine, total residual	1/week	Daily Maximum & Monthly Average	March 31-April 6, 2024
002	Chlorine, total residual	1/week	Daily Maximum & Monthly Average	March 31-April 6, 2024
003	Chlorine, total residual	1/week	Daily Maximum & Monthly Average	March 31-April 6, 2024
002	Total Ammonia	1/week	Daily Maximum & Monthly Average	April 28-May 4, 2024
002	Chlorine, total residual	1/week	Daily Maximum & Monthly Average	April 28-May 4, 2024
003	Total Ammonia	1/week	Daily Maximum & Monthly Average	April 28-May 4, 2024
003	Chlorine, total residual	1/week	Daily Maximum & Monthly Average	April 28-May 4, 2024
002	Total Ammonia	1/week	Daily Maximum & Monthly Average	August 4-August 10, 2024
002	Total Ammonia	1/week	Daily Maximum & Monthly Average	August 11-August 17, 2024
002	Total Ammonia	1/week	Daily Maximum & Monthly Average	August 18-August 24, 2024
002	Total Ammonia	1/week	Daily Maximum & Monthly Average	August 25-August 31, 2024
003	Total Ammonia	1/week	Daily Maximum & Monthly Average	August 4-August 10, 2024
003	Total Ammonia	1/week	Daily Maximum & Monthly Average	August 11-August 17, 2024
003	Total Ammonia	1/week	Daily Maximum & Monthly Average	August 18-August 24, 2024
003	Total Ammonia	1/week	Daily Maximum & Monthly Average	August 25-August 31, 2024
001	Total Lead	1/month	Daily Maximum & Monthly Average	August 2024
003	Hardness	1/month	Monthly Maximum	August 2024
Receiving Stream	Alkalinity as CaCO ₃	1/month	Monthly Maximum	August 2024