



State of Oregon
Department of
Environmental
Quality

Water Pollution Control Facilities Permit Renewal Fact Sheet City of Monument

Permittee	City of Monument 291 Main Street Monument, Oregon 97864
Existing Permit Information	File Number: 110070 Permit Number: 101653 Expiration 5-31-2034
Permittee Contact	Carrie Jewell Public Works Director (541) 934-2025 pwccityofmonument@centurytel.net PO Box 426 Monument, Oregon 97864
Facility Name & Location	Facility Name: City of Monument Address: .5 miles north of Monument Monument, Oregon 97864 Lat/Long: 44.82859, -119.42156 County: Grant
LLID:	LLID: 1196393447553
Receiving Stream/Basin:	Nearest stream: North Fork John Day River at mile 15.5 Sub Basin Name: Upper NF John Day WRD Basin Name: John Day
Proposed Action:	Permit Renewal Application Number: 959319 Date Application Received: January 14, 2015
Source Category:	Domestic
Sources Covered:	Domestic Wastewater and Recycled Water
Permit Type:	WPCF-DOM-E
Permit Writer	Anna Morgan-Hayes 541-246-4562 Date Prepared: 4-2-2024

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City of Monument

1. Introduction

As required by Oregon Administrative Rule 340-045-0037, this fact sheet describes the basis and methodology used in developing the permit. The permit is divided into several sections:

- Schedule A – Waste discharge limitations
- Schedule B – Minimum monitoring and report requirements
- Schedule C – Compliance conditions and schedules
- Schedule D – Special conditions
- Schedule F – General conditions

A summary of the major changes to the permit are listed below:

The permit has been updated to reflect Class D recycled water use requirements from previously “Level I” (non-disinfected) treated effluent, including requiring monitoring for *E. coli*.

The permit requires the permittee to submit an updated Recycled Water Use Plan, Lagoon Leak Test, Hauled Waste Control Plan, and Sludge Depth Survey. These areas have been identified as needing updates during the permit renewal process. Additionally, annual reporting for recycled water, wastewater solids/biosolids, inflow and infiltration, and hauled waste acceptance is required in the permit.

There have been no changes to monitoring frequencies for influent and lagoon monitoring. Reporting for the verification of flow meter calibrations have been removed from Schedule B requirements to report to DEQ but must be retained by the facility and available upon request for any flow meters in use by the facility.

2. Facility Description

2.1 Wastewater Facility

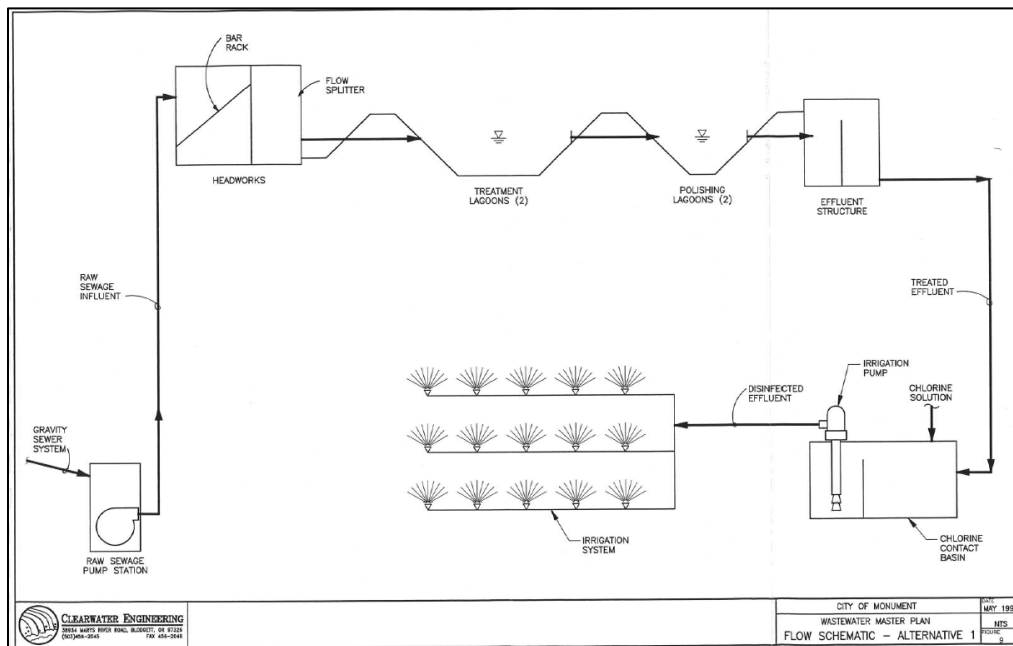
The facility is located about a half mile northwest and west of the North Fork John Day River. The treatment facility and land application system were constructed in 2014-15. Influent is delivered to the treatment plant via two grinder pump lift stations (Main Street and Wall Creek) and discharge to the treatment ponds uniformly. Influent flow is measured using pump run times.

The treatment system consists of two 30-mil PVC-lined facultative lagoon cells, a 30-mil PVC-lined polishing pond, and land application area. The lagoons are designed to allow for recirculation from one pond to another from a single depth, blending aerated wastewater from the top layer to the raw wastewater being pumped from the collections system. The primary lagoon is 0.94 acres and secondary is 0.8 acres. The polishing pond capacity is 3.2 MG.

Figure 2-1: City of Monument Site Map



Figure 2-2: City of Monument Flow Schematic



This flow schematic was provided in the City of Monument's Master Plan (1995) and is not the as-built design. The City of Seneca operates two treatment lagoons and one polishing pond. Effluent from the polishing pond is routed through a chlorine contact basin for disinfection to the land application site.

Table 2-1: List of Outfalls

Outfall Number	Type of Waste	Lat/Long	Design Flow ¹ (mgd)	Existing Flow ² (mgd)
001	Wastewater Lagoons	44.82859, -119.42156	0.0226	0.009
002	Recycled Water Land Application	As specified in the Recycled Water Use Plan		Total amount irrigated ³ : 687,500 gallons
003	Biosolids	As described in a DEQ-approved biosolids management plan		
1. Design Flow = average dry weather design flow (provided in City of Monument, Wastewater Facility Master Plan, 1995 and Recycled Water Use Plan, 2011). 2. Existing Flow = existing average monthly influent flow provided by City of Monument DMRs, January 2021 – January 2024. 3. Total amount irrigated provided in City of Monument Recycled Water Reuse Annual Report, 2019				

2.2 Compliance History

In conjunction with the permit renewal DEQ conducted a compliance review of the City of Monument's discharge monitoring and annual reports. Based on the review, DEQ documented violations and issued the following enforcements:

August 25, 2023: Warning Letter with Opportunity to Correct (2023-WLOTC-8653) including 1,764 violations for monitoring, reporting, and failing to collect monitoring. Corrective actions were required which the facility completed.

Prior enforcements:

November 7, 2006: Pre-Enforcement Notice (PEN-ERP-06-060) issued to the City for failing to monitor and failing to operate and maintain the collection system in a manner that prevents health hazard and nuisance conditions.

2.3 Biosolids

The term wastewater solids includes sewage sludge and biosolids. Sewage sludge refers to solids from primary, secondary, or advanced treatment of domestic wastewater that have not been treated or determined to be suitable for land application as fertilizer or soil amendment. The term biosolids refers to domestic wastewater treatment facility solids that have undergone adequate treatment and are suitable for application to the land as a fertilizer or soil amendment. Land application of biosolids must be performed in accordance with a DEQ-approved biosolids management plan (BSMP) and site authorization letter. Alternatively, a BSMP and site authorization are not required for disposal of wastewater solids in a landfill.

2.4 Groundwater

The facility utilizes lined lagoons and is required to land apply recycled water at or below agronomic rates. As such, DEQ determined the facility is not required to have limits to protect groundwater at this time, however a lagoon leak test will be required to further determine whether the lagoons have an impact to groundwater.

2.5 Recycled Water

The previous permit authorized the land application of Level I (non-disinfected) treated effluent on 4.6 acres of grass (south of the irrigation storage lagoon). The City's Recycled Water Use Plan was approved by the Department on November 21, 2006. The proposed permit requires that the plan be updated prior to the use of recycled water to reflect needed changes, including monitoring for Class D recycled water use. In 2015 the facility finished construction on the lagoon treatment and irrigation storage lagoon system, including installation of a chlorination building. Treated wastewater is routed through the chlorination system after the third cell polishing lagoon and before being discharged at the land application site.

2.6 Wastewater Classification

OAR 340-049 requires all permitted municipal wastewater collection and treatment facilities receive a classification based on the size and complexity of the systems. DEQ evaluated the classifications for the treatment and collection system, which are publicly available at: <https://www.deq.state.or.us/wq/opcert/Docs/OpcertReport.pdf>.

3. Schedule A: Effluent Limit Development

No discharge to state waters is permitted. All wastewater is treated in facultative lagoons and must be irrigated only on DEQ-approved land application sites in accordance with a recycled water use plan. Prior to land application, recycled water must be treated by disinfection to at least Class D, standards for beneficial use as defined in OAR 340-055.

All activities concerning recycled water must conform to a recycled water use plan approved by DEQ. Specific crops, application rates and buffers are included in the required recycled water use plan. All recycled water must be distributed on land, for dissipation by evapotranspiration and controlled seepage by following sound irrigation practices so as to prevent:

- i. Prolonged ponding of treated recycled water on the ground surface;
- ii. Surface runoff or subsurface drainage through drainage tile;
- iii. The creation of odors, fly and mosquito breeding, or other nuisance conditions;
- iv. The overloading of land with nutrients, organics, or other pollutant parameters; and
- v. Treated effluent must only be applied at site and crop specific agronomic loading rates.

3.1 Groundwater

DEQ may evaluate the need for a full assessment of the facility's impact on groundwater quality if there is any evidence of an adverse impact resulting from the facilities operation or the facility fails to operate in accordance with permit conditions. Schedule A of the proposed permit includes a condition prohibiting adverse impacts to groundwater.

3.2 Recycled Water

Schedule A of the permit requires the permittee to apply recycled water according to a recycled water use plan. Schedule A also restricts the application of recycled water to prevent the following:

- Irrigating above agronomic rates,
- Adverse impact to groundwater,
- Offsite surface runoff or subsurface drainage through drainage tile,
- Creation of odors, fly and mosquito breeding, or other nuisance conditions.

3.3 Biosolids

Schedule A of the permit requires the facility to apply biosolids according to a DEQ-approved biosolids management plan. In addition, Schedule A requires the following:

- Apply at or below agronomic rates.
- The permittee must have written site authorization for each location from DEQ before land applying and abide by the restrictions for each site.
- Prior to application, the permittee must ensure that biosolids meet one of the pathogen reduction standards under 40 CFR 503.32 and one of the vector attraction reduction standards under 40 CFR 503.33.
- The permittee must not apply biosolids containing pollutants in excess of the ceiling concentrations for the nine metals shown in Schedule A of the permit.

4. Schedule B: Monitoring and Reporting Requirements

Schedule B of the permit describes the minimum monitoring and reporting necessary to demonstrate compliance with the proposed effluent limits. Detailed monitoring frequency and reporting requirements are in Schedule B of the proposed permit. The required monitoring,

reporting and frequency for many of the parameters are based on DEQ's monitoring and reporting matrix guidelines, the permit writer's professional judgment, reporting requirements for similar facilities of this type and size and to ensure the needed data is available for the next permit renewal.

The monitoring data provide DEQ with information to evaluate the performance of the wastewater treatment facility for influent, the lagoons, and effluent. The authority to require periodic reporting by permittees is found at ORS 468.065(5).

Monitoring requirements for influent pH, BOD₅ (biochemical oxygen demand) and total suspended solids (TSS) sampling are included in the permit for the permittee to monitor the performance of the treatment system. Lagoon monitoring is required so that the permittee can evaluate the structural integrity and proper functioning of the treatment system. The permittee is required to submit annual reporting for inflow and infiltration and conduct a one-time lagoon leak test and sludge depth survey to ensure that maintenance is conducted appropriately and there are no impacts to groundwater.

Effluent parameters are required when irrigating with recycled water at an approved land application site. Requirements for flow monitoring, irrigation volume, bacteria, total chlorine residual, and nutrient monitoring are included in Table B4. Nutrients must be evaluated and reported on by the permittee to ensure overloading of the field above agronomic uptake rate for the planted crops does not occur. The permittee must track and report any supplemental fertilizer and additional nutrient loading applied to the site.

5. Schedule C: Compliance Schedule

The permittee is expected to meet all limits required by the permit renewal and therefore a compliance schedule is not needed.

6. Schedule D: Special Conditions

The proposed permit contains the following special conditions. The conditions include the following:

6.1 Inflow and Infiltration

A requirement to submit an annual inflow and infiltration report to DEQ.

6.2 Emergency Response and Public Notification Plan

A requirement to develop and submit an emergency and spill response plan or ensure the current one is current per General Condition B.6 in Schedule F.

6.3 Recycled Water Use Plan

A condition requiring the permit holder to update and maintain a recycled water use plan that meet the requirements in OAR 340-055-0025. The plan must also include location-specific information describing where and how recycled water is managed to protect public health and the environment.

6.4 Exempt Wastewater Reuse at the Treatment System

A condition that exempts the permit holder from the recycled water requirements in OAR 340-055, when recycled water is used for landscape irrigation at the treatment facility or for in-plant processes, such as in plant maintenance activities.

6.5 Wastewater Solids and Biosolids Annual Report

This condition requires the permittee to submit a Wastewater Solids and Biosolids Annual Report each year documenting removal of wastewater solids from the facility during the previous calendar year.

6.6 Biosolids Management Plan

A requirement to manage all biosolids in accordance with a DEQ-approved biosolids management plan and land application plan. The biosolids management plan and the land application plan must meet the requirements in OAR 340-050-0031 and describe where and how the land application of biosolids is managed to protect public health and the environment.

6.7 Wastewater Solids Transfers

A condition that allows the facility to transfer treated or untreated wastewater solids to other in-state or out-of-state facilities that are permitted to accept the wastewater solids.

6.8 Hauled Waste Control Plan

A condition that allows the acceptance of hauled waste after a hauled waste plan is submitted and approved by DEQ. The hauled waste plan ensures waste is not accepted that could negatively impact the treatment capabilities of the facility.

6.9 Hauled Waste Annual Report

A condition requiring submittal of an annual hauled waste report that summarizes hauled waste accepted at the facility during the previous year.

6.10 Lagoon Solids

A condition requiring the permittee to submit a sludge depth survey report to ensure lagoon solids are maintained within design standards and accumulations do not negatively affect treatment capabilities.

6.11 Lagoon Leak Test

By no later than the date provided in Schedule B of this permit, the permittee must conduct and submit the results of a lagoon leak test to DEQ for each cell of the wastewater lagoon system. Guidelines for estimating lagoon leakage are available from DEQ. Use of the guidelines is required to provide sufficient information on estimation of lagoon leakage.

6.12 Operator Certification

The permit holder is required to have a certified operator consistent with the size and type of treatment plant covered by the permit per OAR 340-049-0005. This special condition describes the requirements relating to operator certification.

6.13 Industrial User Survey

This condition requires the permittee to conduct or update an industrial user survey. The purpose of the survey is to identify whether there are any categorical industrial users discharging to the POTW and ensure regulatory oversight of these discharges.

7. Schedule F: WPCF General Conditions

This schedule includes conditions and definitions that are applicable to all WPCF permits in Oregon of this type.

8. Next Steps

The City of Monument has submitted a complete WPCF permit renewal application. DEQ will send the draft permit documents to the applicant for review and comment, and then proceed with a Category II permitting action for public notification as per OAR 340-045-0027.

DEQ will respond to comments received during the comment period. Interested parties may request a copy of DEQ's response to comments. Once comments are received and evaluated, DEQ will decide whether to issue the permit as proposed, to make changes to the permit, or to deny the permit. DEQ will notify the permittee of DEQ's decision. If substantive changes are made to the permit, then an additional public notice period may occur. DEQ may also revise this fact sheet or update the fact sheet through memorandum.