

2022 Annual Report on Oregon's Water Quality National Pollutant Discharge Elimination System Permit Program

Dec. 30, 2022



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DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.



State of Oregon
Department of
Environmental
Quality

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Executive summary

The Oregon Department of Environmental Quality regulates the discharges of pollutants to waterways by issuing federal National Pollutant Discharge Elimination System permits to point source discharges of wastewater and stormwater. Under the federal NPDES permit program, permits are issued for a five-year term. However, as of December, 2022, 55 percent of the NPDES permits in Oregon have not been renewed on time. These out-of-date permits remain in effect but may not contain conditions that reflect updated standards and water quality conditions.

Oregon DEQ is committed to improving the NPDES individual permit backlog through continuous improvement. DEQ will continue to implement permit development process improvement efforts designed to reduce the time to develop and issue permits that meet state and federal requirements and are protective of water quality. During Federal Fiscal Year 2022 (October 1 through September 30), DEQ successfully accomplished a number of program improvements, including:

- Published significant updates to NPDES Domestic Major NPDES individual permit template
- Published significant updates to NPDES Domestic Minor NPDES individual permit template
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- Continued external advisory groups led by DEQ's Water Quality Administrator – Water Quality Roundtable and Water Quality Forum
- Published NPDES individual permit issuance plan for FFY 2022
- Published NPDES five-year individual permit issuance plan for 2022-2026
- Continued implementation of a defined front-loaded process for permit writer engagement with subject matter experts
- Planned and prepared for state-wide implementation of the “Your DEQ Online” system in 2023 for individual and general WPCF and NPDES permits
- Continued standardized regular training and collaboration for the NPDES individual permit writing team
- Continued to improve quality assurance reviews on all individual NPDES permit modifications, renewals, and initial issuance
- Continued internal process for data gap and reasonable potential analysis for planned permits; successfully completed gap analysis review with monitoring requests as needed for all 2023 planned permits
- Completed and published new guidance for NPDES and WPCF monitoring

As of Dec. 30, 2022, Oregon's individual NPDES permit program included:

- 314 active municipal and industrial individual NPDES wastewater permits, of which, 174 (55 percent) are administratively continued

Introduction

In 1973, EPA authorized DEQ to administer the federal NPDES permit program under section 402(b) of the Clean Water Act. The NPDES permit program provides two types of permits, individual and general, that may be used to authorize point source discharges of pollutants to surface waters. DEQ issues individual permits to single facilities, and general permits that cover classes or categories of multiple dischargers under a single permit, for a period not to exceed five years.

In November 2018, DEQ agreed to significantly reduce (<10%) the number of permits administratively continued (five years or more) within 10 years, and to implement a number of actions to improve program operations and transparency.

DEQ also agreed to report annually on the NPDES permit program's performance and include the following information:

1. A list of NPDES permits where administrative action (i.e., issuance, renewal, or termination) was taken during the past federal fiscal year.
2. A list of any NPDES administratively continued permits that were on DEQ's permit issuance plan and were delayed and identification of the reasons for delay.
3. A list providing the age of all administratively continued individual and general NPDES permits.
4. A brief explanation of why individual and general NPDES permits administratively continued for ten or more years continue to be administratively continued

2022 NPDES permit status

The [2022 NPDES individual permit issuance plan](#) identified 57 permits for administrative action (i.e., issuance or termination) by Sep. 30, 2022. The federal fiscal year 2022 NPDES individual permit issuance plan was developed considering the results of the “Permit Readiness Review” efforts, regional or local priorities, and technical or policy barriers present in a geographic region, such as development of a new TMDL. Additionally, DEQ prioritized rollover permits from the 2021 work plan to populate the 2022 permit issuance plan. DEQ took final action on 38 permits in 2022 which includes 27 renewals, 2 terminations, and 9 modifications.

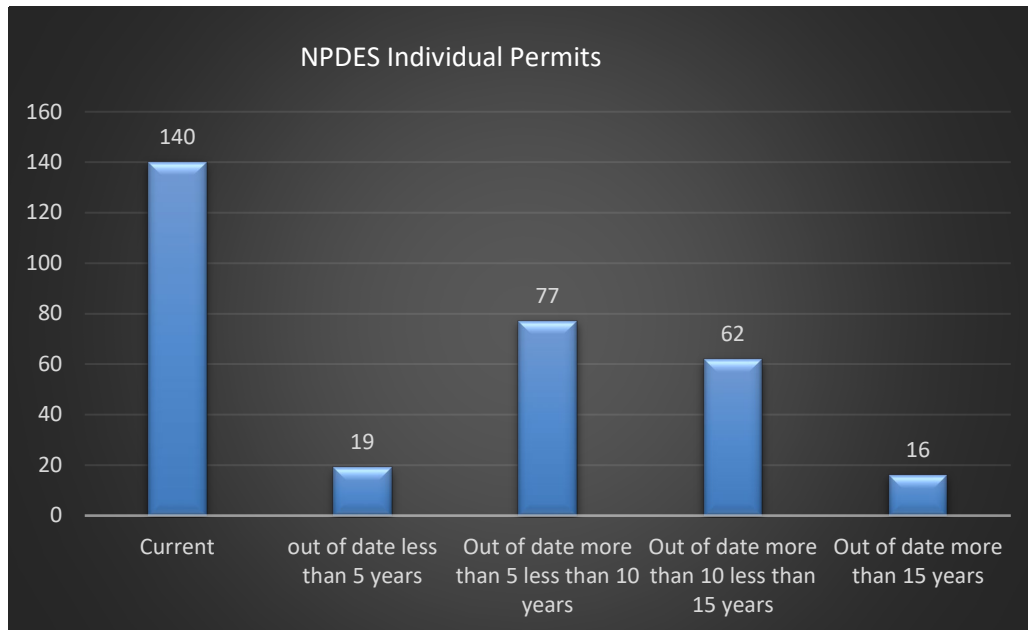
Overall status of DEQ’s NPDES individual permit program

As of Dec 30, 2022, Oregon had 314 active individual municipal and industrial NPDES wastewater permits (shown in Figure 1 below) that must be renewed every five years. Of those permits:

174 (55 percent) are administratively continued with

- 19 (6 percent) are administratively continued for less than five years.
- 77 (25 percent) are administratively continued five years or more and less than 10 years.
- 62 (20 percent) are administratively continued 10 years or more and less than 15.
- 16 (5 percent) are administratively continued for 15 years or more.

Figure 1



DEQ's NPDES general permit program

General permits provide environmental protection for water quality through management practices, discharge limits, recordkeeping, and reporting. DEQ issues a general permit to provide permit coverage for a category of dischargers that have similar types of operations and waste. A general permit issued for a category of dischargers contains similar effluent limitations, operating conditions and monitoring requirements for its category. General permits provide consistent administration for smaller discharges at a lower cost than individual permits. Federal regulations provide that NPDES general permits may not be issued for a term longer than five years.

DEQ sets priorities for general permit development based on pressing needs, such as new state or federal regulation, court decisions and economic growth. DEQ also looks at opportunities to consolidate similar minor individual permits into a single general permit. For example, issuance of the 2000-J irrigation system pesticide general permit eliminated an individual permit backlog for this same type of discharge.

Current NPDES general permit efforts include renewing/writing the following permits:

- 100-J Cooling water/heat pumps
- 600 Off-Stream Placer Mining (WPCF)
- 1700-A Vehicle and Equipment Washwater
- #01-2021 Confined Animal Feeding Operation

The following general permits were renewed and issued in FFY 2022:

- 2300-A Pesticide General Permit (required by the 2018 settlement agreement)
- 1200-CA Construction Stormwater for Government Agencies

General permit renewal is typically an 18-month process involving research, public involvement, permit writing, legal review, public notice, developing forms and templates, as well as communications material and conducting outreach to permittees and interested stakeholders.

NPDES individual permits issued during 2022

As of Sep. 30, 2022, DEQ had taken 38 administrative actions on NPDES individual permits. Table 1 below shows individual permit actions according to plan in Federal Fiscal Year 2022.

Table 1. Individual Permit Actions in 2022			
No.	Facility	Permit No.	Date of Service¹
1	EUGENE WATER & ELECTRIC BOARD (CARMEN-SMITH)	101329	11/22/2021
2	PORT ORFORD STP	101001	12/6/2021
3	ONTARIO STP (MAJOR MODIFICATION #3)	101633	12/10/2021
4	BEND, CITY OF (MS4)	102901	12/15/2021
5	SFPP, LP	103042	12/23/2021
6	BEVERLEY HILTERBRAND, K&D CANTRELL (RIVIERA MOBILE PARK)	101475	1/20/2022

¹ The date of service is the date on which DEQ transmitted the document to the permitted facility.

Table 1. Individual Permit Actions in 2022			
No.	Facility	Permit No.	Date of Service¹
7	REGENCY OF OREGON, INC (CANBY REGENCY MOBILE HOME PARK)	101644	1/25/2022
8	US FOREST SERVICE (TIMBERLAKE STP) (MINOR MODIFICATION)	101498	1/28/2022
9	NORTH BEND STP	100703	2/8/2022
10	RAINBOW ROCK STP	101687	2/8/2022
11	ASHLAND STP	101609	2/15/2022
12	BIO-OREGON PROTEIN	101804	2/17/2022
13	GLENDALE STP	100742	2/23/2022
14	COVANTA MARION, INC	101240	2/24/2022
15	MAUPIN STP	102274	3/4/2022
16	ASHLAND STP (MINOR MODIFICATION)	101609	3/30/2022
17	ARCH CAPE STP	100967	3/31/2022
18	ODFW - LEABURG HATCHERY (MINOR MODIFICATION)	101914	4/4/2022
19	ODFW - MCKENZIE RIVER HATCHERY (MINOR MODIFICATION)	101918	4/4/2022
20	OAK LODGE WATER SERVICES DISTRICT	100986	4/7/2022
21	MONROE STP	101692	5/12/2022
22	CAVE JUNCTION WWTF	102610	6/1/2022
23	ODFW - MCKENZIE RIVER HATCHERY (MODIFICATION #2 - MINOR)	101918	6/23/2022
24	SOUTH SUBURBAN STP (MODIFICATION #2 - MAJOR)	100700	6/24/2022
25	AURORA STP	101772	6/24/2022
26	MAPLETON COMMERCIAL AREA OWNERS ASSOCIATION, INC. (MAPLETON STP)	101392	6/24/2022
27	ASHLAND STP (MINOR MODIFICATION #2)	101609	8/12/2022
28	THREE RIVERS SCHOOL DISTRICT (HIDDEN VALLEY HIGH SCHOOL STP)	102221	8/31/2022
29	INDEPENDENCE STP	101217	9/6/2022
30	ODFW - LEABURG HATCHERY (MINOR MODIFICATION #2)	101914	9/21/2022
31	DUNDEE STP	101722	9/22/2022
32	HOODLAND STP (WES)	100962	9/27/2022
33	ARCLIN SURFACES, INC	101544	9/27/2022
34	DIAMOND FRUIT GROWERS, INC. (CENTRAL)	100515	9/27/2022
35	DIAMOND FRUIT GROWERS, INC. (PARKDALE)	100514	9/27/2022
36	HARRISBURG LAGOON TREATMENT PLANT	101626	9/28/2022
37	HUBBARD STP	101640	9/30/2022

Table 1. Individual Permit Actions in 2022			
No.	Facility	Permit No.	Date of Service¹
38	EUGENE PUBLIC LIBRARY (MCAYAELS)	NEW	9/30/2022

Administratively continued NPDES individual permits that were delayed in 2022

Thirty-two individual NPDES permits planned for issuance in 2022 were delayed and have been moved to the federal fiscal year 2023 NPDES individual permit issuance plan. The information in Table 2 shows the reason for each of the 33 planned 2022 individual permits that were delayed, based on standardized permit delay factors developed by the permit program in 2015 (Appendix A).

Table 2. NPDES Permits Delayed in Federal Fiscal Year 2022			
No.	Facility	Permit No.	Reason for delay
1	SILTRONIC CORPORATION	101128	Resource limitation – workload
2	VERNONIA STP	101094	Resource limitation – workload
3	AMALGAMATED SUGAR	101174	Resource limitation – workload
4	PRECISION DRYING SERVICESES INC.	102871	Resource limitation – workload
5	INTERNATIONAL PAPER COMPANY (SPRINGFIELD PAPER MILL)	101081	Resource limitation – workload
6	ROCKAWAY BEACH STP	102580	Resource limitation – workload – Permit issued in FFY 2023
7	CANBY STP	101063	Resource limitation – workload – Permit issued in FFY 2023
8	PORT OF PORTLAND - TROUTDALE	100757	Resource limitation – workload
9	COQUILLE STP	3885	Resource limitation – workload
10	MYRTLE POINT STP	101192	Resource limitation – workload
11	RAY, HELEN, RICE HILL INVESTMENTS CORP.; SWEET HOME HOSPITALITY, LLC; EK ONKAR CORP. (RICE HILL EAST LAGOON)	101158	Resource limitation – workload
12	RICE HILL OWNERS ASSOCIATION, INC.	101725	Resource limitation – workload – Permit issued in FFY 2023
13	JUNCTION CITY	102396	Resource limitation – workload
14	NORPAC FOODS #5, BROOKS	100907	Resource limitation – workload
15	NEWPORT STP	102497	Resource limitation – workload

Table 2. NPDES Permits Delayed in Federal Fiscal Year 2022			
No.	Facility	Permit No.	Reason for delay
16	CHILOQUIN STP	101029	Resource limitation – workload
17	TEKTRONIX, INC	101534	Resource limitation – workload
18	CRESWELL STP	101639	Resource limitation – workload – Permit issued in FFY 2023
19	ODFW - MARION FORKS	101917	Resource limitation – workload – Permit issued in FFY 2023
20	STANFIELD STP	101136	Resource limitation – workload – Permit issued in FFY 2023
21	UNION STP	101624	Resource limitation - workload
22	DAYANG SEAFOOD PROCESSING	NEW	Permitting process – internal factors - policy limitation on complex issue (describe): new limits, compliance schedule, and TBEL's
23	DIAMOND FRUIT GROWERS, INC. (ODELL)	100516	Resource limitation – workload – Permit issued in FFY 2023
24	METROPOLITAN WASTEWATER MANAGEMENT COMMISSION (EUGENE/SPRINGFIELD STP)	102486	Resource limitation – workload – Permit issued in FFY 2023
25	CLEAN WATER SERVICES (DURHAM STP)	101141	Permitting Process – Internal Factor - Policy limitation on complex issue (describe): Complex watershed permit with temperature trading – Permit issued in FFY 2023
26	CLEAN WATER SERVICES (FOREST GROVE STP)	101142	Permitting Process – Internal Factor - Policy limitation on complex issue (describe): Complex watershed permit with temperature trading – Permit issued in FFY 2023
27	CLEAN WATER SERVICES (HILSBORO-WESTSIDE STP)	101143	Permitting Process – Internal Factor - Policy limitation on complex issue (describe): Complex watershed permit with temperature trading – Permit issued in FFY 2023
28	CLEAN WATER SERVICES (MS4)	101309	Permitting Process – Internal Factor - Policy limitation on complex issue (describe): Complex watershed permit with temperature trading – Permit issued in FFY 2023
29	CLEAN WATER SERVICES (ROCK CREEK STP)	101144	Permitting Process – Internal Factor - Policy limitation on complex issue (describe):

Table 2. NPDES Permits Delayed in Federal Fiscal Year 2022			
No.	Facility	Permit No.	Reason for delay
			Complex watershed permit with temperature trading – Permit issued in FFY 2023
30	FOSTER POULTRY FARMS, INC.	101590	Permitting Process – External Factor – Other local/state/federal review
31	CITY OF ST. HELENS	101173	Resource limitation – workload
32	HERMISTON STP	101294	Resource limitation – workload

Summary of NPDES individual permits administratively, continued

Table 4. NPDES individual permits administratively continued (as of Dec. 29, 2022)				
Facility name	Permit No.	Facility type	Location	Years admin.
TDY INDUSTRIES, LLC	100522	INDUSTRIAL	ALBANY	29.35
INTERNATIONAL PAPER COMPANY	101081	INDUSTRIAL	SPRINGFIELD	24.77
AMALGAMATED SUGAR COMPANY LLC, THE	101174	INDUSTRIAL	NYSSA	24.01
ARCLIN U.S.A. LLC	101235	INDUSTRIAL	SPRINGFIELD	23.35
NORPAC FOODS, INC.	101265	INDUSTRIAL	STAYTON	22.85
WESTROCK NORTHWEST, LLC	101299	INDUSTRIAL	NEWBERG	22.60
GEORGIA-PACIFIC CHEMICALS LLC	101474	INDUSTRIAL	EUGENE	21.18
CASCADE STEEL ROLLING MILLS, INC.	101487	INDUSTRIAL	MCMINNVILLE	20.60
DALLAS, CITY OF	101518	DOMESTIC	DALLAS	20.18
LEBANON, CITY OF	101771	DOMESTIC	LEBANON	18.01
ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	102024	DOMESTIC	ALBANY	17.17
LANE COMMUNITY COLLEGE	102116	DOMESTIC	EUGENE	17.01
ARUCO NORTH AMERICA, INC.	100668	INDUSTRIAL	ALBANY	16.01
DUFUR, CITY OF	102478	DOMESTIC	DUFUR	15.85
NEWPORT, CITY OF	102497	DOMESTIC	NEWPORT	15.68
ROGUE RIVER, CITY OF	102588	DOMESTIC	ROGUE RIVER	15.34
SALISHAN SANITARY DISTRICT	101273	DOMESTIC	GLENEDEN BEACH	15.01
PORT OF COLUMBIA COUNTY	102650	INDUSTRIAL	CLATSKANIE	15.01
STARLINK LOGISTICS INC.	101180	INDUSTRIAL	PORTLAND	14.51
HOLLINGSWORTH & VOSE FIBER COMPANY	101331	INDUSTRIAL	CORVALLIS	14.42

Table 4. NPDES individual permits administratively continued (as of Dec. 29, 2022)

Facility name	Permit No.	Facility type	Location	Years admin.
MYRTLE CREEK, CITY OF	101014	DOMESTIC	MYRTLE CREEK	14.26
LA GRANDE, CITY OF	101549	DOMESTIC	LA GRANDE	14.17
BAKER CITY, CITY OF	101632	DOMESTIC	BAKER CITY	14.17
HARRISBURG, CITY OF	101626	DOMESTIC	HARRISBURG	14.09
MCMINNVILLE, CITY OF	101062	DOMESTIC	MCMINNVILLE	14.00
CITY OF ST. HELENS	101173	DOMESTIC	ST HELENS	14.00
COQUILLE, CITY OF	3885	DOMESTIC	COQUILLE	14.00
ARKEMA, INC	100752	INDUSTRIAL	PORTLAND	14.00
NEWBERG, CITY OF	100988	DOMESTIC	NEWBERG	13.59
FRANK LUMBER CO., INC.	101583	INDUSTRIAL	LYONS	13.59
IDAHO POWER COMPANY	101287	INDUSTRIAL	HELLS CANYON	13.42
IDAHO POWER COMPANY	101275	INDUSTRIAL	OXBOW	13.34
PORTLAND, CITY OF	101614	DOMESTIC	LAKE OSWEGO	13.26
SALEM, CITY OF	101513	DOMESTIC	KEIZER	13.17
UNION, CITY OF	101624	DOMESTIC	UNION	13.17
REEDSPORT, CITY OF	100941	DOMESTIC	REEDSPORT	13.17
ELGIN, CITY OF	101606	DOMESTIC	ELGIN	13.17
WOODBURN, CITY OF	101558	DOMESTIC	WOODBURN	13.09
WINCHESTER BAY SANITARY DISTRICT	101254	DOMESTIC	WINCHESTER BAY	13.09
RAY, HELEN; RICE HILL INVESTMENTS CORP.; SWEET HOME HOSPITALITY, LLC; EK ONKAR CORP.	101158	DOMESTIC	RICE HILL	13.09
WATER ENVIRONMENT SERVICES	100983	DOMESTIC	MILWAUKIE	13.00
SILVERTON, CITY OF	101720	DOMESTIC	SILVERTON	13.00
HUBBARD, CITY OF	101640	DOMESTIC	HUBBARD	13.00
MT. ANGEL, CITY OF	101802	DOMESTIC	MT ANGEL	13.00
PENDLETON, CITY OF	100982	DOMESTIC	PENDLETON	12.92
SWEET HOME, CITY OF	101657	DOMESTIC	SWEET HOME	12.76

Table 4. NPDES individual permits administratively continued (as of Dec. 29, 2022)

Facility name	Permit No.	Facility type	Location	Years admin.
RIDDLE, CITY OF	101196	DOMESTIC	RIDDLE	12.76
CALIFORNIA SHELLFISH COMPANY, INC.	101820	INDUSTRIAL	HAMMOND	12.68
GLIDE-IDLEYLD SANITARY DISTRICT	101877	DOMESTIC	ROSEBURG	12.59
HOOVER TREATED WOOD PRODUCTS, INC.	102834	INDUSTRIAL	WINSTON	12.59
WINSTON GREEN REGIONAL TREATMENT FACILITY	100554	DOMESTIC	ROSEBURG	12.51
ROSEBURG URBAN SANITARY AUTHORITY	100981	DOMESTIC	ROSEBURG	12.26
TOLEDO, CITY OF	101713	DOMESTIC	TOLEDO	12.09
PACIFIC SURIMI - NEWPORT, LLC	101805	INDUSTRIAL	NEWPORT	12.09
INTERFOR U.S. INC.	100660	INDUSTRIAL	GILCHRIST	12.09
RSG FOREST PRODUCTS, INC.	102858	INDUSTRIAL	CLATSKANIE	11.92
RICE HILL OWNERS ASSOCIATION, INC., THE	101725	DOMESTIC	YONCALLA	11.76
TRI-CITY SERVICE DISTRICT	102229	INDUSTRIAL	OREGON CITY	11.76
ADAIR VILLAGE, CITY OF	101701	DOMESTIC	ADAIR VILLAGE	11.59
VERNONIA, CITY OF	101094	DOMESTIC	VERNONIA	11.59
ALPINE COUNTY SERVICE DISTRICT	101923	DOMESTIC	MONROE	11.51
JUNCTION CITY, CITY OF	102396	DOMESTIC	JUNCTION CITY	11.51
OREGON SYSTEM OF HIGHER EDUCATION	102512	INDUSTRIAL	CORVALLIS	11.51
HULL-OAKES LUMBER CO.	101466	INDUSTRIAL	MONROE	11.51
OAKLAND, CITY OF	101975	DOMESTIC	OAKLAND	11.42
DIAMOND FRUIT GROWERS, INC.	100516	INDUSTRIAL	HOOD RIVER	11.42

Table 4. NPDES individual permits administratively continued (as of Dec. 29, 2022)

Facility name	Permit No.	Facility type	Location	Years admin.
SENECA SAWMILL COMPANY	101893	INDUSTRIAL	EUGENE	11.34
CONRAD WOOD PRESERVING CO.	101901	INDUSTRIAL	HAUSER	11.17
ECHO, CITY OF	102054	DOMESTIC	ECHO	11.09
OAKRIDGE, CITY OF	102443	DOMESTIC	OAKRIDGE	10.67
EATINGER, AL	101990	DOMESTIC	TRAIL	10.59
KINGSFORD MANUFACTURING COMPANY	102153	INDUSTRIAL	SPRINGFIELD	10.42
CITY OF PORTLAND WATER BUREAU	101617	INDUSTRIAL	PORTLAND	10.25
PORT OF PORTLAND	100757	INDUSTRIAL	TROUTDALE	10.17
WESTPORT ENERGY, LLC	102935	INDUSTRIAL	COOS BAY	10.17
GRAPHIC PACKAGING INTERNATIONAL, INC.	101002	INDUSTRIAL	PORTLAND	10.09
PORTLAND GENERAL ELECTRIC COMPANY	101209	INDUSTRIAL	CLATSKANIE	10.09
CASCADE WOOD PRODUCTS, INC.	102305	INDUSTRIAL	WHITE CITY	10.09
USDOD; US ARMY CORPS OF ENGINEERS BONNEVILLE DAM	102768	INDUSTRIAL		10.00
SUNSTONE CIRCUITS, LLC	101015	INDUSTRIAL	MULINO	9.25
SANDY, CITY OF	102492	DOMESTIC	BORING	9.09
CENTURY MEADOWS SANITARY SYSTEM, INC.	101721	DOMESTIC	AURORA	9.09
USDOI; FISH & WILDLIFE SERVICE	101522	INDUSTRIAL	ESTACADA	9.00
OREGON DEPARTMENT OF FISH & WILDLIFE	102663	INDUSTRIAL	ESTACADA	9.00
SANDERS WOOD PRODUCTS, INC.	100929	INDUSTRIAL	LIBERAL	9.00
COBURG, CITY OF	102979	DOMESTIC	COBURG	8.59
GOLD HILL, CITY OF	102494	DOMESTIC	GOLD HILL	8.51

Table 4. NPDES individual permits administratively continued (as of Dec. 29, 2022)

Facility name	Permit No.	Facility type	Location	Years admin.
WESTFIR, CITY OF	100811	DOMESTIC	WESTFIR	8.51
LOWELL, CITY OF	101384	DOMESTIC	LOWELL	8.51
WILLAMETTE LEADERSHIP ACADEMY	101441	DOMESTIC	GOSHEN	8.51
SILTRONIC CORPORATION	101128	INDUSTRIAL	PORTLAND	8.51
JASPER WOOD PRODUCTS, LLC	101427	INDUSTRIAL	JASPER	8.51
GRANTS PASS, CITY OF	101985	DOMESTIC	GRANTS PASS	8.25
COTTAGE GROVE, CITY OF	101300	DOMESTIC	COTTAGE GROVE	8.25
WILLAMETTE FALLS PAPER COMPANY, INC.	100976	INDUSTRIAL	WEST LINN	8.25
UNIVAR USA INC	101613	INDUSTRIAL	PORTLAND	8.25
BLOUNT, INC.	101162	INDUSTRIAL	MILWAUKIE	8.25
SCAPPOOSE, CITY OF	100677	DOMESTIC	SCAPPOOSE	8.17
FOREST PARK MHP, LLC	102323	DOMESTIC	OREGON CITY	8.09
EVRAZ INC. NA	101007	INDUSTRIAL	PORTLAND	8.09
VIGOR INDUSTRIAL LLC	101393	INDUSTRIAL	PORTLAND	8.00
ASH GROVE CEMENT COMPANY	102465	INDUSTRIAL	PORTLAND	8.00
HATFIELD MARINE SCIENCE CENTER, OREGON STATE UNIVERSITY	101477	INDUSTRIAL	NEWPORT	7.59
MYRTLE POINT, CITY OF	101192	DOMESTIC	MYRTLE POINT	7.51
YAMHILL, CITY OF	101473	DOMESTIC	YAMHILL	7.51
ATHENA, CITY OF	102125	DOMESTIC	ATHENA	7.51
GRAND RONDE SANITARY DISTRICT	101429	DOMESTIC	GRAND RONDE	7.51
SHERIDAN, CITY OF	101625	DOMESTIC	SHERIDAN	7.51
AMITY, CITY OF	101924	DOMESTIC	AMITY	7.51
CARLTON, CITY OF	101902	DOMESTIC	CARLTON	7.51
NORPAC FOODS, INC.	100907	INDUSTRIAL	SALEM	7.51
JLR, LLC	101253	INDUSTRIAL	WOODBURN	7.51

Table 4. NPDES individual permits administratively continued (as of Dec. 29, 2022)

Facility name	Permit No.	Facility type	Location	Years admin.
COLUMBIA HELICOPTERS, INC.	101906	INDUSTRIAL	AURORA	7.51
ROYAL PACIFIC INDUSTRIES, INC.	101213	INDUSTRIAL	MCMINNVILLE	7.51
ESTACADA, CITY OF	101542	DOMESTIC	ESTACADA	7.25
INDUSTRIAL HARBOR USA, LLC	101468	INDUSTRIAL	GARDINER	7.17
PERMAPOST PRODUCTS CO.	101489	INDUSTRIAL	HILLSBORO	7.17
MCFARLAND CASCADE POLE & LUMBER COMPANY	102392	INDUSTRIAL	EUGENE	7.17
J.H. BAXTER & CO., INC.	102432	INDUSTRIAL	EUGENE	7.17
POWERS, CITY OF	101694	DOMESTIC	POWERS	7.09
DAYTON, CITY OF	101742	DOMESTIC	DAYTON	7.09
WILLAMINA, CITY OF	101070	DOMESTIC	WILLAMINA	7.09
GERVAIS, CITY OF	101665	DOMESTIC	GERVAIS	7.09
CASCADE PACIFIC PULP, LLC	101114	INDUSTRIAL	HALSEY	7.09
GEORGIA-PACIFIC CONSUMER OPERATIONS LLC	101488	INDUSTRIAL	HALSEY	7.09
OREGON METALLURGICAL, LLC	102223	INDUSTRIAL	ALBANY	7.09
ALLWEATHER WOOD, LLC	102034	INDUSTRIAL	WHITE CITY	7.09
STIMSON LUMBER COMPANY	101480	INDUSTRIAL	GASTON	7.00
SHADY COVE, CITY OF	100998	DOMESTIC	SHADY COVE	6.75
Water Environment Services	101168	DOMESTIC	OREGON CITY	6.71
USDA; FOREST SERVICE	100107	DOMESTIC	TILLER	6.50
CANYONVILLE, CITY OF	100532	DOMESTIC	CANYONVILLE	6.50
USDA; FOREST SERVICE	100064	DOMESTIC	GLIDE	6.50
SCIO, CITY OF	101503	DOMESTIC	SCIO	6.42
JEFFERSON, CITY OF	101780	DOMESTIC	JEFFERSON	6.25

Table 4. NPDES individual permits administratively continued (as of Dec. 29, 2022)

Facility name	Permit No.	Facility type	Location	Years admin.
GREEN DIAMOND PERFORMANCE MATERIALS, INC.	101932	INDUSTRIAL	RIDDLE	6.25
MURPHY COMPANY	101777	INDUSTRIAL	FOSTER	6.25
CORVALLIS, CITY OF	101714	DOMESTIC	CORVALLIS	6.17
ASTORIA, CITY OF	102397	DOMESTIC	ASTORIA	6.17
LONG CREEK, CITY OF	101751	DOMESTIC	LONG CREEK	6.08
MT. VERNON, CITY OF	101316	DOMESTIC	MT VERNON	6.08
PRINEVILLE, CITY OF	101433	DOMESTIC	PRINEVILLE	6.00
US ARMY CORPS OF ENGINEERS, BONNEVILLE LOCK AND DAM	101793	DOMESTIC	CASCADE LOCKS	5.84
CLATSKANIE, CITY OF	101595	DOMESTIC	CLATSKANIE	5.50
HALSEY, CITY OF	101297	DOMESTIC	HALSEY	5.50
VENETA, CITY OF	102480	DOMESTIC	VENETA	5.50
PHILOMATH, CITY OF	102060	DOMESTIC	CORVALLIS	5.50
BROWNSVILLE, CITY OF	102206	DOMESTIC	BROWNSVILLE	5.50
TANGENT, CITY OF	102247	DOMESTIC	TANGENT	5.50
GEORGIA-PACIFIC CHEMICALS LLC	102603	INDUSTRIAL	ALBANY	5.50
MAGAR E. MAGAR	102520	DOMESTIC	RAINIER	5.42
RAINIER, CITY OF	102571	DOMESTIC	RAINIER	5.42
FUJIMI CORPORATION	103033	INDUSTRIAL	WILSONVILLE	5.33
BOEING COMPANY, THE	101761	INDUSTRIAL	PORTLAND	5.33
VALLEY LANDFILLS, INC.	101545	INDUSTRIAL	CORVALLIS	5.25
CORVALLIS MHC LLC	102611	DOMESTIC	CORVALLIS	5.00
DIAMOND HILL L.L.C.	101557	DOMESTIC	HARRISBURG	5.00
OREGON CHERRY GROWERS, INC.	100841	INDUSTRIAL	THE DALLES	5.00
OREGON CHERRY GROWERS, INC.	101593	INDUSTRIAL	THE DALLES	5.00
TOYO TANSO USA, INC.	101685	INDUSTRIAL	TROUTDALE	5.00

Table 4. NPDES individual permits administratively continued (as of Dec. 29, 2022)				
Facility name	Permit No.	Facility type	Location	Years admin.
ENVIRONMENTAL BUSINESS SOLUTIONS	103051	INDUSTRIAL	PORTLAND	4.75
OREGON DEPARTMENT OF CORRECTIONS	101619	INDUSTRIAL	SALEM	4.50
NORTHWEST NATURAL	103061	INDUSTRIAL	PORTLAND	4.33
UMATILLA, CITY OF	101059	DOMESTIC	UMATILLA	4.25
TEKTRONIX, INC.	101534	INDUSTRIAL	BEAVERTON	3.75
ARKEMA, INC	103075	INDUSTRIAL	PORTLAND	3.75
FLORENCE, CITY OF	101703	DOMESTIC	FLORENCE	3.67
MOLALLA, CITY OF	101514	DOMESTIC	MOLALLA	3.58
FOSTER POULTRY FARMS, INC.	101590	INDUSTRIAL	CRESWELL	2.75
FORT CHICAGO HOLDINGS II U.S. LLC	101499	INDUSTRIAL	NORTH BEND	2.50
WATER ENVIRONMENT SERVICES	100968	DOMESTIC	BORING	1.83
PRECISION DRYING SERVICES INC.	102871	INDUSTRIAL	RAINIER	1.75
CHILOQUIN, CITY OF	101029	DOMESTIC	CHILOQUIN	1.67
HERMISTON, CITY OF	101294	DOMESTIC	HERMISTON	1.42

Detail of individual NPDES permits administratively continued for 10 or more years

Table 5 below represents a list of NPDES individual permits that have been administratively continued for 10 or more years. To reduce this backlog of permits to less than 10 percent of the total issued permits, a systematic approach is being implemented that includes multiple criteria. For consistency, DEQ has implemented five criteria that are used in workload planning for permit development of all NPDES individual permits:

1. Rollover permits from previous plan
2. Results of DEQ's 2017 readiness review
3. Geographic location
4. DEQ resources

5. Local priorities

The readiness review criteria are:

1. Compliance history
2. New or outstanding TMDL work
3. New or outstanding standards or monitoring assessments
4. Data availability, including mixing zone studies and specific data used for reasonable potential analysis

This review provides predictability and accountability for annual permit planning. However, detailed, fact-specific reasoning for permit delays will not be available prior to permit development.

Table 5. NPDES individual permits administratively continued greater than 10 years (as of Dec. 29, 2022)				
Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
TDY INDUSTRIES, LLC	ALBANY	Low priority based on planning criteria	29.35	2023
INTERNATIONAL PAPER COMPANY	SPRINGFIELD	Low priority based on planning criteria	24.77	2023
AMALGAMATED SUGAR COMPANY LLC, THE	NYSSA	Low priority based on planning criteria	24.01	2023
ARCLIN U.S.A. LLC	SPRINGFIELD	Low priority based on planning criteria	23.35	2024
NORPAC FOODS, INC.	STAYTON	Low priority based on planning criteria	22.85	2024
WESTROCK NORTHWEST, LLC	NEWBERG	Low priority based on planning criteria	22.6	2024

Table 5. NPDES individual permits administratively continued greater than 10 years (as of Dec. 29, 2022)

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
GEORGIA-PACIFIC CHEMICALS LLC	EUGENE	Low priority based on planning criteria	21.18	2024
CASCADE STEEL ROLLING MILLS, INC.	MCMINNVILLE	Low priority based on planning criteria	20.6	2024
DALLAS, CITY OF	DALLAS	Low priority based on planning criteria	20.18	2023
LEBANON, CITY OF	LEBANON	Low priority based on planning criteria	18.01	2024
ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	ALBANY	Low priority based on planning criteria	17.17	2023
LANE COMMUNITY COLLEGE	EUGENE	Low priority based on planning criteria	17.01	2026
ARUCO NORTH AMERICA, INC.	ALBANY	Low priority based on planning criteria	16.01	2024
DUFUR, CITY OF	DUFUR	Low priority based on planning criteria	15.85	2026
NEWPORT, CITY OF	NEWPORT	See Table 2	15.68	2023

Table 5. NPDES individual permits administratively continued greater than 10 years (as of Dec. 29, 2022)

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
ROGUE RIVER, CITY OF	ROGUE RIVER	Low priority based on planning criteria	15.34	2023
SALISHAN SANITARY DISTRICT	GLENEDEN BEACH	Low priority based on planning criteria	15.01	2026
PORT OF COLUMBIA COUNTY	CLATSKANIE	Low priority based on planning criteria	15.01	2026
STARLINK LOGISTICS INC.	PORTLAND	Low priority based on planning criteria	14.51	2024
HOLLINGSWORTH & VOSE FIBER COMPANY	CORVALLIS	Low priority based on planning criteria	14.42	2026
MYRTLE CREEK, CITY OF	MYRTLE CREEK	Low priority based on planning criteria	14.26	2024
LA GRANDE, CITY OF	LA GRANDE	Low priority based on planning criteria	14.17	2024
BAKER CITY, CITY OF	BAKER CITY	Low priority based on planning criteria	14.17	2024
HARRISBURG, CITY OF	HARRISBURG	Low priority based on planning criteria	14.09	2023

Table 5. NPDES individual permits administratively continued greater than 10 years (as of Dec. 29, 2022)

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
ARKEMA, INC	PORTLAND	Low priority based on planning criteria	14.00	2024
COQUILLE, CITY OF	COQUILLE	See Table 2	14.00	2023
CITY OF ST. HELENS	ST HELENS	See Table 2	14.00	2023
MCMINNVILLE, CITY OF	MCMINNVILLE	Low priority based on planning criteria	14.00	2024
NEWBERG, CITY OF	NEWBERG	Low priority based on planning criteria	13.59	2025
FRANK LUMBER CO., INC.	LYONS	Low priority based on planning criteria	13.59	2025
IDAHO POWER COMPANY	HELLS CANYON	Low priority based on planning criteria	13.42	2025
IDAHO POWER COMPANY	OXBOW	Low priority based on planning criteria	13.34	2025
PORTLAND, CITY OF	LAKE OSWEGO	Low priority based on planning criteria	13.26	2025
UNION, CITY OF	UNION	See Table 2	13.17	2023

Table 5. NPDES individual permits administratively continued greater than 10 years (as of Dec. 29, 2022)

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
REEDSPORT, CITY OF	REEDSPORT	Low priority based on planning criteria	13.17	2025
SALEM, CITY OF	KEIZER	Low priority based on planning criteria	13.17	2025
ELGIN, CITY OF	ELGIN	Low priority based on planning criteria	13.17	2025
RAY, HELEN; RICE HILL INVESTMENTS CORP.; SWEET HOME HOSPITALITY, LLC; EK ONKAR CORP.	RICE HILL	See Table 2	13.09	2023
WINCHESTER BAY SANITARY DISTRICT	WINCHESTER BAY	Low priority based on planning criteria	13.09	2025
WOODBURN, CITY OF	WOODBURN	Low priority based on planning criteria	13.09	2025
WATER ENVIRONMENT SERVICES	MILWAUKIE	Low priority based on planning criteria	13.00	2023
SILVERTON, CITY OF	SILVERTON	Low priority based on planning criteria	13.00	2026

Table 5. NPDES individual permits administratively continued greater than 10 years (as of Dec. 29, 2022)

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
HUBBARD, CITY OF	HUBBARD	Low priority based on planning criteria	13.00	2027
MT. ANGEL, CITY OF	MT ANGEL	Low priority based on planning criteria	13.00	2027
PENDLETON, CITY OF	PENDLETON	Low priority based on planning criteria	12.92	2023
SWEET HOME, CITY OF	SWEET HOME	Low priority based on planning criteria	12.76	2024
RIDDLE, CITY OF	RIDDLE	Low priority based on planning criteria	12.76	2027
CALIFORNIA SHELLFISH COMPANY, INC.	HAMMOND	Low priority based on planning criteria	12.68	2027
GLIDE-IDLEYLD SANITARY DISTRICT	ROSEBURG	Low priority based on planning criteria	12.59	2027
HOOVER TREATED WOOD PRODUCTS, INC.	WINSTON	Low priority based on planning criteria	12.59	2027

Table 5. NPDES individual permits administratively continued greater than 10 years (as of Dec. 29, 2022)

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
WINSTON GREEN REGIONAL TREATMENT FACILITY	ROSEBURG	Low priority based on planning criteria	12.51	2027
ROSEBURG URBAN SANITARY AUTHORITY	ROSEBURG	Low priority based on planning criteria	12.26	2027
INTERFOR U.S. INC.	GILCHRIST	Low priority based on planning criteria	12.09	2027
TOLEDO, CITY OF	TOLEDO	Low priority based on planning criteria	12.09	2027
PACIFIC SURIMI - NEWPORT, LLC	NEWPORT	Low priority based on planning criteria	12.09	2027
RSG FOREST PRODUCTS, INC.	CLATSKANIE	Low priority based on planning criteria	11.92	2027
RICE HILL OWNERS ASSOCIATION, INC., THE	YONCALLA	See Table 2	11.76	2023
TRI-CITY SERVICE DISTRICT	OREGON CITY	Low priority based on planning criteria	11.76	2025
VERNONIA, CITY OF	VERNONIA	Low priority based on planning criteria	11.59	2023

Table 5. NPDES individual permits administratively continued greater than 10 years (as of Dec. 29, 2022)

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
ADAIR VILLAGE, CITY OF	ADAIR VILLAGE	Low priority based on planning criteria	11.59	2024
HULL-OAKES LUMBER CO.	MONROE	Low priority based on planning criteria	11.51	2024
OREGON SYSTEM OF HIGHER EDUCATION	CORVALLIS	Low priority based on planning criteria	11.51	2024
ALPINE COUNTY SERVICE DISTRICT	MONROE	Low priority based on planning criteria	11.51	2025
JUNCTION CITY, CITY OF	JUNCTION CITY	Low priority based on planning criteria	11.51	2027
OAKLAND, CITY OF	OAKLAND	Low priority based on planning criteria	11.42	2027
SENECA SAWMILL COMPANY	EUGENE	Low priority based on planning criteria	11.34	2027
CONRAD WOOD PRESERVING CO.	HAUSER	Low priority based on planning criteria	11.17	2027
ECHO, CITY OF	ECHO	Low priority based on planning criteria	11.09	2027

Table 5. NPDES individual permits administratively continued greater than 10 years (as of Dec. 29, 2022)

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
OAKRIDGE, CITY OF	OAKRIDGE	Low priority based on planning criteria	10.67	2027
EATINGER, AL	TRAIL	Low priority based on planning criteria	10.59	2023
KINGSFORD MANUFACTURING COMPANY	Springfield	Low priority based on planning criteria	10.42	2025
CITY OF PORTLAND WATER BUREAU	PORTLAND	Low priority based on planning criteria	10.25	2024
PORT OF PORTLAND	TROUTDALE	Low priority based on planning criteria	10.17	2023
WESTPORT ENERGY, LLC	COOS BAY	Low priority based on planning criteria	10.17	2027
GRAPHIC PACKAGING INTERNATIONAL, INC.	PORTLAND	Low priority based on planning criteria	10.09	2024
PORTLAND GENERAL ELECTRIC COMPANY	CLATSKANIE	Low priority based on planning criteria	10.09	2027
CASCADE WOOD PRODUCTS, INC.	WHITE CITY	Low priority based on planning criteria	10.09	2027

Table 5. NPDES individual permits administratively continued greater than 10 years (as of Dec. 29, 2022)

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
USDOD; US ARMY CORPS OF ENGINEERS BONNEVILLE DAM		Low priority based on planning criteria	10.00	2025

* Planned year of issuance is the federal fiscal year and is determined annually according to the individual NPDES permit issuance plan. The listed plan year in this report is subject to change.

Summary of general NPDES permits administratively continued

Facility name	Years admin. continued	2023 issuance plan
100-J Cooling water/heat pumps	21	X
200-J Filter backwash	20	
300-J Fish hatcheries	15	
400-J, Log ponds	15	
500-J, Boiler blowdown	20	
1200-A Sand, gravel, other non-metallic	5	
1300-J	17	
1700-A, Vehicle and Equipment wash water	19	X
1900-J, Non-contact geothermal heat exchange	20	
2200-J Domestic wastewater floating residences (Young's Bay only).	7	
#01-2021 Confined Animal Feeding Operation	2	X

Appendix A – Water Quality permitting delay factors

To: WQ Permit Program

From: Ron Doughten, WQ Manager, WQ Permitting and Program Development

Date: 18 September 2015

Subject: Permit issuance – delay factors

Beginning with 2016 Water Quality Permit Issuance Plan, we will begin identifying, recording, and reporting on factors that delay permit issuance. Identifying and quantifying delays to permit issuance is intended to bring transparency to our program as well as identify significant barriers to permit issuance, which will help us focus on program improvements.

When updating the state-wide permit issuance plan, please identify delays from the following list.

Delay Factor	Description/definition
Resource limitations	Delays related to internal DEQ resource limitations
Staff leave	Staff resources have been identified and assigned to permit issuance. Delay is caused by sick leave, vacation, or other typical leave. Leave does not include vacancies, retirements, reassignment of duties.
Training need	Staff resources have been identified and assigned to permit issuance. Delay is due to staff person needing additional training.
Technical staff unavailable	Delay is due to specific expertise not available to complete the work. For example, mixing zone analysis not complete or biosolids management plan review delayed because of limited availability of technical experts.
Vacancy	Delay is due to a position vacancy, such as a retirement, resignation, job rotation, or promotion to another position. Vacancy does not include delays due to staff being temporarily reassigned to another project or task.
Workload	Delay is due to other priority permitting work as defined by the permit issuance plan or manager direction
Competing priorities	Delays related to DEQ resources focused on other tasks
Technical assistance	Staff resources have been identified and assigned to permit issuance. Delay is caused by higher than expected time spent

providing *external* technical assistance, including TA inspections.

Compliance work	Staff resources have been identified and assigned to permit issuance. Delay is caused by higher than expected time spent on compliance activities, including DMR review, compliance inspections, and compliance reporting issues. Compliance work does not include follow up activities such as enforcement action or technical assistance.
Enforcement	Staff resources have been identified and assigned to permit issuance. Delay is caused by higher than expected time spent on enforcement activities resulting from a complaint or compliance inspection.
Emergency spill response	Staff resources have been identified and assigned to permit issuance. Delay is caused by staff time being reassigned to an emergency spill response.
Complaints	Staff resources have been identified and assigned to permit issuance. Delay is caused by higher than expected time spent investigating and responding to a complaint, which may include site visit investigation, documentation, and communication.
New permit applications ³	Staff resources have been identified and assigned to permit issuance (specifically a renewal for this delay factor). Delay is caused by reassignment to work on unexpected new permit applications.
High priority WQ permit program or policy development	Staff resources have been identified and assigned to permit issuance. Delay is caused by reassignment to work on program or policy development specifically related to the permit program. Examples may include development of an IMD, strategic planning on permit issuance strategies, etc. This does not include non-permitting related projects, such as standard development TMDL, NPS support etc.
High priority regional or state-wide permitting project	Staff resources have been identified and assigned to permit issuance. Delay is caused by reassignment to work on a high- priority water quality permit-related project, such as Jordan Cove, Pioneer Mountain, or Eddyville.
High priority non-permit related special project	Staff resources have been identified and assigned to permit issuance. Delay is caused by reassignment to work on a non- permit related special project. May include providing assistance to other water quality subprograms, such as assessments, standards, TMDL, etc. This also includes special

³ Permit issuance plan should account for some new permit applications.

regional or agency projects such as breakthrough teams, problem solving, IT-related projects.

Other competing priority (describe):

Permitting process - internal limitation

Delays related to limitations or barriers in the DEQ WQ permitting process. These are delays that are within the permitting program's scope of control.

Data analysis⁴

Delay caused by difficulty obtaining necessary data that DEQ has historically collected and analysed. Also includes unexpected challenges or delays in cleaning or formatting data to be usable for analysis. For example, difficulty getting stream flow data, LASAR data, or other data sets.

No data available

Minimum data is not available to analyse reasonable potential to exceed water quality criteria.

Response to public comment

Delay caused by higher than expected time required to respond to public comment, either due to an unexpected volume or comments or complexity of comments received.

Policy limitation on complex issue (describe)

Delay caused by lack of policy on a complex permitting issue. Includes situations where no policy exists or where a policy has been developed but does not address a specific situation. Also includes IMDs that are obsolete or under revisions.

Lack of thorough program documentation (describe)

Delay caused by uncertainty in the permitting process that could have been avoided with better program documentations. This delay does not include complex policy issues that need documentation. This delay may include procedural issues associated with interpreting applications, fees, LUCS, entering information into internal systems, etc.

Permitting tool needed

Delay caused by lack of some type of technical tool that would assist with the permitting process, including items such as an update RPA spreadsheet, ammonia limit calculator, checklist, template, etc. This delay factor applies to routine permitting activities; it does not apply to non-routine special situations.

Need for state-wide consistency

Delay caused by internal review to establish cross-program, state-wide consistency on a permitting issue.

Other internal permit process limitation (describe):

⁴ Submission of accurate data to DEQ is a responsibility of the applicant and this factor could be included under “Incomplete permit application.” It has been included as an internal process limitation because DEQ has historically taken on this responsibility, partly to assist small communities, but also to ensure the quality of the data (e.g., consistent 7Q10 flow data from an appropriate USGS station).

Permitting process – alternative development	Delays related to development of alternatives to address challenging effluent limits. Delays associated with internal or external review should be also be identified.
Compliance schedule	Delay caused by negotiating with permit applicant to develop a compliance schedule.
Variance	Delay caused by need to gather information necessary to support the development of a variance.
Trading	Delay associated with development of a WQ Trading plan.
Other permitting process not listed(describe):	
Permitting process – external factor	Delays related to aspects of the permitting process that are external to DEQ. These delays occur as a normal aspect of the administrative process followed with the permitting process.
Applicant review ⁵	Delay caused due to longer than anticipated period of applicant review on the draft permit. This includes negotiations that may occur on proposed permit conditions as well as language in the permit evaluation report.
EPA review	Delay cause by extended or unexpected EPA review of a permit. Includes informal review during the pre-public comment phase as well as extended review requested during or after the formal public comment period.
Other local/state/ federal review	Delay caused by extended or unexpected review by another local, state, or federal organization.
Public information	Delay caused by additional need to provide public information on a proposed permitting action. This includes public meetings and outreach that occur <i>prior</i> to the formal public comment period.
Public comment	Delay caused by an unexpected request for a public hearing or extension of the public comment period.

⁵ Applicant review is not a required administrative step under the federal Clean Water Act. Oregon Administrative Rules specify a 14 day review period for permit applicants. It's been included as an external process factor because DEQ has historically extended the applicant review period as a courtesy to the applicant, when requested. (Applicants have the opportunity to review the permit during the public comment period.)

Additional public comment	Delay caused by need to provide a second public comment period on a proposed permit. This generally applies to significant changes to the draft permit that resulted from an initial public comment period. This delay does not apply to requested extensions on the initial public comment period.
Permit appeal	Delay in final issuance due to an appeal <i>by the permittee</i> during the permit appeal period.
Request for reconsideration	Delay in final permit issuance due to a request for reconsideration by a third party.
Other permitting process external factor (describe):	
Incomplete permit application	Delays that result from incomplete permit applications, including incomplete data submissions by the permit applicant and where a compliance schedule or special condition cannot be used.
Administratively incomplete	Delay caused by an administratively incomplete application, including missing documentation, wrong signature, inaccurate information, etc. Does not include more complex issues that are identified during technical analysis of the documentation.
LUCS	Delay caused by need to clarify a LUCS, obtain additional information from a local jurisdiction, or receive an updated LUCS.
Plan limitations	Delay due to missing, incomplete, or unclear plan required to be submitted prior to permit issuance, including pretreatment plan, biosolids management plan, land application plan, recycled water plan, etc.
Facility plan	Delay due to issues receiving a complete facility plan, which could result from unexpected lack of funding.
Mixing zone	New mixing zone study or analysis required.

Ambient data	Need additional ambient data
Effluent data	Need additional effluent data to complete the analysis.
DMR data	Need additional DMR data. For example, need daily monitoring results where only statistics have been provided.
WET	Need additional WET testing
Data format	Need data submitted in a useable format. For example, applicant supplies data in hard copy only or using wrong units.
New discharger to impaired waterbody, or new 303(d) listing.	Permit applicant must demonstrate that discharge will not cause or contribute to exceedance of a water quality standard on an impaired waterbody without a TMDL. This demonstration is also required for new listings, or applicants must meet criteria at end of pipe.
Other incomplete permit application (describe):	
Other limitations	Delays related to other DEQ Water Quality Program limitations. These factors also include DEQ's decision to delay or otherwise not renew an expired permit (i.e., not place the permit on the permit issuance plan).
Assessments	Delays associated with status of WQ assessment, including pending 303(d) listing or delisting actions.
WQ Standards – new standards	Delay waiting for development/approval of a new standard that is expected soon.
WQ Standards – beneficial use	Delay associated with impractical water quality standards because of need for an obvious change in a beneficial use, for example, irrigation canals listed as essential spawning habitat.
TMDL	Delay associated with TMDL development or approval of a TMDL.
Economic-community impact	Cost of complying with permit conditions will have significant social or economic impacts on a <i>community</i> . This factor should not generally be used as delay factor when the impact is solely on a business without wider impacts on the community.

Economic-negative environmental impact	Cost of complying with permit conditions will have measurable negative environmental impacts, such as significant energy consumption, contribution to green-house gas emissions, generating large quantities of solid waste, etc.
Economic-minimal environmental gain	Cost of complying with permit conditions results in minimal environmental gain.
Economic-facility development	Delay associated with facility securing funding necessary for plant improvements, including developing a facility plan, plant upgrade, etc. Under this delay factor, DEQ could issue a permit with a compliance schedule, but has “de-prioritized” permit issuance.
Limited discharge	Permit holder has a minimal environmental impact due to no discharge or limited discharge to waters of the state.
Other (describe):	

Since we will be reporting delays on the state-wide permit issuance plan and making the information publicly available, all regions and water quality subprograms (i.e., NPDES, WPCF, MS4, Stormwater, UIC, general permits, etc.) are expected to use this list. However, as we implement this system, we may identify the need to modify, change, or otherwise clarify the list of delay factors. Moreover, the list will be used as a starting place for uncovering root causes for permitting challenges and finding opportunities for improvement.

Alternate formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.oregon.gov.