



# Oregon

Tina Kotek, Governor

**Department of Environmental Quality**  
**Eastern Region Bend Office/Water Quality**  
800 SE Emigrant Ave., Suite 330  
Pendleton, OR 97801  
(541) 276-4063  
FAX (541) 278-0168

December 22, 2025

Mr. Dustin Miller  
Hexion Inc.  
P.O. Box 1028  
La Grande, OR 97850

Re: **Warning Letter 2025-WL-10069**  
WPCF Permit No. 101334; FIS ID No. 310291  
WQ – Union County

Dear Mr. Miller:

Hexion Inc. operates a wastewater collection and treatment system under Water Pollution Control Facilities (WPCF) Permit No. 101334. DEQ conducted review of annual reports associated with the WPCF permit, in conjunction with a permit transfer request submitted on December 1, 2025. Based on this review, DEQ has documented forty (40) violations. These are described in the following warning letter.

### **Violations: Failure to Monitor**

Schedule B.2, Table B.1 of the WPCF permit provides minimum monitoring frequencies for the wastewater storage basins.

**Table B 1: Wastewater Storage Basin Monitoring**

Item or Parameter	Minimum Frequency	Sample Type/Required Action	Report
Total volume reused (gallons)	Quarterly	Measurement	Quarterly total
pH (s.u.)	Weekly	Grab/Field measurement	<ol style="list-style-type: none"><li>1. Daily values</li><li>2. Maximum quarterly value</li><li>3. Minimum quarterly value</li></ol>
Nitrate + nitrite, as N (mg/l)	Quarterly	Grab	Daily values
Total ammonia, as N (mg/l)	Quarterly	Grab	Daily values
Total Kjeldahl Nitrogen (mg/l)	Quarterly	Grab	Daily values
Chloride (mg/l)	Quarterly	Grab	Daily values
Total Dissolved Solids (mg/l)	Quarterly	Grab	Daily values

The facility submits annual reports, due February 15<sup>th</sup> of each year following the reporting period. While the annual reports describe the month typically monitored as “Basin dry, frozen, or insufficient water for sampling”, quarterly monitoring is required for each parameter listed for the months specified. Quarters are defined as: Q1 = January – March, Q2 = April – June, Q3 = July – September, and Q4 = October – December. Quarterly monitoring should be conducted during any of the months within the quarter to satisfy the monitoring condition.

DEQ has concluded that Hexion Inc. is responsible for the following violations of the WPCF permit:

Monitoring Period	Parameter	Class
2022, Q1 - West Basin	Nitrate + Nitrite, as N (mg/L) Total Ammonia, as N (mg/L) Total Kjeldahl Nitrogen (mg/L) Chloride (mg/L) Total Dissolved Solids (mg/L)	
2023, Q3 - West Basin	Nitrate + Nitrite, as N (mg/L) Total Ammonia, as N (mg/L) Total Kjeldahl Nitrogen (mg/L) Chloride (mg/L) Total Dissolved Solids (mg/L)	
2024, Q4 - West Basin	Nitrate + Nitrite, as N (mg/L) Total Ammonia, as N (mg/L) Total Kjeldahl Nitrogen (mg/L) Chloride (mg/L) Total Dissolved Solids (mg/L)	
2022, Q1 - Middle Basin	Nitrate + Nitrite, as N (mg/L) Total Ammonia, as N (mg/L) Total Kjeldahl Nitrogen (mg/L) Chloride (mg/L) Total Dissolved Solids (mg/L)	Failure to monitor in accordance with Schedule B of the WPCF permit; OAR 340-012-0055(1)(o). I
2023, Q3 - Middle Basin	Nitrate + Nitrite, as N (mg/L) Total Ammonia, as N (mg/L) Total Kjeldahl Nitrogen (mg/L) Chloride (mg/L) Total Dissolved Solids (mg/L)	
2024, Q4 - Middle Basin	Nitrate + Nitrite, as N (mg/L) Total Ammonia, as N (mg/L) Total Kjeldahl Nitrogen (mg/L) Chloride (mg/L) Total Dissolved Solids (mg/L)	
2022, Q1 - East Basin	Nitrate + Nitrite, as N (mg/L) Total Ammonia, as N (mg/L)	

Monitoring Period	Parameter	Class
2023, Q3, East Basin	Total Kjeldahl Nitrogen (mg/L)	
	Chloride (mg/L)	
	Total Dissolved Solids (mg/L)	
	Nitrate + Nitrite, as N (mg/L)	
	Total Ammonia, as N (mg/L)	
	Total Kjeldahl Nitrogen (mg/L)	
	Chloride (mg/L)	
	Total Dissolved Solids (mg/L)	

## 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, 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 may 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 in writing, 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  
DEQ Eastern Region

Cc: Mike Hiatt, DEQ WQ Permitting

Morgan Olson, Kronospan

Alyssa Witt, DEQ WQ Permitting