

INSPECTION REPORT

Inspection Entry Date/Time	03/29/2023 09:09 AM (PT)	Announced: No	
Inspection Exit Date/Time	03/29/2023 03:45 PM (PT)	Access: Granted	
Weather	40°F, Overcast		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	City Of Pendleton		
Facility Name	City Of Pendleton WWTP		
Facility Physical Address	4300 Houtama Road		
City, State, Zip Code	Pendleton, Oregon 97801		
County	Umatilla		
Facility GPS Coordinates	45.66751, -118.83607		
Mailing Address	500 SW Dorion Ave		
City, State, Zip Code	Pendleton, Oregon 97801		
FRS ID	ORT3850174458		
Permit Number	R0026395		
SIC	4952 (Sewage Systems)		
Lead Inspector:			
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the City of Pendleton WWTP (the “Site” or “Facility”), located at 4300 Houtama Road, Pendleton, OR, at 09:09 AM (PT) on 03/29/2023 for an unannounced inspection. I presented my inspector credentials to Mark Milne and informed him I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA) and the facility’s National Pollutant Discharge Elimination System (NPDES) permit, permit # OR0026395. This report is based on information supplied by City of Pendleton representatives, my direct observations, and records and reports maintained by the permittee. In addition, information gathered prior to or after the Inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
City of Pendleton	Mark Milne	Wastewater Superintendent	Yes	Yes
City of Pendleton	Kyle Willman	Lead Operator	Yes	Yes

Facility Information

Responsible official	Mayor John H. Turner; john.turner@ci.pendleton.or.us
WWTP Approx. # of residents served	The facility services a population of approximately 17,500, which includes the cities of Pendleton, Mission, and Reith.
What are the names and certification levels of facility employee?	Mark Milne, Wastewater Superintendent, Level IV Treatment Kyle Willman, Lead Operator, Level III Treatment Heidi Stiers, Operator II, Level II Treatment Michael Walborn, Operator II, Level II Treatment Greg Senter, Operator I, Level I Treatment John Harvey, Operator I, Level I Treatment Jessica Schneider, Laboratory Technical Manager, Level I Treatment
When is the facility staffed?	The facility is staffed from 6:30am until 4:00pm, Monday through Friday. On Saturday and Sunday, an operator spends two to three hours at the facility.
How many discharge points or outfalls does the facility have?	The facility has one effluent outfall (001), a discharge point for biosolids (002), and an outfall for flood relief. The biosolids outfall is for land application of solids.
Does the facility treat anything other than domestic sewage waste?	No. The facility accepts waste from septage haulers but there have been no known issues related to the additional sewage input.
What is the average daily flow?	The facility has an average daily 2.1 million gallons per day (MGD).
What is the design flow of the facility?	The facility has a design flow of 5.5 MGD with a peak daily flow of 4.48 MGD.
How often does the facility discharge?	The facility discharges continually.
What is the facility's receiving water?	The Umatilla River receives the facility's discharge.
Explain the facility's treatment process.	The influent enters the headworks and goes through 2mm screening to remove grit and other fine particulates. The wastewater then goes through primary clarification. Solids are sent to the anaerobic digester followed by dewatering and discharge for land application. Liquids continue from the primary clarifier to biological nitrogen (ammonia) removal using the Modified Ludzack-Ettinger (MLE) process. The influent continues to secondary clarification followed by disinfection with hypochlorite. After disinfection, the effluent goes through dichlorination with calcium thiosulfate. Once the effluent has been dechlorinated, it travels by underground pipe to discharge into the Umatilla River.

Does the facility conduct its own analysis?	The facility's Laboratory Technical Manager, Jessica Schneider, analyzes wastewater samples.
Are the composite samples time, or flow, proportional?	The facility uses refrigerated composite samplers to collect time proportional composite samples.
What parameters does the facility monitor?	Per the permit, the facility is required to monitor biochemical oxygen demand (BOD), total suspended solids (TSS), Bod & TSS % removal, ammonia, total residual chlorine (TRC), <i>E. coli</i> , and pH.
Is the facility sampling more frequently than required?	The facility is sampling for total suspended solids (TSS) more frequently than required for process monitoring. The additional samples are factored into calculations for DMR reporting.
Who conducts the sampling?	The facility conducts its own sampling.
Where does the facility collect effluent samples?	The facility collects influent samples in the headworks after the flow has passed through screening and the grit chamber. Effluent samples are collected in the "sample", which is approximately 50 feet after the chlorine contact chamber.
How often do you calibrate the pH meter?	The facility calibrates the pH meter daily.
How was the exceedance reported?	The facility has had daily maximum exceedances. Those exceedances were reported to the Oregon Department of Environmental Quality (ODEQ) telephonically within 24-hours of knowledge of the exceedance and the phone call was followed with a 5-day written notification through email.
Are any upgrades planned at the facility?	Within 18 months, the facility plans to install a Supervisory Control and Data Acquisition (SCADA) system to aid in controlling and monitoring the wastewater treatment plant and install a secondary clarifier. A secondary digester and lab/office remodel is a longer-term plan which will depend on acquiring funding and getting a new permit.
Has the facility been changed or upgraded in the last 5-years?	The facility added a new lift station, switched from gas chlorine to bleach for decontamination, and completed a drying bed upgrade.

SECTION II – OBSERVATIONS

No areas of concern were observed during the site tour.

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: Other - EPA's Integrated Compliance Information System (ICIS) Database	AOC: Yes
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews
	Reviewed Date: 05/30/2023
I reviewed EPA's ICIS database data from 6/1/2018 through 5/30/2023. I found the facility had exceeded its maximum daily limit for total residual chlorine in the monitoring month September 2021. The facility reported a value of 0.127 mg/L. The facility also exceeded its monthly average and daily maximums for ammonia, and the daily maximum for chlorine in the monitoring month July 2022. The reported values are 1.3 mg/L, 3.07 mg/L, and 0.081 mg/L, respectively.	

SECTION IV – Sampling Activities

No sampling was conducted.

SECTION V – Areas of Concern

Areas of Concern may not be in sequential order.

The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-001	Records Review: Other - EPA's Integrated Compliance Information System (ICIS) Database
Permit Requirement	
Permit Part A.1.a.1 shows from May 1 through October 13 the maximum daily concentration limit for total residual chlorine is 0.05 mg/L, the maximum daily concentration limit for ammonia is 2.0 mg/L, and the monthly average limit for ammonia is 1.0 mg/L.	

SECTION VI – Closing Conference

The EPA REGION 10 Lead Inspector held a closing conference with Facility personnel at 03:45 PM (PT) on 03/29/2023 for the inspection. During the closing conference, EPA REGION 10 Lead Inspector discussed the observations and Area(s) of Concern identified during the inspection. Observations and Area(s) of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – Lis of Appendices

1. Photo Log

APPENDIX 1: Photo Log

All photos were taken by Lead EPA Inspector, Ray Andrews, during the inspection.

Photos were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photo.

All photos taken during the inspection are included in the Photo Log; however, only photos that support an Area of Concern are included in the inspection report.

- P1010673 – Drying Oven with Temperature Log
- P1010674 – Incubator with Back-up Thermometer on Top
- P1010675 – Sample Refrigerator with Temperature Log
- P1010676 – Sample Refrigerator Back-up Thermometer
- P1010677 – 2mm Screen
- P1010678 – Screenings Collection (Blurry)
- P1010679 – Auto-Sampler Controls (Influent)
- P1010680 – Auto-Sampler Interior
- P1010681 – Primary Clarifier, photo 1
- P1010682 – Primary Clarifier, photo 2
- P1010683 – Primary Clarifier, photo 3
- P1010684 – Drying Bed, 1 of 9
- P1010685 – Primary Clarifier, photo 3
- P1010686 – Aeration Basin
- P1010687 – Secondary Clarifier, photo 1
- P1010688 – Secondary Clarifier, photo 2
- P1010689 – Chlorine Contact Chamber, photo 1
- P1010690 – Chlorine Contact Chamber, photo 2
- P1010691 – Dechlorination, sprayed in from white tube at top
- P1010692 – Dechlorination, mixing
- P1010693 – Auto-Sampler Controls (Effluent)