



State of Oregon
Department of
Environmental
Quality



**Oregon Department of Environmental Quality
and U.S. EPA Region 10
Performance Partnership Agreement**

July 1, 2026, to June 30, 2028

Performance Partnership Agreement Between the Oregon Department of Environmental Quality and the U.S. Environmental Protection Agency – Region 10

We are pleased to sign the Performance Partnership Agreement between Oregon DEQ and the EPA.

DEQ and the EPA have a joint commitment to ensure the success of this PPA. Collaborative approaches to addressing environmental issues ensure efficient and focused use of resources and are essential to achieve environmental results. DEQ and the EPA’s partnership reflects an agreement to align and focus resources on priority work.

Working in partnership to achieve our environmental goals and making decisions regarding how best to employ our resources within the context of funding uncertainties, requires timely communication and collaboration. During this PPA the agencies’ leadership will meet periodically to check in on our progress, identify issues and enhance our partnership.

Date: _____

Date: _____

Signed: _____
Emma Pokon, Regional Administrator
U.S. EPA - Region 10

Signed: _____
Leah Feldon, Director
Oregon Department of Environmental Quality

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PERFORMANCE PARTNERSHIP AGREEMENT

PURPOSE AND SCOPE

This Performance Partnership Agreement describes how the Oregon Department of Environmental Quality, and the U.S. Environmental Protection Agency (EPA) Region 10 will work together to protect the environment and environmental public health in Oregon during the period from July 1, 2026, through June 30, 2028.

The PPA is an agreement documenting the commitments of the EPA and DEQ regarding implementation of federally delegated or authorized environmental programs and is part of a wider effort called the National Environmental Performance Partnership System, an agreement between the EPA and the Environmental Council of States. The goal of NEPPS, and of PPAs, is to promote flexibility, accountability, and innovation in state/federal agreements regarding implementation of federal environmental programs authorized or delegated to states for operation. PPAs provide enhance protection of the environment by focusing attention on overall environmental protection goals and the results of efforts to achieve these goals.

This PPA also serves as the work plan for the Performance Partnership Grant. A PPG allows for a number of grants to be combined into one flexible grant package. This reduces administrative burden and enhances efficiency by consolidating several grants into one and allows states the flexibility to direct resources to the highest environmental and public health priorities, while maintaining an agreed upon level of effort to support all programs addressed by the PPA. The PPA appendices contain program-specific work plans for Air Quality, Hazardous Waste, and Water Quality programs describing the joint priority work to be accomplished during the period of this agreement.

Grants from the following program authorities are included in this agreement and are combined in the PPG:

- Clean Air Act, Section 105
- Clean Water Act, Section 319 (partial grant)
- CWA, Section 106
- Resource Conservation and Recovery Act, Section 3011
- Safe Drinking Water Act – Underground Injection Control, Section 1443(b)(1)
- Multipurpose Grant, FY 2016 Consolidated Appropriations Act (Public Law 114-113), if available

STRATEGIC PRIORITIES

The EPA and DEQ staff members were guided in these PPA negotiations by their respective program guidance, strategic plans and priorities, and other agreements. DEQ's strategic priorities and the EPA's national goals share similar objectives that achieve the requirements of CAA, CWA, SDWA and RCRA. DEQ and the EPA will continue to improve collaboration and integration of strategic planning efforts that have shared objectives, including resources, to achieve the highest overall environmental health benefits for Oregon.

EPA's Strategic Priorities

The [EPA Strategic Plan](#) in development for Fiscal Year 2026-2030 is expected to clarify national goals, priorities, strategies, and expectations based on the five pillars of the EPA's Powering the Great American Comeback Initiative: (1) Clean air, land, and water for every American; (2) Restore American energy dominance; (3) Permitting reform, cooperative federalism, and cross-agency partnership; and (4) Make the U.S. the Artificial Intelligence capital of the world; and (5) Protecting and bringing back American auto jobs. This overarching framework for the new 2026-2030 Strategic Plan reflects the Agency's focus on environmental progress and economic growth with emphasis on the EPA's role of supporting states as the primary implementers of

environmental programs. This will be achieved by streamlining programs and processes, reducing duplication of effort, and enabling EPA to focus on its core mission work. The FY 2026-2030 EPA Strategic Plan will be posted at <https://www.epa.gov/planandbudget/strategicplan>.

Measuring Performance

EPA's senior managers will use EPA's 2026-2030 Strategic Plan to guide the Agency's path forward, tracking progress, and assessing and addressing risks and challenges that could potentially interfere with the EPA's ability to accomplish its goals.

The Plan also includes EPA's Agency Priority Goals, a component of the Administration's performance management framework which supports improvement in near-term outcomes related to the Strategic Plan. More information on the Agency's APGs is available at [Performance.gov](https://www.performance.gov).

Compliance and Enforcement

The mission of the EPA's enforcement program is to protect human health and the environment by ensuring compliance with federal environmental laws. The primary focus for the EPA's enforcement program is achieving and ensuring timely compliance. The EPA core enforcement work uses a variety of approaches and tools (inspections, investigations, compliance assistance) that may include taking civil and criminal enforcement actions to improve compliance with our nation's environmental laws in partnership with states and federally recognized Indian Tribes.

The EPA initiates civil enforcement actions to protect human health and the environment by taking legal action to bring polluters into compliance with the law. The EPA also investigates and assists in the criminal prosecution of deliberate or egregious violations of environmental laws or regulations and any associated violation of the U.S. criminal code.

The EPA civil enforcement actions may lead to settlement agreements, civil penalties, and/or injunctive relief. Criminal investigations may lead to penalties and/or incarceration.

The EPA ensures consistent implementation and oversight of federal environmental laws and policies across states and in Indian country in order to provide equal environmental benefits to the public and a level playing field for the regulated community. The EPA's oversight responsibility includes working to improve state performance by building upon existing practices and effective working relationships.

In addition to the EPA's core enforcement work, the EPA has six [National Enforcement and Compliance Initiatives](https://www.epa.gov/enforcement/national-enforcement-and-compliance-initiatives) (<https://www.epa.gov/enforcement/national-enforcement-and-compliance-initiatives>) for FY 2024-2027 that focus enforcement and compliance resources on the most serious environmental violations.

Oregon DEQ's Strategic Priorities

DEQ's mission is to be a leader in restoring, maintaining, and enhancing the quality of Oregon's air, land, and water. The agency's vision is to work collaboratively with all Oregonians for a healthy and sustainable environment. The EPA and DEQ partner in a collaborative and shared learning relationship to ensure alignment between the EPA's strategic goals and Oregon's state specific goals. Like the EPA, DEQ's priorities have a strong focus on environmental protection and public health.

DEQ's strategic goals guide the agency's actions to protect human health and the environment.

Key goals:

- Set and implement environmental standards that are protective of all Oregonians and the air, water, and land resources that we all depend on.
- Work with all partners to meet environmental standards in ways that are efficient, effective, and fair.
- Engage the public, including communities, in decision-making concerning Oregon's environment.
- Establish and maintain Oregon as a leader in reducing pollution and do this in ways that position Oregon's economy to benefit from a clean energy future.
- Develop and sustain an outcome-oriented workforce and culture that values and practices equal opportunity employment practices.
- Provide transparency to the public and regulated communities about environmental conditions in Oregon, and how Oregon DEQ makes decisions and carries out its responsibilities.

Improving Water Quality

Clean water is critical to Oregon's environment, community public health, Tribal nations' interests and to our economy. Protecting Oregon's rivers, lakes, streams, territorial sea, and groundwater quality keeps the state's waters safe for people, fish, and other uses. DEQ works with federal, state, tribal, local, and business partners on the overall water quality and ecosystem protection efforts. This includes both innovative and efficient grey and green wastewater infrastructure, and implementation of clean water plans. For example, PPG resources have supported DEQ, with the EPA, to meet obligations and deadlines to issue TMDLs including building out schedule and responsibilities to meet deadlines and critical milestones; efficient and effective use of CWSRF funding to address communities with critical needs and meeting ESA requirements.

Improving Air Quality

Meeting National Ambient Air Quality Standards and reducing exposure to toxic air pollution are key elements of DEQ's work to protect public health. DEQ works closely with communities where air quality health standards are not met, or in danger of not being met, to develop strategies, plans and programs to reduce emissions and ultimately bring those communities into attainment with federal standards. DEQ also works to reduce air toxics from specific sources such as vehicles, diesel engines, woodstoves, and industrial and commercial operations. DEQ also works to improve visibility in protected areas by developing and implementing strategies to reduce and prevent pollution from industrial, commercial, motor vehicle and household sources. Support from PPG resources have aided in statewide attainment; advancement of smoke management to both increase public safety and pace and scale of prescribed burning; and supports investments into alternatives to burning (Air Curtain Incinerator adoption and general permit update), among other outcomes.

Improving Land Quality and Managing Materials Responsibly

DEQ's land quality programs work to reduce waste, ensure the proper generation, handling, treatment, storage, and disposal of hazardous waste. In addition, DEQ programs respond to new releases, and require cleanup of historic pollution to ensure people are not exposed to unhealthy concentrations of hazardous substances in the air, water, or soil. This work also reduces runoff of harmful chemicals to our rivers and streams and protects against contamination of drinking water supplies. DEQ also works proactively with many partners to make our use of materials more sustainable. PPG resources have assisted in managing data transmission issues, permit modifications and renewals, and site-specific corrective actions, oversight, and cleanup progress.

Tribal Government Relations

Oregon DEQ partners with the nine federally recognized Tribes in Oregon on air quality, water quality and land quality issues, as well as Tribal nations in neighboring states that have interests in Oregon. DEQ works with sovereign Tribal governments to understand and address Tribal interests related to DEQ's environmental initiatives, policy and program development, and proposed legislation. DEQ partners with Tribal nations to increase our collective ability to protect and enhance Oregon's environment and public health.

DEQ works with federally recognized Tribal governments and communicates formally through in-person meetings, correspondence via letters and emails, as well as informally through phone conversations and coordination meetings. DEQ's internal Tribal relations activities are focused on improving consultation and communication between agency and Tribal leadership and staff, as well as providing training to DEQ employees on Tribal government, sovereignty, and issues of interest to Tribal nations.

DEQ adopted a Tribal Government-to-Government Relations Program in 1996 following Governor Kitzhaber's signing of Executive Order 96-30. In 2001, the Oregon Legislature approved Senate Bill 770, which codified the executive order.

DEQ implements the directives of SB 770 through our Tribal relations policy. The policy reflects DEQ's commitment to strong inter-governmental relations between the agency and Tribes. Measures include:

- Maintaining a Tribal Liaison function in the Director's Office
- Providing orientation, periodic training, and educational opportunities to staff on tribal sovereignty and related issues
- Institutionalizing the consideration of tribal interests and issues in planning and decision-making activities
- Encouraging day-to-day working relationships between agency staff and tribal environmental staff.
- Providing focused engagement with tribal nations on major policy initiatives.

DEQ's Tribal Liaison meets regularly with tribal nations and participates in tribal-state workgroups focused on natural resource management and protection of tribal cultural resources. DEQ's Tribal Liaison also facilitates leadership-level meetings between tribal and agency officials, provides tribal relations training to DEQ employees and other groups, and advises DEQ managers and staff on opportunities for strengthening relationships with tribal nations.

The EPA is an important participant in DEQ's coordination with Tribal governments. The U.S. government has a federal trust responsibility to federally recognized Tribes. The EPA directly implements the federal environmental laws the EPA administers in Indian country or Tribes may also seek delegated authority from the EPA to implement certain federal regulations in Indian Country, developing their own environmental laws and programs in some cases. In these circumstances, tribal nations and DEQ may co-manage resources in a collaborative fashion in carrying out their respective responsibilities for protecting and enhancing Oregon's environmental resources.

DEQ developed Cultural Resources Protection Guidance, a resource for agency staff and the regulated community, that describes federal and state cultural protection laws.

Compliance and Enforcement

DEQ enforces the law and holds violators accountable by taking enforcement actions that assess civil penalties and impose corrective actions. After identifying violations through records review, complaint response and compliance inspections DEQ determines the appropriate enforcement response according to its rules and

enforcement guidance directives. DEQ's enforcement directives balance agency resources and focus enforcement efforts on the most critical environmental compliance issues. Formal enforcement is essential to DEQ's regulatory mission because it deters future violations, promotes fairness, maintains a level playing field for those that do comply, and advances a healthier environmental outcome.

DEQ supplements some of its regulatory programs with clearly defined "technical assistance" and other non-enforcement educational efforts. These efforts help regulated entities – especially small businesses and communities – to better understand regulatory requirements, find cost-effective ways to comply, and improve environmental performance. These supplemental compliance assurance efforts are guided by statute, rule, and agency directive.

DEQ works with many other local, state, and federal agencies, including the Oregon Department of Justice's Environmental and Cultural Resources Enforcement Unit, the Oregon State Police and the EPA's Criminal Investigation Division to identify and present possible environmental crimes for prosecution at both the state and federal levels.

OVERVIEW OF THE EPA'S AND OREGON DEQ'S JOINT OBJECTIVES

DEQ and the EPA share the goals of clean air, clean land, clean water, healthy communities, and compliance with environmental laws. This PPA incorporates the EPA's national and regional objectives in ways that fit with Oregon's priorities and objectives. Each agency has unique responsibilities to achieve these objectives, with a common outcome of environmental and public health protection. For example, both agencies take a holistic approach to protecting water quality and quantity, preventing pollution, and reducing toxics, and engaging communities and partners in problem-solving strategies to help clean up communities and advance sustainable development. In the 2026-2028 PPA, both the EPA and DEQ will share an increased focus on core work and cooperative federalism in all agency work.

The EPA's Pillar 1 to *Ensure Clean Air, Water, and Land for Every American* is an overarching theme reflected in the work of both agencies. DEQ's focus on improving water quality, reducing pollution, managing materials responsibly, and integrating community engagement principles into agency operations provide the foundation to accomplish these goals through innovative and efficient practices with measurable outcomes that support concepts from the Government Performance and Results Act. The EPA's Pillar 3: Permitting reform, cooperative federalism, and cross-agency partnership are included in Oregon DEQ's commitments to ongoing collaboration with the EPA and illustrated in greater detail in both the programmatic workplan materials and Gold Standard Science appendix of this agreement.

In parallel to the EPA's Pillars for "Powering the Great American Comeback," DEQ's objectives include enhancing interactions and accountability with regulated entities, and the public, through a modernized electronic data management system, enforcing environmental laws and ensuring compliance, and supporting tribal government relations. Other examples of the agencies' strategic alignment include promoting permitting reform, and work across air, land, and water media for overall reductions of toxics in the environment.

Primary Responsibilities

The EPA and DEQ agree that the *EPA's primary responsibility* is to ensure compliance with, and enforcement of, federal or federally approved laws and regulations and to ensure that DEQ's administration enforcement operations are consistent with national enforcement policies. The EPA is also responsible for addressing environmental issues in Indian Country in accordance with Indian treaties, statutes, executive orders, and the unique legal relationship between the United States and Indian Tribes.

The EPA and DEQ agree that *DEQ's primary responsibility* is to administer delegated or authorized federal and state environmental laws on a day-to-day basis. DEQ is the primary agency conducting inspections and initiating enforcement to ensure effective compliance through consistent and predictable enforcement.

EPA and DEQ agree that each will follow their statutory and regulatory directives and federal and state policy and guidance to determine the appropriate enforcement response to violations. The EPA and DEQ will use their respective penalty regulations and policy in the assessment of civil penalties, including both gravity based and economic benefit portions of civil penalties.

Guiding Principles

The EPA and DEQ agree to follow these guiding principles when conducting civil and criminal enforcement activity in Oregon.

1. The EPA and DEQ agree to establish and maintain a cooperative regulatory approach that will ensure compliance with state and federal pollution control regulations and improve environmental quality in Oregon.
2. The EPA and DEQ agree to a collaborative planning process in order to avoid duplication and surprises. The EPA will collaborate with the state in setting national and regional initiatives and in planning for the appropriate roles and responsibilities necessary to implement these initiatives.
3. The EPA and DEQ agree to engage in a collaborative process and coordinate enforcement and compliance goals, priorities, and activities to maximize the effectiveness of resources. Individual programs may have unique enforcement policies that may be found under each program narrative or work plan.
4. The EPA and DEQ agree to coordinate when the EPA initiates an inspection or enforcement action when requested by DEQ or for other reasons. When the EPA initiates an inspection or enforcement action in federally delegated and state administered programs, the EPA will, to the extent practicable, inform DEQ and provide an opportunity for DEQ to participate.
5. The EPA and DEQ agree to communicate about potential disagreements at the earliest possible time and to resolve conflicts at the lowest appropriate organizational level. If a dispute cannot be resolved at the lowest level, it will be elevated to the next organizational level as soon as possible. If not resolved at that level, the dispute will be referred to each sequentially higher level until resolved. When program priorities differ, the parties will attempt to resolve the differences as soon as possible and ensure that all program objectives are met.
6. The EPA and DEQ agree to consider innovative approaches to compliance and enforcement and to look for pollution prevention opportunities when returning sources to compliance in order to further benefit the environment when resolving environmental issues.
7. The EPA and DEQ can improve performance through reciprocal capacity sharing in many areas where sharing expertise, knowledge and resources would enhance performance and benefit the environment.
8. The EPA and DEQ agree that the EPA will assess the adequacy and efficacy of the DEQ enforcement program by completing a State Review Framework report. The current SRF Review (Round 5) should conclude in 2026. The EPA and DEQ will work to implement recommendations for improvement identified in a timely manner. The most recent SRF report was finalized and delivered to DEQ on April 1, 2020. DEQ has implemented EPA's recommendations for improvements in a timely manner. Program effectiveness will be determined by application of mutually agreed-upon program assessment principles.

The attached Air Quality, Hazardous Waste, and Water Quality work plans describe how Oregon DEQ and EPA will collectively work together on specific activities to help achieve the environmental goals outlined in this agreement. The workplans in these appendices will serve as the Performance Partnership Grant (PPG) workplan. Over the next 24 months, DEQ and the EPA will continue to strengthen inter-agency relationships and align and leverage our resources to meet environmental outcomes.

PERFORMANCE EVALUATION

DEQ and the EPA have developed agreements regarding the process for conducting joint evaluation of performance. The specific process is included in the attached work plans for each program. The purpose of the joint evaluation process is to discuss:

- Work plan accomplishments
- Effectiveness of work performed
- Existing and potential problem areas
- Suggestions for improvement

For Performance Partnership Grant annual progress reports, the tables in Appendices A - C will distinguish between time-bound actions and ongoing actions, use narrative updates only where needed, and use a simple status indicator for ongoing work. Tables for the PPG workplan updates will include a “Timeframe” column to clearly distinguish between actions with a specific completion date and ongoing actions for specific objectives. Actions with specific dates will be listed first to streamline review of detailed updates and the color-coded system described below will be used for ongoing activities.

An “Update” column will be used for ongoing reporting. For each program objective or workplan element, a brief narrative response will be provided, including exceptions to progress, milestones achieved or notable developments. For actions with specific completion dates, updates will generally be brief and focused on progress made, any delay or issue, and next steps. Use of the simplified status and color for ongoing actions will be used according to the criteria below:

- Green = On track
- Yellow = Issue being managed / at risk
- Red = Significant barrier / off track

If there has been a material change, issue, or notable development for ongoing actions, narrative may be added. Media division meetings between agencies will address progress report frequency (at least annual reporting is required), level of narrative detail expected, and acceptable use of “no material change” for some actions, as well as whether certain ongoing items should also include interim milestones or checkpoints.

This streamlined reporting approach complies with 2 CFR §200.329 and programmatic terms and conditions of the PPG award. The EPA and DEQ programs will assess the new approach to annual reporting during programmatic PPA meeting(s) in 2028.

MODIFYING THE AGREEMENT

The PPA is intended to be a “living” document. Although DEQ and the EPA developed this agreement based upon current and projected information, it is possible that either partner may want to revise the agreement based upon new information or changes that occur during the timeframe of the agreement.

Economic conditions have an impact on DEQ and the EPA’s operating budgets. Potential changes in state or federal funding in air, hazardous waste or water programs is one reason modifications to the commitments outlined in this PPA might be required. An example of the implications of potential federal water quality budget reductions to PPA commitments is detailed in the Water Quality Program section of Appendix C. In the event of any major budget reductions that affect the ability to meet outlined commitments in this PPA, The EPA and DEQ will work closely to re-negotiate work plans to meet commitments with the available funding. Additionally, re-

negotiation of PPA commitments may be required to address changes in environmental conditions or priorities. DEQ and the EPA expect that, in most instances, negotiating changes will be a fluid process that both agencies can readily agree to, or that changes will be interpreted to be within the scope of the existing agreement. These modifications can be captured through written or verbal side agreements. When major changes are needed, the PPA can be re-opened and re-negotiated under the direction of the DEQ Director and the EPA Regional Administrator.

When either agency believes that changes are needed, the agencies will need to reach agreement on the following:

- The level of resources necessary to do the work,
- Any specific disinvestments from existing work that will be required to accomplish this new work, and
- The roles and responsibilities of each agency to support identified projects.

APPENDIX A: AIR QUALITY PROGRAM

The goal of DEQ's Air Quality Program, in support of the EPA strategic goals, is to ensure Oregon's air is healthy to breathe, to protect important resources such as visibility and ecosystems, and to manage air pollution that is threatening public health. DEQ uses several measures to determine whether these goals are being met.

Pillar 1 of the EPA's strategy is to provide clean air, land, and water for all Americans. In support of this goal, DEQ's Air Quality Division is prioritizing actions to manage and reduce pollution impacts in Oregon communities. DEQ advances this work through targeted reductions of criteria pollutants and ongoing collaboration with the EPA, including quarterly meetings to inform and strengthen population-based approaches to improve air quality.

DEQ has implemented a suite of programs to reduce air pollution in Oregon. To address air pollution from the transportation sector, DEQ administers Oregon's Clean Fuels Program. In 2022, the Environmental Quality Commission adopted rules to expand the program and extend it for an additional 10 years. DEQ also administers other supporting air quality programs to reduce air pollution, including the Employee Commute Options program that requires large employers in the Portland metropolitan area to reduce commute-related trips as well as a vehicle inspection program in the Portland Metro area. DEQ's ability to manage ozone concentrations is heavily reliant on continued improvements in vehicle's tailpipe emissions.

Reducing Criteria pollutants remains a priority for DEQ. From the late 1990s through early 2000s, all Oregonians lived in areas meeting the National Ambient Air Quality Standards for criteria pollutants, representing a significant improvement from the routine violations experienced in the 1980s and early 1990s.

In 2006, based on updated health information, the EPA strengthened the daily standard for fine particulate matter, resulting in two Oregon communities – Klamath Falls and Oakridge – being designated as nonattainment. In January of 2022, DEQ submitted a request to the EPA to redesignate the Oakridge area to attainment, along with the associated maintenance plan for both the 2006 PM_{2.5} NAAQS and the 1987 PM₁₀ NAAQS. In August 2022, The EPA redesignated the Oakridge area to attainment for the 2006 PM_{2.5} NAAQS and the 1987 PM₁₀ NAAQS. The Maintenance Plans for Oakridge PM_{2.5} and PM₁₀ project continued maintenance of the applicable standard through 2035.

Since the last PPA period DEQ has continued working on Klamath Falls to implement PM_{2.5} reduction strategies described in the PM_{2.5} attainment plan. Klamath Falls is meeting the PM_{2.5} standard. DEQ submitted a redesignation request and associated maintenance plan in August of 2024.

Overall, DEQ considers the number of nonattainment area designations avoided through early intervention and pollution prevention to be a very important goal and measure.

The Portland-metropolitan area continues to take proactive steps to ensure compliance with the daily PM_{2.5} standard. Washington and Multnomah Counties have both adopted and are implementing residential wood burning curtailment ordinances. Washington County continues to implement a wood stove exchange program. DEQ will continue exploring programs to further reduce precursor emissions.

Additionally, DEQ administers a comprehensive permitting and inspection program for stationary sources to ensure ambient air quality remains below the NAAQS.

Progress is tracked using DEQ Key Performance Measures 9a and 9b, measuring the number of days when air is unhealthy for sensitive groups and for all groups.

While all areas of Oregon meet federal air quality standards, many communities still experience individual days when air quality is unhealthy. DEQ assesses air quality through a key performance measure that counts the number of days when the air in Oregon communities exceeds federal standards. The measure has two parts: (a) tracks the number of days when air quality is unhealthy for sensitive groups, asthmatics, children, and the elderly; and (b) tracks the number of days when air quality is unhealthy for everyone.

DEQ's goal is to eliminate all unhealthy air days in all communities. Progress toward this goal is reflected in recent trends. The number of days when air was unhealthy for sensitive groups based on the criteria pollutants decreased from 137 days in 2021 (135 attributed to wildfires) to 83 days in 2022 (62 attributed to wildfires) to 81 days in 2024 (56 attributed to wildfires) to 23 days in 2025 (12 attributed to wildfire). This is based on data from 30 cities or airsheds across the state. Similarly, the number of days when air quality was unhealthy for all groups or worse decreased from 159 days in 2021 (157 attributed to wildfires) to 68 days in 2022 (66 attributed to wildfires) to 52 days in 2024 (50 attributed to wildfire) to 4 days in 2025 (all attributed to wildfire).

High levels of fine particulate matter during winter months and wildfire smoke during the summer remain the primary factors contributing to days of unhealthy air. Wildfire continues to affect communities across Oregon, leading to unusually high concentrations of fine particulate matter. DEQ's most recent annual air quality data report is also available on our [website](#).

Air Toxics Trends in Larger and Smaller Communities (DEQ Key Performance Measures 10a and 10b)

DEQ tracks trends in select common air toxics in both large and small representative communities – Portland and LaGrande – through a key performance measure. Monitoring reflects regional and metropolitan-scale influences from a broad range of emission sources affecting communities. Using current peer-reviewed toxicological research, DEQ has established ambient air toxics goals, also referred to as ambient benchmark concentrations, which represent long-term goals for acceptable ambient air levels.

DEQ's key performance measure focuses on reducing monitored levels of five representative air toxics, including benzene, acetaldehyde, formaldehyde, arsenic, and cadmium, to no more than one measurement above the ambient benchmark concentration per pollutant per year. A three-year rolling average is used to track long-term air pollution trends.

Oregon's regional-scale air toxics concentrations are trending lower, largely due to the introduction and maintenance of cleaner motor vehicles. More work is needed to measure and reduce all types of air toxics. During the 2017 Legislative Session, DEQ received a \$2.5 million appropriation to establish and operate six air toxics monitoring sites measuring the full NATTS suite. DEQ has since established eight air toxics trends sites and two rotating sites statewide. Subsequent budget shortfalls have necessitated reducing this to a total of five air toxics trends sites, including the two federally funded NATTS sites.

In addition to expanded air toxics monitoring resources, the 2017 Legislature authorized resources for DEQ to expand the state's network of particulate monitors. DEQ used low-cost sensor technology to develop its own trademarked SensOR™ box, which were deployed at 30 sites statewide. DEQ continues to co-locate SensORs with Federal Reference Method (FRM) samplers and Federal Equivalence Method (FEM) analyzers to establish correlations and document the accuracy of the SensOR modules. The 2021 Legislature also approved resources for an additional 20 SensOR locations, but staffing and funding shortages prevented that deployment from occurring; DEQ has planned locations when the legislature provides additional resources (i.e., FTE) to enable that deployment. This expanded monitoring will allow for a more comprehensive and real-time understanding of particulate trends across the state.

AIR QUALITY PROGRAM JOINT PRIORITIES

DEQ and the EPA work together to develop the Performance Partnership Agreement Air Quality Program Work Plan. The objective is to devise a plan that targets Oregon's most important air quality issues with available resources. Through this partnership agreement, both agencies commit to support each other's efforts through coordinated planning and technical assistance. This includes the EPA exploring support for air quality modeling tools to evaluate ozone attainment strategies, ongoing coordination on the development of updated woodstove emission standards and testing requirements, and training support for DEQ air permitting staff, including grant management training. The Air Division at DEQ embodies the EPA's strategic goal to ensure clean air, water, and land for every American.

Priority 1: Meeting National Ambient Air Quality Standards

The EPA and DEQ recognize the importance of consistent and open communication and sharing information of mutual interest during the development of a SIP. DEQ and the EPA established the SIP Lean MOA outlining key expectations for communication, SIP planning and coordination, and expectations regarding the SIP lean process, particularly technical exchange of information early in the process. Both agencies check in frequently. The EPA will work with DEQ to identify priorities in managing the work with available resources.

Fine particulate, PM_{2.5}:

Some Oregon Communities still violate or are at risk of violating the daily fine particulate matter standard. In February 2024, The EPA finalized tightening the annual PM_{2.5} standards which, if not revisited¹, will result in a new round of PM_{2.5} designations and SIP requirements. Wildfire exceptional events workload has increased in the lead up to the designations process.

Klamath Falls is currently designated as a fine particulate nonattainment area. DEQ worked with the EPA and the local community to develop an attainment plan, which was adopted by the Environmental Quality Commission and submitted to the EPA for approval in late 2012 and was approved by the EPA in 2016. Through implementation of control measures, Klamath Falls has reduced PM_{2.5} levels and attained compliance with the NAAQS. DEQ submitted a re-designation request in August 2024.

In 2021, the EPA awarded a \$1.8 million Targeted Airshed Grant (TAG) to DEQ in partnership with Klamath County Public Health and community partners. In 2023, the EPA awarded an additional \$4.6 million in Targeted Airshed Grant funds to DEQ and Klamath County. Both grants support ongoing efforts to improve air quality and protect community health in Klamath Falls. DEQ concluded its work on TAG 1 in November of 2024, changing out 131 woodstoves to cleaner home heating devices. DEQ continues to support Klamath County Public Health in implementing the second TAG to change-out residential woodstove, support home weatherization, and provide funding to offset the costs of electricity use for homes that convert to heat pumps.

DEQ continues to be a partner agency in the implementation of Oregon's Smoke Management plan and participates in the wildfire response committee and prescribed fire team along with the Oregon Department of Forestry and Oregon Health Authority (OHA). In November 2023, DEQ, EPA Region 10, and partner agencies at the Federal, State, and local level, met in Bend, Oregon to discuss ways to increase the pace and scale of prescribed fire while protecting public health from smoke impacts. The agencies agreed to pilot the proposed changes to smoke management planning during a surge burn in Bend in early 2024. That pilot was repeated in 2025. Both pilots resulted in increases in pace and scale of understory burning near Bend while also increasing outreach to communities about smoke impacts and coordination on burn planning between the National Forest, State agencies (including DEQ), and local public health officials.

In 2024, EPA Region 10 and United State Forest Service, along with State representatives from Washington and Oregon, issued a Joint Statement of Intent to Cooperate on Prescribed Fire and Smoke Management, that

builds on the conversations and collaboration occurring in Bend. The group formed the Northwest Prescribed Fire and Smoke Management Leadership Taskforce to find systematic solutions to both increase the pace and scale of prescribed burning while minimizing the impacts on public health. From these efforts, DEQ expects some changes to the smoke management plan based on the results of the pilot burn and will continue to support regional leadership on prescribed fire and smoke management.

Woodstove smoke remains a major source of fine particulate matter and air toxics in Oregon and continues to pose a challenge for maintaining compliance with the PM_{2.5} NAAQS. To address this, DEQ plans to update Oregon's Heat Smart program to increase effectiveness and streamline implementation. DEQ also plans to evaluate the current woodstove emissions performance and work with partner states on approaches to reduce emissions. The success of this program relies on a robust and reliable certification program for woodstoves.

DEQ's nonattainment planning, PM_{2.5} and air toxics prevention work focuses on the reduction of woodstove smoke in at-risk communities. These include Washington County (Hillsboro), Multnomah County, Prineville, Burns, Medford, Oakridge, Klamath Falls, and Lakeview. This work reflects partnerships between DEQ and the local communities to fund and implement public education and outreach programs, episodic curtailment during air stagnation events, and woodstove replacement grants as funding becomes available. When funding is available, DEQ also provides annual grants to communities with a history of high concentrations of PM_{2.5} to fund local prevention efforts.

Other NAAQS

Carbon Monoxide (CO) and PM₁₀: All areas of Oregon follow the federal PM₁₀ and carbon monoxide National Ambient Air Quality Standards. Oregon is in attainment status for all areas. Both CO monitoring sites measure CO concentrations under 1 ppm. Five of the seven PM₁₀ maintenance areas in Oregon will reach the end of their 20-year maintenance periods in summer 2026 (La Grande, Medford, Klamath Falls, Lakeview, and Grants Pass). ODEQ continues to track PM₁₀ levels in these communities either via direct measurements or via correlation with PM_{2.5}. Any monitoring requirements in the maintenance plan continues to apply unless the state submits a SIP revision. ODEQ is preparing a consolidated SIP revision for these areas to remove the PM₁₀ monitoring requirement and provide greater flexibility for design of their air monitoring network.

Ozone (O₃): All communities in Oregon meet the NAAQS standard for ground-level ozone. Preliminary data shows that the Portland-Metro area is under the Ozone NAAQS-for calendar years 2022-2024. Other monitored areas within Oregon show increasing or stable ozone trends. During the 2026-2028 PPA period, DEQ will continue to work with interested parties to explore control options to proactively reduce ozone and ozone precursors.

Lead (Pb): All areas of Oregon are currently designated as unclassifiable or in compliance for the lead standard. DEQ discontinued lead monitoring after years of lead concentrations measured below the applicable standard.

Nitrogen dioxide (NO₂): All areas of Oregon are designated as in attainment or unclassifiable for NO₂. DEQ requires 1-hour NO₂ modeling for major permit modifications and new major sources. DEQ has added an additional near-road monitoring site in the Portland-Vancouver metro area in NE Portland next to I-5 as of November 2025 that is required to monitor NO₂ as part of the EPA's required near-road monitoring program.

Sulfur dioxide (SO₂): DEQ maintains one SO₂ monitoring location at Oregon's N CORE site to measure ambient concentrations below 1 ppb. All areas of Oregon are in compliance with the federal SO₂ NAAQS. The EPA updated the secondary SO₂ standard on December 10, 2024.

Priority 2: Air Toxics

DEQ's stationary source air toxics program, Cleaner Air Oregon, continues to assess risk from air toxics emissions for both minor and major permitted sources in the state. These risk assessments inform permit conditions that ensure facilities meet or exceed Oregon's health-based air toxics standards. The program requires source testing to collect representative, site-specific air toxics emissions data as part of the risk assessment process. Although source testing for air toxics is time and resource intensive, it provides high quality data that can be shared with the public. All permitted sources are required to submit a periodic, statewide air toxics emissions inventory. This has expanded the emissions information DEQ provides to the EPA for the National Emissions Inventory.

In November of 2021, the Environmental Quality Commission (EQC) adopted rules that integrated and updated DEQ's air toxics programs, including Cleaner Air Oregon and the Oregon Air Toxics Program. These updated rules integrate toxic air contaminant standards and strengthen the process for updating those standards based on new science and research. Notably, the rules expanded the role of DEQ's Air Toxics Science Advisory Committee to advise DEQ and OHA during periodic standard updates. The next update is currently under way and is expected to be completed within the 2026-2028 PPA period.

The November 2021 rulemaking also revised Cleaner Air Oregon program rules in Division 245. These changes reflect lessons learned, streamline the program, and improve implementation while strengthening the protectiveness of health risk assessments.

Currently the Cleaner Air Oregon program is in the process of updating the standards as part of the Toxic Air Contaminant Review and Update Rulemaking. As part of this process, DEQ and OHA reviewed the most recent information from authoritative sources and convened an Air Toxics Science Advisory Committee to review proposed updates. DEQ began the formal rulemaking process in January 2026 by initiating the Rules and Fiscal Advisory Committee meetings and is anticipating presenting the proposed rules to the EQC in late 2027 for adoption.

DEQ uses a multi-pollutant approach to achieve air toxics co-benefits in an effort to reduce emissions of fine particulate and ozone precursors. DEQ continues to implement NESHAP requirements to achieve air toxics reductions from point sources, including a comprehensive approach for the industrial permitting program. DEQ incorporates major source NESHAPs into Title V permits and has implemented numerous area source NESHAPs through the Air Contaminant Discharge Permit program. In addition, DEQ continues to lead and support projects to retrofit and replace older, high-emitting diesel engines using the EPA grant funding and Volkswagen settlement funds.

Priority 3: Visibility

Oregon's regional haze plan was adopted by the Environmental Quality Commission in June 2009, and the agency submitted a five-year progress report in 2017. EQC adopted our Round 2 plan in 2022. DEQ provided a supplement to the plan in 2023. During this PPA period, The EPA approved the Round 2 Regional Haze Plan on October 8, 2024, and the EPA acknowledged DEQ's completion of the five-year progress report obligation on April 14, 2025. DEQ continues to explore options for future visibility improvements while the EPA considers changes to the Federal Regional Haze program. Many of the remaining sources of visibility impairment are federally regulated sources and continued progress is dependent on future partnership.

Priority 4: Enforcement

DEQ and the EPA will work collaboratively to ensure an effective partnership in enforcement and compliance assurance work. The EPA's overall national enforcement goals focus on civil and criminal enforcement for violations that threaten communities and the environment, greater compliance, and protection through use of

advanced monitoring and information technologies; and strong EPA/State/Tribal partnerships for working together toward shared environmental goals. DEQ and the EPA will continue to collaborate on inspection targeting and enforcement actions. DEQ will prioritize identification of High Priority Violations and timely enforcement responses.

Priority 5: Permitting

EPA Region 10 and the DEQ will jointly prioritize strengthening the air permitting program through regular coordination and collaboration, training, and timely actions. DEQ will administer PSD, Nonattainment NSR, minor, and Title V permitting programs; address its Title V permit backlog; share major NSR and Title V applications, drafts, and final permits with the EPA on required timelines; and will keep programs current by adopting and implementing Title V, PSD, and other federal permitting program updates in a timely manner, while the EPA will act on these program updates in a timely manner.

Both agencies will emphasize technically sound and consistent air quality analyses by using the EPA-approved models and methods in accordance with 40 CFR Part 51, Appendix W for commercial and industrial source permits; DEQ will seek approval for alternatives as needed and coordinate with the EPA on modeling protocols and applicability decisions. The EPA will review requests for approval of alternative models or methods in a timely manner.

EPA Region 10 will, as resources and schedules allow, participate in the Permit Writers Workgroup meetings and co-host permitting workshops in Region 10 focused on implementation of the NSR and Title V programs and associated modeling issues, and will work with other approved state and local permitting programs to promote training, discussion, and information sharing so permit writers understand program requirements and can use available tools. DEQ will participate with the EPA in permit writer workgroups, trainings and discussion for shared learning with Region 10 air agencies. DEQ will submit major point source emissions data to NEI annually.

Evaluation Process

To ensure that the EPA and DEQ maintain open communications during this PPA, the two agencies agree to meet annually, and check-in as needed. In addition, grant update reports will be submitted annually and will be used to determine if a virtual or in-person check-in meeting should be scheduled. At a minimum the update should include the following information:

- A discussion of accomplishments as measured against the work plan commitments.
- A discussion of the cumulative effectiveness of the work performed.
- A discussion of existing and potential problem areas,
- Suggestions for improvement including schedules if possible.

If the joint evaluation process reveals that sufficient progress under the work plan is not being made, the EPA and DEQ agree to negotiate a resolution that addresses the issue.

2024-2026 PPG: Oregon DEQ Air Quality Program Work Plan

Objective 1: Limit public exposure to criteria pollutants by consistently meeting and exceeding NAAQS standards throughout the state.

Outcome Measures:

- Monitoring demonstrates continuous improvement in air quality as measured by a decline in the number of days when air quality is considered unhealthy for sensitive groups or unhealthy for all groups, as recorded by the Air Quality Index.
- All communities within DEQ’s jurisdiction have been redesignated from nonattainment to attainment with a National Ambient Air Quality Standard.
- DEQ will continue to implement proactive actions needed to avoid nonattainment for communities at risk of violating NAAQS standards.

Core Work	Manager	Criteria
Designations for revised NAAQS	DEQ: Michael Orman EPA: Gina Bonifacino	If the EPA finalizes revisions to any NAAQS, DEQ will develop and submit designation recommendations to the EPA and develop and submit SIPs to fill any related planning requirements such as infrastructure SIP requirements.
Wood Smoke	DEQ: Michael Orman EPA: Gina Bonifacino, John Chi	DEQ continues to support Prineville, Klamath County, Lakeview, Burns, Jackson County, and Josephine County in the implementation of their community-based wood smoke reduction programs.
Smoke Management	DEQ: Michael Orman EPA: Gina Bonifacino, Erin McTigue	DEQ will participate in the PNW Taskforce meetings to collaborate on ways to increase the pace and scale of prescribed burning while also minimizing the impact to public health.
Smoke Management	DEQ: Michael Orman EPA: Gina Bonifacino, Erin McTigue	DEQ will work with ODF and OHA, to update the Oregon Smoke Management plan, incorporating lessons learned from the 2024 and 2025 West Bend pilot burns and coordinate with the EPA for technical support
Smoke Management	DEQ: Michael Orman EPA: Gina Bonifacino, Erin McTigue,	DEQ will work with Oregon Department of Forestry, local elected officials, US Forest Service, the EPA, and others on smoke management program policy, implementation, and communications. DEQ will periodically meet with USFS and ODF to review burn objectives and smoke intrusions.
Wildfire	DEQ: Michael Orman EPA: Gina Bonifacino, Erin McTigue	DEQ will participate in the annual multi-agency team dedicated to air quality wildfire response. This includes DEQ, Oregon Health Division, US Forest Service, Oregon Dept. of Forestry, local county health agencies and others.
State Implementation Plan	DEQ: Michael Orman EPA: Gina Bonifacino	DEQ will continue to implement all strategies contained in the PM _{2.5} , PM ₁₀ , carbon monoxide and ozone maintenance area plans. DEQ will engage with community leaders as needed to discuss the latest information on PM _{2.5} compliance levels, smoke management, or other air issues.
State Implementation Plan	DEQ: Michael Orman EPA: Gina Bonifacino, Claudia Vaupel	DEQ and the EPA will communicate monthly to discuss the status and prioritization of submitted plans and the projected schedule for future submittals.

State Implementation Plan	DEQ: Michael Orman EPA: Gina Bonifacino	DEQ will develop draft SIP Development schedules for each priority SIP submittal approximately six months before the EPA review is needed. The purpose is to facilitate communication between DEQ and the EPA on key milestone dates and to identify potential issues.
State Implementation Plan	DEQ: Michael Orman EPA: Gina Bonifacino, Claudia Vaupel	DEQ will continue to coordinate and collaborate during the development of priority SIPs under the CAA per the joint EPA, DEQ and LRAPA MOA.
State Implementation Plan	DEQ: Wade Sadler EPA: Gina Bonifacino, Tess Bloom	DEQ will continue to evaluate necessary rule changes for vehicle inspection that are part of the Portland and Medford ozone maintenance plan.
Transportation	DEQ: Michael Orman/Rachel Sakata EPA: Gina Bonifacino, Tess Bloom	DEQ will provide on-going assistance to local, state, and federal agencies on transportation design and development issues, travel modeling consultation, mobile emission estimates and conformity regulations/analysis.
Metrics and Data	DEQ: Jeffrey Stocum EPA: Karl Pepple, Geoffrey Glass	DEQ will work to review the released versions of the 2023 National Emissions Inventory in partnership with the EPA and adjust data as needed. The data is used to plan air quality protection measures.
Metrics and Data	DEQ: Jeffrey Stocum EPA: Karl Pepple, Geoffrey Glass	DEQ will report to the EPA criteria pollutant emissions for Oregon's point sources by December 31, 2026, and 2027. DEQ will track the EPA's AERR revisions and plan future advancements accordingly
Metrics and Data	DEQ: Jeffrey Stocum EPA: Karl Pepple, Geoffrey Glass	DEQ will continue to fulfill Air Emissions Reporting Rule requirements for the 2026 NEI, including submitting nonpoint tools categories data, point source data, and reviewing and submitting on-road/non-road MOVES input data files.
Monitoring	DEQ: Matt Shrensel, Anthony Barnack EPA: Debra Suzuki, Sarah Waldo, Joey Richardson	DEQ will operate and maintain the monitoring network plan according to 40 CFR Part 58 requirements and the EPA approved quality assurance plans. DEQ will follow requirements set out in 40 CFR Part 58 for network modification and documentation. DEQ will propose any modifications to State or Local Air Monitoring Stations (SLAMS) for regional approval in their annual network plan or other written communication. DEQ will ensure the documentation of all SLAMS and Special Purpose Monitoring (SPM) sites in the ANP is accurate and up to date.
Monitoring	DEQ: Matt Shrensel, Michael Orman EPA: Debra Suzuki, Sarah Waldo, Joey Richardson	DEQ and the EPA will meet semi-annually to discuss monitoring issues that have planning implications for population-based decisions, enhanced communication, and overall understanding of Oregon's monitoring network.

Monitoring	DEQ: Matt Shrensel EPA: Debra Suzuki, Sarah Waldo, Joey Richardson	DEQ will participate in national and regional monitoring quality assurance activities including NPAP for the gaseous criteria pollutants and PEP for PM _{2.5} .
Monitoring	DEQ: Matt Shrensel EPA: Debra Suzuki, Sarah Waldo, Joey Richardson	DEQ will maintain Quality Assurance Project Plans (QAPPs) and Standard Operating Procedures (SOPs) for each pollutant it monitors for reporting to the EPA. Specifically, QAPPs must be reviewed annually and updated every 5 years. SOPs must be reviewed and updated every three years.
Monitoring	DEQ: Matt Shrensel EPA: Debra Suzuki, Sarah Waldo, Joey Richardson	DEQ will submit real-time FEM PM _{2.5} data, nephelometer data converted to PM _{2.5} estimates and ozone values to AIRNow for all FEM and nephelometer PM _{2.5} sites and all ozone sites. Hourly average data is submitted to AIRNow every hour.
Monitoring	DEQ: Matt Shrensel EPA: Debra Suzuki, Sarah Waldo, Joey Richardson	DEQ will continue to report criteria pollutant ambient air quality data to EPA's Air Quality data system quarterly, submitted within 90 days of the end of the quarter, as required by 40 CFR Part 58. DEQ will certify the annual SLAMS monitoring data by May 1, each year. DEQ will ensure that the metadata for each site and monitor in AQS is up-to-date and meets the requirements of the EPA regulations, guidelines, and policy memos. DEQ will ensure that AQS metadata is consistent with information provided in the DEQ annual monitoring network plan.
Monitoring	DEQ: Matt Shrensel EPA: Debra Suzuki, Sarah Waldo, Joey Richardson	DEQ will continue to evaluate requirements for source-oriented lead monitoring for point-sources emitting >0.5 tons of Pb per year (tpy) and document in the Annual Monitoring Network Plan. DEQ will work with Cleaner Air Oregon to clarify emissions inventory and permitting information for sources close to 0.5 tpy.
VIP	DEQ: Wade Sadler EPA: Gina Bonifacino, Tess Bloom	DEQ will evaluate necessary rule changes for vehicle inspection.
Biannual Core Work Updates	DEQ: Matt Shrensel EPA: Debra Suzuki, Sarah Waldo, Joey Richardson	DEQ will monitor for gaseous criteria pollutants at the NCORE and PAMS site in SE Portland, and the two near-roadway NO ₂ sites: one in Tualatin, and the new Commercial and Russel site established in late 2025.
<p>Objective 3: Protect human health and the environment through ongoing Air Quality improvement strategies.</p> <p>Outcome Measures:</p> <ul style="list-style-type: none"> Monitoring demonstrates continuous improvement in air quality as measured by a decline in the number of days when air quality is considered unhealthy for sensitive groups or unhealthy for all groups, as recorded by the Air Quality Index. The National Emissions Inventory results will show a decrease in emissions over time. 		

Core Work	Manager	Criteria
NESHAP	DEQ: Tim Wollerman EPA: Karl Pepple, Geoffrey Glass	DEQ will periodically submit a National Emission Standards for Hazardous Air Pollutant delegation request to the EPA every two years. The request will generally be for all NESHAPs adopted by the EPA and in the CFR published by July 1 of the previous year.
NESHAP	DEQ: Tim Wollerman EPA: Karl Pepple, Geoffrey Glass	DEQ will continue to implement the area source NESHAPs program by issuing permits or registrations, performing periodic inspections, and performing outreach and technical assistance to help area sources comply with regulations.
ACDP Permitting & New Source Review	DEQ: Tim Wollerman EPA: Karl Pepple, Geoffrey Glass	DEQ will issue permits that contain limits to address source-specific air quality impacts of NAAQS pollutants.
ACDP Permitting & New Source Review	DEQ: Tim Wollerman, JR Giska EPA: Karl Pepple, Geoffrey Glass	DEQ continues to implement New Source Review by issuing permits that address minor NSR, minor modifications, Cleaner Air Oregon, and major NSR.
ACDP Permitting & New Source Review	DEQ: Tim Wollerman EPA: Karl Pepple, Geoffrey Glass	DEQ will implement the major NSR air permitting programs as specified in the SIP and state regulations.
ACDP Permitting & New Source Review	DEQ: Tim Wollerman EPA: Karl Pepple, Geoffrey Glass	DEQ will continue to submit major New Source Review/Prevention of Significant Deterioration information to the EPA upon receipt/completion including: applicability determinations, applications, application completeness/incompleteness letters, updated application information, draft permits (including technical analyses) and final permits (including responses to comments).
ACDP Permitting & New Source Review	DEQ: Tim Wollerman EPA: Karl Pepple, Geoffrey Glass	DEQ will send to the EPA (via email to Karl Pepple) a quarterly update on the status of all known/expected PSD permit actions. DEQ will post all final permits to the web within 10 days after issuance.
ACDP Permitting & New Source Review	DEQ: Tim Wollerman, Jeffrey Stocum EPA: Karl Pepple, Jay McAlpine	DEQ will communicate with the EPA on modeling at the initiation of any major NSR permit project. DEQ will submit modeling protocols for major source projects to EPA within 7 days of receipt. DEQ will use the EPA approved models and methodologies, in accordance with 40 CFR Part 51 Appendix W, for air quality analysis for commercial and industrial source permits or seek the EPA approval of alternative models or methods when applicable. DEQ will send a quarterly update on the status of all known/expected PSD permit actions to EPA via email. DEQ will post all final permits to the web within 10 days after issuance on The Your DEQ Online system.

ACDP Permitting & New Source Review	DEQ: Jeffrey Stocum EPA: Karl Pepple, Jay McAlpine	DEQ will communicate and work with the EPA to satisfy any and all consultation and modeling approvals required under 40 CFR Part 51 Appendix W, for both minor and major NSR permit projects.
ACDP Permitting & New Source Review	DEQ: Tim Wollerman EPA: Karl Pepple, Geoffrey Glass	DEQ will conduct Best Available Control Technology evaluations in a manner consistent with the EPA's top-down, five-step procedure and will enter RACT, BACT, and LAER determinations into the clearinghouse database within 30 days of permit issuance.
Small Business Assistance Program	DEQ: Tim Wollerman; JR Giska EPA: Karl Pepple, Carl Brown	DEQ will run the Small Business Assistance Program. DEQ will provide training and technical assistance to small businesses to help them reduce air emissions and comply with air quality rules. DEQ will also assist smaller businesses with completing triennial inventories of air toxics emissions and performing health-based risk assessment for new businesses that require them.
Miscellaneous	DEQ: Wade Sadler EPA: Gina Bonifacino, Tess Bloom	Vehicle Inspection Program: DEQ will submit annual and biennial Vehicle Inspection Program reports in compliance with Title 40, Chapter 1, Part 51, Subpart S, Sec. 51.366 of the Clean Air Act by July of each year. It will contain statistical analysis from data collected from January through December of the previous year.
Open Burning	DEQ: Michael Orman EPA: Gina Bonifacino, Randall Ruddick	DEQ will engage with Oregon Department of Agriculture, elected officials and the public as needed regarding field burning issues.
Open Burning	DEQ: Michael Orman, Regional Managers EPA: Elly Walters	DEQ will implement the open burning program including complaint management (database, tracking); investigations; inspections; compliance determination and enforcement; issuance of permits for construction, demolition, and land clearing where applicable; outreach and education to the public, cities, counties, and fire departments. DEQ staff will conduct site visits at high priority burning events and those requiring enforcement actions.
Miscellaneous	DEQ: Rachel Sakata EPA: Gina Bonifacino, John Chi	Employee Commute Options DEQ will operate the Employee Commute Options program in the Portland Air Quality Maintenance Area. Activities include providing assistance to affected employers, reviewing compliance status, documenting, and responding to violations, conducting outreach and education, maintaining rules, and improving the database. Over the next year, DEQ will review the existing program with program participants to identify areas for improvement regarding program implementation.
Miscellaneous	DEQ: Regional Managers	Tanker Certification:

	EPA: Gina Bonifacino, Tess Bloom	DEQ will continue the tanker certification program by providing assistance to gasoline transporters, issuing tanker certifications, and maintaining the database.
Miscellaneous	DEQ: Matt Shrensel, Wade Peerman EPA: Debra Suzuki	DEQ will implement the Air Pollution Advisory program. In the summer, DEQ will forecast daily and issue ozone pollution advisories in Portland, Salem, and Medford. The rest of the year, DEQ will forecast daily and issue PM _{2.5} pollution advisories statewide.
Metrics and Reporting	DEQ: Tim Wollerman EPA: Karl Pepple, Geoffrey Glass	DEQ will continue to implement the Title V permitting program as specified in the approved Part 70 program and in state regulations. DEQ will electronically (through EPS or email) submit Title V-related information to the EPA within 7 days of availability: applicability determinations, Title V permit applications (if not submitted by source directly to the EPA), updated permit application information, application incompleteness and completeness determinations, draft permits (including the public notice and statements of basis), proposed permits (including statements of basis and responses to comments) and final permits (including statements of basis). Inform all commenters of the date the proposed permit was submitted to the EPA. DEQ will submit semi-annual Title V Operating Permit System reports consistent with the EPA's deadline. DEQ will post all final permits to the web within 10 days after issuance.
<p>Objective 4: Limit public exposure to toxic air pollution.</p> <p>Outcome Measures:</p> <ul style="list-style-type: none"> • The National Emission Inventory results will show a decrease in emissions over time. • Diesel emissions in Oregon will decrease over time. • Oregon will implement state level air toxics permitting in alignment with the Title V permitting program. • DEQ intends to use part of the remaining funds from the 2020- 2022 grant cycle to support Air Quality Monitoring functions for NATTS and PAMS. <p>DEQ is committed to working with the EPA and will continue to communicate project status of diesel emissions work and Title V air toxics permitting.</p>		
Core Work	Manager	Criteria
Air Toxics	DEQ: Jeffrey Stocum EPA: Karl Pepple, Geoffrey Glass	DEQ will review and Quality Assure the EPA's annual_AirToxScreen_results released and communicate those findings to Oregon residents.
Air Toxics	DEQ: Jeffrey Stocum EPA: Karl Pepple, Geoffrey Glass	In 2027, DEQ will evaluate air toxics emission submittals from ~400 permitted facilities and use submitted production data for 1000+ smaller permitted facilities to calculate estimated 2026 emissions for those sources.

Air Toxics	DEQ: Matt Shrensel EPA: Karl Pepple, Geoffrey Glass, Sarah Waldo, Joey Richardson	During the PPA period, DEQ will measure ambient air toxics concentrations at existing NATTS sites in Portland and La Grande. DEQ will make results and conclusions of DEQ air toxics monitoring projects publicly available and discuss them with community leaders.
Air Toxics	DEQ: Matt Shrensel EPA: Sarah Waldo, Joey Richardson	DEQ will continue to participate in the NATTS laboratory Proficiency Testing Program.
Air Toxics	DEQ: Matt Shrensel EPA: Karl Pepple, Geoffrey Glass, Sarah Waldo, Joey Richardson	DEQ will provide the EPA with air toxics data quarterly, submitted within 120 days of the end of the quarter.
National Emissions Inventory	DEQ: Jeffrey Stocum EPA: Karl Pepple, Geoffrey Glass	DEQ will report to the EPA hazardous air pollutant emissions for Oregon's facilities permitted for HAPs by December 31 of 2026 and 2027. DEQ will continue to report county level hazardous air pollutant emission inventory data to the EPA as requested as a partner to support the 2026 National Emissions Inventory submittal process.
NESHAP	DEQ: Tim Wollerman EPA: Karl Pepple, Geoffrey Glass	DEQ and the EPA will maximize information sharing and explore innovative implementation options for area source NESHAPs.
Heat Smart	DEQ: Michael Orman EPA: Gina Bonifacino, Claudia Vaupel	DEQ will implement the Heat Smart program, including program improvements, database improvements, customer assistance, compliance assistance, education, and outreach. DEQ will conduct a rulemaking to streamline implementation of the program. DEQ will also evaluate changes to the program to address shortcomings of EPA's implementation of the wood heater NSPS.
<p>Objective 5: Improve visibility in federal Class I areas.</p> <p>Outcome Measures:</p> <ul style="list-style-type: none"> No worsening of visibility on the clearest days in Crater Lake National Park and Oregon's wilderness areas. Improved visibility on days with degraded air quality in Crater Lake National Park and Oregon's wilderness areas. <p>Updates & Milestones: DEQ would like to include corrected outcome measures and more information about the areas of visibility to show that all 12 facilities affecting these areas are following through for the next cycle.</p>		
Core Work	Manager	Criteria
Regional Haze	DEQ: Michael Orman EPA: Gina Bonifacino, Jeff Hunt	DEQ will track Columbia River Gorge air quality through periodic regional haze updates via ORS 468 & 468A. DEQ remains available to meet as needed with the EPA, federal land managers and tribal nations to discuss Gorge air quality issues.

Regional Haze	DEQ: Matt Shrensel EPA: Gina Bonifacino, Jeff Hunt, Sarah Waldo, Joey Richardson	DEQ will operate the existing visibility monitoring network at Crater Lake, and Mt. Hood.
<p>Objective 6: Maintain an effective compliance and assurance program that contributes to prevention and reduction of pollution, protection of public health, and meets the national goals set forth in the Clean Air Act Stationary Source Compliance Monitoring Strategy.</p> <p>Outcome Measures:</p> <ul style="list-style-type: none"> • Issues discovered during the State Review Framework process are addressed. • Violations are addressed in accordance with the Timely and Appropriate Enforcement Responses to High Priority Violations. • Meet with the EPA to discuss HPVs/FRVs 		
Core Work	Manager	Criteria
Metrics and Reporting	DEQ: Tim Wollerman EPA: Elly Walters, Karl Pepple	DEQ will take steps to address areas for improvement or that need attention relating to the permit backlog identified in the most recent State Review Framework.
Metrics and Reporting	DEQ: Tim Wollerman EPA: Elly Walters, Karl Pepple	DEQ will implement its Title V program restoration plan including fee increases, staff recruitment, and training. DEQ will create and implement a new statewide backlog reduction plan and goal. (9/30/2025).
Metrics and Reporting	DEQ: Tim Wollerman, Erin Saylor EPA: Elly Walters	DEQ and the EPA will hold monthly compliance meetings and compliance update conference calls. Discussion topics for the meetings include: <ul style="list-style-type: none"> • work share opportunities; roles and responsibilities; national, regional, and state priorities; • trends in data; changes in national guidance; changes in DEQ compliance and enforcement guidance; • joint compliance and enforcement activities; and • planned inspection activities (i.e., mentoring, oversight, joint).
Metrics and Reporting	DEQ: Tim Wollerman EPA: Elly Walters	<p>ICIS-Air Entries:</p> <p>DEQ will utilize the OpenNode2 for monthly reporting of compliance evaluations, compliance certifications, and stack tests. If necessary, DEQ will upload to ICIS- Air.</p> <p>DEQ will provide data to ICIS-Air in a timely fashion, completing the annual input by the required timeframe.</p> <p>DEQ will enter sources subject to New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants and the applicable subparts into ICIS-Air.</p>

Metrics and Reporting	DEQ: Tim Wollerman EPA: Elly Walters	DEQ will conduct annual FFY data verification of compliance and enforcement data captured in ECHO and correct data in ICIS-Air as needed. This will be done according to the schedule provided by the EPA in anticipation of the EPA's annual Data Metric Analysis and EPA's annual release of data to the public through ECHO.
High Priority Violations and Federally Reportable Violations	DEQ: Tim Wollerman, Erin Saylor EPA Elly Walters	DEQ will resolve violations detected at major sources and SM80s in accordance with the EPA "Timely and Appropriate Enforcement Response to High Priority Violations." DEQ check in frequently to discuss DEQ's identification of and strategy for responding to HPVs.
High Priority Violations and Federally Reportable Violations	DEQ: Tim Wollerman EPA: Elly Walters	DEQ will report the Federally Reportable Violations for CAA Stationary Sources and the Minimum Data Requirements for CAA Stationary Source Compliance.
Compliance and Enforcement	DEQ: Tim Wollerman, Erin Saylor EPA: Elly Walters	DEQ will work with the EPA each year to ensure that compliance and enforcement data (annual data set) is accurate in anticipation of the annual public compliance and enforcement data release through EPA's website, Enforcement and Compliance History Online.
SRF	DEQ: Tim Wollerman EPA: Elly Walters	DEQ will continue to participate in the implementation (e.g., file availability, coordination) of the State Review Framework review every three years.
Inspections	DEQ: Tim Wollerman, Regional Managers EPA: Elly Walters	DEQ's Air Quality program staff will continue to inspect air permitted gasoline dispensing facilities required to have stage II controls. DEQ Tanks program staff will inspect air permitted GDFs not required to have stage II controls while performing their tank inspections.

APPENDIX B: HAZARDOUS WASTE PROGRAM

Oregon Department of Environmental Quality, authorized by the Environmental Protection Agency, is responsible for administering the [Resource Conservation and Recovery Act](#) in Oregon. This includes activities outlined in the agreement, which is partly funded through the EPA's consolidated Performance Partnership Grant.

This Performance Partnership Agreement, along with associated programmatic work plans, explains the goals, sub-goals, objectives, programs, activities, deliverables, and measures of progress to address federal-state environmental programs under DEQ's jurisdiction. The PPG plays a crucial role in implementing the agreement, and the work plan details commitments agreed upon by DEQ and the EPA.

In accordance with the [EPA Order 5700.7A1](#), program offices are directed to ensure that work plans include well-defined outputs and outcomes, specifically addressing:

- Components to be funded under the grant in each work plan.
- Commitments for each work plan component and the timeframe for their completion.
- A performance evaluation process and reporting schedule in accordance with [40 CFR 35.115](#).
 - The roles and responsibilities of both the recipient and the EPA in fulfilling the work plan commitments.

All hazardous waste inspection commitments, targets, and performance measures under this Performance Partnership Agreement are evaluated on a Federal Fiscal Year (October 1–September 30) basis. While the PPA period itself is structured on an Oregon State Fiscal Year (July 1–June 30), inspection planning, performance tracking, and reporting align with the Federal Fiscal Year to ensure consistency with the EPA national reporting systems, including RCRAInfo, and with the RCRA Compliance Monitoring Strategy.

This agreement incorporates the following documents by reference:

- DEQ and the EPA 2017 Memorandum of Agreement, which includes the 2011 RCRA Data Management Agreement and the 2021 Addendum for Your DEQ Online;
- 2000 Corrective Action Communication Strategy; and
- 2011 EPA/DEQ Hazardous Waste Program Issue Resolution Process.

Implementing RCRA requires strategic use of resources for maximum environmental benefit. This hazardous waste Performance Partnership Agreement highlights opportunities to efficiently promote shared priorities between DEQ and the EPA, as well as opportunities to collaboratively address emerging issues.

Specifically, this PPA aligns with:

- DEQ's commitment to implementing initiatives ensuring the safe management and reduction of hazardous waste and toxic chemicals. The focus is on continuous improvement and innovation for enhanced efficiency and significant environmental gains.
- The [EPA's Strategic Plan for Fiscal Years 2026-2030](#) highlighting key goals such as Pillar 1: Clean Air, Land, and Water for Every American.

This collaborative effort promotes compliance and emphasizes advancing community considerations. Moreover, it underscores the commitment to making science-based decisions. This reinforces the importance of a robust scientific foundation in shaping environmental policies and actions.

DEQ and the EPA revised and approved the latest Memorandum of Agreement on November 30, 2017, to align with state program adjustments associated with the annual state grant work program, or PPA.

In 2013, the DEQ Hazardous Waste program adopted a strategic plan with a vision of leading Oregon to protect human health and the environment by reducing the generation and ensuring the safe management of hazardous

waste and toxic chemicals. The Hazardous Waste program updated the strategic plan July 2023, making minor changes, and has completed data collection to inform a more robust strategic plan in the near future.

The DEQ Hazardous Waste Program will achieve its vision in four ways:

1. Continuously improving the program by engaging staff through:
 - a. Fostering science-based decision making to devise innovative solutions for program priorities;
 - b. Measuring performance and outcomes; and
 - c. Celebrating accomplishments in achieving core work and program priorities.
2. Integrating community engagement principles into program work.
3. Collaborating across media on local, statewide, regional, and national initiatives aimed at addressing environmental protection, leveraging partnerships to maximize impact and promote coordinated responses.
4. Reducing hazardous waste and toxic chemicals while ensuring safe management of wastes, with a focus on minimizing environmental harm and contributing to environmental resilience through sustainable waste management practices.

The DEQ Hazardous Waste program will work towards these goals in this PPA through the following three priorities:

1. Hazardous waste initiatives
2. Safe management and reduction of hazardous waste and toxics
3. Hazardous waste improvement and innovations

Each of these three priorities is discussed in greater detail below.

PRIORITY 1: HAZARDOUS WASTE INITIATIVES

The DEQ Hazardous Waste program's comprehensive compliance strategy underscores the importance of fostering collaborative partnerships with Oregon businesses, communities, governmental agencies, and other DEQ programs to achieve meaningful environmental outcomes.

Enhanced Notifier Engagement

The DEQ Hazardous Waste program facility compliance assistance "welcome wagon" initiative represents a proactive approach by field staff to foster positive relationships with new notifiers. This non-regulatory strategy aims to go beyond traditional compliance technical assistance by focusing on education and relationship-building. By establishing connections with new notifiers, field staff lay the groundwork for a cooperative and transparent working relationship.

This initiative aligns with the broader goals of community engagement and environmental protection. Through education and collaboration, DEQ seeks to ensure that generators are well-informed, thereby increasing compliance. The emphasis on reducing the use of toxic chemicals, water, and energy underscores a commitment to sustainable practices that benefit both the environment and surrounding communities, promoting resilience to extreme weather-related risks. The "welcome wagon" initiative serves as a catalyst for positive change, fostering a culture of environmental responsibility and cooperation between DEQ and hazardous waste generators.

Community Outreach

In a dedicated effort to enhance accessibility and community engagement, DEQ designed the following initiatives to bridge gaps, promote awareness, and foster compliance in communities.

- Translation of guidance documents, fact sheets, and web content into Oregon's four most widely spoken languages other than English: Spanish, Chinese, Vietnamese, and Russian, to ensure additional accessibility and improve compliance.

- Collaboration with the [Oregon Health Authority](#) to educate retail vape shops and schools on their obligations under the [Pharmaceutical Rule](#), promoting compliance and protection of human health and the environment.
- Revamped [RCRA Basics training sessions](#) offered in-person and on-demand via recorded sessions available on DEQ's [Hazardous Waste program website](#). This initiative enhances awareness of compliance by aligning with community engagement principles.

PRIORITY 2: SAFE MANAGEMENT AND REDUCTION OF HAZARDOUS WASTE AND TOXICS

The safe management and reduction of hazardous waste and toxics are indispensable elements of the DEQ Hazardous Waste program that align with principles of community engagement, environmental resilience, and science-based decision-making. By prioritizing the safe handling and reduction of hazardous waste, the program helps to ensure that vulnerable communities, often disproportionately affected by environmental hazards, are protected from potential adverse impacts. Additionally, incorporating science-based decision-making guarantees that strategies for waste management and reduction are grounded in data, enhancing the program's effectiveness. DEQ achieves this priority primarily through its permitting and inspections of hazardous waste facilities.

In keeping with the DEQ and the EPA 2017 Memorandum of Agreement, DEQ and EPA Region 10 will coordinate as needed, but no less than annually, on the frequency of EPA oversight and lead inspections.

Compliance Monitoring Inspections

The DEQ Hazardous Waste program directs its compliance inspection efforts mainly towards large quantity generators, small quantity generators, treatment storage and disposal facilities, high-priority complaints, and non-notifiers. Transporters and used oil generators are inspected on an “as-needed” basis, for example, in response to complaints or as part of a generator enforcement investigation.

As part of our commitment, DEQ pledges to conduct inspections on a minimum of 20 percent of large quantity generators annually, with the overarching objective of inspecting 100 percent of the large quantity generator universe, including the pharmaceutical reverse distributor universe, every five years, in accordance with the EPA [RCRA core program](#) compliance monitoring requirements. When application of the 20 percent threshold results in a fractional value, the inspection target is rounded up to ensure the minimum inspection requirement is met.

To identify inspection sites, DEQ will utilize two primary sources:

1. The most recent state annual generator report data, which, in alternate years, corresponds to the information utilized for the national [Biennial Report](#) of hazardous waste generation and management.
2. The most up-to-date information on large quantity generators available in DEQ's [Your DEQ Online](#) reporting system.

Annual Large Quantity Generator inspection targets are determined using the most recent finalized Biennial Report data, which establishes the total number of facilities that reported as LQGs for the previous reporting year. This Biennial Report total is used to calculate the required number of inspections for the applicable Federal Fiscal Year.

DEQ recognizes the crucial role of enforcement actions in deterring future violations, ensuring violators do not obtain a competitive advantage through non-compliance, and fulfilling DEQ's obligation to the EPA and the public to enforce the law. To fulfill these objectives, DEQ endeavors to issue timely and appropriate enforcement responses to violations, including formal enforcement actions assessing civil penalties and requiring corrective actions. In addition, DEQ will designate a facility as a [Significant Non-Complier](#) if it meets any of the qualifying factors outlined in the [SNC policy](#):

- Violation where there is actual exposure or substantial likelihood of exposure to people or the environment from hazardous waste;
- Violation through flagrant or willful action;
- Violation by a chronic or recalcitrant violator; or
- Violation that constituted a substantial deviation from a permit, order, or environmental regulation.

DEQ's Office of Compliance and Enforcement staff also assesses the SNC checklist during the later stages of the process when evaluating compliance with orders. If any of the factors become applicable at a later stage of the case, facilities will be designated as a SNC, as deemed appropriate.

RCRA Info

DEQ translates all related data to compliance, monitoring, and enforcement (CM&E), and Handler data via [Virtual Exchange Services](#) (VES) to [RCRAInfo](#) from the Your DEQ Online (YDO) enterprise data management system. This automated translation occurs every 30 days for CM&E data to maintain up-to-date compliance information for generators and weekly for Handler data. The Biennial Report data is uploaded as text files via RCRAInfo. Ongoing coordination between the EPA and the state ensures that translations remain current per our 2011 RCRA Data Management Agreement. DEQ staff actively update the EPA's RCRAInfo system manually for handler, corrective action, permitting and financial assurance, when applicable.

Technical Assistance

DEQ is committed to providing comprehensive technical assistance in support of hazardous waste compliance to businesses and organizations across Oregon. This commitment translates into various forms of support, including site visits, educational workshops, and support for initiatives of the Hazardous Waste [Technical Assistance program](#), as detailed in DEQ's Internal Management Directive titled "[Using Immunity from Enforcement in the Hazardous Waste Technical Assistance Program](#)." Our efforts are dedicated to bolstering compliance, with an emphasis on the Hazardous Waste Initiatives highlighted in that section.

Permitted Facilities

According to the Statutory/Program-specific Activities section in the [FY 2023-2024 Office of Enforcement and Compliance Assurance National Program Manager Guidance](#) (Aug 19, 2022, Section B.6.5. p. 34), RCRA requires minimum inspection frequencies for treatment, storage, and disposal facilities annually for TSDFs operated by federal/state/local governments, and biennially for non-governmental TSDFs. The inspections required under these RCRA commitments are on-site Compliance Evaluation Inspections. To meet the TSDF inspection requirement, a CEI and a Financial Record Review of the facility's financial assurance documentation must be completed in the same federal fiscal year.

The EPA [RCRA core program Compliance Monitoring Strategy](#) allows states to conduct Focused Compliance Inspections in lieu of CEIs at TSDFs if the states have written approval from their Region and the TSDF meets the established requirements as identified in the CMS Appendix.

DEQ and the EPA's specific permitting activities are outlined in the work plan that follows this narrative and within the current Memorandum of Agreement Between the State of Oregon and the U.S. EPA Region 10. The strategic objective for permitting activities is to, "prevent releases and safely manage hazardous waste by updating approved controls by renewing permits and other actions at Treatment, Storage and Disposal Facilities".

Corrective Action Activities

Most components of corrective action are managed under DEQ's [Environmental Cleanup program](#), as specified in the latest federal authorization, and are tracked and reported to the EPA by the DEQ [Hazardous Waste Permit](#)

[program](#). DEQ and the EPA's specific corrective action activities are outlined in the work plan that follows this narrative and within the current Memorandum of Agreement and Corrective Action Communications Strategy Agreement.

PRIORITY 3. HAZARDOUS WASTE IMPROVEMENT AND INNOVATIONS

Continuous improvement and innovation play pivotal roles in enhancing the effectiveness and adaptability of the RCRA Hazardous Waste program. In the ever-evolving landscape of environmental regulations, embracing a culture of continuous improvement allows the program to stay abreast of emerging challenges and opportunities. By fostering innovation, the program can identify and implement more efficient processes, advanced technologies, and streamlined approaches to hazardous waste management. This commitment to continuous improvement ensures that the program remains responsive to changing environmental dynamics, evolving industry practices, and emerging scientific insights. It also enables the program to proactively address new and complex environmental issues, ultimately contributing to the program's ability to achieve its core objectives of protecting human health and the environment.

Rules and Authorization

In 2021, DEQ completed adoption of most federal regulations established through July 30, 2020. Simultaneously, the agency implemented statutory changes to integrate non-federal regulations, such as increases in hazardous waste disposal fees. In November 2022, DEQ adopted a modified version of the revised [Definition of Solid Waste](#). DEQ, in partnership with EPA Region 10, has begun work on the next [authorization](#) revision application. This forthcoming application will encompass all federal rules adopted by DEQ in 2021 and 2022.

Joint Agreements on Agency Communication and Coordination

DEQ and the EPA have established agreements on information sharing, communication, and reporting. During the term of this agreement, the agencies will begin a review of these agreements, and either reaffirm, update, or delete them as appropriate. DEQ and the EPA will consider updates to the appendices of the 2017 Memorandum of Agreement Between the State of Oregon and the U.S. EPA Region 10 dated November 30, 2017, the 2000 Corrective Action Communication Strategy, and the 2011 the EPA and DEQ Hazardous Waste Program Issue Resolution document during the terms of this agreement to ensure that documents are up-to-date and compatible. DEQ and the EPA will also consider updates, as needed, to this Performance Partnership Agreement during the term of this agreement.

The agencies will maintain quarterly or semi-annual meetings to exchange updates on progress, coordinate work plans, and address any issues. Disputes will follow the communication channels outlined in the 2011 EPA/DEQ Hazardous Waste Program Issue Resolution Process.

By June 30 of each year, DEQ and the EPA will review progress and negotiate potential adjustments in resource allocation to align with priority activities for the subsequent year. Both agencies commit to modifying the work plan in response to changes in priority tasks or the inclusion of new responsibilities, such as the EPA's enforcement priorities. The achievements outlined in this agreement will be summarized in quarterly reports shared throughout the agreement's duration.

Community Engagement and Environmental Resilience

Throughout this agreement, the agencies will strive to integrate community engagement, as well as environmental resilience considerations, into RCRA hazardous waste work, including inspections, permits and corrective action cleanups. DEQ additionally seeks to strengthen its community engagement capacity and adopt a proactive

approach by combining awareness of potential community issues, opportunities to improve environmental outcomes, and strategies to mitigate negative impacts in the event of catastrophic events exacerbated by extreme weather events or wildfire. The goal is to address community concerns during RCRA enforcement actions, thereby promoting fairness and resilience in environmental practices as part of broader efforts to address the increase in extreme weather events.

Note: The PPA is based on the state fiscal year from July 1 to June 30. Program measures are based on the federal fiscal year of Oct. 1 to Sept. 30.

HAZARDOUS WASTE PROGRAM WORK PLAN

Ensure Safety of Chemicals for People and the Environment			
DEQ HW Activities	EPA Activities	Timeframe	Program Measures
RCRA Grant (STAG Funding)	Financial assistance to help implement environmental programs	Continuous	Direct the EPA grant funds to priority environmental problems or program needs.

Enforce Environmental Laws and Ensure Compliance			
DEQ HW Activities	EPA Activities	Timeframe	Program Measures
Conduct large quantity generator inspections per the EPA Compliance Monitoring Strategy for the Resource Conservation and Recovery Act (CMS) and other inspections to address priority areas and take necessary enforcement actions.	Conduct LQG inspections per national guidance and other inspections to address priority areas and take necessary enforcement actions. Coordinate specific sites and dates with DEQ.	Continuous	DEQ will inspect a minimum 20 percent of the LQG universe, and the pharmaceutical reverse distributor (RD) universe, based on 2023 BRS data in each year of the PPA.

Detect Violations and Promote Compliance			
DEQ HW Activities	EPA Activities	Timeframe	Program Measures
Conduct treatment, storage and disposal facility inspections per national guidance, groundwater OAMs at non-operating TSDFs every 3 years and other inspections to address priority areas and take necessary enforcement actions.	Conduct TSDF inspections per the CMS. Other inspections to address priority areas and take necessary enforcement actions will be coordinated with DEQ.	Continuous	Inspect 50% of operating TSDFs and all federal facilities annually. Complete financial reviews with non-federal facility CEIs.
Inspect small quantity generators.	Inspect SQGs to address priority areas and issues and take necessary enforcement actions. Coordinate specific sites and dates with DEQ.	Continuous	Measure total SQGs inspected, and percentage inspected using the previous state fiscal year's SQG universe.

Inspect very small quantity generators.	Inspect VSQGs to address priority areas and issues and take necessary enforcement actions. Coordinate specific sites and dates with DEQ.	Continuous	Inspect VSQGs, including those that may be non-notifiers.
Inspect non-notifiers.	Inspect non-notifiers to address priority areas and issues and take necessary enforcement actions. Coordinate specific sites and dates with DEQ.	Continuous	Inspect non-notifiers when identified.
Inspect high priority complaints. Complaint response may include a desk investigation to clarify the issues and improve the efficiency of site visits.	Provide technical assistance as appropriate, if requested.	Continuous	Total number of hazardous waste complaints, total number of site visits due to hazardous waste complaints and percentage of site visits due to a hazardous waste complaint.
Ensure SNC designations are made appropriately, and data is updated according to the SNC policy.	Discuss SNC designations and enforcement strategy.	Quarterly	Track and review total number of active and inactive SNCs, including those with a repeat SNC designation.
Complete data verification and provide file information for the State Review Framework process, as requested.	Conduct Oregon SRF reviews of the state RCRA enforcement program, following up-to-date EPA Headquarters guidance.	Final report out to the EPA to be completed by TBD	The EPA Monitors and ODEQ implements agreed upon improvements from previous SRF.

Detect Violations and Promote Compliance			
DEQ HW Activities	EPA Activities	Timeframe	Program Measures
Evaluate all financial assurance submittals made to DEQ each year.	Follow-up to non-compliance in consultation with DEQ, note financial assurance is included with TSD inspections.	Annually when facilities submit assurances.	Compliance determinations and appropriate enforcement.
Lockheed Martin (ORD052221025) – Evaluate cleanup complete criteria and ready for anticipated use.	Provide technical assistance for Ready for Anticipated Use, if requested.	TBD	GPR Measure: Number of RCRA facilities with corrective action performance standards attained and the site is ready for anticipated use. RCRAInfo: CA800, CA900, CA999.
Permapost (ORD009041187) – Develop and issue permit renewal.	Timely review and comments on draft permit renewal. Provide technical assistance, if requested.	TBD	Prevent releases at hazardous waste management facilities with updated permit controls.

Detect Violations and Promote Compliance			
DEQ HW Activities	EPA Activities	Timeframe	Program Measures

Chemical Waste Management of the Northwest (ORD089452353) – Develop and issue permit renewal.	Timely review and comments on draft permit renewal. Discuss key changes in permit conditions with DEQ. Provide technical assistance, if requested.	TBD Permit renewal	Prevent releases at hazardous waste management facilities with updated permit controls.
Tektronix (ORD009020231) – Develop and issue permit renewal.	Timely review and comments on draft permit renewal. Provide technical assistance, if requested.	TBD	Prevent releases at hazardous waste management facilities with updated permit controls.
Umatilla Chemical Storage Depot (OR6213820917) - Determine if facility can be certified as clean closed and corrective action is complete with controls. Evaluate effectiveness and sustainability of institutional controls and modify as necessary to ensure protectiveness and enforceability. If satisfactory, then modify permit to remove hazardous waste management units (HWMUs) and solid waste management units (SWMUs).	Timely review and comment on permit modifications including effectiveness and enforceability of controls.	TBD for closing permitted units and removal from the permit. TBD Corrective Action Closure under CERCLA TBD renewal evaluation due to DEQ staffing workload	Prevent releases at hazardous waste management facilities with updated controls.

Cleanup and Revitalize Communities			
DEQ HW Activities	EPA Activities	Timeframe	Program Measures
Univar Portland VWR (ORD009227398) – Technical coordination as needed.	The EPA-lead to oversee facility construction of the modified remedy.	TBD due to the EPA staffing workload	Increase the number of RCRA facilities where the site is ready for anticipated use CA800.
Evraz (ORD009106055) – Evaluate cleanup complete criteria and ready for anticipated use.	Provide technical assistance, if requested.	TBD	GPR Measure: Number of RCRA facilities with corrective action performance standards attained and the site is ready for anticipated use. RCRAInfo: CA800, CA900, CA999.
Boeing of Portland (ORD054964481) – Evaluate cleanup complete criteria.	Provide technical assistance for Ready for Anticipated Use, if requested.	TBD	GPR Measure: Number of RCRA facilities with corrective action performance standards attained. RCRAInfo: CA900 and CA999.

Promote Sound Data Management, Strong Joint Initiatives and Policy			
DEQ HW Activities	EPA Activities	Target Date	Program Measures
Use the National Virtual Exchange Service (VES) to translate data to RCRAInfo.	Ensure VES technical assistance is available to execute this project.	Continuous	Secure Internet- and standards-based way to support electronic data reporting, sharing, and integrating regulatory environmental data.
Translate Your DEQ Online data into RCRAInfo and directly enter any core data not available in YDO.	Provide technical assistance, if requested	Monthly	Translations and data entry remain current per 2011 RCRA Data Management Agreement.
RCRAInfo data analysis and update.	Provide data technical assistance, if requested.	Continuous	Translations and data entry remain current per 2011 RCRA Data Management Agreement.
Review joint agreements on agency communication and coordination.	Continue to review and collaborate with DEQ on joint agency communication and coordination agreements.	TBD: MOA Appendix Edits and July 2026-2028 PPA	All agreements reaffirmed, updated, or deleted, except for the MOA which can be modified, but never deleted.
Expedited Enforcement Offers (EEOs) Program.	Cross-reference to the authorized program description.	Continuous	Implemented EEO program statewide.
Develop and submit the two federal rule adoptions - 2021 and 2022 - for one Authorization revision application.	Review and approve.	2028	Coordinate with the EPA to review those federal rules subsequently promulgated by the EPA and adopted by DEQ.
e-Manifest communication to promote regulated community understanding and registry.	Manage new e-Manifest system, with continuous user and stakeholder engagement.	Continuous	e-Manifest communication to promote regulated community understanding and registry.

APPENDIX C: WATER QUALITY PROGRAM

The Water Quality Program's mission is to protect and improve Oregon's water quality. Protecting and improving the quality of Oregon's rivers, streams, lakes, estuaries, and groundwater keeps these waters safe for multiple beneficial uses such as drinking water, fish and aquatic wildlife habitat, recreation, and irrigation. This is accomplished by developing and implementing water quality standards and clean water plans, regulating wastewater treatment systems, stormwater, and industrial dischargers, collecting, and evaluating water quality data, providing grants and technical assistance to reduce nonpoint pollution sources, providing below market rate loans and technical assistance to communities to construct or improve infrastructure that advances water quality objectives. The availability of clean and healthy water is critical to Oregon's environment and economy.

During the 2024-2026 PPA/PPG term (7/1/2024-6/30/2026), DEQ's Water Quality Program made significant advances in several areas, including, but not limited to, the following:

Assessments: DEQ has made significant progress on improving processes necessary to support a comprehensive and functional assessment program that meets federal requirements, informs DEQ's water quality programs, and provides essential data and information to interested parties and the public.

Water Quality Standards: DEQ made significant progress implementing the Triennial Review Workplan for 2021-2024. DEQ also conducted and submitted a new Water Quality Standard Triennial Review and Workplan for 2025-2028 to the EPA on May 9, 2025. DEQ created a new Outstanding Resource Water (ORW) nomination process that clearly outlines the information needed before conducting the Triennial Review process. DEQ conducted a rulemaking to adopt three new 304(a) aquatic life criteria and to revise three additional aquatic life criteria for toxics substances. The EQC adopted these amendments in September 2024. DEQ continues to work to develop procedures to apply the narrative toxics criterion and excess algal growth criteria, beginning with the assessment methodology.

Data management: DEQ has completed a significant milestone towards upgrading and streamlining the way we accept, process and share information at DEQ. DEQ's new Environmental Data Management System, called 'Your DEQ Online', provides an easy and intuitive online system for connecting to DEQ. This is an important and exciting upgrade to the way DEQ does business now, from internal processes, interactions with permittees and agents and with the public. **Permitting:** Based on a 2016 program audit conducted by an external consultant, DEQ has continued to implement audit recommendations through ongoing process improvements across the Water Quality permitting program. These efforts include refinement of an internal quality assurance and management review process, updates to individual permit and fact sheet templates, and improved consistency and defensibility in permit development. DEQ has also completed both one-year, and five-year permit issuance plans that identify the individual and general permits the agency intends to issue within those timeframes, supporting transparency, prioritization, and workload planning.

Compliance and Enforcement

Compliance assurance and enforcement are key elements of DEQ's NPDES program. The EPA and DEQ collaborate on compliance and enforcement activities and coordinate with permitting to maximize NPDES resources especially while facing important decisions on priorities for needed program improvements.

Compliance inspections and audits are conducted according to the EPA's NPDES Compliance Inspection Manual and targeted in accordance with the EPA's Compliance Monitoring Strategy as specified in the PPA. DEQ and the EPA collaborate on inspection targeting. DEQ also performs compliance inspections while responding to complaints warranting site visits and other permitted sources based on the likelihood of

important environmental outcome and other criteria. Sources with compliance schedules in permits or corrective action schedules in mutual agreement and final orders are also prioritized.

Enforcement priorities for water are guided by the EPA's Compliance Advisories and Enforcement Alerts, the National Enforcement Goals, the National Enforcement and Compliance Initiatives, and the national Clean Water Act Action Plan, as well as other DEQ and the EPA priorities. The EPA's overall national enforcement goals focus on civil and criminal enforcement for violations that threaten communities and the environment; greater compliance and protection through use of advanced monitoring and information technologies; and strong EPA/State/Tribal partnerships for working together toward shared environmental goals. DEQ's enforcement guidance directives focus the agency's enforcement resources on the most important violations and ensure statewide consistency. DEQ's formal enforcement actions require corrective actions and assess civil penalties according to Division 12 of the Oregon Administrative Rules. The formal enforcement actions deter future violations, promote fairness, and generate beneficial environmental outcomes.

The EPA implemented a National Compliance Initiative in 2019 with states to improve Significant Non-Compliance Rates for NPDES permitted facilities nationwide with a goal to reduce the national SNC rate to 10.1% by end of federal fiscal year 2022 (September 30, 2022). In partnership with the states, the EPA met its SNC rate reduction goal, reducing the percent of individual NPDES permittees in SNC to below 10% by FY 2022, and elected not to continue the SNC NCI in the new NECIs for fiscal year 2024. In addition, Oregon's SNC rate has remained below 4% over the last approximately five years. However, the EPA continues to coordinate closely with DEQ to implement this initiative to reduce levels of SNC in Oregon, particularly SNCs from effluent limit violations. The EPA and DEQ meet at least quarterly to discuss facilities in SNC. In addition, DEQ and the EPA may pursue civil enforcement jointly for the most egregious violators.

WATER QUALITY PROGRAM JOINT PRIORITIES FOR 2026-2028

DEQ and the EPA worked together to develop the Performance Partnership Agreement Water Quality Program Work Plan. These shared objectives target Oregon's most important water quality issues with available resources and in support of the EPA's 2026-2030 Strategic goals including Pillar 1: "Clean air, water, and land for every American". Through this partnership agreement, in addition to the core work areas highlighted below, both agencies have agreed to support each other's efforts in the following important cross-cutting areas of work.

Priority 1: Process Improvement

DEQ and the EPA will focus on improving process and streamlining across program areas including permitting, Total Maximum Daily Loads, reporting, and overall CWA implementation efficiencies. Both agencies will also specifically support more integrated ways of completing biological evaluations and Endangered Species Act reviews for Water Quality Standards and identify areas for shared learning in areas where there are emerging issues.

Priority 2: Approvability and Active Coordination

Managers at both agencies will maintain proactive, regular communication to support agency action of state submissions, including Integrated Reports, TMDLs, and Water Quality Standards. This includes communicating timing and information needs for upcoming actions, aligning data-sharing platforms, convening on research questions, and completing ongoing projects.

Future Opportunities

In the event that additional state or federal funds become available, DEQ - in coordination with the EPA - has identified various project areas for potential future work emphasis. Continued improvement of coordination between the state agencies, governor's office, and local entities, including impacted communities, to identify opportunities to enhance groundwater protection across Oregon. Other opportunities include building community

capacity for engagement and outreach, which could be enhanced with grant or other funding to support community representative participation in program advisory forums.

Evaluation Process

To ensure that the EPA and DEQ maintain open communications during this PPA, the two agencies agree to check-in every six months and have meetings as needed. In addition, grant update reports will be submitted every twelve months and will be used to determine if a check-in meeting or teleconference should be scheduled. At a minimum the update will include the following information:

- A discussion of accomplishments as measured against the work plan commitments.
- A discussion of the cumulative effectiveness of the work performed.
- A discussion of existing and potential problem areas.
- Suggestions for improvement including schedules if possible.

If the joint evaluation process reveals that sufficient progress under the work plan is not being made the EPA and DEQ agree to negotiate a resolution that addresses the issue.

WATER QUALITY PROGRAM WORK PLAN

This workplan includes a description of key water quality program elements and associated environmental outcomes. The following tables enumerate DEQ's and the EPA's commitments, with outputs and timeframes. The table indicates whether the outputs are supported by funding from the PPG, and whether there is an associated Program Activity Measure. PAMs address activities to be implemented by the EPA Headquarters, the EPA Regional Offices, or by States/Tribes that administer national programs. They are the basis for monitoring progress in implementing programs to accomplish the environmental improvements described in the EPA's [FFY 2026-2030 Strategic Plan](#).

The EPA National Water Program Guidance also provides overarching national goals, priorities, and performance measures aimed at making significant progress toward protecting human health and improving water quality. This national program guidance is augmented by the National Program Manager Guidance for enforcement activities in all media. Both documents are relevant for the implementation of CWA programs delegated to the State of Oregon and are available [online](#).

Over the next two years, the EPA will work with states, Tribes, territories, and local communities to better safeguard human health; maintain, restore, and improve water quality; and make US water systems sustainable and secure, supporting new technology and innovation wherever possible. EPA Region 10 strives to integrate state and regional priorities with the EPA's national strategic planning objectives.

Element 1: Water Quality Standards and Assessments

DEQ contact: Connie Dou

EPA contact: Becky Garnett

Establishing water quality standards for waters in Oregon is at the core of DEQ's water quality activities. Standards include beneficial uses of water, such as drinking water supply, fish, and aquatic life, contact recreation, etc., the water quality criteria needed to protect those uses, and antidegradation requirements to protect existing uses and high-quality waters. The Water Quality Program then acts to protect and restore water quality by implementing those standards in our water quality programs, including assessment, TMDLs, and permitting. DEQ evaluates whether Oregon's water quality standards are being met through the development of the biennial Integrated Report, which includes the section 303(d) list of impaired waters and the section 305(b) report describing the status of Oregon's surface water quality. The staff who work on these program areas perform the following activities:

- Conduct triennial standards reviews to establish and update scientifically based water quality standards and related policies.
- Develop and maintain procedures and guidance to regional and headquarters staff on the application of water quality standards in various water programs.
- Identify waterbodies not meeting water quality standards and develop biennial Integrated Reports.

Environmental Outcome: Adoption and implementation of appropriate water quality standards will contribute to protection of the beneficial uses of Oregon's waterbodies and water quality improvements as measured by monitoring and other environmental data. It is important that the water quality

standards are up to date based on the best available information so that DEQ applies the correct water quality standards in Clean Water Act programs including NPDES permitting, TMDL and 401 certification programs to protect Oregon waters.

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
1.1	Work with the EPA as needed to provide additional information and clarification during their ESA consultation and review of the revised Oregon’s aquatic life toxics criteria including 1) acrolein, 2) carbaryl, 3) diazinon, 4) tributyltin, 5) cadmium and 6) aluminum.	Review and consult under ESA section 7 on revised use designations. Take CWA 303(c) action.	Rule amendments were adopted by the EQC and submitted to the EPA. Implementation Procedure Document.	Waiting for the EPA’s action on the WQS submittal for carbaryl, acrolein, and diazinon. The final rule package was submitted to the EPA in Oct. 2024.	Partial	
1.2	Work with the EPA as needed to provide additional information and clarification during their ESA consultation and review of the revised beneficial use subcategories for temperature and dissolved oxygen. Engage with the EPA and the Services as an “applicant” in the ESA consultation process.	Review and consult under ESA section 7 on revised use designations. Take CWA 303(c) action.	EPA Action on temperature and DO use subcategory designation updates and clarifications.	Waiting for the EPA’s action. The final rule package was submitted to the EPA in Feb. 2024.	Partial	
1.3	Illinois River and Rough and Ready Creek Outstanding Resource Water Rulemaking	Provide technical input and review, as needed. Take CWA 303(c) action.	Rule amendments proposed to the EQC for adoption and submitted to the EPA.	Q2 2027	Partial	

1.4	Establish a procedure and database to track additional information on “active spawning areas” used by resident trout for purposes of applying the DO spawning criteria. As resources allow, work with ODFW to establish a procedure to fill data gaps on resident trout spawning locations.	Provide technical input and support, as requested and as resources allow.	Database to track the active spawning areas used by resident trout.	Anticipated completion date: Q3 2026	Not currently	
1.5	Temperature – address site-specific instances where natural conditions exceed biologically based numeric criteria	Provide technical assistance as requested and as resources allow.	Explore different options including variances, site specific temperature criteria, etc. Implement solutions through appropriate administrative processes.	Ongoing	Partial	
1.6	Review and update Oregon’s procedures to apply the narrative toxics criterion. Consider use of published benchmark values and fish tissue data.	Provide technical assistance, as requested and as resources allow.	Procedures document and assessment methodology.	Ongoing with anticipated completion Q4 2026	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
1.7	Develop application procedures for Oregon narrative excessive algal growth criterion together with the chlorophyll-a action value. Consider pH and DO criteria and HABs advisories in developing narrative application	Provide technical assistance, as requested and as resources allow.	Narrative algal growth criterion application procedures and assessment methodology.	Underway; anticipated completion of some elements in Q4 2028	Partial	

	procedures and prioritizing nutrient work. These procedures will allow DEQ to evaluate and address water quality and beneficial use impacts that occur from anthropogenic nutrient loading.					
1.8	Sedimentation Narrative Application Procedure	Provide technical input and review, as requested and as resources allow.	Narrative sedimentation criterion application procedures and assessment methodology.	Q4 2028 and beyond	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
1.9	Release 2028 Integrated Report Assessment Methodology for public comment – including supporting documentation for major revisions (technical support documents and peer review summaries as appropriate)		Final assessment methodology for use in the development of the 2028 Integrated Report.	Q1 2027	Partial	
1.10	Hold Call for Data for 2028 Integrated Report	Provide technical input regarding relevant sources of data	Compilation of data for 2028 IR	Q1 2027	Partial	
1.11	Complete DEQ’s 2028 Integrated Report and submit to the EPA	Provide technical input and review, as needed. Take CWA 303(c) action	Final approved 2028 Integrated Report	Q2 2028	Partial	

1.12	DEQ's 2026 Integrated Report and 303(d) list will be submitted into the EPA's ATTAINS data system.	The EPA will continue to communicate information about ATTAINS and the Water Quality Framework and provide technical assistance as DEQ prepares to load data into ATTAINS.	2026 Integrated Report and associated reporting data.	Ongoing DEQ work with the EPA ATTAINS and Water Quality Framework design team. Final submittal by Q2 2026	Partial	
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Element 2: TMDLS - Total Maximum Daily Loads and Water Quality Management Plans

DEQ contact: Steve Mrazik

EPA contact: Jenny Wu

The federal Clean Water Act requires that water pollutant budgets, called TMDLs, be developed for waterbodies included on DEQ's 303(d) list of water quality limited waterbodies (Category 5 in the Integrated Report). TMDLs describe the maximum amount of pollutants point and nonpoint sources, including natural background, which can enter the river or stream without exceeding water quality standards, and (by extension) what reductions need to occur from current levels of pollution in order for water quality standards to be met. These allocations are required for waterbodies that have been identified as exceeding one or more water quality standards.

DEQ develops TMDLs on a basin, subbasin, or watershed scale (generally on a six-digit US Geological Survey Hydrologic Unit Code or smaller). These TMDLs address all sources of pollutants when determining allocations of loading for the pollutants being addressed by the TMDL. These allocations are developed through water quality analysis, statistical analysis, and mathematical modeling, as well as consideration of where load and waste load reductions are possible. Program staff collect, analyze, and present results to the public, conduct stakeholder outreach and engagement to ensure input when decisions are being made. The combination of community engagement and development provides for the transition from development of loading capacity and allocations to implementation in permits for point sources and implementation plans for nonpoint sources.

TMDL Wasteload Allocations are implemented through NPDES and WPCF permits for point source discharges, and Load Allocations are implemented through DEQ's Water Quality Management Plan and individual TMDL Implementation Plans for nonpoint sources, by designated management agencies and other responsible entities. DEQ implements TMDLs by:

- Revising industrial and municipal wastewater permits to incorporate wasteload allocations into revised permits.
- Working with the U.S. Department of Agriculture, USDA Natural Resources Conservation Service, the Oregon Department of Agriculture, and local organizations to develop and carry out plans to implement the TMDL load allocations on agricultural lands and wherever agricultural activities occur. This work includes but is not limited to regulatory measures under Oregon's Agricultural Water Quality Management Program and development of implementation plans by ODA, BLM and USFS, among others.
- Working with the Oregon Department of Forestry to develop and carry out plans to implement the TMDL load allocations on state and private forestlands. This work includes, but is not limited to, regulatory measures under the Oregon Forest Practices Act, other long range management plans and TMDL-specific implementation plans.
- Assisting local governments in developing TMDL Implementation Plans for urban areas.
- Working with the U.S. Forest Service, Bureau of Land Management and other federal agencies on developing TMDL-specific implementation plans for lands under their jurisdiction. These may draw from water quality restoration plans and Forest Plans and Rangeland Management Plans, which DEQ also advises on updating.

- Working with all Designated Management Agencies and other responsible entities on TMDL implementation planning; timelines; milestones for pollutant reduction targets and strategies to reduce pollutants such as sediment, temperature, nutrients, and bacteria; which may include developing surrogate measures that make it possible to monitor progress in achieving load allocations.
- Working with the EPA on nutrient allocations when phosphorous or nitrogen are identified in a TMDL as the pollutant causing or contributing to the impairment.

Under many circumstances, TMDL Implementation Plans for improved water quality rely on cooperation among landowners and land managers within a river basin. Local watershed councils, Soil and Water Conservation Districts or other organizations serve as community-based coordination points for these efforts. Agencies and municipalities with jurisdiction over nonpoint sources of pollution and sources not covered by permits may be required to submit TMDL implementation plans to DEQ for approval. These plans describe actions that will be taken to reduce their contribution to water quality problems.

In September 2022 the EPA, with input from the states, updated the long-term vision for assessment, restoration, and protection under the Clean Water Act Section 303(d) Program (for 2022-2032). DEQ is participating in the 303(d) vision by designating biennial priority projects in ATTAINS.

Environmental Outcome: Development and implementation of TMDLs will contribute to protection of the beneficial uses and meeting water quality standards in Oregon's waterbodies and water quality improvements, as measured by water quality data and other environmental data and measures in TMDLs, WQMPs and TMDL implementation plans.

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
2.1	Develop TMDLs and WQMPs in accordance with 303(d) list schedule.	Provide technical input and review, as needed. Take CWA 303(d) actions.	DEQ Issuance of TMDLs for the: Coquille Subbasin: bacteria; DO, pH, and temperature John Day Basin: temperature Rogue River Basin: temperature Snake River: temperature Snake River: methylmercury, mercury WQMP development and issuance for the EPA's Columbia River temperature TMDL WQMP development and issuance for the EPA's Umpqua Basin temperature TMDL	Q1 2027 By court ordered deadlines Q4 2026 Q1 2027	Partial	WQ-8b

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
2.2	Include robust Reasonable Assurance documentation in the TMDL and WQMP to implement issued TMDLs, including (where appropriate) adoption of surrogate measures.		Complete and assure implementation of implementation plans for issued TMDLs that guide management practices, and pollutant controls to meet load allocations in TMDLs. Facilitate projects that result in improvements in water quality.	Ongoing	Partial	
2.3	<p>Provide framework for ensuring implementation of TMDLs for Nonpoint Sources in subbasins where TMDLs/WQMPs have been completed or are being completed, including load allocations where applicable.</p> <p>Work with watershed councils, local, state and federal government agencies and other RPs/DMA's to develop appropriate management practices and plans for controlling pollutants.</p> <p>Work with USDA agencies to leverage Farm Bill resources to implement priority best management practices in critical areas.</p> <p>Work with watershed councils, local, state and federal government agencies, and other RPs/DMA's to develop implementation plans that contain appropriate management practices and milestones for meeting TMDL allocations.</p> <p>Support implementation of priority best management practices in critical watersheds throughout Oregon.</p>	Provide technical assistance, as requested and as resources allow.	<p>Completed TMDL, WQMP and implementation plans that guide management practices, pollutant controls to meet load allocations in TMDLs. Facilitate projects that result in improvements in water quality.</p> <p>Review and approval of implementation plans that meet load allocations or management measures identified in the TMDL/WQMP. Evaluate RP/DMA implementation through TMDL/WQMP reporting requirements and 5-year review of TMDL implementation. Evaluate DEQ WQ Status & Trend tool as a method for evaluating DMA implementation.</p>	Ongoing	Partial	WQ-10

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
	<ul style="list-style-type: none"> a) Review and take action on TMDL implementation plans that are received. b) Review for sufficiency, comment on, or take other appropriate action on submitted TMDL implementation plan annual reports. c) Notify each DMA or responsible person of the TMDL and WQMP requirements and follow up with appropriate action (e.g., technical assistance, warning letter, or enforcement notice). d) Work with watershed councils, local governments, DMAs and USDA agencies to leverage Farm Bill funds, and OWEB to implement appropriate management strategies to reduce pollutant loading and meet TMDL allocations. 		<ul style="list-style-type: none"> a) DMAs or responsible persons have submitted TMDL implementation plans to DEQ and DEQ receives, reviews, and takes action on TMDL implementation plans within 12 months of receipt. b) DMAs or responsible persons have submitted TMDL implementation plans annual reports to DEQ and DEQ takes action on them. c) DEQ has notified DMAs or responsible persons of the TMDL and WQMP requirement or implemented any appropriate actions d) Using available information DEQ summarizes in the 			

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
			nonpoint source annual report the count or amount of management strategies that have been completed in each subbasin in Oregon.			

Element 3: Underground Injection Control

DEQ contacts: Benjamin Benninghoff

EPA contacts: Brian Nickel

The Underground Injection Control program protects drinking water sources and aquifers by providing oversight on the use of injection systems (dry wells, sumps, large onsite wastewater treatment systems, geothermal, Aquifer Storage and Recovery, remediation injection, etc.) that discharge to the subsurface and may endanger groundwater quality. Federal regulation requires DEQ to keep an updated inventory of all injection wells and report them to the EPA annually. In Oregon, most injection systems are associated with stormwater discharge, large onsite wastewater, aquifer remediation, and industrial process/wastewater. Injection systems must obtain approval from DEQ to operate under Authorization by Rule, a UIC-WPCF permit, or must be formally closed. DEQ staff review and approve applications of a variety of injection system types, provide technical assistance to private and public injection well owners, and work closely with municipalities in their development of stormwater management plans related to injection systems. As a delegated program under the Safe Drinking Water Act, injection systems are subject to EPA enforcement.

Environmental Outcome: These activities help to ensure that adequate controls are in place so that UICs do not result in water quality standards exceedances, which will contribute to water quality improvements as measured by water quality monitoring and other environmental data.

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
3.1	Continue administration of UIC program by providing Authorization by Rule site reviews, developing and issuing WPCF permits, assigning coverage to permit applicants under the WPCF general permit, and closures.	The EPA will provide enforcement and compliance assistance as requested by and in close coordination with DEQ. The EPA may provide input on WPCF permit conditions related to consistency with minimum federal requirements and ongoing SPA revisions in section 3.3.	Wells inventoried and registered per year; Authorization by Rule determination process (e.g., requesting additional information, providing clarification on application issues, retrofits) will occur as needed. Issue area wide UIC- WPCF permits as appropriate.	Ongoing	Partial	SDW-8, SDW-7b
3.2	Provide technical assistance to consultants, cities, municipalities and other public and private UIC owners.	The EPA will provide inspector training opportunities; provide training/outreach to municipalities and other public and private UIC owners, as requested and as resources allow.	Technical assistance will include meetings with municipalities and other private and public UIC owners.	Ongoing	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
3.3	Develop and refine a project plan, with deliverables and timelines, to address EPA identified UIC re-delegation issues. Deliverables may include rulemaking to address EPA issues. If identified as a need, DEQ will develop a plan and initiate efforts following resolution of all identified issues with the EPA.	The EPA will review and provide comments on the project plan and on proposed rule revisions, if necessary. The EPA will facilitate the scheduling of meetings with EPA HQ on technical and legal issues, as necessary and as resources allow.	A project plan identifying tasks, timelines and deliverables.	Initial plan complete. Pending agreement with the EPA.	Partial	
3.4	Provide UIC program approval package to the EPA for re-delegation from the EPA to DEQ for program primacy.	The EPA will review program delegation package.	Program approval package submitted to the EPA includes and addresses the required program elements addressing program revisions for re-delegation that results in program re-delegation.	Ongoing. Pending agreement with the EPA and timing to work through issues and rulemaking. The rulemaking will likely span PPA cycles once it commences.	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
3.5	Prioritize inspection and compliance activities for UICs identified as high-environmental risk.	The EPA will provide technical assistance to DEQ as needed and as resources allow.	Follow identified compliance and enforcement procedures for all inspections and conduct a minimum of 10 inspections per year.	Ongoing	Partial	
3.6	Respond to complaints associated with discharges to UIC's in Oregon		Follow identified compliance and enforcement procedures associated with complaints regarding unauthorized discharges into UICs throughout Oregon.	Ongoing	Partial	
3.7	Implementation of "Your DEQ Online," an electronic online system that will manage all aspects of DEQ's UIC program including applications, renewals, tracking, reporting, electronic payments and more.		Implementation and ongoing support of "Your DEQ Online" for all 46,000 plus UIC's registered in Oregon.	Ongoing	Partial	

Element 4: Groundwater Program

DEQ contact: Ann Farris and Karen Williams

EPA contact: Brian Nickel

The Oregon Groundwater Quality Protection Act of 1989, which was updated in 2025, provides the framework for comprehensive groundwater management and protection in Oregon. This Act and the federal Safe Drinking Water Act establish the critical elements for enhancing and protecting Oregon's groundwater resource for its many beneficial uses. Over ninety percent of Oregon's available freshwater is stored beneath the earth's surface as groundwater. Approximately 70 percent of Oregon's people depend on groundwater for their daily water needs via private, public, and industrial water wells.

Oregon has designated three areas with significant groundwater quality issues as "Groundwater Management Areas"; one is located in the Lower Umatilla Basin (LUB), one in Northern Malheur County and the other in the Southern Willamette Valley. Protection efforts in these management areas involve the implementation of voluntary groundwater action plans to address degraded water quality, impaired beneficial uses, and potential risk to public health from nonpoint source groundwater pollution. In addition to these three areas, DEQ, in partnership with sister agencies, evaluates groundwater quality statewide to proactively identify concern areas for groundwater quality and work to avoid needing to designate any further groundwater management areas. Since 2015, DEQ implemented statewide groundwater monitoring by prioritizing high risk geographic areas. DEQ also provides extensive outreach and education on groundwater issues and provides technical assistance to communities and watershed councils engaged in groundwater pollution prevention efforts.

Environmental Outcome: Groundwater protection efforts will help to prevent the degradation of Oregon's groundwater resources and maintain or improve the quality of groundwater resources, as measured through the various groundwater monitoring efforts DEQ conducts around the state.

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
4.1	Implement the Lower Umatilla Groundwater Management Area Nitrate Reduction Plan. Regularly collaborate with Oregon Department of Agriculture, Oregon Water Resources Department, and Oregon Health Authority to collectively address the increasing groundwater nitrate concentration trends in the LUB GWMA.	Support development of a data hub and a reevaluation of source allocation and as resources allow.	<p><u>Coordination</u></p> <ul style="list-style-type: none"> - Meet with local stakeholders, Groundwater Management Committee, Tribal Governments, local agencies, and environmental justice communities to coordinate Action Plan activities. - Meet with sister agencies to share data and other information to collaboratively enhance groundwater protection in the management area, - Annually update the Nitrate Reduction Plan for the LUB <p><u>Education and Outreach</u></p> <ul style="list-style-type: none"> Organize education and outreach efforts to increase awareness of groundwater vulnerability and BMPs. Maintain GWMA website. <p><u>Monitoring and Data Analysis</u></p> <ul style="list-style-type: none"> - Monitor groundwater quality at 33 domestic and irrigation wells quarterly to evaluate impacts and effectiveness of Action Plan. - Evaluate success of implemented activities in coordination with sister agencies, local organizations, and the committee. 	Ongoing	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
4.2	Implement the Northern Malheur County Groundwater Management Area Action Plan by focusing on agricultural, residential, commercial, industrial, municipal and public water supply activities that will prevent and reduce nitrate contamination in groundwater.	The EPA will provide technical support as needed and as resources allow.	<p><u>Coordination</u></p> <ul style="list-style-type: none"> - Meet with local stakeholders and local agencies to coordinate on the ongoing implementation of BMPs and to inform them of the latest sample results. <p><u>Action Plan activities.</u></p> <ul style="list-style-type: none"> - Provide technical support. - Ongoing implementation of BMPs - Inform of trend analysis as indicator of BMP effectiveness. <p><u>Education and Outreach</u></p> <ul style="list-style-type: none"> - Organize education and outreach efforts to increase awareness of groundwater vulnerability and BMP. <p><u>Monitoring and Data Analysis</u></p> <ul style="list-style-type: none"> - Monitor groundwater quality at 36 domestic and irrigation wells once annually to evaluate impacts and effectiveness of Action Plan. - Complete groundwater nitrate trend analysis. - Evaluate ongoing success of BMP awareness and implementation. 	Ongoing	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
4.3	Implement the Southern Willamette Valley Groundwater Management Area Action Plan by focusing on agricultural, residential, commercial, industrial, municipal and public water supply activities that will prevent and reduce nitrate contamination in groundwater.	The EPA will provide technical support as needed and as resources allow.	<p><u>Coordination</u></p> <ul style="list-style-type: none"> - Facilitate information sharing and coordinate initiatives of local interested parties and communities, Groundwater Management Committee, and local agencies with implementation of Action Plan activities. <p><u>Education and Outreach</u></p> <ul style="list-style-type: none"> - Organize education and outreach efforts to increase awareness of groundwater vulnerability and BMPs. - Maintain GWMA website. <p><u>Monitoring and Data Analysis</u></p> <ul style="list-style-type: none"> - Monitor groundwater quality at 27 locations to evaluate impacts and effectiveness of Action Plan. - Evaluate success of BMP awareness and implementation. 	Ongoing	Partial	
4.4	DEQ prioritizes geographic areas based on known or suspect contaminant sources, soil and land use characteristics and aquifer sensitivity as well as other internal and external monitoring objectives. DEQ has implemented monitoring in seven basins since 2015.	NA	<p><u>Monitoring and Data Collection</u></p> <ul style="list-style-type: none"> - Monitoring at approximately 50 wells (combination of domestic wells and monitoring wells) in a geographically targeted area of Oregon outside of the GWMA's. - Nitrates, arsenic and targeted analytes based on known or suspected risk factors. 	Ongoing	No	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
			<ul style="list-style-type: none"> - During the 2026 – 2028 period, DEQ will complete three geographic area reports and align statewide groundwater monitoring plans with 2025 amendments to Groundwater Protection Act. 			
4.5	Complete federal and state groundwater reporting requirements.	NA for biennial report. The EPA review of 305 (b).	<ul style="list-style-type: none"> - Biennial Report to the legislature. - Groundwater component of 305(b) report. 	Ongoing	Partial	

Element 5: WQ Permitting, Pretreatment and 401 Certifications

DEQ contacts: Rebecca Bodnar, Benjamin Benninghoff, Theresa Burcsu, Wyatt Stinnett

EPA contact: Erin Seyfried

Industrial and Domestic Wastewater Permitting (Rebecca Bodnar) and Stormwater Permitting (Benjamin Benninghoff)

DEQ's wastewater management program regulates and minimizes adverse impacts of pollution on Oregon's waters from point sources of pollution. The term "point source" generally refers to wastewater discharged into water or onto land through a pipe or a discernible channel. These point sources operate under the terms of a federal National Pollutant Discharge Elimination System, or a state Water Pollution Control Facilities wastewater discharge permit issued by DEQ.

DEQ has had authority for NPDES permit issuance since 1974. As a delegated program, DEQ's NPDES permitting activities are subject to EPA oversight. Effective implementation of the program is required for continued delegation of the water quality program and is essential to the continued receipt of federal program funds. To effectively protect water quality, DEQ must carry out four activities:

- Issue discharge permits that adequately evaluate and limit pollutant discharges to meet water quality standards or approved variances.
- Periodically inspect facilities and review regular monitoring results.
- Update and maintain the EPA's ICIS database with timely and accurate permit and permit related data (DMRs, Compliance Schedules, Inspections, etc.).
- Take prompt and appropriate enforcement actions when violations occur.

DEQ administers over 4,500 water quality permits. Approximately 65% are NPDES individual and general permits, and 35% are WPCF permits designed to protect groundwater resources. Achievement of permit program objectives requires targeted and effective implementation and integration of water quality standards, TMDLs, and state-led programs for non-surface water discharges. Program staff require up-to-date tools and training to consistently develop and issue high quality permits statewide and ensure effective permit implementation. Targeted program implementation is based on source-specific and watershed-specific priorities.

Wastewater and stormwater program workload continues to expand in scope and DEQ will continue to implement current aquatic life and human health criteria as individual NPDES permits are issued or renewed. DEQ will more broadly use permit-specific compliance strategies such as compliance schedule, variances, and water quality trading to achieve water quality goals of individual discharges while complying with NPDES requirements.

Pretreatment Program- Rebecca Bodnar

Pretreatment regulations establish requirements to control pollutants discharged from industrial users to public sewer systems and publicly owned treatment works. These regulations are designed to prevent toxic pollutants and other contaminants from passing through wastewater treatment

processes, interfering with treatment operations, or may contaminate sewage sludge, all of which could harm human health or the environment.

In Oregon, DEQ delegates primary implementation of pretreatment requirements to POTWs which act as the control authorities connected to their collection systems. As control authorities, the POTWs are responsible for regulating, monitoring, and enforcing pretreatment requirements for industrial users to ensure compliance with applicable standards. DEQ provides oversight of the 27 POTWs in Oregon with approved pretreatment programs and offers technical assistance to smaller POTWs that are not required to have a formal pretreatment program but implement additional measures to protect their collection systems, treatment works, and receiving streams.

Biosolids Program– Wyatt Stinnett

Biosolids are wastewater solids that have undergone sufficient treatment to make them safe for land application. These wastewater residuals are desirable fertilizers and soil conditioners. DEQ works with domestic wastewater treatment facilities to assure proper stabilization, application, management, and monitoring of solids on sites used to improve soil tilth and to grow a variety of crops. Biosolids applications are controlled by detailed site authorization letters that together with biosolids management plans, are linked directly to the Water Quality permits of wastewater treatment facilities. DEQ is developing a general statewide biosolids permit to enable wastewater facilities with administratively extended permits to make changes and advancements in their biosolids program. With funding secured by DEQ, Oregon State University has initiated a study to assess the effects of PFAS in land-applied biosolids across Oregon. DEQ will review and utilize the results of this study, while closely following EPA's risk assessment, to evaluate potential changes to our biosolids program.

Water Reuse– Wyatt Stinnett

DEQ staff work with municipal and industrial wastewater facilities to permit the recycling of treated wastewater effluent and provide technical assistance to those facilities interested in the practice of reuse. Water reuse is an alternative for municipalities and industrial wastewater dischargers managing their treated wastewater. Water reuse provides these entities with options that may be more economical and/or environmentally sound than surface water discharge, and that can be an additional source of non-potable water. Most water reuse occurs through land application to crops and golf courses, and there is increasing interest in reuse of treated effluent for industrial and commercial applications. DEQ is currently reevaluating our rules, policies, and program implementation to incorporate aspects of the EPA's Water Reuse Action Plan and expand beneficial water reuse in the state. DEQ works with the Oregon Health Authority, Water Resources Department and Department of Fish and Wildlife in implementing this program.

401 Water Quality Certification–Theresa Burcsu

Section 401 of the federal Clean Water Act requires that any federal license or permit to conduct an activity that may result in a discharge to waters of the U.S. receive certification from DEQ that the activity complies with state water quality requirements and standards before the activity is allowed. In order to provide a certification, DEQ reviews project applications that may result in such a discharge to ensure that the activity that would be authorized will also meet state water quality requirements. The federal licensing of hydroelectric projects and dredge and fill permitting are among the programs that typically require a 401-water quality certification from DEQ as a condition of the license or permit.

For dredge and fill projects, DEQ issues approximately 150 individual WQCs per biennia that contain conditions that provide protective measures for water quality and beneficial uses. DEQ also issues programmatic WQCs that cover groups of activities with protective conditions to provide a streamlined approach to the regulatory process.

Environmental Outcome: These activities help to ensure that adequate controls are in place so that point source discharges, dredge and fill activities and the recertification of hydroelectric projects do not result in water quality standards violations and will contribute to water quality improvements as required by TMDLs and other aspects of DEQ's work to implement the Clean Water Act.

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
5.1	<p>Continue to issue and reissue NPDES and WPCF permits statewide. Oregon has approximately 500 individual permittees, including 76 NPDES major facilities (including MS4 PI stormwater permits), 225 NPDES minor facilities, and 197 WPCF permittees.</p> <p>During this agreement period, DEQ will continue efforts to improve the NPDES permit issuance rate in order to reduce the backlog of administratively extended permits and make progress toward the EPA’s national performance goal of no more than 10% of NPDES permits remaining administratively extended. These efforts include improved workload planning and refinements to internal review and quality assurance processes.</p> <p>Migrate NPDES and WPCF permitting activities to Your DEQ Online (YDO), a web-based portal that supports permit access, application submittals, fee payments, reporting, and communication with permittees. Implementation is being phased by permit type and function and includes staff training, data validation, and permittee support. Full implementation of YDO is expected to improve efficiency, transparency, and consistency in permit administration over time.</p>	<p>Review subset of DEQ NPDES permits as agreed upon between the agencies and as resources allow. The EPA review of these permits will occur prior to public notice.</p> <p>Review permits during the public notice process and proposed final permits consistent with the Memorandum of Agreement. EPA’s goal is to screen all Oregon permits and determine whether a review of the permit and fact sheet is warranted. The decision to conduct a review is based on permit conditions including major/minor designation and whether significant or unique permit conditions are addressed by the permit. Continue to coordinate with DEQ on permit review selection and frequency.</p> <p>EPA’s program support coordinators for permit program support are: Erin Seyfried and Bilin Basu</p>	<p>Develop and issue a permit issuance plan each year that identifies specific NPDES permits intended to be reissued during the upcoming year.</p> <p>Transmit the issuance plan to the EPA annually.</p> <p>Implement the plan to improve permit issuance rate and reduce backlog of administratively extended NPDES permits to 40%.</p> <p>NPDES and WPCF permitting are live in YDO</p>	<p>Ongoing</p> <p>Permit issuance plans issued October each year</p> <p>Backlog reduced to Less than 40% by end of FFY 2026</p> <p>NPDES and WPCF DMRs live in YDO by Q1 2027</p>	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
5.2	Continue to improve the quality and consistency of permits and fact sheets through standardized use of updated templates and by providing clear, permit-specific technical analysis and documentation to support permit conditions. This includes identification of pollutants of concerns, application of the appropriate reasonable potential analysis (RPA), and development of defensible effluent limitations consistent with federal and state requirements.	Provide technical assistance, review and comment on permit language and justification in permit administrative records as resources allow.	Issued permits and fact sheets using standardized templates. Documented technical analyses, including RPAs and effluent limits. Completed internal QA and management review prior to issuance. Updated templates based on program and EPA feedback. Reduced permit rework following review. Training and guidance provided to permit writers.	Ongoing	Partial	
5.3	DEQ will continue to improve the consistency of permits, fact sheets, permit records through improved data acquisition, management and analyses	Provide technical assistance, review, and comment on draft policies, guidance, and procedures as resources allow. Assist with training and guidance of NPDES permit writers on federal regulations as resources allow. Participate in at least one permit writers training as resources allow.	Validated migration of permit, facility, and compliance data into YDO. Standardized data elements and workflows for NPDES and WPCF permits. Expanded use of electronic submittals for applications, reports, and payments. Improved linkage of permits, monitoring, and compliance data. Data quality checks completed	Ongoing	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
			for migrated and newly entered records.			
5.4	Develop and implement procedures, as needed, to ensure timely and consistent application of new or revised water quality standards in permit development and program implementation.	Technical Assistance; EPA review and comment on draft policies and guidance as resources allow.	Implementation plans completed for new or revised water quality standards. Program guidance or procedures issued to support consistent application of standards. Staff training or briefings conducted on new standards.	Ongoing	Partial	
5.5	Continue to implement statewide permitting procedures, guidance, and tools to promote consistency, effectiveness, and efficiency in permit development and implementation. This includes identifying, training, and maintaining subject-matter expertise across key technical areas, such as mixing zones and reasonable potential analysis, to strengthen permit quality and program resilience.	Technical Assistance; EPA review and comment on draft procedures and guidance; and other program support as needed and as resources allow.	Statewide permitting procedures, guidance, and tools implemented or updated. Permit templates and guidance revised as needed to reflect program and regulatory developments. Identified and trained back-up subject-matter experts for priority technical areas (e.g., mixing zones, reasonable potential analysis). New permit	Ongoing	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
			writers trained through the EPA Permit Writers Workshops or equivalent training.			
5.6	Implement State stormwater program, including construction, industrial, and municipal stormwater		<ul style="list-style-type: none"> - Implement general MS4, construction and industrial stormwater permits for phase one and two MS4 communities. - Renew the 1200-CA construction stormwater general permit - Renew the 1200-A and 1200-Z industrial stormwater permits - Work with local government agencies to assist DEQ in program implementation. 	<p>Ongoing</p> <p>1200CA Issuance: September 2027</p> <p>1200A Issuance: Winter 202/27 1200Z Issuance: July 2026 Ongoing</p>	Partial	
5.7	Implement a program for water reuse activities.	The EPA will provide TA program support as needed and as resources allow.	<ul style="list-style-type: none"> -Issue water reuse permits consistent with state requirements. -Lead interstate agencies in efforts to promote and effectively regulate water reuse activities. -Provide updates on water reuse program advancements via 	Ongoing	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
			legislative report at end of CY2027.			
5.8	Implement a program for biosolids/sewage sludge reuse activities.	The EPA will provide TA and program support as needed and as resources allow.	Issue biosolids/sewage sludge reuse permits consistent with state requirements.	Ongoing	Partial	
5.9	Implement the Pretreatment Program.	The EPA will provide TA and program support as needed and as resources allow.	<ul style="list-style-type: none"> - Oversee development of new programs as necessary - Provide technical assistance and categorical determinations - Compliance metrics of program audits and inspections, IU inspections, and annual report reviews are given in element 6.3. 	Ongoing	Partial	

Element 6: Compliance Assurance and Enforcement and Data Management

DEQ contact: Wyatt Stinnett and Erin Saylor

EPA contact: Jeff Kenknight/Dino Marshalonis

Compliance assurance and enforcement are key elements of the NPDES permitting program. DEQ and the EPA will collaborate to implement Clean Water Act Action Plan implementation policies in Oregon. DEQ will continue to improve permit compliance reporting and public accountability through improvements in electronic reporting system and automated compliance evaluations. DEQ and the EPA will coordinate NPDES permitting, compliance and enforcement activities to efficiently achieve program priorities and desired outcomes.

Compliance is assured primarily by targeted facility inspections and monthly Discharge Monitoring Report reviews in between inspections. Until DEQ develops its own compliance inspection procedures for NPDES permits, DEQ will continue to follow the current EPA NPDES Compliance Inspection Manual see <https://www.epa.gov/sites/default/files/2017-01/documents/npdesinspect.pdf>. DEQ also responds to complaints and performs technical assistance when warranted. The EPA's Compliance Monitoring Strategy policy specifies the minimum inspection targets and occurrence frequency. CMS policy requires annual inspection planning and end-of-year inspection performance reporting via the EPA's CMS form.

Enforcement is a deterrent to noncompliance and the means for correcting violations. DEQ issues enforcement responses of varying severity in accordance with the Enforcement Guidance for Field Staff. This guidance document is an internal management directive that helps DEQ appropriately allocate enforcement resources and achieve a consistent and fair statewide enforcement program. The Enforcement Guidance for Field Staff may be found at <https://www.oregon.gov/deq/FilterDocs/enforcementpol2.pdf>.

DEQ's enforcement response varies, according to the Enforcement Guidance for Field Staff, depending on the classification of the violation and the permittee's past enforcement history. Some programs may issue an Expedited Enforcement Offer, which offers the responsible party to settle the violations for a reduced penalty. However, the EEO is not an agency order and is therefore not appealable or negotiable. If the Respondent does not accept the EEO, DEQ will initiate formal enforcement by issuing an order in contested case. DEQ's formal enforcement actions assess civil penalties and require corrective actions to achieve compliance. Finally, according to Appendix A of the Enforcement Guidance for Field Staff, (IMD on Water Quality Mutual Agreement and Orders), DEQ may offer to resolve ongoing and anticipated future violations in exchange for a set of enforceable commitments through an upfront Mutual Agreement and Final Order. MAOs may also include civil penalties, stipulated penalties, corrective action schedules, and interim limits. All MAOs will have a final, date certain, termination date. Upon request by the EPA, DEQ will prepare an annual enforcement report with issued and closed formal enforcement action cases to assess enforcement performance.

DEQ will work with the EPA to implement the EPA's new National Enforcement and Compliance Initiatives, and its Compliance Advisories and Enforcement Alerts. DEQ will continue to work with the EPA to address Significant Non-Compliance by meeting quarterly. In addition, DEQ and the EPA will continue to collaborate on specific enforcement actions and may elect to pursue joint civil actions against the most egregious violators.

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
6.1	Conduct compliance assistance and compliance assurance activities as appropriate (see additional detail below).	TA and support as needed.	<ul style="list-style-type: none"> - TA provided to permittees. - DMRs from individual permittees reviewed. 	Ongoing	Partial	
6.2	Respond to significant public complaints. Note: DEQ often performs a compliance inspection for complaints warranting a site visit.	TA and support as needed.	<ul style="list-style-type: none"> - Prompt response to complaints that involve potential significant threats to public health and the environment. - Investigate spills. - Issue and complete enforcement actions as warranted. 	Ongoing	Partial	
6.3	Continue the inspection program of major and minor facilities. DEQ will implement the Clean Water Act Compliance Monitoring Strategy to ensure adequate inspection coverage, as resources allow. Notes: <ul style="list-style-type: none"> (1) Until DEQ agents are integrated into reporting through Your DEQ Online or YDO (formerly EDMS), DEQ will not consider DEQ agent administered permits for CMS targeting (i.e., construction and industrial stormwater general permits, individual and general CAFO permits, etc.). (2) On the CMS report form, EPA’s CMS national goal specifies “Traditional non- major” that are minor individual permits. DEQ does 	As resources allow, The EPA may schedule joint and/or oversight inspections with DEQ. The EPA may plan to do a number of industrial stormwater inspections in Oregon.	<ul style="list-style-type: none"> - DEQ will conduct inspections at major facilities every other year. Major facilities that qualify for offsite desk audits via Alternate CMS plan will also require on- site comprehensive inspections per CMS once each five-year permit cycle. - DEQ will conduct inspections at non-major facilities once every five years. - DEQ will target additional NPDES compliance efforts in targeted watersheds and environmental outcomes or 	Ongoing	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
	<p>not plan inspections at industrial general permits other than stormwater, CAFO (agent only), Pesticide, and Vessel (no DEQ permit) general permits as given on the CMS form.</p> <p>(3) EPA’s CMS national goal is “inspect as needed,” so DEQ will at least respond to credible complaints against any of the registrants with NPDES 2300A general permit for pesticides.</p> <p>(4) DEQ may perform sanitary sewer inspections as part of a POTW/sewage treatment plant inspection. Per CMS national goal, DEQ targets at least 5% of the sanitary sewer system universe annually or more frequently to evaluate recurring Sanitary Sewer Overflows (or Combined Sewer Overflows).</p> <p>(5) With the exception of Offsite Desk Audits and Focused Inspections reserved for an Alternate CMS plan, DEQ may conduct Reconnaissance Inspections and other inspections specified in the current EPA NPDES Compliance Inspection Manual to be counted towards minimum CMS goals.</p> <p>(6) Complaint responses by DEQ may be counted as CMS evaluations for</p>		<p>NPDES compliance history.</p> <p>Stormwater:</p> <ul style="list-style-type: none"> - Inspect at least 10% of industrial stormwater facilities per year. - Inspect at least 10% of construction sites 5 acres or larger per year - Inspect at least 5% of construction sites less than 5 acres per year. - Conduct compliance activities (review all annual reports and conduct at minimum five inspections per year) for Phase I permittees and Phase II MS4 permit registrants. <p>Pretreatment:</p> <ul style="list-style-type: none"> - DEQ will conduct audits of three approved, active pretreatment programs each year. - As part of the audit, DEQ will perform oversight inspections of at least two industrial users discharging to the POTW. - DEQ will conduct a minimum of one 			

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
	<p>NPDES permitted and unpermitted facilities.</p> <p>(7) DEQ engineers and permit writers may conduct investigation inspection types like Diagnostics Inspection per the EPA inspection manual for credit towards CMS goal counts.</p> <p>(8) For the Pretreatment metric of CMS goals, DEQ may include state WPCF pretreatment program facilities.</p> <p>(9) The EPA may conduct inspections at Oregon WPCFs independently or on behalf of DEQ only if there is an illicit discharge of pollutants to waters of the U.S.</p>		<p>Pretreatment Compliance Inspection annually, based on the review of pretreatment annual reports. A PCI will be conducted when the annual report review indicates potential compliance concerns; if no issues are identified, additional inspections may not be necessary.</p>			
6.4	<p>Use the NPDES Compliance Monitoring Strategy Plan and End of Year Report provided by the EPA. The annual CMS plan for the upcoming federal fiscal year must be submitted to the EPA annually by the target date of each year. The CMS End of Year report of the former federal fiscal year must be submitted annually by the target date of each year.</p>	<p>Provide draft NPDES Annual CMS Plan and End of Year Report template.</p>	<p>Alternate CMS plan</p> <p>Annual CMS plan</p> <p>Annual CMS EOY report</p>	<p>Annually by August 15</p> <p>Annually by September 15</p> <p>Annually by December 15</p>		
6.5	<p>Pursue timely and appropriate enforcement actions, prioritizing the most egregious or repeated violations and addressing Significant Non-Compliance.</p>	<p>The EPA collaborates with states on routine national webinars, teleconferences, and symposiums to implement this policy to develop measures to reduce</p>	<p>Formal enforcement actions taken pursuant to state law and DEQ policy.</p>	<p>Ongoing</p>	<p>Partial</p>	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
		SNC. The EPA and DEQ will continue to conduct quarterly calls on SNC reduction in Oregon.				
6.6	Upon request, send to the EPA all final formal enforcement actions issued and/or closed in the previous federal fiscal year for all NPDES major and minor facilities.		This annual report shall be submitted to the EPA by the target date of each year following the federal fiscal year. The report shall be formatted to include Case Name, EPA Class, NPDES Permit Number, Case Number, Action Type, Issued Date, Penalty Assessed, Final Penalty Paid, Compliance Complete Date, and Case Closed Date.	Upon Request	Partial	
6.7	Work with the EPA to update EPA/DEQ agreements, as needed.	Work with DEQ to update EPA/DEQ agreements, as needed.	EPA/DEQ agreements related to NPDES will be reviewed to determine if revisions are needed. Agreements include the 2010 NPDES MOA. The EPA will coordinate internally amongst permitting and compliance groups. DEQ will coordinate internally across DEQ regions, as appropriate. Updated agreements, as needed	Annually by October 31 of each year	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
6.8	Participate in quarterly planning/coordination calls with the EPA- SWES.	The EPA-Surface Water Enforcement Section will participate in quarterly planning/coordination calls with DEQ.	Coordination of inspection and enforcement work and improved work-sharing, as needed	Ongoing	Partial	
6.9	Meet annually with EPA-NPDES Permitting and Enforcement Sections to discuss priorities, performance expectations, updates on issues and activities, inspection and enforcement targets, and opportunities for integrating work between The EPA and DEQ.	Meet annually with DEQ to discuss priorities, performance expectations, updates on issues and activities, inspection and enforcement targets, and opportunities for integrating work between DEQ and the EPA.	Annual integrated work planning session.	Annually by October 31 of each year	Partial	
6.10	Per EPA-OECA protocol, DEQ will complete the annual review and data verification of DEQ-generated compliance and enforcement data in ECHO from ICIS- NPDES data. DEQ will supplement with state data any gaps in ECHO results of ICIS-NPDES data used for the annual SRF Data Metric Analysis.	Use ECHO data for an annual SRF Data Metric Analysis. The EPA will consider state data that supplements gaps in the ECHO data.	Verified Data and assessment of SRF metrics based on verified data.	February of each year for verified data.	Partial	
6.11	Work with the EPA to implement the EPA National Enforcement and Compliance Initiatives, including the initiative to increase compliance with Drinking Water Standards	Work with DEQ, other state agencies, Tribes, local governments, and regulated communities to ensure delivery of safe drinking water to communities.	Work with the EPA to implement this policy with measures as developed. Enhanced enforcement of state water quality permit conditions designed to protect sources of drinking water, including ground water.	NECI for Fiscal Years 2024-2027	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
6.12	Implement the NPDES Electronic Reporting rule (eRule) depending on the declared Initial Recipient status.	Provide assistance to DEQ and Oregon permittees for implementation of eRule.	DEQ's individual permit holders and general permit registrants will submit DMRs to Your DEQ Online for Group 3 data in Phase 1 and applicable data groups in Phase 2. DEQ will collaborate with the EPA and its agents to implement sharing of Group 1 data for Phase 1 and reports for Groups 2 through 10 using Your DEQ Online.	DEQ will implement the eRule in collaboration with the EPA on an agreed schedule. On August 21, 2025, DEQ requested an extension of eRule Phase 2 schedule from December 21, 2025, to December 31, 2026, for select Phase 2 elements. As the EPA posted on November 6, 2025, EPA's memo to DEQ specifies the NPDES eRule Phase 2 alternative compliance deadline for implementing electronic reporting and data sharing with ICIS is December 21, 2028.		

#	DEQ Commitment	EPA Commitment	Outputs	Timeframe	Supported by PPG?	EPA PAM
6.13	Continue to execute sustainable processes to maintain accurate data transfers from State data systems to ICIS.	The EPA R10 will support and assist with acquiring funding from EPA HQ.	Continued complete and timely data transfers to ICIS through manual entry and batch upload routines and EPA's ICIS interface screens.	As scheduled by the EPA	Partial	

Element 7: Water Quality Monitoring, Data Analysis and Management

DEQ contact: Karen Williams, Wade Peerman

EPA contact: Lisa Kusnierz (Regional Monitoring Coordinator), Becky Garnett (Standards and Assessment Section), and Ashley Zanolli (106 Coordinator)

DEQ's Water Quality and Laboratory and Environmental Assessment Divisions are responsible for monitoring and assessing Oregon's 52,000 miles of rivers, 400,000 acres of lakes, 360 miles of coastal ocean, Oregon's groundwater, 56,000 acres of tidal wetlands and 206 square miles of estuaries, harbors, and bays. DEQ is engaged in several water monitoring efforts, including the following:

- Studies to determine the relationship between water quality, habitat conditions and biological condition.
- Studies to determine threats to human and ecological health from toxic compounds, including harmful algal blooms.
- Studies to identify threats to groundwater.
- Supporting complaint response
- Technical support and equipment loan to watershed partners
- Assimilation of partners' data.

Surface water and biological monitoring and assessment provide the foundation for effective watershed investigation and management. DEQ uses monitoring data to discern status and trends, determine if water quality supports beneficial uses and to identify causes of impairment. DEQ monitors water quality and collects other environmental measurements to assess pollutant loading, such as spatial and temporal variability. DEQ then uses that data to develop plans that quantify pollutant reduction necessary for the waterbody to meet water quality standards and sustain beneficial uses.

In addition to monitoring and analysis, DEQ's Laboratory and Environmental Assessment Division serves as a technical and quality assurance resource to the ORELAP (Oregon Environmental Laboratory Accreditation Program) which is administered by the Oregon Health Authority. DEQ augments its water quality data with data from other sources, including watershed councils and federal agencies, as long as that data meets DEQ's quality assurance and control standards.

LEAD manages data collected by and for several water quality subprograms (e.g. NPDES, TMDL, NPS) and makes that data publicly available via the Ambient Water Quality Monitoring System.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM
7.1	Ambient Monitoring Network -DEQ will continue to monitor approximately 160 ambient water quality stations (including 15 sites monitored for Oregon Dept. Of Agriculture) at least 5 times annually throughout Oregon. These stations provide status and trends data for understanding water quality.	Provide technical assistance, as requested and as resources allow	<ul style="list-style-type: none"> - Continue entering data into the AWQMS repository. - The Oregon Water Quality Index will continue to be updated annually. Annual reports will be prepared on water quality trends and indicators. - Data will be used to support the 303(d) assessment process and 305(b) report. 	Ongoing	Partial	
7.2	<p>Collect water quality data to support TMDL development and to interpret implementation effectiveness. Examples include:</p> <ol style="list-style-type: none"> 1. Dairy McKay (Tualatin TMDL)- Temp, DO, E. coli and total phosphorus monitoring 10-year trend analysis plus continuous temperature and DO throughout the critical summer period. 2. North Coast Temperature- Monitoring at approximately 40 sites. 3. Upper Klamath and Lost River Temperature Monitoring- About 30 sites in the Upper Klamath and Lost River basins. 4. Continued monitoring in the Upper Deschutes Lakes to calibrate models for TMDL development. 5. Pollution reduction strategies including total mercury monitoring in the South Yamhill. <p>As resources allow, develop methods for establishing continuous monitoring stations with telemetric capability.</p>	Provide technical assistance, as requested and as resources allow	TMDLs developed on schedule and supported by adequate data. Data to interpret TMDL implementation effectiveness available where needed.	Ongoing	Partial	

7.3	Establish and document updated thresholds for chemical, habitat and biological stressor metrics statewide using newly selected reference sites.	Provide technical assistance, as requested and as resources allow	<ul style="list-style-type: none"> -Calculated in-stream metrics for habitat/chemistry at all biomonitoring stations where data exists. - Revised thresholds for chemical and habitat stressors and biological metrics statewide -Documented process for establishing thresholds for stressors 	Ongoing	Yes	
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#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM
7.4	Implement process to identify the most likely cause(s) of biological impairments	Provide technical assistance, as requested and as resources allow	Integrate methodology for biocriteria stressor identification into routine workflows	Ongoing	Partial	
7.5	Migrate historic “habitat metrics” into AWQMS and work with the EPA to migrate new habitat metrics into WQX	Provide technical assistance, as requested and as resources allow	Publicly accessible EPA habitat metrics for use in assessments.	Ongoing	Partial	
7.6	DEQ Monitoring Manager and the EPA Regional Monitoring Coordinator will meet quarterly to discuss monitoring needs and collaborations.	The EPA will keep DEQ informed about its monitoring activities in Oregon and share data as it becomes available		Ongoing	Partial	

Element 8: Management of Nonpoint Sources of Pollution

DEQ contact: Steve Mrazik

EPA contact: Jenny Wu

Section 319 of the federal Clean Water Act requires states to have nonpoint source management programs based on assessments of the amounts and origins of NPS pollution in the state. The Coastal Zone Act Reauthorization Amendments require development of additional management measures for NPS within the coastal zone.

Nonpoint source pollution comes from numerous diffuse sources such as runoff from roads, urban areas, forestry operations, on-site disposal, farms, and construction sites. This type of pollution is understood to be the largest source of water quality impairment in Oregon, as well as the rest of the United States. Historically, DEQ was able to provide close to \$1 million in 319 grant funds per year to local organizations for nonpoint source projects such as public education and watershed restoration. However, since 2015 DEQ's 319 grant funds have been reduced by the EPA because the EPA and National Oceanic and Atmospheric Administration (NOAA) determined that Oregon had not submitted a fully approvable Coastal Nonpoint Program under the Coastal Zone Act Reauthorization Amendments. The 2025 FFY 319 grant was reduced by \$509,800 and DEQ expects a similar level of reduction until the EPA/NOAA fully approve Oregon's CNP Plan. Oregon submitted information on the state's CNP for the EPA and NOAA to address these deficiencies and anticipate the agencies' consideration and action under CZARA during this PPA timeframe. DEQ's NPS program continues to fund the following activities:

- Characterization of NPS problems/concerns.
- Assessment to support and determine effectiveness of BMP's and DMA NPS programs.
- Coordination between DEQ and NPS stakeholders.
- Liaison staff to work with other state and federal agencies.
- Restoration activities.
- Development and modeling for NPS aspects of TMDLs; and
- Public education on NPS pollution.

Other areas of work include working with the Oregon Department of Agriculture in the implementation of the Agriculture Water Quality Management Program, with biennial reviews of ODA's area plans and rules, and ongoing work with the Oregon Department of Forestry concerning the sufficiency of that agency's programs to meet water quality standards and TMDLs. Basin coordinators and HQ staff analyze existing water quality data and provide a summary of the analysis to ODA and Local Advisory Committees for biennial reviews. DEQ compares water quality data to water quality standards and TMDL allocations and analyzes the water quality data for trends. The purpose of DEQ participation is to ensure that updated water quality information is considered during biennial reviews and potential rule revisions. Basin coordinators and HQ staff will also be involved in the design and application of ODA's and ODF's effectiveness monitoring of water quality improvement measures. When ODA and ODF are in the planning stages to develop effectiveness monitoring studies to evaluate how well plans and rules are meeting TMDL load allocations, DEQ will assist in the formulation of the goals and objectives (the questions to be answered) of the monitoring study. The purpose of DEQ's participation

is to ensure that the studies are focused on outcomes that are directly related to water quality standards and TMDL load allocation targets and to ensure that the data collected, and the analysis proposed is sufficient to answer these questions.

Environmental Outcomes: Active management and control of nonpoint sources of pollution will reduce the amount of nonpoint source pollution getting into Oregon's waterways, resulting in water quality improvements as measured by water quality data and measures in WQMPs and TMDL implementation plans.

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM
8.1	Based on available funding, distribute 319 funds as pass-through grants (sub-grants) to implement priority watershed-based plans or alternative plans.	Provide technical assistance, as requested and as resources allow.	Based on available funding, solicit and select projects.	Ongoing	Yes	
8.2	Evaluate options and choose option to meet the EPA's watershed project funding requirement that are in alignment with National NPS Program guidance (e.g., 319 leveraging exemption, NPS staff time to implement TMDLs).	Provide technical assistance, as requested and as resources allow.	DEQ tracks and reports the number of 319 grant funded staff time devoted to tasks that are eligible for funding using CWA Section 319(h) watershed project funds and implements a watershed based plan or alternative plan. DEQ determination of 319 leveraged exemption options.	Ongoing Q4 2026	Yes	
8.3	Complete an annual nonpoint source report that describes the progress in implementing the State's nonpoint source management program plan.	Review and take final action on annual report	NPS Annual Report.	Submit final annual report to the EPA by May 30 annually	Yes	
8.4	Complete coordination and update process with NPS team partners to finalize NPS Plan in accordance with current National NPS Guidelines for next 5-year cycle	Provide technical assistance, as requested and as resources allow.	Updated NPS Plan (2027-2031)	Draft issued for public comment by June 30, 2026	Yes	

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM
	(plan implementation during 2027-2031). Submit final 2027-2031 NPS Plan to the EPA for review and final action.	Review and take final action on NPS Plan update submittal.		Final NPS Plan Submitted to the EPA by November 30, 2026		
8.5	Determine with EPA available NPS Success Stories documenting either water quality progress or attainment of water standards annually.	Provide technical assistance, as requested and as resources allow.	NPS Success Stories or evaluation of potential success stories following completion of the Integrated Report.	Q4 2027	Yes	SP-12 WQ- 10
8.6	Enter GRTS 319 mandated elements to 319 project tracking data (in addition to any projects supported by staff time or projects that qualify under a leverage exemption for watershed projects, pending outcomes of 8.2) by annual national deadlines, including load reductions	Provide technical assistance, as requested and as resources allow	Data reflecting progress and status of 319 implementation for appropriate projects are in GRTS.	Load Reductions Due by March 31, 2027 and March 31, 2028	Yes	WQ-9a WQ-9b WQ-9c
8.7	Implement an approach to ensure a watershed-based plan or acceptable alternative plan, as presented in EPA's 319 grant guidelines, has been completed in a geographical area prior to funding on-the-ground projects with Section 319 dollars (or projects using state funding to qualify under a leverage exemption, see 8.2). The approach will in part rely on TMDLs,	Provide technical assistance, as requested and as resources allow. Review and take action on proposed alternative plans.	Watershed Based Plan or alternative plan checklists for specific watershed areas and pollutants describing how TMDLs, WQMPs, and other planning documents meet the required elements described in EPA's 319 grant guidelines.	Ongoing	Yes	

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM
	WQMP, TMDL implementation plans, and other plans.					
8.8	Review ODA’s area plan and rules and advises ODA of any changes or additions necessary to achieve water quality standards and meet TMDL agricultural load allocations. ODA anticipates biennial reviews during the PPG period for the following basins: Lower Willamette, Middle Willamette, Molalla/Pudding/French Prairie/North Santiam, Coos-Coquille, Goose and Summer Lakes, Greater Harney, Walla Walla, Hood River, Upper Deschutes, South Santiam, Umpqua River, Crooked River, Wallowa, Lower Deschutes, Clackamas, Malheur River, and Owyhee,	Provide technical assistance, as requested and as resources allow.	DEQ has submitted to ODA written comments and recommendation of any changes or additions to area plans and rules during the biennial review process.	Ongoing	Partial	

#	DEQ Commitment	EPA Commitment	Outputs	Target Date	Supported by PPG?	EPA PAM
8.9	Provide input, as needed, to the EPA/NOAA team as they evaluate and develop the decision rationale for the state's Coastal Nonpoint Source program submittal under CZARA.	Review and take action, in coordination with NOAA.		Q2 2027		

Element 9: Source Water Protection

DEQ contacts: Connie Dou

EPA contacts: Brian Nickel and Michelle Tucker

The Safe Drinking Water Act Amendments of 1996 provided resources to states to focus more attention on the source areas for public water systems instead of solely relying upon treatment to achieve clean drinking water. Approximately 75% of Oregon's citizens get their drinking water from public water systems. To address the assessment requirements of the SDWA, the Oregon Health Authority teamed up with the Department of Environmental Quality. The two agencies have established an Interagency Agreement to coordinate their ongoing work and DEQ's drinking water source protection positions are funded through the Drinking Water State Revolving Loan Fund Local Set-asides.

The two agencies have worked closely since 1998 to share the responsibilities of implementing the program. DEQ's role in that work includes maintaining GIS data layers and regulatory database information for Source Water Assessments, contamination source inventories, surface water delineations, and susceptibility analyses. DEQ provides technical assistance to public water systems and communities to develop and implement drinking water protection actions. DEQ also serves as the lead agency in coordinating drinking water source protection activities with other state and federal agencies in Oregon. Source water protection is accomplished through the implementation of the Clean Water Act and state regulations. DEQ works to reduce pollutants in source waters through various point and nonpoint source control programs so that the source waters meet CWA standards.

DEQ's source water protection work is reported to EPA Region 10 in OHA's annual reports. These annual reports are completed in conjunction with the OHA and include an accounting of the total population and public water systems that implement new source water protection strategies every year. Source Water Protection activities that address non-point sources of pollution are included in the NPS Plan and reported annually in DEQ's NPS report to the EPA.

Element 10: Clean Water State Revolving Fund Program

DEQ contacts: Deb Mailander

EPA contacts: Derrick Terada and Nic Taylor

The Clean Water State Revolving Fund program, established in 1987, provides below-market interest-rate loans to water quality infrastructure projects such as upgrading sanitary sewers. In recent years, the program also funded more nonpoint source projects (e.g., irrigation modernization, stormwater, septic tank repair/replacement, and watershed protection) and estuary projects. Congress provides funding to all CWSRF programs through the EPA federal capitalization grants, which generally require 20 percent matching funds for cap grants. Annual SRF loan repayments are “revolved” to finance future water quality projects. DEQ raises about \$10-20 million in match bonds as needed, which usually covers two to three years of state match requirements. Oregon CWSRF provides below-market rate loans with a variety of terms, offering communities financing options to plan, design and construct water quality improvement and protection projects. Through 2025, DEQ has provided loans to more than 260 communities statewide totaling more than \$1.6 billion.

The Infrastructure Investment and Jobs Act of 2021 provides substantial supplemental funding authority over five years (FFY 2022-2026). IIJA supplemental funds require 49% additional subsidy that does not require repayment. IIJA supplemental funds prioritize funding for distressed communities. Another category of IIJA funding is dedicated to emerging contaminants or IIJA EC (such as 6PPD-q and PFAS). IIJA EC funds must be provided as 100 percent additional subsidy, which the Oregon CWSRF provides as principal forgiveness to borrowers. A top priority for the Oregon CWSRF program 2024-2026 was expanding the loan program to maximize the impact of the IIJA supplemental and emerging contaminants funding, including increased principal forgiveness, while IIJA funding is still available. With the increased IIJA funding and expanded outreach efforts, Oregon’s CWSRF program nearly doubled its average annual loan commitments from \$59 million in SFY2020-SFY2022 to an average of \$110 million in SFY2024 - SFY2025.

Eligible Oregon CWSRF loan recipients include public agencies defined in Oregon Revised Statutes 468.423 including cities, counties, sanitary districts, soil and water conservation districts, irrigation districts, school districts, and various special districts. Oregon can also lend to non-profit Community Development Financial Institutions, certified by the US Department of Treasury, for the specific purpose of funding repairs or replacement of individual homeowner septic systems or connection to sewer.

DEQ CWSRF provides loans across the state to fund a variety of projects from small communities to larger municipalities. In recent years, DEQ loans have served more small community projects. During the most recent state fiscal year 2025, approximately 60 percent of CWSRF loan activity was for small communities with populations of 10,000 or less. DEQ CWSRF financing also helps municipalities meet wastewater treatment standards including discharge permitting and surface water quality obligations. These water quality standards are required under the Clean Water Act to protect beneficial uses such as recreation, fish habitat, boating, irrigation and drinking water protection. In addition to municipal wastewater needs, the CWSRF program also provides funding and incentives to address nonpoint water pollution and is integrating sustainable approaches to water quality improvement and protection. The program continues to increase funding for nonpoint source and wider range of CWSRF eligible projects including septic tank solutions, irrigation modernization projects, stormwater mitigation, brownfields, land fill, estuary, and land acquisition for watershed protection projects. In 2023, the State of Oregon amended the Oregon Revised Statutes definition of public agency to include water districts as eligible borrowers under CWSRF, which allows the program to finance more nonpoint source and drinking water protection projects. CWSRF is also financing projects that address emerging contaminants with new IIJA Emerging Contaminants funding for stormwater projects, Water Pollution Control Facility planning, and septic to sewer conversions.

In 2023, the program completed a rulemaking to address new requirements and priorities for IJJA implementation including increasing principal forgiveness, updating affordability criteria, project ranking and scoring and a new Intended Use Plan. The program is providing more principal forgiveness based on new affordability criteria including economically distressed communities, communities with high unemployment, water pollution and health burdened communities, small and very small communities. CWSRF is also providing principal forgiveness for communities with ratepayer hardship programs, water efficiency, energy efficiency, stormwater, and sustainable planning, design and construction projects per the Clean Water Act and Oregon Administrative Rules. The program increased limits for principal forgiveness up to \$2,000,000 or 50% of a loan for design and construction projects and 100% principal forgiveness or up to \$100,000 for planning loans. The program also provides 100% principal forgiveness for projects that address emerging contaminants under federal IJJA emerging contaminants cap grants, which has been \$2,400,000 the past two years. In SFY 2025, Oregon CWSRF received three federal capitalization grant awards: FFY 2023 IJJA supplemental cap grant for \$23,546,000; FFY 2023 IJJA emerging contaminants cap grant for \$2,402,000; and FFY 2024 annual base cap grant for \$9,222,000 for a total of \$35,170,000. In SFY 2026, Oregon reached a new high mark of \$43,614,402 in Federal funding combined with the base capitalization grant FFY 2025 for \$17,922,000, IJJA supplemental cap grant for \$25,690,000 and emerging contaminant cap grant for \$2,402,000. The Intended Use Plan for SFY 2026 includes 75 applications for projects requesting a total of \$420,086,383 requested from the fund.

Oregon CWSRF coordinates with EPA Region 10 staff and technical assistance providers to assist potential and current borrowers. DEQ focuses our staff technical assistance on assisting applicants on the IUP to complete requirements for loan readiness and assists borrowers with active disbursements. Oregon CWSRF exceeds EPA Region 10 and national averages for Disbursements as a Percentage of Assistance Provided, which is a measure of the efficiency of funds being actively disbursed to Oregon communities. The program coordinates with other programs to leverage funding including the EPA Sewer Overflow and Stormwater Reuse Municipal Grants program, which supports CSO/SSO mitigation and stormwater reuse projects in Oregon as well as state and federal funding opportunities for septic system repair and replacement projects in Oregon. Oregon CWSRF has also developed a new online application and loan tracking system, the Clean Water Funding Hub, which was launched internally in August 2024. This system is improving efficiency, security, and implementation of the program.

The EPA oversees any CWSRF program implemented by a state. The EPA also provides technical assistance to ensure overall CWSRF program consistency with federal regulations, while acknowledging the uniqueness of each state's program needs. The EPA accounts for the requirements of the Clean Water Act, federal regulations and the EPA CWSRF program guidance whenever considering requests for flexibility, depending on their specific circumstances. DEQ and EPA Region 10 maintain an Operating Agreement that stipulates the practices, procedures and expectations that remain the same from year to year. While SRF implementation is delegated to the state, The EPA will coordinate with DEQ SRF as practicable in support of Oregon's program. For example, DEQ provides the EPA with an SRF Intended Use Plan up to three times per year and provides an annual report to the EPA on the financial and programmatic accomplishments during the state fiscal year. DEQ reports on environmental outcomes in EPA's Office of Water State Revolving Fund database, combining environmental benefits system and aggregate financial information into the EPA SRF Data System. These reports inform the EPA's annual review, technical assistance, and advice to the state SRF program.

APPENDIX D: GOLD STANDARD SCIENCE

As stated in the Executive Order 14303 “Resorting Gold Standard Science”, the EPA remains committed to upholding the principles of Gold Standard Science (aka Scientific Integrity) to ensure that decisions and policies are informed by the most credible, reliable, and impartial scientific evidence available. As stewards of the nation's human health and environment, the EPA recognizes the critical importance of scientific integrity in research and applied science. In addition, as included in DEQ’s 25-27 Strategic Plan, scientific integrity is identified as a core value. Through this, DEQ affirms its commitment to fostering honest investigation, open discussion, objectivity and firm commitment to ethical standards.

EPA and DEQ will work to integrate the following scientific integrity objectives through the implementation of this PPA:

- Scientific integrity / Gold Standard Science will be highly visible within the EPA and DEQ partnership.
- All responsible for protecting Oregon’s land, air and water will embrace and model scientific integrity / Gold Standard Science.
- Robust mechanisms will ensure objectivity, clarity, and reproducibility, to protect and maintain a shared culture of scientific integrity as we carry out actions under this PPA.

DEQ commitment	EPA commitment	Contacts	Output
Quarterly meetings for information exchange to discuss scientific integrity and quality assurance.	Quarterly meetings for information exchange to discuss scientific integrity and quality assurance.	DEQ: Lori Pillsbury, Administrator Laboratory and Environmental Assessment Division	Improved information sharing and understanding to protect and maintain culture of scientific integrity.
Maintain a robust quality assurance system for programs under this PPA	Provide review and guidance on this system	EPA: Kelly McFadden Director Laboratory Services and Applied Science Division	High quality outcomes to embrace and model scientific integrity.
Sharing of scientific integrity trainings and policies as they relate to work under this PPA.	Sharing of scientific integrity trainings and policies as they relate to work under this PPA.		Partnership and consistency leading to making scientific integrity highly visible