



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

Eastern Region Pendleton Office

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TTY 711

December 4, 2024

Ms. Shanna Gronquist  
City of Arlington  
P.O. Box 68  
Arlington, OR 97812

Re: Warning Letter  
City of Arlington  
**2024-WL-9740**  
File #3384, NPDES Permit #101369  
Gilliam County

Dear Ms. Gronquist:

The City of Arlington operates a domestic wastewater treatment plant with discharge to the Columbia River under National Pollutant Discharge Elimination System (NPDES) Permit #101369. Based on review of the September 2024 Discharge Monitoring Report (DMR) submitted as required by your permit, DEQ has documented the following violations of Oregon environmental law. With each violation, the facility failed to comply with the terms and conditions of the assigned permit, which is a violation of ORS 468B.025(2).

### **Reporting Violation: Effluent Discharge Exceedance for Technology Based Effluent Limitations**

The City of Arlington NPDES permit contains effluent limitations to control discharge of pollutants to the Columbia River. Schedule A, Condition 1. of the permit establishes effluent limits for the facility discharge. However, the facility exceeded these limits as described in the table below.

The permit provides a provision allowing for the facility to resample *E. coli*, however the facility did not conduct resampling.

**Table 1. Technology Based Effluent Limitation Exceedances**

Effluent Limit	Effluent Limit Exceedance			Flow Data	
	Reported Result*	Violation Date	Violation Class	Stream Flow** (Columbia River) CFS	Effluent Flow* CFS
<i>E. coli</i> monthly geomean not to exceed 126 org/100 mL	142 org/100mL	September 2024	III	265,000	0.05

**\*Data from permit required monitoring for September 2024, submitted to DEQ.**

**\*\*Receiving stream flow monitoring data upstream of Outfall 001 discharge to the Columbia River and effluent flow reported by facility on monthly DMR Excel attachments for September 2024.**

Per DEQ’s enforcement guidance, violating a TBEL for bacteria in an NPDES permit by less than 5 times the limit is a Class III violation (OAR 340-012-0055(3)(b)). Class I violations are considered to be the most serious violations; Class III violations are the least serious.

## **Corrective Actions Required**

The permittee must ensure compliance with the terms and conditions of the issued NPDES permit, including all Schedule A effluent limits.

## **Summary**

This notice is a Warning Letter. DEQ does not intend to take formal enforcement action at this time. However, should the City fail to meet permit compliance deadlines in the future, the matter may be referred to DEQ’s Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a DEQ order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this Warning Letter are in error, you may provide information to me at the address shown at the top of this letter. DEQ will consider new information you submit and take appropriate action. Should you have any questions about the content of this letter or would like follow-up technical assistance, please contact me at (541) 714-0035.

Sincerely,

*Stuart Blois*

Stuart Blois

NPDES Permitting and Compliance  
Specialist

cc: Mike Hiatt, ER Water Quality Permitting and Compliance, DEQ  
Anna Morgan-Hayes, ER Water Quality Permitting and Compliance, DEQ  
Garren Friedemann, Delta ESI  
WQ Data Crew