

# 2019 Annual Report on Oregon's Water Quality National Pollutant Discharge Elimination System Permit Program

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## Water Quality Permitting and Program Development

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



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# Executive summary

The Oregon Department of Environmental Quality (DEQ) regulates the discharges of pollutants to waterways by issuing federal National Pollutant Discharge Elimination System (NPDES) permits to point source discharges of wastewater and stormwater. Under the federal NPDES permit program, permits are normally issued for a five-year term. However, as of December 1, 2019, approximately 77 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 These out-of-date permits remain in effect, but may not contain conditions that reflect updated standards and water quality conditions.

Under the direction of the 2015 Oregon Legislature, DEQ hired an external consultant, MWH, now part of Stantec, who conducted a thorough program review and provided recommendations in December 2016 to improve the NPDES permit program. During Federal Fiscal Year 2019, DEQ successfully accomplished a number of program improvements, including:

- Significant updates to NPDES Domestic Major NPDES individual permit template
- Significant updates to NPDES Domestic Minor NPDES individual permit template
- Establish two new external advisory committees groups led by DEQ's Water Quality Administrator – Water Quality Roundtable and Water Quality Forum
- Publish NPDES individual permit issuance plan for FFY 2020
- Publish NPDES individual permit issuance plan for the next five years through 2025
- Enhance the program's use of subject matter experts and a dedicated QA process
- Plan and prepare for state-wide implementation of the Environmental Data Management System
- Continue to develop dedicated NPDES individual permit writers
- Continue standardized monthly training and collaboration for the NPDES individual permit writing team
- Continue to improve quality assurance reviews on all individual NPDES permit modifications, renewals, and initial issuance

As of Dec. 1, 2019, Oregon's individual NPDES permit program included:

- 334 active municipal and industrial individual NPDES wastewater permits.
- 242 (72 percent) administratively continued permits, 39 (12 percent) of which are administratively continued for 10 years or more.

# 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 2017, Northwest Environmental Advocates (NWEA) and others filed a lawsuit against DEQ, alleging DEQ “unreasonably delayed taking action or failed to make decisions on pending National Pollutant Discharge Elimination System permit renewal applications.” 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.

## 2019 NPDES permit status

The [2019/20 NPDES permit issuance work plan](#) identified 48 permits for administrative action (i.e., issuance, or termination) by Sep. 30, 2020. The 2019/20 NPDES (AKA FFY 2020) permit issuance work 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 mercury TMDL in the Willamette Basin. The plan originally established a target goal of taking final administrative action on 30 permits in 2019 and an additional 18 permits in 2020. The work plan is intended to provide a seamless transition between permits developed in 2019 and issued in 2020.

Although DEQ expects to provide annual permit issuance targets and updates based on the federal fiscal year (Oct. 1 through Sept. 30), the 2019/20 permit issuance plan was based on truncated 2019 FFY from January 1, 2019 through September 30, 2019. DEQ has returned to the Federal Fiscal calendar for the 2020 annual NPDES individual permit issuance plan.

## Overall status of DEQ’s NPDES individual permit program

As of Dec. 1, 2019, Oregon had 334 active individual municipal and industrial NPDES wastewater permits (shown in figure 1 below) that must be renewed every five years. Of those permits:

- 242 (72 percent) were administratively continued.
- 119 (36 percent) are administratively continued for less than five years.
- 84 (25 percent) are administratively continued five years or more and less than 10 years.
- 26 are administratively continued 10 years or more and less than 15.
- 13 (4 percent) are administratively continued for 15 years or more.

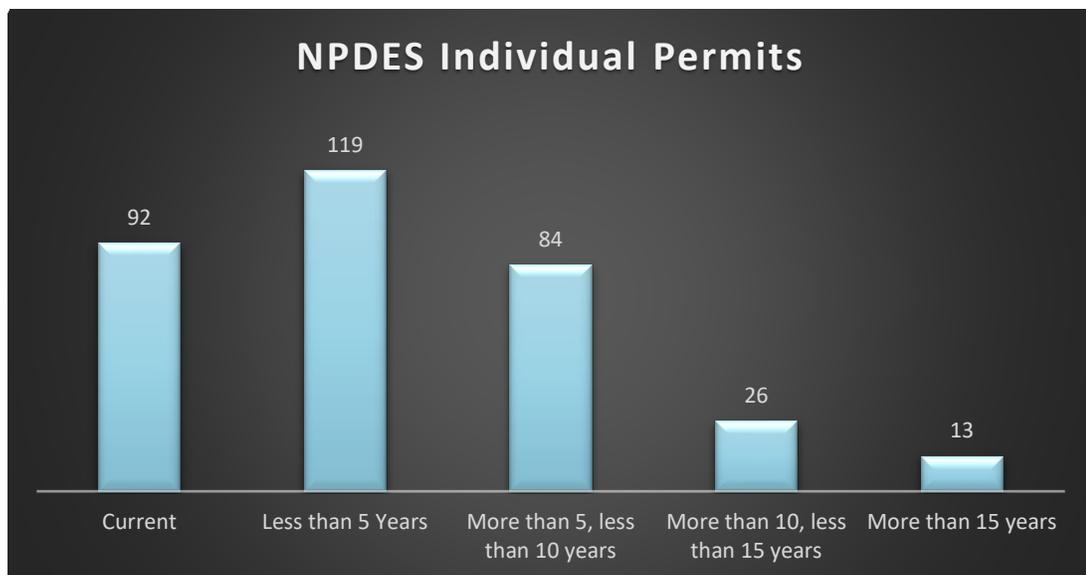


Figure 1

# 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 similar category of dischargers that have similar types of operations and waste. Each general permit requires 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 regulation requires a NPDES general permit to be effective for five years.

Each year, 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 to help eliminate the individual permit backlog.

Current NPDES general permit efforts include renewing/writing:

- 700-PM Suction dredge and in-water, non-motorized mining operations
- 900-J Seafood processing effluent discharge
- 2000-J Irrigation system pesticide

Further, the 2018 settlement requires the following general permits to be renewed by the end of 2021.

- 2300-A Pesticide
- 1500-A Wastewater from clean-up of petroleum products

General permit renewal is typically an 18-month process involving extensive research, public involvement, permit writing, legal review, public notice of draft permit, response to comments, revising permit applications, reporting templates, developing communications materials and conducting outreach.

## 1. NPDES individual permits issued during 2019

As of Dec. 31, 2019, DEQ had taken administrative action on 23 NPDES Individual Permits planned for permit issuance in 2019. An additional three individual permits were on public notice as of the end of 2019, one of the final steps in the permit development and issuance process. Table 1 below shows individual permits issued according to plan and general permit actions in Federal Fiscal Year 2019.

Table 1. Individual permit actions in 2019		
No.	Facility	Date of Service <sup>1</sup>
1	NESKOWIN REGIONAL SANITARY AUTHORITY STP	9/30/2019
2	GARIBALDI STP	9/30/2019
3	WESTPORT SEWER SERVICE DISTRICT STP	9/18/2019
4	CASCADE LOCKS STP	8/28/2019
5	ODELL STP	7/12/2019
6	CITY OF SUTHERLIN	7/9/2019
7	SUNDIAL MARINE (TERMINATED)	6/18/2019
8	HALFWAY STP (TERMINATED)	6/13/2019
9	GEORGIA PACIFIC TOLEDO, LLC	6/12/2019
10	CITY OF MOSIER	2/28/2019
11	DYNO NOBEL INC. (DYNO NOBEL INC.)	2/5/2019
12	KOPPERS INC. (TERMINATED)	2/4/2019
13	ASHLAND MUNICIPAL STORMWATER, MS4	3/1/2019

<b>Table 1. Individual permit actions in 2019</b>		
<b>No.</b>	<b>Facility</b>	<b>Date of Service<sup>1</sup></b>
14	BENTON COUNTY MUNICIPAL STORMWATER, MS4	3/1/2019
15	KEIZER MUNICIPAL STORMWATER, MS4	3/1/2019
16	LANE COUNTY MUNICIPAL STORMWATER, MS4	3/1/2019
17	MARION COUNTY MUNICIPAL STORMWATER, MS4	3/1/2019
18	MEDFORD MUNICIPAL STORMWATER, MS4	3/1/2019
19	PHILOMATH MUNICIPAL STORMWATER, MS4	3/1/2019
20	POLK COUNTY MUNICIPAL STORMWATER, MS4	3/1/2019
21	ROGUE VALLEY MUNICIPAL STORMWATER, MS4	3/1/2019
22	TROUTDALE MUNICIPAL STORMWATER, MS4	3/1/2019
23	WOOD VILLAGE MUNICIPAL STORMWATER, MS4	3/1/2019

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\* Issued according to the 2019 plan based on calendar year instead of federal fiscal year. All NPDES permit issuance plans going forward will be federal fiscal year (Oct. 1 – September 31).

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

## 2. Administratively continued NPDES individual permits that were delayed in 2019

Nine individual NPDES permits planned for issuance in 2019 were delayed and are expected to be issued in early 2020, or have been moved to the Federal Fiscal Year 2020 NPDES individual permit issuance work plan. The information in Table 2 shows the reason for each of the nine 2019 individual permits that were delayed, based on standardized permit delay factors developed by the permit program in 2015 (Appendix A).

<b>Table 2. NPDES individual permits delayed in Federal Fiscal Year 2019</b>		
<b>No.</b>	<b>Facility</b>	<b>Reason for delay</b>
1	Bay City STP	Permitting process – internal factors – Data analysis
2	Bandon STP	Resource limitation – Training need
3	Bourne Mining Corporation (E&E Mine), Bourne	Permitting process – external factor – Applicant review
4	Cannon Beach WWTP	Permitting process – internal factor - Data analysis
5	City of Lincoln City	Permitting process – alternative development. Compliance schedule
6	Amalgamated Sugar Co. LLC, Nyssa	Permitting process – alternative development – Other permitting process – Memorandum of Agreement and Order (MAO)
7	Mt. Hood Meadows Ski Resort	Permitting process – internal factors – Data analysis
8	City of Waldport	Permitting process – alternative development. Compliance schedule
9	City of Lakeside	Permitting process – alternative development. Compliance schedule
10	Sundown Sanitary Sewer District	Permitting process – internal factors – Data analysis
11	Tillamook Industrial Park STP	Resource limitation – Training need
12	Arlington STP	Permitting process – internal factors – Data analysis

<b>Table 2. NPDES individual permits delayed in Federal Fiscal Year 2019</b>		
<b>No.</b>	<b>Facility</b>	<b>Reason for delay</b>
13	City of Warrenton STP	Permitting process – internal factors – Data analysis
14	Westport Sewer Service District	Permitting process – internal factors – Data analysis
15	Hebo Joint Water Service District	Resource limitation – Training need
16	Netarts-Oceanside STP	Resource limitation – Training need
17	Cloverdale STP	Permitting process – internal factors – Data analysis
18	Tillamook Creamery	Permitting process – internal factors – Data analysis
19	Gresham WWTP	Permitting process – internal factors – Data analysis

### 3. NPDES general permits that were delayed in 2019

The information in Table 3 shows the reason for the 2019 general permits that were delayed.

<b>Table 3. NPDES general permits, on the 2019 issuance plan, delayed in Federal Fiscal Year 2019</b>		
<b>No.</b>	<b>Permit</b>	<b>Reason for delay</b>
1	900-J*	Permitting process – external factor – Additional public comment
2	2300-A	Competing priorities – High priority water quality permit program or policy development
3	2000-J*	Competing priorities – High priority water quality permit program or policy development

\*Permits were public noticed in 2019 but not issued.

## 4. Summary of NPDES individual permits administratively continued

Table 4. NPDES individual permits administratively continued			
Facility name	Facility type	Location	Years admin. continued
Columbia Plywood Corporation, Forest Products	Industrial	Klamath Falls	30.0
TDY Industries, LLC, Teledyne Wah Chang	Industrial	Albany	26.3
City Of Klamath Falls Wastewater Treatment And Reclamation Facility (Spring Street)	Domestic	Klamath Falls	24.3
South Suburban Sanitary District	Domestic	Klamath Falls	24.3
Collins Products LLC	Industrial	Klamath Falls	21.7
International Paper Company, Springfield Paper Mill	Industrial	Springfield	21.7
Amalgamated Sugar Company, LLC.	Industrial	Nyssa	20.9
Arclin U.S.A., LLC.	Industrial	Springfield	20.3
Norpac Foods, Inc., Plant #1, Stayton	Industrial	Stayton	19.8
Westrock Northwest, LLC., Newberg Mill	Industrial	Newberg	19.5
Georgia-Pacific Chemicals LLC.	Industrial	Eugene	18.1
Cascade Steel Rolling Mills, Inc.	Industrial	McMinnville	17.5
City of Dallas	Domestic	Dallas	17.1
City of Lebanon	Domestic	Lebanon	14.9
Oregon Department Of Transportation	State-wide Stormwater MS4	Salem	14.5
City of Monmouth	Domestic	Monmouth	14.3
Albany-Millersburg Water Reclamation Facility	Domestic	Albany	14.1
Lane Community College	Domestic	Eugene	13.9
Metropolitan Wastewater Management Commission, Eugene/Springfield	Domestic	Eugene	12.9
Flakeboard America Limited, Duraflake	Industrial	Albany	12.9
City of Dufur	Domestic	Dufur	12.8
City of Newport	Domestic	Newport	12.6
Klamath Irrigation District	Industrial	Klamath Falls	12.4
Westland Irrigation District	Industrial	Echo	12.3
West Extension Irrigation District	Industrial	Umatilla	12.3
Stanfield Irrigation District	Industrial	Stanfield	12.3
Hermiston Irrigation District	Industrial	Hermiston	12.3
City of Rogue River, City Of	Domestic	Rogue River	12.3
North Unit Irrigation District	Industrial	Madras	12.2
Owyhee Irrigation District	Industrial	Nyssa	12.2
Vale Oregon Irrigation District	Industrial	Vale	12.2

**Table 4. NPDES individual permits administratively continued**

Facility name	Facility type	Location	Years admin. continued
Owyhee Ditch Company	Industrial	Ontario	12.2
Ochoco Irrigation District	Industrial	Prineville	12.2
City of North Bend	Domestic	North Bend	11.9
Port Of St. Helens	Industrial	Clatskanie	11.9
City of Waldport	Domestic	Waldport	11.9
City of Lincoln City	Domestic	Lincoln City	11.9
City of Coos Bay, No. 2 - Empire	Domestic	Coos Bay	11.9
Salishan Sanitary District	Domestic	Gleneden Beach	11.9
Starlink Logistics Inc.	Industrial	Portland	11.4
Hollingsworth & Vose Fiber Co.	Industrial	Corvallis	11.3
City of Myrtle Creek	Domestic	Myrtle Creek	11.2
City of La Grande	Domestic	La Grande	11.1
Baker City	Domestic	Baker City	11.1
City of Harrisburg, Lagoon Treatment Plant	Domestic	Harrisburg	11.0
Bourne Mining Corporation, E & E Mine	Industrial	Bourne	11.0
Arkema, Inc.	Industrial	Portland	10.9
City of McMinnville, Water Reclamation Facility	Domestic	McMinnville	10.9
City of Ashland	Domestic	Ashland	10.9
City of Coquille, City Of	Domestic	Coquille	10.9
Boise White Paper, LLC	Domestic	St. Helens	10.9
Jeld-Wen, Inc.	Industrial	Klamath Falls	10.8
City of Ontario	Domestic	Ontario	10.8
City of Joseph	Domestic	Joseph	10.5
Newberg, City Of, Wyooski Road	Domestic	Newberg	10.5
Eugene Water & Electric Board, Carmen-Smith	Industrial	Eugene	10.5
Frank Lumber Co., Inc.	Industrial	Lyons	10.5
Idaho Power Company, Hells Canyon Power Plant	Industrial	Hells Canyon	10.3
Idaho Power Company, Oxbow Power Plant	Industrial	Oxbow	10.3
Odell Sanitary District	Domestic	Odell	10.2
City of Portland, Tryon Creek	Domestic	Lake Oswego	10.2
City of Elgin	Domestic	Elgin	10.1
City of Reedsport	Domestic	Reedsport	10.1
City of Salem, Salem Willow Lake	Domestic	Keizer	10.1

<b>Table 4. NPDES individual permits administratively continued</b>			
<b>Facility name</b>	<b>Facility type</b>	<b>Location</b>	<b>Years admin. continued</b>
City of Union	Domestic	Union	10.1
Ray, Helen; Rice Hill Investments Corp.; Sweet Home Hospitality, LLC; Rice Hill East Lagoon, EK Onkar Corp.	Domestic	Rice Hill	10.0
Winchester Bay Sanitary District	Domestic	Winchester Bay	10.0
City of Drain	Domestic	Drain	10.0
City of Woodburn	Domestic	Woodburn	10.0
Covanta Marion, Inc.	Industrial	Brooks	10.0
Oak Lodge Water Services District	Domestic	Milwaukie	10.0
Clackamas County Service District #1, Kellogg Creek	Domestic	Milwaukie	9.9
City of Mt. Angel	Domestic	Mt. Angel	9.9
City of Hubbard	Domestic	Hubbard	9.9
City of Lakeside	Domestic	Lakeside	9.9
City of Silverton	Domestic	Silverton	9.9
City of Pendleton	Domestic	Pendleton	9.8
City of Riddle	Domestic	Riddle	9.7
City of Sweet Home	Domestic	Sweet Home	9.7
California Shellfish Company, Inc., Point Adams Packing Co.	Industrial	Hammond	9.6
Glide-Idleyd Sanitary District	Domestic	Roseburg	9.5
Hoover Treated Wood Products, Inc.	Industrial	Winston	9.5
Winston Green Regional Treatment Facility	Domestic	Roseburg	9.4
Georgia-Pacific Toledo LLC	Industrial	Toledo	9.3
Roseburg Urban Sanitary Authority	Domestic	Roseburg	9.2
Oregon Department of Fish and Wildlife, Marion Forks Hatchery	Industrial	Idanha	9.1
Toledo, City Of	Domestic	Toledo	9.0
Interfor U.S. Inc.	Industrial	Gilchrist	9.0
Pacific Surimi - Newport, LLC	Industrial	Newport	9.0
RSG Forest Products, Inc., Olympic Forest Products	Industrial	Clatskanie	8.8
City of Yoncalla	Domestic	Yoncalla	8.8
Pacific Surimi Co., Inc.	Industrial	Warrenton	8.7
Rice Hill Owners Association, Inc., West Lagoon	Domestic	Yoncalla	8.7
Tri-City Service District, Blue Heron Paper Co.	Industrial	Oregon City	8.7
City of Vernonia	Domestic	Vernonia	8.5
City of Adair Village	Domestic	Adair Village	8.5

<b>Table 4. NPDES individual permits administratively continued</b>			
<b>Facility name</b>	<b>Facility type</b>	<b>Location</b>	<b>Years admin. continued</b>
Hull-Oakes Lumber Co.	Industrial	Monroe	8.4
Alpine County Service District	Domestic	Monroe	8.4
Oregon System Of Higher Education, OSU John L. Fryer Aquatic Animal Health Lab	Industrial	Corvallis	8.4
City of Monroe	Domestic	Monroe	8.4
City of Junction City	Domestic	Junction City	8.4
City of Oakland	Domestic	Oakland	8.3
Diamond Fruit Growers, Inc., Odell Plant	Industrial	Hood River	8.3
Diamond Fruit Growers, Inc., Parkdale Plant	Industrial	Parkdale	8.3
Diamond Fruit Growers, Inc., Central Plant	Industrial	Odell	8.3
Seneca Sawmill Co.	Industrial	Eugene	8.3
Conrad Wood Preserving Co.	Industrial	Hauser	8.1
City of Echo	Domestic	Echo	8.0
Tillamook County Creamery Association	Industrial	Tillamook	7.9
City of Oakridge	Domestic	Oakridge	7.6
Oregon Department of Fish and Wildlife, Leaburg Hatchery	Industrial	Leaburg	7.6
Eatinger, Al, Country View Mobile Home Estates	Domestic	Trail	7.6
Oregon Department of Fish and Wildlife, Mckenzie River Hatchery	Industrial	Leaburg	7.5
City of Falls City	Domestic	Falls City	7.4
Rosboro Company, LLC	Industrial	Springfield	7.4
Kingsford Manufacturing Company, Springfield Plant	Industrial	Springfield	7.3
City Of Portland Water Bureau	Industrial	Portland	7.2
Port Of Portland	Industrial	Troutdale	7.2
Bio-Oregon Protein, Inc.	Industrial	Warrenton	7.1
Graphic Packaging International, Inc.	Industrial	Portland	7
Portland General Electric Company	Industrial	Clatskanie	7
Cascade Wood Products, Inc.	Industrial	White City	7
U.S. Department of Defense; U.S. Army Corps of Engineers Bonneville Dam	Industrial	Cascade Locks	7
Sunstone Circuits, LLC	Industrial	Mulino	6.9
Century Meadows Sanitary System, Inc.	Domestic	Aurora	6.2
City of Sandy	Domestic	Boring	6
Oregon Department of Fish and Wildlife, Clackamas River Hatchery	Industrial	Estacada	6
U.S. Department of Interior; Fish & Wildlife Service, Eagle Creek National Fish Hatchery	Industrial	Estacada	5.9
Sanders Wood Products, Inc.	Industrial	Liberal	5.9
City of Aumsville	Domestic	Aumsville	5.9
City of Coburg, City Of	Domestic	Coburg	5.9

**Table 4. NPDES individual permits administratively continued**

Facility name	Facility type	Location	Years admin. continued
Port of Portland and Co-Applicants	Industrial	Portland	5.5
City of Westfir	Domestic	Westfir	5.5
Willamette Leadership Academy	Domestic	Goshen	5.4
City of Lowell	Domestic	Lowell	5.4
Siltronic Corp.	Domestic	Portland	5.4
City of Gold Hill	Domestic	Gold hill	5.4
Jasper Wood Products, LLC	Industrial	Jasper	5.4
West Linn Paper Company	Industrial	West Linn	5.4
City of Cottage Grove	Domestic	Cottage Grove	5.2
City of Grants Pass	Domestic	Grants Pass	5.2
Blount, Inc. Oregon Cutting Systems Division	Industrial	Milwaukie	5.2
Univar USA Inc.	Industrial	Portland	5.2
Scappoose	Domestic	Scappoose	5.1
Evraz Inc. North America	Industrial	Portland	5
Forest Park Mobile Village	Domestic	Oregon City	5
Ash Grove Cement Company, Rivergate Lime Plant	Industrial	Portland	4.9
City of Wilsonville, City Of	Domestic	Wilsonville	4.9
City of Canby	Domestic	Canby	4.9
Vigor Industrial LLC	Industrial	Portland	4.9
Arclin surfaces, Inc.	Industrial	Portland	4.9
Oregon Health Sciences University	Industrial	Portland	4.8
Hatfield Marine Science Center, Oregon State University	Industrial	Newport	4.5
Norpac Foods, Inc. Brooks Plant no. 5	Industrial	Salem	4.4
Grand Ronde Sanitary District	Domestic	Grand Ronde	4.4
City of Athena, City Of	Domestic	Athena	4.4
City of Myrtle point	Domestic	Myrtle Point	4.4
City of Amity, City Of	Domestic	Amity	4.4
Royal pacific industries, Inc.	Industrial	McMinnville	4.4
Sheridan, City Of	Domestic	Sheridan	4.4
JLR, LLC	Industrial	Woodburn	4.4
Columbia Helicopters, Inc.	Industrial	Aurora	4.4
City of Carlton, City Of	Domestic	Carlton	4.4
City of Yamhill, City Of	Domestic	Yamhill	4.4
City of Estacada, City Of	Domestic	Estacada	4.2
Oregon Racing, Inc., Portland meadows	Industrial	Portland	4.2
J.H. Baxter & Co., Inc.	Industrial	Eugene	4.1

**Table 4. NPDES individual permits administratively continued**

Facility name	Facility type	Location	Years admin. continued
McFarland Cascade Pole & Lumber Co.	Industrial	Eugene	4.1
Permapost Products Co.	Industrial	Hillsboro	4.1
Industrial Harbor USA, LLC	Industrial	Gardiner	4.1
City of Dayton, City Of	Domestic	Dayton	4
City of Gervais, City Of	Domestic	Gervais	4
City of Powers, City Of	Domestic	Powers	4
Allweather Wood, LLC	Industrial	White City	4
Oregon Metallurgical, LLC., ATI Albany Operations	Industrial	Albany	4
Cascade Pacific Pulp, LLC	Industrial	Halsey	4
Willamina, City Of	Domestic	Willamina	4
Georgia-Pacific Consumer Operations LLC, Halsey Mill	Industrial	Halsey	4
Stimson Lumber Company, Forest Grove	Industrial	Gaston	3.9
Intel Corporation, Aloha Campus	Industrial	Aloha	3.9
City of Gold Beach	Domestic	Gold Beach	3.8
City of Shady cove	Domestic	Shady Cove	3.7
Tri-city Service District	Domestic	Oregon City	3.6
Mapleton Commercial Area Owners Association, Inc.	Domestic	Mapleton	3.5
City of Portland, Columbia Blvd.	Domestic	Portland	3.4
USDA: Forest Service, Umpqua National Forest; Wolf Creek Civilian Conservation Center	Domestic	Glide	3.4
USDA: Forest Service, Umpqua National Forest; Tiller Ranger Station	Domestic	Tiller	3.4
City of Glendale	Domestic	Glendale	3.4
Canyonville	Domestic	Canyonville	3.4
City of Scio	Domestic	Scio	3.3
City of Dundee	Domestic	Dundee	3.3
City of Jefferson	Domestic	Jefferson	3.2
City of Huntington	Domestic	Huntington	3.2
Green Diamond Performance Materials, Inc.	Industrial	Riddle	3.2
Murphy Company, Veneer Foster Division	Industrial	Foster	3.2
City of Corvallis	Domestic	Corvallis	3.1
Pacific City Joint Water-Sanitary Authority	Domestic	Pacific City	3.1
City of Astoria	Domestic	Astoria	3.1
City of Brookings	Domestic	Brookings	3.1

<b>Table 4. NPDES individual permits administratively continued</b>			
<b>Facility name</b>	<b>Facility type</b>	<b>Location</b>	<b>Years admin. continued</b>
City of Mt. Vernon	Domestic	Mt. Vernon	3
City of Long Creek	Domestic	Long Creek	3
City of Medford	Domestic	Central Point	3
Netarts-Oceanside Sanitary District	Domestic	Oceanside	2.9
City of Prineville	Domestic	Prineville	2.9
City of Stanfield	Domestic	Stanfield	2.8
Knife River Corporation - Northwest	Industrial	Troutdale	2.8
U.S. Army Corps of Engineers, Bonneville Lock and Dam, Tanner Creek Wastewater Treatment Plant	Domestic	Cascade Locks	2.8
Port of Tillamook Bay, Industrial Park	Domestic	Tillamook	2.7
City of Brownsville	Domestic	Brownsville	2.4
City of Clatskanie	Domestic	Clatskanie	2.4
City of Veneta	Domestic	Veneta	2.4
City of Halsey	Domestic	Halsey	2.4
City of Tangent	Domestic	Tangent	2.4
City of Philomath	Domestic	Corvallis	2.4
Georgia-Pacific Chemicals, LLC, Millersburg Resin Plant	Industrial	Albany	2.4
City of Rainier	Domestic	Rainier	2.3
Magar e. Magar, Riverwood Mobile Home Park	Domestic	Rainier	2.3
Fujimi Corporation, SW Commerce Circle	Industrial	Wilsonville	2.3
Boeing Company, Fabrication Division	Industrial	Portland	2.3
Valley Landfills, Inc., Coffin Butte Landfill	Industrial	Corvallis	2.2
SFPP, LP	Industrial	Eugene	2
Corvallis MHC, LLC, Knoll Terrace	Domestic	Corvallis	1.9
Diamond Hill LLC Sherman Bros. Trucking	Domestic	Harrisburg	1.9
Toyo Tanso USA, Inc.	Industrial	Troutdale	1.9
Oregon Cherry Growers, Inc.	Industrial	The Dalles	1.9
Oregon Cherry Growers, Inc., Riverside plant	Industrial	The Dalles	1.9
Sundown Sanitary Sewer District	Domestic	Astoria	1.9
City of Warrenton	Domestic	Warrenton	1.9
Environmental Business Solutions	Industrial	Portland	1.7
City of Coos bay, STP No.1	Domestic	Coos bay	1.6
Rainbow Rock Service Association, Inc.	Domestic	Brookings	1.4
Oregon Department of Corrections, Oregon State Penitentiary	Industrial	Salem	1.4
Northwest Natural	Industrial	Portland	1.3
City of Umatilla	Domestic	Umatilla	1.2
City of Arlington	Domestic	Arlington	1.2

## 5. 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 must be implemented that includes multiple criteria. For consistency, DEQ has implemented four criteria that are used in workload planning for permit development of all NPDES individual permits:

1. Results of DEQ's 2017 readiness review
2. Geographic location
3. DEQ resources
4. 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-based reasoning for permit delays will not be available prior to permit development.

<b>Table 5. NPDES individual permits administratively continued 10 or more years</b>				
<b>Facility name</b>	<b>Location</b>	<b>Years admin. continued</b>	<b>Reason</b>	<b>2020 issuance plan</b>
Columbia Plywood Corporation, Forest Products	Klamath Falls	30		✓
TDY Industries, LLC, Teledyne Wah Chang	Albany	26.3	Low priority based on planning criteria	
City Of Klamath Falls Wastewater Treatment And Reclamation Facility (Spring Street)	Klamath Falls	24.3		✓
South Suburban Sanitary District	Klamath Falls	24.3		✓
Collins Products LLC	Klamath Falls	21.7		✓
International Paper Company, Springfield Paper Mill	Springfield	21.7	Low priority based on planning criteria	
Amalgamated Sugar Company LLC	Nyssa	20.9	Planned for termination in Q2 FFY 2019	✓
Arclin U.S.A. LLC	Springfield	20.3	Low priority based on planning criteria	

<b>Table 5. NPDES individual permits administratively continued 10 or more years</b>				
<b>Facility name</b>	<b>Location</b>	<b>Years admin. continued</b>	<b>Reason</b>	<b>2020 issuance plan</b>
Norpac Foods, Inc., Plant #1, Stayton	Stayton	19.8	Low priority based on planning criteria	
Westrock Northwest, LLC, Newberg Mill	Newberg	19.5	Low priority based on planning criteria	
Georgia-Pacific Chemicals LLC	Eugene	18.1	Low priority based on planning criteria	
Cascade Steel Rolling Mills, Inc.	McMinnville	17.5	Low priority based on planning criteria	
City of Dallas	Dallas	17.1	Low priority based on planning criteria	
City of Lebanon	Lebanon	14.9	Low priority based on planning criteria	
Oregon Department of Transportation	Salem	14.5	Municipal Stormwater, MS4 due for reissuance	
City of Monmouth	Monmouth	14.3	Low priority based on planning criteria	
Albany-Millersburg Water Reclamation Facility	Albany	14.1	Low priority based on planning criteria	
Lane Community College	Eugene	13.9	Low priority based on planning criteria	
Metropolitan Wastewater Management Commission, Eugene/Springfield	Eugene	12.9	Low priority based on planning criteria	
Flakeboard America Limited, Duraflake	Albany	12.97	Low priority based on planning criteria	
City of Dufur	Dufur	12.8	Low priority based on planning criteria	
City of Newport	Newport	12.6	Lack of resources and low priority based on planning criteria	
Klamath Irrigation District	Klamath Falls	12.4	General permit due to be issued in 2020	

<b>Table 5. NPDES individual permits administratively continued 10 or more years</b>				
<b>Facility name</b>	<b>Location</b>	<b>Years admin. continued</b>	<b>Reason</b>	<b>2020 issuance plan</b>
City of Dufur	Dufur	12.8	Low priority based on planning criteria	
City of Newport	Newport	12.6	Lack of resources and low priority based on planning criteria	
Klamath Irrigation District	Klamath Falls	12.4	General permit due to be issued in 2020	
Westland Irrigation District	Echo	12.3	General permit due to be issued in 2020	
West Extension Irrigation District	Umatilla	12.3	General permit due to be issued in 2020	
Stanfield Irrigation District	Stanfield	12.3	General permit due to be issued in 2020	
Hermiston Irrigation District	Hermiston	12.3	General permit due to be issued in 2020	
City of Rogue River	Rogue River	12.3	Lack of resources and low priority based on planning criteria	
North Unit Irrigation District	Madras	12.2	General permit due to be issued in 2020	
Owyhee Irrigation District	Nyssa	12.2	General permit due to be issued in 2020	
Vale Oregon Irrigation District	Vale	12.2	General permit due to be issued in 2020	
Owyhee Ditch Company	Ontario	12.2	General permit due to be issued in 2020	
Ochoco Irrigation District	Prineville	12.2	General permit due to be issued in 2020	
City of North Bend	North Bend	11.9		✓
Port of St. Helens	Clatskanie	11.9	Lack of resources and low priority based on planning criteria	✓

**Table 5. NPDES individual permits administratively continued 10 or more years**

Facility name	Location	Years admin. continued	Reason	2020 issuance plan
City of Lincoln City	Lincoln City	11.9		✓
City of Coos Bay, No. 2 - Empire	Coos Bay	11.9		✓
Salishan Sanitary District	Gleneden Beach	11.9	Lack of resources and low priority based on planning criteria	
Starlink Logistics Inc.	Portland	11.4	Low priority based on DEQ	
Hollingsworth & Vose Fiber Co.	Corvallis	11.3	Lack of resources and low priority based on planning criteria	
City of Myrtle Creek	Myrtle Creek	11.2	Low priority based on planning criteria	
City of La Grande	La Grande	11.1	Low priority based on planning criteria	
City of Baker City	Baker City	11.1	Lack of resources and low priority based on planning criteria	
City Of Harrisburg Lagoon Treatment Plant	Harrisburg	11.0	Lack of resources and low priority based on planning criteria	
Bourne Mining Corporation, E & E Mine	Bourne	11.0	2018 permit	
Arkema, Inc.	Portland	10	Lack of resources and low priority	
City of McMinnville, Water Reclamation Facility	McMinnville	10	based on planning criteria	
City of Ashland	Ashland	10	Lack of resources and low priority	
City of Coquille, City Of	Coquille	10	based on planning criteria	
Boise White Paper, LLC	St. Helens	10	Lack of resources and low priority	

<b>Table 5. NPDES individual permits administratively continued 10 or more years</b>				
<b>Facility name</b>	<b>Location</b>	<b>Years admin. continued</b>	<b>Reason</b>	<b>2020 issuance plan</b>
Jeld-Wen, Inc.	Klamath Falls	10		✓
Newberg, City Of, Wyooski Road	Newberg	10	Lack of resources and low priority	
Eugene Water & Electric Board, Carmen-Smith	Eugene	10	Lack of resources and low priority	
Frank Lumber Co., Inc.	Lyons	10	Lack of resources and low priority	
Idaho Power Company, Hells Canyon Power Plant	Hells Canyon	10	Lack of resources and low priority	
Idaho Power Company, Oxbow Power Plant	Oxbow	10	Lack of resources and low priority	
City of Portland, Tryon Creek	Lake Oswego	10	Lack of resources and low priority	
City of Elgin	Elgin	10	Lack of resources and low priority	
City of Reedsport	Reedsport	10	Lack of resources and low priority	
City of Salem, Salem Willow Lake	Keizer	10	Lack of resources and low priority	
City of Union	Union	10	Lack of resources and low priority	
Ray, Helen; Rice Hill Investments Corp.; Sweet Home Hospitality, LLC; Rice Hill East Lagoon, EK Onkar Corp.	Rice Hill	10	Lack of resources and low priority	
Winchester Bay Sanitary District	Winchester Bay	10	Lack of resources and low priority	
City of Drain	Drain	10		✓
City of Woodburn	Woodburn	10	Lack of resources and low priority	

Table 5. NPDES individual permits administratively continued 10 or more years				
Facility name	Location	Years admin. continued	Reason	2020 issuance plan
Covanta Marion, Inc.	Brooks	10	Lack of resources and low priority	
Oak Lodge Water Services District	Milwaukie	10	Lack of resources and low priority	

## 6. Summary of general NPDES permits administratively continued

Table 6. NPDES general permits administratively continued				
Facility name	Location	Years admin. continued	Reason	2020 issuance plan
100-J, Cooling water/heat pumps	State-wide	18	Staffing levels to complete general permits have been inadequate.	
200-J Filter backwash		17		
300-J Fish hatcheries		12		
400-J, Log ponds		12		
500-J, Boiler blowdown		17		
900-J Seafood processing		8		✓
1200-A Sand, gravel, other non-metallic		2		
1200-CA		14		
1300-J		15		
1500-A, Petroleum hydrocarbon clean-up (scheduled to be issued in FFY 2019, Q4: July 1 – September 30)		14		✓
1700-A, Vehicle and Equipment wash water		16		
1900-J, Non-contact geothermal heat exchange		17		
2200-J treated from floating residences (Young's Bay only).		4		
2300-A Pesticide general permit		3		✓

# 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.

<b>Delay Factor</b>	<b>Description/definition</b>
<b>Resource limitations</b>	<b>Delays related to internal DEQ resource limitations</b>
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.
<b>Competing priorities</b>	<b>Delays related to DEQ resources focused on other tasks</b>
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.

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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 <sup>3</sup>	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

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<sup>3</sup> Permit issuance plan should account for some new permit applications.

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

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Other competing priority (describe):

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**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.**

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Data analysis<sup>4</sup>

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.

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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.

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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.

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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.

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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.

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Need for state-wide consistency

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

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Other internal permit process limitation (describe):

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<sup>4</sup> 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).

<b>Permitting process – alternative development</b>	<b>Delays related to development of alternatives to address challenging effluent limits. Delays associated with internal or external review should be also be identified.</b>
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 alternative development (describe):	
<b>Permitting process – external factor</b>	<b>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.</b>
Applicant review <sup>5</sup>	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.

<sup>5</sup> 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 3 <sup>rd</sup> party.
Other permitting process external factor (describe):	
<b>Incomplete permit application</b>	<b>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.</b>
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):	
<b>Other limitations</b>	<b>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).</b>
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.

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Limited discharge	Permit holder has a minimal environmental impact due to no discharge or limited discharge to waters of the state.
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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.

**Alternative formats**

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 800-452-4011, ext. 5696; or email [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us).