



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Eastern Region Pendleton Office  
800 SE Emigrant Avenue, Suite 330  
Pendleton, OR 97801  
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January 9, 2025

Heather Daggett, Public Works  
City of Union  
P.O. Box 259  
Union, Oregon 97883

RE: Warning Letter with Opportunity to Correct  
City of Union STP  
NPDES permit #101624/ WQ file #90800  
EPA OR ID# OR0029939  
2025-WLOTC-9787  
WQ – Union County

Dear Mrs. Daggett:

Department of Environmental Quality (DEQ) has completed an audit of required reporting submitted by the City of Union in accordance with National Pollution Discharge Elimination System (NPDES) permit #101624.

Schedule C of the NPDES permit requires compliance deliverables be submitted by specified due dates, in order to meet final effluent ammonia nitrogen limits. The City was required to evaluate the effectiveness of system cleaning and improvements and notify DEQ of the City's ability to meet the final effluent ammonia limits in Table A1 of the permit:

**Table A1: Permit Limits**

Parameter	Units	Average Monthly	Average Weekly	Daily Maximum
Total Ammonia Nitrogen (Final) (Oct. 1 – Jun. 30) See note e.	mg/L	15	-	22

### SCHEDULE C: COMPLIANCE SCHEDULE

**1. Compliance Schedule to Meet Final Effluent Limitation**

The permittee must comply with the following schedule:

Compliance Date:	Requirement:
By 12/01/2023	Complete headworks screen upgrade project and initiate process to clean the wastewater treatment system of debris. Submit written statement to DEQ stating the upgrade project is complete.
Within 1 year of permit effective date and annually thereafter (Due by Jan 15 <sup>th</sup> )	Submit to DEQ a written Progress Report outlining the progress made towards achieving the final effluent limitations.
By 12/01/2024	Complete evaluation of the effect of screening improvements on treatment capability for total ammonia nitrogen reduction. Notify DEQ in writing of the permittee's choice to either: 1) meet the final ammonia limit by (2 years after effective date), or 2) proceed with the remaining compliance schedule.
By 6/01/2025	If, under the requirement immediately above, the permittee has notified DEQ of the choice to meet the final total ammonia nitrogen limit early, the final total ammonia nitrogen effluent limit must be met.
By 12/01/2026	Submit to DEQ for review and approval a feasibility study that describes potential alternatives that will enable the final total ammonia nitrogen effluent limit to be met. (This requirement does not apply if the permittee has previously notified DEQ that it intends to meet the final total ammonia nitrogen effluent limit by 6/01/2025.)
By 12/01/2028	Submit to DEQ for review and approval design plans and specifications, per OAR 340-052 requirements, that describe the selected alternative to bring the facility into compliance with the final total ammonia nitrogen effluent limit. (This requirement does not apply if the permittee has previously notified DEQ that it intends to meet the final total ammonia nitrogen effluent limit by 6/01/2025.)

On November 27, 2024, the City submitted a letter (Progress Report, Attachment 1) to DEQ documenting the City's cleaning efforts. However, this did not provide an evaluation of ammonia data or specify the City's decision to meet compliance limits as required by item #3 in the Compliance Schedule.

**Violation: Failure to Comply with a Compliance schedule**

Due Date	Violation	Violation Class
By 12/01/2024	Violating a requirement or condition of a commission or department order, consent order, agreement, consent judgment (formerly called judicial consent decree) or compliance schedule contained in a permit or permit; OAR 340-012-0053(1)(a).	I

Class I violations are considered to be the most serious violations; Class III violations are the least serious.

### **Environmental Impact of Violations**

Fulfilling the mandatory reporting requirements is an important obligation. Submittal of the required information is to ensure the facility meets the final ammonia limit or is making plans to evaluate alternatives to meet the required limit.

### **Required Corrective Action**

The City must ensure compliance with the terms and conditions of the issued NPDES permit, including all monitoring, reporting, and Schedule C requirements.

1. **By February 15, 2025** the City must submit a complete evaluation of the effectiveness of screening improvements on treatment capability meet final effluent ammonia limits, as described in Schedule C, item # 3. Additionally, the City must include notification to DEQ of the permittee's choice to either: 1) meet the final ammonia limit by (2 years after effective date), or 2) proceed with the remaining compliance schedule.

### **Summary**

This notice is a Warning Letter. DEQ does not intend to take formal enforcement action at this time. However, should you repeat any of these violations or fail to complete the required corrective action listed in this letter, this matter may be referred to the Department's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a Department order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this notice are in error, you may provide information to me at the address shown at the top of this letter. I will consider any new information you submit and take appropriate action. If you have any questions, please contact me at [anna.morgan-hayes@deq.oregon.gov](mailto:anna.morgan-hayes@deq.oregon.gov) or at 541-246-4562.

Sincerely,



Anna Morgan-Hayes Water Quality Permit Writer  
Eastern Region

cc: Doug Wiggins, City of Union  
Mike Hiatt, DEQ WQ Permitting and Compliance

City of Union  
January 9, 2025  
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## Oregon Records Management Solution

## Attachment 1: City of Union, Annual Progress Report

Dept. of Environmental Quality  
700 S.E. Emigrant, Suite 330  
Pendleton OR. 97801

Subject: Wastewater Treatment Facilities cleaning

D.E.Q. Permit # 101624

D.E.Q. File # 90800

To whom it may concern,

This letter is to notify DEQ of the cleaning completed at the Wastewater Treatment Facility at The City of Union, with written description and photos. This cleaning was done by the City of Union employees, we started at the Headworks and screen working our way through the Treatment Facility.

- **Influent Screen (New Oct 2023)**

Pulled the screen from the channel, cleaned the screen and channel of all rags, debris, grease and garbage. A deflector plate provided by the screen manufacturer (Lakeside) was also installed to help keep the rags from building up at the beginning of the screen.

Influent wet well and pumps. The influent wet well chamber was pumped down to remove all rags, debris, and grease, then cleaned thoroughly with a pressure washer.

- **Primary Clarifier**

The Primary Clarifier was cleaned, sand blasted, painted, along with a new shaft in the fall of 2022. So, this time we pumped down the clarifier pressure washed and inspected the previous work.

- **SBC & RBC's**

I was unable to ascertain the proper cleaning process on these I was unsure about, so I reached out to OAWU, other operators that have experience with this process, as well as colleagues I have made in the wastewater industry. I did not want to just take a couple pressure washers to these chambers, as I believed we would just push the items we are trying to remove farther inside and clog it that much more. The consensus I received was to slough the media in a controlled manner so I could monitor the media loss and then clean out the bottom of the chambers removing any sludge, rags, etc. and preserve some media for treatment and not completely washout the process. So that's what I did one by one so we could preserve the process while eliminating most of the unwanted debris.

- **Secondary Clarifier**

Drained, clean with a pressure washer and inspected the tank, shaft, and ring. Made some repairs to the supports for the ring that we could. We are starting the plan and looking at the budget for more repairs in the upcoming year to sand blast and paint the concrete tank, along with some new support brackets for the ring.

- **Primary Digester**

Decanted, hauled biosolids and land applied to empty the tank. Then cleaned and pressure washed the remaining material and rags with the Vac Truck and pressure washer. Noticing that 75% of our air diffusers were compromised and letting grit into the air piping we removed all the diffusers and flushed the air piping. I talked to operators and wastewater educators to help decide on the new diffuser we ordered. The bad diffuser that were in the digester had been in there for 4 years is therefore we wanted to look into possibly using something different. Replaced all 106 diffusers and filled the tank over the diffusers and checked to see how they would work before putting the digester back into operation.

- **Secondary Digester**

Decant, haul biosolids and land applied to empty the secondary tank, then cleaned and pressure washed the remaining material with the Vac Truck and a pressure washer.

Heather Daggett  
Wastewater Lead  
City of Union  
Wastewater Treatment II  
Wastewater Collections II