



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

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Salem, OR 97302

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TTY 711

February 12, 2025

Steve Dahl, City Administrator
City of Dundee
PO Box 220
Dundee, OR 97115

Re: Warning Letter with Opportunity to Correct
Dundee STP
2025-WLOTC-9836
NPDES Permit #101722, EPA ID OR0023388
File 25567
WQ-Yamhill County

Dear Mr. Dahl:

DEQ has completed a records review for City of Dundee to determine compliance with the conditions of National Pollutant Discharge Elimination System permit number 101722, issued by DEQ, on September 22, 2022. The findings are summarized below.

Records Review

I reviewed records from January 2018 through December 2024. City of Dundee has submitted most monthly discharge monitoring reports (DMR) on time in NetDMR. The September 2024 data was submitted two days late.

I also reviewed the noncompliance reporting form received January 13, 2025. It was reported that one of the diversion ponds used when flow exceed plant capacity overtopped and spilled onto a neighboring property. Once the issue was noted by staff, flow was diverted into a different holding pond. It is noted that the root cause of the treatment capacity is the age of the membrane filters. They have come to the end of their useful life and need to be replaced.

Schedule B Violations

1. Schedule B Table B1 and Schedule D items 10 and 12 list reporting requirements and their due dates. The city failed to submit the reports listed below. Failing to timely submit a report as required by permit is a Class II violation per OAR 340-012-0055(2)(b).
 - a. Sludge Depth Survey due 11/15/2024
 - b. Industrial User Survey due no later than 11/1/2024

Other Violations

1. Page 1 of the City's NPDES states *Unless specifically authorized by this permit, by another NPDES or WPCF permit, or by Oregon Administrative Rule, any other direct or indirect discharge to waters of the state is prohibited, including discharge to an underground injection control system.* Allowing the pond to overtop violated this condition. This is a Class II violation per OAR 340-053(2).

Class I violations are the most serious violations; Class III violations are the least serious. Compliance with your permit is required by Oregon Revised Statute 468B.025(2).

Required Corrective Actions:

By April 30, 2024, please submit documentation that the following issues have been corrected:

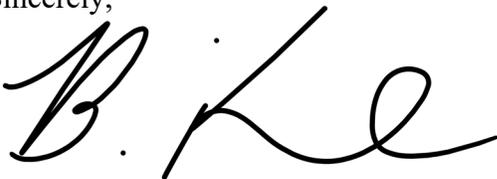
1. Submit an Industrial User Survey.
2. Submit a sludge depth report or a schedule in which one is to be completed.
3. Correct NetDMR entries as indicated in Table 1 of the attachment.

This notice is a warning letter. DEQ does not intend to take formal enforcement action at this time. However, should you fail to submit documentation that the corrective actions have been completed by the date requested or repeat any of these violations, 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 with opportunity to correct are in error, you may provide information to me at the office at the address shown at the top of this letter. DEQ will consider the new information you submit and take appropriate action.

If you have any questions, please contact me in writing at brenda.kuiken@deq.oregon.gov or by phone at (503) 893-0924.

Sincerely,



Brenda Kuiken
WQ Compliance Specialist

cc: DEQ Salem Office file

ec: Ranei Nomura, Manager, Western Region DEQ
Oregon Records Management Solution
Jared Nunley, Wastewater Treatment Plant Operator

Table 1 – Incorrect Calculations and Reporting in NetDMR

Monitoring Period	Parameter	Reported Value	Correct Value	Violation Y/N
November 2024	Influent TSS concentration monthly average, mg/L	483	299	N