



Oregon

Tina Kotek, Governor

Department of Environmental Quality

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October 30, 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
EPA OR ID# OR0029939
2025-WLOCT-10047
FIS ID #: 213471
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. Based on review of Discharge Monitoring Reports (DMRs), DEQ found the City to be in violation of the NPDES permit for submitting late and incomplete reports. There are two (2) violations described in the following warning letter with opportunity to correct.

Violation: Late Submittal of DMR

Schedule B.1, Table B1 of the NPDES permit requires the City to submit DMRs no later than the 15th day of the month following the monitoring period. The City submitted the May 2025 DMRs on July 14, 2025, approximately twenty-nine days later than the due date of June 15, 2025.

Based on review of the DMR, this is a violation of the permit and Oregon environmental law.

| Due Date | Violation | Violation Class | Number of Violations |
|---------------------------------|---|-----------------|----------------------|
| June 15, 2025 (May 2025 DMR) | Failing to timely submit a report or plan as required by rule, permit, or license, unless otherwise classified; OAR 340-012-0055(2)(b). | II | 1 |

Violations: Incomplete DMR

Schedule B.3(c), Table B4 of the NPDES permit provides minimum monitoring requirements for the receiving stream (Catherine Creek) while discharging from Outfall 001. Quarterly monitoring is required to be submitted in NetDMR by the 15th of the month following the monitoring period.

| | | | | | |
|---|------|------------------|-----------|------|-----------------|
| Alkalinity as CaCO ₃ (00410) | mg/L | Oct. 1 – Jun. 30 | Quarterly | Grab | Monthly Maximum |
| Total Ammonia (as N) (00610) | mg/L | Oct. 1 – Jun. 30 | Quarterly | Grab | Monthly Maximum |

While DMR attachments show that the facility conducted monitoring for the monitoring period: Quarter 1 of 2025, due April 15, 2025, a DMR was not submitted in NetDMR.

Based on review of the DMRs, there is one (1) violation of the permit and Oregon environmental law.

| Due Date | Violation | Violation Class | Number of Violations |
|----------------------------|---|-----------------|----------------------|
| April 15, 2025 Q1, 2025 | Failing to submit a complete discharge monitoring report; OAR 340-012-0055(3)(a). | III | 1 |

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 B requirements. The City must submit noncompliance reports for all instances of noncompliance. Additionally, the following corrective action is required:

1. **By December 15, 2025**, the City must submit a DMR in NetDMR for 001-Q (Quarterly Receiving Water Monitoring) for Quarter 1 of 2025.

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 or at 541-246-4562.

Sincerely,



Anna Morgan-Hayes Water Quality Permit Writer
Eastern Region

ec: Alyssa Witt, DEQ, WQ Permitting & Compliance
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Oregon Records Management Solution