



2025 Annual Report

Oregon's Water Quality National Pollutant Discharge Elimination System Permit Program

Updated December 2025



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Non-discrimination statement

DEQ does not discriminate on the basis of race, color, national origin, disability, age, sex, religion, sexual orientation, gender identity, or marital status in the administration of its programs and activities.

Visit DEQ's [Civil Rights and Environmental Justice page](#).

Executive summary

The Oregon Department of Environmental Quality regulates the discharges of pollutants to waterways by issuing federal National Pollutant Discharge Elimination System permits to point source discharges of wastewater and stormwater. Under the federal NPDES permit program, permits are effective for a fixed term not to exceed five years (40 CFR 122.46/123.25). As of October 2025, 54% of DEQ's NPDES permits are administratively continued. These administratively continued out-of-date permits remain in effect but may not reflect updated standards and Total Maximum Daily Loads.



From 2020 to 2025, DEQ reduced this backlog by more than 30% and is committed to eliminating the NPDES individual permit backlog of administratively continued permits. Through continued implementation of permit development process improvements, DEQ will protect water quality and meet all state and federal requirements; increase permit continuity throughout Oregon; educate permittees (municipal and industrial) to better understand and fulfill their permit requirements; maintain a proficient permit development team of permit writers and subject matter experts; and reduce the time to develop and issue permits. To this end, during Federal Fiscal Year 2025, Oct. 1 through Sept. 30, DEQ successfully accomplished several program improvements, including:

- Published updates to NPDES Domestic Major NPDES individual permit template.
- Published updates to NPDES Domestic Minor NPDES individual permit template.
- Published updates to NPDES Domestic Fact Sheet template.
- Published NPDES individual permit issuance plan for FFY 2026.
- Published NPDES five-year individual permit issuance plan for 2026-2030.
- Continued process improvements for engagement with SMEs.
- Implemented “Your DEQ Online” system in 2025 for individual and general Water Pollution Control Facility and NPDES permits.
- Continued standardized regular training and collaboration for the NPDES individual permit writing team.
- Continued to improve quality assurance reviews on all individual NPDES permit modifications, renewals, and initial issuance.
- Successfully completed gap analysis review with monitoring requests as needed for all FFY 2026 planned permits.

As of Dec. 3, 2025, Oregon's individual NPDES permit program included:

- 310 active municipal and industrial individual NPDES wastewater permits, of which, 137 are current (44 percent).
- There are 20 new (not active) permit applications under review and development for individual NPDES permits (domestic and industrial).

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Introduction

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

In November 2018, DEQ agreed to significantly reduce the number of permits administratively continued within 10 years, and to implement several actions to improve program operations and transparency. The goal was to get the number of permits administratively continued by five years or more down to less than 10% by 2028.

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

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

2025 NPDES permit status

The [2025 FFY NPDES individual permit issuance plan](#) identified 80 permits for administrative action (i.e., issuance, renewal, or termination) by Sept. 30, 2025. The 2025 FFY NPDES individual permit issuance plan was developed using the 2024-2028 five year issuance plan, permits expected to expire within FFY 2025, permits not completed during FFY 2024, regional or local priorities, and technical or policy barriers present in a geographic region, such as development of a new TMDL. DEQ took final action on 38 permits in 2025 which includes 27 renewals (including 3 terminations), two new, and nine modifications.

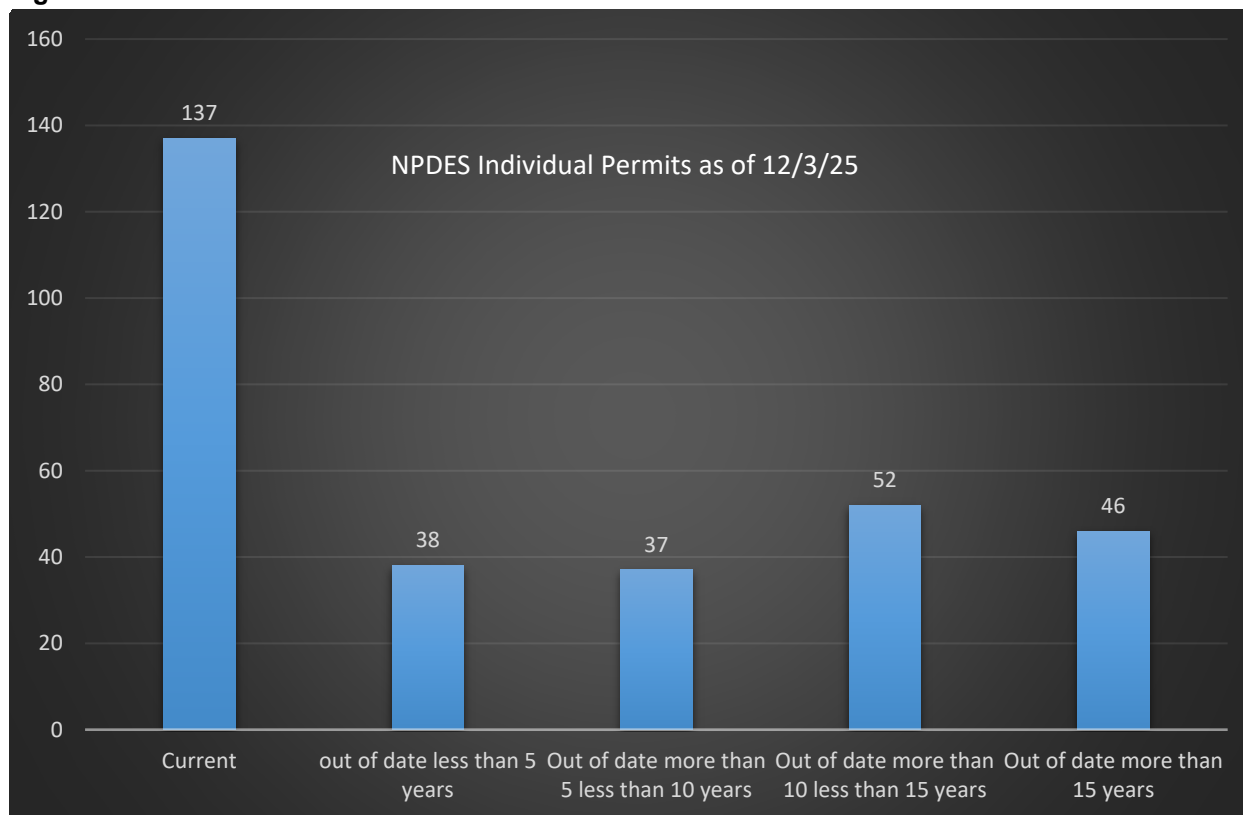
Overall status of DEQ's NPDES Individual Permit Program

As of Dec. 3, 2025 Oregon had 310 active individual municipal and industrial NPDES wastewater permits (shown in Figure 1 below) that must be renewed every five years. Of those permits:

137 (44%) are current

- 38 (12%) are administratively continued for less than five years.
- 37 (12%) are administratively continued five years or more and less than 10 years.
- 52 (17%) are administratively continued 10 years or more and less than 15.
- 46 (15%) are administratively continued for 15 years or more.

Figure 1 – NPDES Individual Permits as of 12/3/2025



DEQ's General Permit Program

DEQ issues a general permit to provide permit coverage for a category of dischargers that have similar types of operations and waste. A general permit issued for a category of dischargers contains similar effluent limitations, operating conditions and monitoring requirements for its category. General permits provide consistent administration for smaller discharges at a lower cost than individual permits while providing environmental protection for water quality through management practices, discharge limits, recordkeeping, and

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reporting. Federal regulations provide that NPDES general permits may not be issued for a term longer than five years. State regulations provide that WPCF general permit may not be issued for a term longer than ten years.

DEQ sets priorities for general permit development based on pressing needs, such as new state or federal regulation, court decisions and economic growth. DEQ also looks at opportunities to consolidate similar minor individual permits into a single general permit.

DEQ issued the 700-PM in-stream placer mining permit in May 2025 and is conducting permitting actions through Your DEQ Online.

Current general permit efforts include renewing the following permits:

- 600 WPCF Off-Stream Placer Mining
- 900-J NPDES Seafood Processing
- 1000 WPCF Sand and Gravel, Non-metallic
- 2000-J NPDES Pesticide Permit for Irrigation Systems
- 01-2021 NPDES general permit for confined animal feeding operations

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

NPDES individual permits issued during 2025

As of Sept. 30, 2025, DEQ had taken 38 administrative actions on NPDES individual permits. Table 1 below shows individual permit actions according to plan in Federal Fiscal Year 2025.

Table 1. Individual Permit Actions in FEDERAL FISCAL YEAR 2025

No.	Facility Legal Name (Common Name)	City	Permit Number	Date of Service ¹
1	YONCALLA MODIFICATION #1 (MAJOR)	YONCALLA	101699	10/9/2024
2	GARIBALDI, CITY OF	GARIBALDI	102609	10/10/2024
3	CITY OF ST. HELENS	ST. HELENS	101173	10/24/2024
4	KLAMATH FALLS STP - MODIFICATION #3 (MAJOR)	KLAMATH FALLS	100701	11/8/2024
5	COQUILLE, CITY OF (COQUILLE STP) (MODIFICATION #1 - MINOR)	COQUILLE	3885	11/18/2024
6	CASCADE LOCKS, CITY OF	CASCADE LOCKS	101328	11/19/2024
7	CITY OF ROGUE RIVER (ROGUE RIVER STP)	ROGUE RIVER	102588	11/22/2024
8	SUTHERLIN, CITY OF	SUTHERLIN	101993	12/6/2024
9	VERNONIA STP	VERNONIA	101094	12/19/2024
10	CLATSOP COUNTY FISHERIES	ASTORIA	101767	1/8/2025

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

No.	Facility Legal Name (Common Name)	City	Permit Number	Date of Service ¹
11	GRESHAM STP MODIFICATION #1 (MAJOR)	GRESHAM	102523	1/10/2025
12	JOSEPH, CITY OF	JOSEPH	101602	1/17/2025
13	NETARTS-OCEANSIDE	TILLAMOOK	101783	1/30/2025
14	OREGON SYSTEM OF HIGHER EDUCATION (JOHN L. FRYER AQUATIC HEALTH LAB)	CORVALLIS	102512	2/5/2025
15	CITY OF AMITY (AMITY STP)	AMITY	101924	3/7/2025
16	GMA GARNET (USA)	COOS BAY	100860	3/26/2025
17	MT. HOOD MEADOWS	MT. HOOD	100681	4/3/2025
18	WALDPORT	WALDPORT	101149	4/3/2025
19	FOSTER POULTRY FARMS, INC.	CRESWELL	101590	4/3/2025
20	ODFW - LEABURG HATCHERY - MODIFCATION #4 (MAJOR)	LEABURG	101914	5/5/2025
21	ODFW - MCKENZIE RIVER HATCHERY - MODIFICATION #4 (MAJOR)	LEABURG	101918	5/5/2025
22	WILLAMETTE LEADERSHIP ACADEMY	GOSHEN	101441	5/6/2025
23	FOREST PARK MPH, LLC. (FOREST PARK MOBILE VILLAGE) MODIFICATION #1 (MAJOR)	OREGON CITY	102323	5/6/2025
24	AMALGAMATED SUGAR	NYSSA	101174	5/20/2025
25	PORTLAND WATER BUREUA	PORTLAND	101617	5/27/2025
26	BW PIER POINT INN, LLC	FLORENCE	102276	6/2/2025
27	SUNDOWN SANITARY DISTRICT	ASTORIA	100905	6/13/2025
28	SUNSTONE CIRCUITS, LLC	MULINO	101015	6/23/2025
29	FOREST PARK MPH, LLC. (FOREST PARK MOBILE VILLAGE) MODIFICATION #2 (MINOR)	OREGON CITY	102323	7/1/2025
30	(TANNER CREEK) US ARMY CORPS OF ENGINEERS, BONNEVILLE LOCK AND DAM (BONNEVILLE; USACOE-TANNER CREEK WASTEWATER TREATMENT PLANT)	CASCADE LOCKS	101793	7/2/2025
31	USDOD; US ARMY CORPS OF ENGINEERS BONNEVILLE DAM	CASCADE LOCKS	102768	7/14/2025
32	PORT OF TILLAMOOK BAY	TILLAMOOK	101118	7/22/2025
33	PACIFIC COAST SEAFOOD - WARRENTON	WARRENTON	NINDB04-OR0055002	7/22/2025
34	USACOE McNARY LOCK AND DAM	UMATILLA	NINDB15-OR0055000	7/24/2025

No.	Facility Legal Name (Common Name)	City	Permit Number	Date of Service ¹
35	USACOE JOHN DAY PROJECT	RUFUS	NINDB15-OR0055001	7/24/2025
36	THE DALLES, CITY OF	THE DALLES	101728	8/1/2025
37	CANNON BEACH, CITY OF	CANNON BEACH	102237	8/6/2025
38	SILTRONIC CORPORATION - MODIFICATION #1 (MAJOR)	PORTLAND	101128	9/18/2025

NPDES individual permits delayed in 2025 (administratively continued)

Sixty individual NPDES permits planned and added to plan for issuance in 2025 were delayed and have been moved to the federal fiscal year 2026 NPDES individual permit issuance plan. The information in Table 2 provides the reason for delay of the 60 planned/added 2025 individual permits based on standardized permit delay factors developed by the permit program in 2015 (Appendix A: Water Quality permitting delay factors)

Table 2. NPDES Individual Permits Delayed in Federal Fiscal Year 2025

No.	Facility	Permit No.	Reason for delay
1	GEORGIA PACIFIC WUANA LLC (GP WAUNA MILL)	101172	Other competing priority (describe): public notice comment
2	MOLALLA, CITY OF	101514	Issued FFY 2026
4	DYNO NOBEL INC.	101535	Issued FFY 2026
5	DALLAS, CITY OF	101518	Issued FFY 2026
6	PORT ORFORD-LANGLOIS SCHOOL DISTRICT 2CJ	101695	Issued FFY 2026
7	GRAND RONDE SANITARY DISTRICT (GRAND RONDE STP)	101429	Issued FFY 2026
8	LEBANON	101771	Issued FFY 2026
9	ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	102024	Policy limitation on complex issue: Upgraded facility, increased discharges, and updated TMDL; Public notice started FFY 2026
10	COOS BAY NO.2	100771	Policy limitation on complex issue: Upgraded facility, increased discharges, and extended applicant review; Public notice started FFY 2026
11	COOS BAY NO. 1	100699	Permitting process – external factor: applicant review
12	ONTARIO, CITY OF	101633	Competing priorities: new permit applications (data centers); Public notice started FFY 2026
13	GOLD BEACH, CITY OF	103006	Policy limitation on complex issue: groundwater management, onsite permit requirements, functional equivalent evaluation: Public notice started FFY 2026

No.	Facility	Permit No.	Reason for delay
14	BOISE - MEDFORD PLYWOOD	100438	Training need
15	JELD-WEN	101540	Competing priorities: new permit applications (hydro-electric facility); Public notice started FFY 2026
16	CITY OF HERMISTON INDUSTRIAL WASTEWATER DISCHARGE SYSTEM	NEW	Policy limitation on complex issue: data center, permit ownership
17	THREE RIVERS/JOSEPHINE COUNTY UNIT JOINT SCHOOL DISTRICT (FLEMMING MIDDLE SCHOOL)	102578	High priority WQ permit program or policy development: various SME responsibilities
18	NEWPORT STP	102497	Permitting process - internal limitation (other): old permit, alignment with internal processes
19	WILSONVILLE, CITY OF	101888	Other limitation: delays due to cyber-attack and YDO development; Applicant review started FFY 2026
20	IMTWAHA FISH HATCHERY	103227	Competing priorities: new permit applications (hydro-electric facility); Public notice started FFY 2026
21	TDY INDUSTRIES LLC. (ATI MILLERSBURG TELEDYNE WAH CHANG)	100522	Policy limitation on complex issue: Complex industrial facility, long expired, new discharge location, increased discharges, and updated TMDL; Applicant review started FFY 2026
22	ARLINGTON, CITY OF	101369	Competing priorities: new permit applications (data centers)
23	NESKOWIN REGIONAL SANITARY AUTHORITY	101788	Training needed
24	CASCADE STEEL ROLLING MILLS INC	101487	Policy limitation on complex issue: Complex industrial facility, long expired, new discharge location, increased discharges, and updated TMDL; Applicant review started FFY 2026
25	ENTERPRISE	101659	Competing priorities: new permit applications (data centers)
26	DA YANG	NEW	Policy limitation on complex issue: Complex industrial facility, long expired, new discharge location, increased discharges, and updated TMDL; Applicant review started FFY 2026
27	LAFAYETTE, CITY OF	101147	High priority WQ permit program or policy development: various SME responsibilities
29	MONMOUTH, CITY OF	101919	Other limitation: delays due to cyber-attack and YDO development; Public notice started FFY 2026
30	PACIFIC CITY JOINT WATER-SANITARY AUTHORITY	101519	High priority WQ permit program or policy development: various SME responsibilities
31	INTERNATIONAL PAPER COMPANY (SPRINGFIELD PAPER MILL) Issuance year 2024	101081	High priority WQ permit program or policy development: various SME responsibilities

No.	Facility	Permit No.	Reason for delay
32	FALLS CITY	101808	Training needed
33	CITY OF PORTLAND, COLUMBIA BOULEVARD	101505	Competing priorities: new permit applications (data centers)
34	PORT OF PORTLAND & CO-APPLICANTS	101647	High priority WQ permit program or policy development: various SME responsibilities
35	McMINNVILLE, CITY OF (McMINNVILLE WATER RECLAMATION FACILITY)	101062	High priority WQ permit program or policy development: various SME responsibilities
36	LAKEWOOD UTILITIES	101781	Training needed
37	HOOD RIVER, CITY OF	101729	Other limitation: delays due to cyber-attack and YDO development; Applicant review started FFY 2026
38	UMATILLA INDUSTRIAL WASTEWATER FACILITY	103196	Policy limitation on complex issue: data center, permit ownership
39	PDX-80, AWS	NEW	Policy limitation on complex issue: Complex industrial facility, new discharge location, novel permit type; Applicant review started FFY 2026
40	SANDY, CITY OF	102492	Vacancy, retirement
41	LINCOLN CITY, CITY OF	101122	Other limitation: delays due to cyber-attack and YDO development;
42	PENDLETON, CITY OF	100982	Policy limitation on complex issue: Upgraded facility, increased discharges, long expired
43	USDOJ; FISH & WILDLIFE SERVICE	101522	Other limitation: delays due to cyber-attack and YDO development;
44	CALIFORNIA SHELLFISH - HALLMARK FISHERIES	NEW	Workload
45	MOSIER, CITY OF	101495	Workload
46	WILLAMETTE FALLS PAPER CO.	100976	Workload
47	PACIFIC COAST SEAFOOD - NEWPORT EAST	NEW	Workload
48	PACIFIC COAST SEAFOOD - NEWPORT CENTRAL	NEW	Workload
49	PACIFIC COAST SEAFOOD - NEWPORT WEST	NEW	Workload
50	KLAMATH FALLS, CITY OF	100701	Competing priorities: new permit applications (hydro-electric facility); Public notice started FFY 2026
51	PORT OF BROOKING CENTRALIZED TREATMENT SYSTEM	NEW	Policy limitation on complex issue: Complex industrial facility, new discharge location, novel permit type; Applicant review started FFY 2026
52	ASTORIA, CITY OF	102397	Workload
53	HALLMARK FISHERIES - CHARLESTON	NEW	Workload

No.	Facility	Permit No.	Reason for delay
54	WATER ENVIRONMENT SERVICES (KELLOGG CREEK WWTP)	100983	Workload
55	PACIFIC SURIMI - NEWPORT, LLC	101805	Workload
56	CALIFORNIA SHELLFISH COMPANY INC. (POINT ADAMS PACKING CO.)	101820	Workload
57	PRECISION DRYING SERVICESES INC.	102871	Workload
58	SOUTH SUBURBAN SANITARY DISTRICT	100700	Competing priorities: new permit applications (hydro-electric facility); Public notice started FFY 2026
59	COLUMBIA PLYWOOD CORPORATION	100016	Workload
60	PACIFIC COAST SEAFOOD - BANDON	NEW	Workload

Table 3. NPDES Individual Permits Administratively Continued, (as of Oct. 8, 2025)

Facility name	Permit No.	Facility type	Location	Years admin. continued
TDY INDUSTRIES, LLC	100522	IND	ALBANY	32.13
INTERNATIONAL PAPER COMPANY	101081	IND	SPRINGFIELD	27.54
ARCLIN U.S.A. LLC	101235	IND	SPRINGFIELD	26.13
NORPAC FOODS, INC.	101265	IND	STAYTON	25.63
WESTROCK NORTHWEST, LLC	101299	IND	NEWBERG	25.37
GEORGIA-PACIFIC CHEMICALS LLC	101474	IND	EUGENE	23.96
CASCADE STEEL ROLLING MILLS, INC.	101487	IND	MCMINNVILLE	23.37
ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	102024	DOM	ALBANY	19.95
LANE COMMUNITY COLLEGE	102116	DOM	EUGENE	19.79
ARAUCO NORTH AMERICA	100668	IND	ALBANY	18.79
DUFUR, CITY OF	102478	DOM	DUFUR	18.62
NEWPORT, CITY OF	102497	DOM	NEWPORT	18.46
PORT OF COLUMBIA COUNTY	102650	IND	CLATSKANIE	17.79
SALISHAN SANITARY DISTRICT	101273	DOM	GLENEDEN BEACH	17.79
STARLINK LOGISTICS INC.	101180	IND	PORTLAND	17.29
HOLLINGSWORTH & VOSE FIBER COMPANY	101331	IND	CORVALLIS	17.20
MYRTLE CREEK, CITY OF	101014	DOM	MYRTLE CREEK	17.03
BAKER CITY, CITY OF	101632	DOM	BAKER CITY	16.95
LA GRANDE, CITY OF	101549	DOM	LA GRANDE	16.95
HARRISBURG, CITY OF	101626	DOM	HARRISBURG	16.87
MCMINNVILLE, CITY OF	101062	DOM	MCMINNVILLE	16.78
ARKEMA, INC	103075	IND	PORTLAND	16.78

Facility name	Permit No.	Facility type	Location	Years admin. continued
FRANK LUMBER CO., INC.	101583	IND	LYONS	16.37
NEWBERG, CITY OF	100988	DOM	NEWBERG	16.37
IDAHO POWER COMPANY	101287	IND	HELLS CANYON	16.20
IDAHO POWER COMPANY	101275	IND	OXBOW	16.12
ELGIN, CITY OF	101606	DOM	ELGIN	15.95
SALEM, CITY OF	101145	DOM	KEIZER	15.95
REEDSPORT, CITY OF	100941	DOM	REEDSPORT	15.95
WOODBURN, CITY OF	101558	DOM	WOODBURN	15.87
WINCHESTER BAY SANITARY DISTRICT	101254	DOM	WINCHESTER BAY	15.87
WATER ENVIRONMENT SERVICES (KELLOG)	100983	DOM	MILWAUKIE	15.78
SILVERTON, CITY OF	101720	DOM	SILVERTON	15.78
HUBBARD, CITY OF	101640	DOM	HUBBARD	15.78
MT. ANGEL, CITY OF	101802	DOM	MT ANGEL	15.78
PENDLETON, CITY OF	100982	DOM	PENDLETON	15.70
SWEET HOME, CITY OF	101657	DOM	SWEET HOME	15.54
RIDDLE, CITY OF	101196	DOM	RIDDLE	15.54
CALIFORNIA SHELLFISH COMPANY, INC.	101820	IND	HAMMOND	15.45
GLIDE-IDLEYLD SANITARY DISTRICT	101877	DOM	ROSEBURG	15.37
HOOVER TREATED WOOD PRODUCTS, INC.	102834	IND	WINSTON	15.37
WINSTON GREEN REGIONAL TREATMENT FACILITY	100554	DOM	ROSEBURG	15.29
ROSEBURG URBAN SANITARY AUTHORITY	100981	DOM	ROSEBURG	15.03
PACIFIC SURIMI - NEWPORT, LLC	101805	IND	NEWPORT	14.87
INTERFOR U.S. INC.	100660	IND	GILCHRIST	14.87
TOLEDO, CITY OF	101713	DOM	TOLEDO	14.87
RSG FOREST PRODUCTS, INC.	102858	IND	CLATSKANIE	14.70
TRI-CITY SERVICE DISTRICT	102229	IND	OREGON CITY	14.54
ADAIR VILLAGE, CITY OF	101701	DOM	ADAIR VILLAGE	14.37
ALPINE COUNTY SERVICE DISTRICT	101923	DOM	MONROE	14.29
HULL-OAKES LUMBER CO.	101466	IND	MONROE	14.29
OAKLAND, CITY OF	101975	DOM	OAKLAND	14.20
SENECA SAWMILL COMPANY	101893	IND	EUGENE	14.12
CONRAD WOOD PRESERVING CO.	101901	IND	HAUSER	13.95
OAKRIDGE, CITY OF	102443	DOM	OAKRIDGE	13.45
KINGSFORD MANUFACTURING COMPANY	102153	IND	SPRINGFIELD	13.20

Facility name	Permit No.	Facility type	Location	Years admin. continued
PORTLAND GENERAL ELECTRIC COMPANY	101209	IND	CLATSKANIE	12.86
GRAPHIC PACKAGING INTERNATIONAL, INC.	101002	IND	PORTLAND	12.86
CASCADE WOOD PRODUCTS, INC.	102305	IND	WHITE CITY	12.86
CENTURY MEADOWS SANITARY SYSTEM, INC.	101721	DOM	AURORA	11.86
SANDY, CITY OF	102492	DOM	BORING	11.86
USDOJ; FISH & WILDLIFE SERVICE	101522	IND	ESTACADA	11.78
SANDERS WOOD PRODUCTS, INC.	100929	IND	LIBERAL	11.78
OREGON DEPARTMENT OF FISH & WILDLIFE	102663	IND	ESTACADA	11.78
COBURG, CITY OF	102979	DOM	COBURG	11.37
JASPER WOOD PRODUCTS, LLC	101427	IND	JASPER	11.28
WESTFIR, CITY OF	100811	DOM	WESTFIR	11.28
LOWELL, CITY OF	101384	DOM	LOWELL	11.28
GOLD HILL, CITY OF	102494	DOM	GOLD HILL	11.28
COTTAGE GROVE, CITY OF	101300	DOM	COTTAGE GROVE	11.03
WILLAMETTE FALLS PAPER COMPANY, INC	100976	IND	WEST LINN	11.03
BLOUNT, INC.	101162	IND	MILWAUKIE	11.03
UNIVAR SOLUTIONS USA LLC	101613	IND	PORTLAND	11.03
GRANTS PASS, CITY OF	101985	DOM	GRANTS PASS	11.03
SCAPPOOSE, CITY OF	100677	DOM	SCAPPOOSE	10.95
OREGON STEEL MILLS LLC.	101007	IND	PORTLAND	10.86
VIGOR INDUSTRIAL LLC	101393	IND	PORTLAND	10.78
ASH GROVE CEMENT COMPANY	102465	IND	PORTLAND	10.78
HATFIELD MARINE SCIENCE CENTER, OREGON STATE UNIVERSITY	101477	IND	NEWPORT	10.37
ATHENA, CITY OF	102125	DOM	ATHENA	10.28
ROYAL PACIFIC INDUSTRIES, INC.	101213	IND	MCMINNVILLE	10.28
YAMHILL, CITY OF	101473	DOM	YAMHILL	10.28
CARLTON, CITY OF	101902	DOM	CARLTON	10.28
JLR, LLC	101253	IND	WOODBURN	10.28
COLUMBIA HELICOPTERS, INC.	101906	IND	AURORA	10.28
ESTACADA, CITY OF	101542	DOM	ESTACADA	10.03
MCFARLAND CASCADE POLE & LUMBER COMPANY	102392	IND	EUGENE	9.95
J.H. BAXTER & CO., INC.	102432	IND	EUGENE	9.95
PERMAPOST PRODUCTS CO.	101489	IND	HILLSBORO	9.95
INDUSTRIAL HARBOR USA, LLC	101468	IND	GARDINER	9.95

Facility name	Permit No.	Facility type	Location	Years admin. continued
CASCADE PACIFIC PULP, LLC	101114	IND	HALSEY	9.86
GEORGIA-PACIFIC CONSUMER OPERATIONS LLC	101488	IND	HALSEY	9.86
OREGON METALLURGICAL, LLC	102223	IND	ALBANY	9.86
WILLAMINA, CITY OF	101070	DOM	WILLAMINA	9.86
DAYTON, CITY OF	101742	DOM	DAYTON	9.86
GERVAIS, CITY OF	101665	DOM	GERVAIS	9.86
ALLWEATHER WOOD, LLC	102034	IND	WHITE CITY	9.86
STIMSON LUMBER COMPANY	101480	IND	GASTON	9.78
ROGUE VALLEY SEWER SERVICES	100998	DOM	SHADY COVE	9.53
USDA; FOREST SERVICE	100107	DOM	TILLER	9.28
CANYONVILLE, CITY OF	100532	DOM	CANYONVILLE	9.28
USDA; FOREST SERVICE	100064	DOM	GLIDE	9.28
SCIO, CITY OF	101503	DOM	SCIO	9.20
JEFFERSON, CITY OF	101780	DOM	JEFFERSON	9.03
MURPHY COMPANY	101777	IND	FOSTER	9.03
GREEN DIAMOND PERFORMANCE MATERIALS, INC.	101932	IND	RIDDLE	9.03
ASTORIA, CITY OF	102397	DOM	ASTORIA	8.94
CORVALLIS, CITY OF	101714	DOM	CORVALLIS	8.94
MT. VERNON, CITY OF	101316	DOM	MT VERNON	8.86
LONG CREEK, CITY OF	101751	DOM	LONG CREEK	8.86
PRINEVILLE, CITY OF	101433	DOM	PRINEVILLE	8.78
CLATSKANIE, CITY OF	101595	DOM	CLATSKANIE	8.28
GEORGIA-PACIFIC CHEMICALS LLC (BAKELITE)	102603	IND	ALBANY	8.28
HALSEY, CITY OF	101297	DOM	HALSEY	8.28
VENETA, CITY OF	102480	DOM	VENETA	8.28
PHILOMATH, CITY OF	102060	DOM	CORVALLIS	8.28
BROWNSVILLE, CITY OF	102206	DOM	BROWNSVILLE	8.28
TANGENT, CITY OF	102247	DOM	TANGENT	8.28
MAGAR E. MAGAR	102520	DOM	RAINIER	8.20
RAINIER, CITY OF	102571	DOM	RAINIER	8.20
FUJIMI CORPORATION	103033	IND	WILSONVILLE	8.11
BOEING COMPANY, THE	101761	IND	PORTLAND	8.11
VALLEY LANDFILLS, INC.	101545	IND	CORVALLIS	8.03
OREGON CHERRY GROWERS, INC.	100841	IND	THE DALLES	7.78
OREGON CHERRY GROWERS, INC.	101593	IND	THE DALLES	7.78
TOYO TANSO USA, INC.	101685	IND	TROUTDALE	7.78
CORVALLIS MHC LLC	102611	DOM	CORVALLIS	7.78
DIAMOND HILL L.L.C.	101557	DOM	HARRISBURG	7.78

Facility name	Permit No.	Facility type	Location	Years admin. continued
ENVIRONMENTAL BUSINESS SOLUTIONS	103051	IND	PORTLAND	7.53
OREGON DEPARTMENT OF CORRECTIONS	101619	IND	SALEM	7.28
NORTHWEST NATURAL	103061	IND	PORTLAND	7.11
ARKEMA, INC	100752	IND	PORTLAND	6.53
FLORENCE, CITY OF	101703	DOM	FLORENCE	6.45
FORT CHICAGO HOLDINGS II U.S. LLC	101499	IND	NORTH BEND	5.28
WATER ENVIRONMENT SERVICES (BORING)	100968	DOM	BORING	4.61
PRECISION DRYING SERVICES INC.	102871	IND	RAINIER	4.53
CHILOQUIN, CITY OF	101029	DOM	CHILOQUIN	4.45
UMATILLA, CITY OF	103196	IND	UMATILLA	2.28
BOISE CASCADE WOOD PRODUCTS, L.L.C.	100438	IND	MEDFORD	2.11
PORT OF PORTLAND & CO-APPLICANTS	101647	IND	PORTLAND	1.86
GEORGIA-PACIFIC CONSUMER OPERATIONS, LLC	101172	IND	CLATSKANIE	1.86
MOSIER, CITY OF	101495	DOM	MOSIER	1.69
GEORGIA-PACIFIC TOLEDO LLC	101409	IND	TOLEDO	1.36
NESKOWIN REGIONAL SANITARY AUTHORITY	101788	DOM	NESKOWIN	1.11
IMTWAHA FISH HATCHERY	103227	IND	MILTON-FREEWATER	0.86
ARLINGTON, CITY OF	101369	DOM	ARLINGTON	0.77
ENTERPRISE, CITY OF	101659	DOM	ENTERPRISE	0.53
FALLS CITY, CITY OF	101808	DOM	FALLS CITY	0.53
COOS BAY, CITY OF	100771	DOM	COOS BAY	0.53
LAKEWOOD HOMEOWNERS, INC.	101781	DOM	AURORA	0.44
PORTLAND, CITY OF	101505	DOM	PORTLAND	0.44
JELD-WEN, INC.	101540	IND	KLAMATH FALLS	0.44
COOS BAY, CITY OF	100669	DOM	COOS BAY	0.36
WILSONVILLE, CITY OF	101888	DOM	WILSONVILLE	0.28
PACIFIC CITY JOINT WATER-SANITARY AUTHORITY	101519	DOM	PACIFIC CITY	0.28
LINCOLN CITY, CITY OF	101122	DOM	LINCOLN CITY	0.28
MONMOUTH, CITY OF	101919	DOM	MONMOUTH	0.19
LAFAYETTE, CITY OF	101147	DOM	LAFAYETTE	0.11
THREE RIVERS/JOSEPHINE COUNTY UNIT JOINT SCHOOL DISTRICT	102578	DOM	MERLIN	0.11

Facility name	Permit No.	Facility type	Location	Years admin. continued
SOUTH SUBURBAN SANITARY DISTRICT	100700	DOM	KLAMATH FALLS	0.11
COLUMBIA PLYWOOD CORPORATION	100016	IND	KLAMATH FALLS	0.11
OREGON DEPARTMENT OF TRANSPORTATION	101822	STM	SALEM	0.11
HOOD RIVER, CITY OF	101729	DOM	HOOD RIVER	0.02
KLAMATH FALLS, CITY OF	100701	DOM	KLAMATH FALLS	0.02

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

Table 4 includes NPDES individual permits administratively continued for 10 or more years. Implementation of a systematic approach will reduce this backlog of permits to less than 10 percent of the total issued permits. For consistency, DEQ applies five criteria in workload planning:

1. Rollover permits from previous plan
2. Five-year NPDES individual issuance plan
3. Geographic location
4. DEQ resources
5. Local priorities

Detailed, fact-specific reasoning for permit delays will be available during permit development and not beforehand.

Table 4. NPDES Individual Permits Administratively Continued Greater than 10 Years (as of Oct. 8, 2025)

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
TDY INDUSTRIES, LLC	ALBANY	Low priority based on planning criteria	32.13	2026
INTERNATIONAL PAPER COMPANY	SPRINGFIELD	Low priority based on planning criteria	27.54	2026
ARCLIN U.S.A. LLC	SPRINGFIELD	Low priority based on planning criteria	26.13	2026
NORPAC FOODS, INC.	STAYTON	Low priority based on planning criteria	25.63	2026
WESTROCK NORTHWEST, LLC	NEWBERG	Low priority based on planning criteria	25.37	2026
GEORGIA-PACIFIC CHEMICALS LLC	EUGENE	Low priority based on planning criteria	23.96	2026
CASCADE STEEL ROLLING MILLS, INC.	MCMINNVILLE	Low priority based on planning criteria	23.37	2026
ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	ALBANY	Low priority based on planning criteria	19.95	2026
LANE COMMUNITY COLLEGE	EUGENE	Low priority based on planning criteria	19.79	2027

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
ARAUCO NORTH AMERICA	ALBANY	Low priority based on planning criteria	18.79	2026
DUFUR, CITY OF	DUFUR	Low priority based on planning criteria	18.62	2027
NEWPORT, CITY OF	NEWPORT	Low priority based on planning criteria	18.46	2026
PORT OF COLUMBIA COUNTY	CLATSKANIE	Low priority based on planning criteria	17.79	2026
SALISHAN SANITARY DISTRICT	GLENEDEN BEACH	Low priority based on planning criteria	17.79	2027
STARLINK LOGISTICS INC.	PORTLAND	Low priority based on planning criteria	17.29	2026
HOLLINGSWORTH & VOSE FIBER COMPANY	CORVALLIS	Low priority based on planning criteria	17.20	2027
MYRTLE CREEK, CITY OF	MYRTLE CREEK	Low priority based on planning criteria	17.03	2026
BAKER CITY, CITY OF	BAKER CITY	Low priority based on planning criteria	16.95	2026
LA GRANDE, CITY OF	LA GRANDE	Low priority based on planning criteria	16.95	2026
HARRISBURG, CITY OF	HARRISBURG	Low priority based on planning criteria	16.87	2026
MCMINNVILLE, CITY OF	MCMINNVILLE	Low priority based on planning criteria	16.78	2026
ARKEMA, INC	PORTLAND	Low priority based on planning criteria	16.78	2026
FRANK LUMBER CO., INC.	LYONS	Low priority based on planning criteria	16.37	2026
NEWBERG, CITY OF	NEWBERG	Low priority based on planning criteria	16.37	2026
IDAHO POWER COMPANY	HELLS CANYON	Low priority based on planning criteria	16.20	2026
IDAHO POWER COMPANY	OXBOW	Low priority based on planning criteria	16.12	2026
ELGIN, CITY OF	ELGIN	Low priority based on planning criteria	15.95	2026
SALEM, CITY OF	KEIZER	Low priority based on planning criteria	15.95	2026
REEDSPORT, CITY OF	REEDSPORT	Low priority based on planning criteria	15.95	2026
WOODBURN, CITY OF	WOODBURN	Low priority based on planning criteria	15.87	2026
WINCHESTER BAY SANITARY DISTRICT	WINCHESTER BAY	Low priority based on planning criteria	15.87	2026
WATER ENVIRONMENT SERVICES (KELLOG)	MILWAUKIE	Low priority based on planning criteria	15.78	2026
SILVERTON, CITY OF	SILVERTON	Low priority based on planning criteria	15.78	2027
HUBBARD, CITY OF	HUBBARD	Low priority based on planning criteria	15.78	2028
MT. ANGEL, CITY OF	MT ANGEL	Low priority based on planning criteria	15.78	2028
PENDLETON, CITY OF	PENDLETON	Low priority based on planning criteria	15.70	2026

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
SWEET HOME, CITY OF	SWEET HOME	Low priority based on planning criteria	15.54	2026
RIDDLE, CITY OF	RIDDLE	Low priority based on planning criteria	15.54	2028
CALIFORNIA SHELLFISH COMPANY, INC.	HAMMOND	Low priority based on planning criteria	15.45	2026
GLIDE-IDLEYLD SANITARY DISTRICT	ROSEBURG	Low priority based on planning criteria	15.37	2028
HOOVER TREATED WOOD PRODUCTS, INC.	WINSTON	Low priority based on planning criteria	15.37	2028
WINSTON GREEN REGIONAL TREATMENT FACILITY	ROSEBURG	Low priority based on planning criteria	15.29	2028
ROSEBURG URBAN SANITARY AUTHORITY	ROSEBURG	Low priority based on planning criteria	15.03	2028
PACIFIC SURIMI - NEWPORT, LLC	NEWPORT	Low priority based on planning criteria	14.87	2026
INTERFOR U.S. INC.	GILCHRIST	Low priority based on planning criteria	14.87	2028
TOLEDO, CITY OF	TOLEDO	Low priority based on planning criteria	14.87	2028
RSG FOREST PRODUCTS, INC.	CLATSKANIE	Low priority based on planning criteria	14.70	2028
TRI-CITY SERVICE DISTRICT	OREGON CITY	Low priority based on planning criteria	14.54	2026
ADAIR VILLAGE, CITY OF	ADAIR VILLAGE	Low priority based on planning criteria	14.37	2026
ALPINE COUNTY SERVICE DISTRICT	MONROE	Low priority based on planning criteria	14.29	2026
HULL-OAKES LUMBER CO.	MONROE	Low priority based on planning criteria	14.29	2026
OAKLAND, CITY OF	OAKLAND	Low priority based on planning criteria	14.20	2028
SENECA SAWMILL COMPANY	EUGENE	Low priority based on planning criteria	14.12	2028
CONRAD WOOD PRESERVING CO.	HAUSER	Low priority based on planning criteria	13.95	2028
OAKRIDGE, CITY OF	OAKRIDGE	Low priority based on planning criteria	13.45	2028
KINGSFORD MANUFACTURING COMPANY	SPRINGFIELD	Low priority based on planning criteria	13.20	2026
PORTLAND GENERAL ELECTRIC COMPANY	CLATSKANIE	Low priority based on planning criteria	12.86	2026
GRAPHIC PACKAGING INTERNATIONAL, INC.	PORTLAND	Low priority based on planning criteria	12.86	2026
CASCADE WOOD PRODUCTS, INC.	WHITE CITY	Low priority based on planning criteria	12.86	2028

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
CENTURY MEADOWS SANITARY SYSTEM, INC.	AURORA	Low priority based on planning criteria	11.86	2027
SANDY, CITY OF	BORING	Low priority based on planning criteria	11.86	2027
USDOJ; FISH & WILDLIFE SERVICE	ESTACADA	Low priority based on planning criteria	11.78	2026
SANDERS WOOD PRODUCTS, INC.	LIBERAL	Low priority based on planning criteria	11.78	2027
OREGON DEPARTMENT OF FISH & WILDLIFE	ESTACADA	Low priority based on planning criteria	11.78	2027
COBURG, CITY OF	COBURG	Low priority based on planning criteria	11.37	2027
JASPER WOOD PRODUCTS, LLC	JASPER	Low priority based on planning criteria	11.28	2027
WESTFIR, CITY OF	WESTFIR	Low priority based on planning criteria	11.28	2027
LOWELL, CITY OF	LOWELL	Low priority based on planning criteria	11.28	2027
GOLD HILL, CITY OF	GOLD HILL	Low priority based on planning criteria	11.28	2027
COTTAGE GROVE, CITY OF	COTTAGE GROVE	Low priority based on planning criteria	11.03	2027
WILLAMETTE FALLS PAPER COMPANY, INC	WEST LINN	Low priority based on planning criteria	11.03	2027
BLOUNT, INC.	MILWAUKIE	Low priority based on planning criteria	11.03	2027
UNIVAR SOLUTIONS USA LLC	PORTLAND	Low priority based on planning criteria	11.03	2027
GRANTS PASS, CITY OF	GRANTS PASS	Low priority based on planning criteria	11.03	2027
SCAPPOOSE, CITY OF	SCAPPOOSE	Low priority based on planning criteria	10.95	2027
OREGON STEEL MILLS LLC.	PORTLAND	Low priority based on planning criteria	10.86	2027
VIGOR INDUSTRIAL LLC	PORTLAND	Low priority based on planning criteria	10.78	2027
ASH GROVE CEMENT COMPANY	PORTLAND	Low priority based on planning criteria	10.78	2027
HATFIELD MARINE SCIENCE CENTER, OREGON STATE UNIVERSITY	NEWPORT	Low priority based on planning criteria	10.37	2028
ATHENA, CITY OF	ATHENA	Low priority based on planning criteria	10.28	2027
ROYAL PACIFIC INDUSTRIES, INC.	MCMINNVILLE	Low priority based on planning criteria	10.28	2027
YAMHILL, CITY OF	YAMHILL	Low priority based on planning criteria	10.28	2027
CARLTON, CITY OF	CARLTON	Low priority based on planning criteria	10.28	2027
JLR, LLC	WOODBURN	Low priority based on planning criteria	10.28	2027

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
COLUMBIA HELICOPTERS, INC.	AURORA	Low priority based on planning criteria	10.28	2027
ESTACADA, CITY OF	ESTACADA	Low priority based on planning criteria	10.03	2027

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

Summary of General NPDES Permits Administratively Continued

Permit name	Years Administratively Continued	Planned Year of Issuance
200-J Filter backwash	23	2027
300-J Fish hatcheries	18	2029
400-J, Log ponds	18	2028
500-J, Boiler blowdown	23	2028
1300-J	20	TBD
1700-A, Vehicle and Equipment wash water	22	2027
1900-J, Non-contact geothermal heat exchange	23	TBD
2200-J Domestic wastewater floating residences (Young's Bay only).	10	TBD

Appendix A: Water Quality permitting delay factors

To: WQ Permit Program

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

Date: Sept. 18, 2015

Subject: Permit issuance – delay factors

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

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

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

Enforcement	Staff resources have been identified and assigned to permit issuance. Delay is caused by higher than expected time spent on enforcement activities resulting from a complaint or compliance inspection.
Emergency spill response	Staff resources have been identified and assigned to permit issuance. Delay is caused by staff time being reassigned to an emergency spill response.
Complaints	Staff resources have been identified and assigned to permit issuance. Delay is caused by higher-than-expected time spent investigating and responding to a complaint, which may include site visit investigation, documentation, and communication.
New permit applications ³	Staff resources have been identified and assigned to permit issuance (specifically a renewal for this delay factor). Delay is caused by reassignment to work on unexpected new permit applications.
High priority WQ permit program or policy development	Staff resources have been identified and assigned to permit issuance. Delay is caused by reassignment to work on program or policy development specifically related to the permit program. Examples may include development of an IMD, strategic planning on permit issuance strategies, etc. This does not include non-permitting related projects, such as standard development TMDL, NPS support etc.
High priority regional or state-wide permitting project	Staff resources have been identified and assigned to permit issuance. Delay is caused by reassignment to work on a high- priority water quality permit-related project, such as Jordan Cove, Pioneer Mountain, or Eddyville.
High priority non-permit related special project	Staff resources have been identified and assigned to permit issuance. Delay is caused by reassignment to work on a non- permit related special project. May include providing assistance to other water quality subprograms, such as assessments, standards, TMDL, etc. This also includes special regional or agency projects such as breakthrough teams, problem solving, IT-related projects.
Other competing priority:	(describe)
Permitting process - internal limitation	Delays related to limitations or barriers in the DEQ WQ permitting process. These are delays that are within the permitting program's scope of control.
Data analysis ⁴	Delay caused by difficulty obtaining necessary data that DEQ has historically collected and analyzed. Also includes unexpected challenges or delays in cleaning or formatting data to be usable for analysis. For example, difficulty getting stream flow data, LASAR data, or other data sets.
No data available	Minimum data is not available to analyze reasonable potential to exceed water quality criteria.

Response to public comment	Delay caused by higher-than-expected time required to respond to public comment, either due to an unexpected volume or comments or complexity of comments received.
Policy limitation on complex issue (describe)	Delay caused by lack of policy on a complex permitting issue. Includes situations where no policy exists or where a policy has been developed but does not address a specific situation. Also includes IMDs that are obsolete or under revisions.
Lack of thorough program documentation (describe)	Delay caused by uncertainty in the permitting process that could have been avoided with better program documentations. This delay does not include complex policy issues that need documentation. This delay may include procedural issues associated with interpreting applications, fees, LUCS, entering information into internal systems, etc.
Permitting tool needed	Delay caused by lack of some type of technical tool that would assist with the permitting process, including items such as an update RPA spreadsheet, ammonia limit calculator, checklist, template, etc. This delay factor applies to routine permitting activities; it does not apply to non-routine special situations.
Need for state-wide consistency	Delay caused by internal review to establish cross-program, state-wide consistency on a permitting issue.
Other internal permit process limitation:	(describe)
Permitting process – alternative development	Delays related to development of alternatives to address challenging effluent limits. Delays associated with internal or external review should also be identified.
Compliance schedule	Delay caused by negotiating with permit applicant to develop a compliance schedule.
Variance	Delay caused by need to gather information necessary to support the development of a variance.
Trading	Delay associated with development of a WQ Trading plan.
Other permitting process not listed:	(describe)
Permitting process – external factor	Delays related to aspects of the permitting process that are external to DEQ. These delays occur as a normal aspect of the administrative process followed with the permitting process.
Applicant review ⁵	Delay caused due to longer than anticipated period of applicant review on the draft permit. This includes negotiations that may occur on proposed permit conditions as well as language in the permit evaluation report.
EPA review	Delay cause by extended or unexpected EPA review of a permit. Includes informal review during the pre-public comment phase as well as extended review requested during or after the formal public comment period.
Other local/state/federal review	Delay caused by extended or unexpected review by another local, state, or federal organization.

Public information	Delay caused by additional need to provide public information on a proposed permitting action. This includes public meetings and outreach that occur <i>prior</i> to the formal public comment period.
Public comment	Delay caused by an unexpected request for a public hearing or extension of the public comment period.
Additional public comment	Delay caused by need to provide a second public comment period on a proposed permit. This generally applies to significant changes to the draft permit that resulted from an initial public comment period. This delay does not apply to requested extensions on the initial public comment period.
Permit appeal	Delay in final issuance due to an appeal <i>by the permittee</i> during the permit appeal period.
Request for reconsideration	Delay in final permit issuance due to a request for reconsideration by a third party.
Other permitting process external factor:	(describe)
Incomplete permit application	Delays that result from incomplete permit applications, including incomplete data submissions by the permit applicant and where a compliance schedule or special condition cannot be used.
Administratively incomplete	Delay caused by an administratively incomplete application, including missing documentation, wrong signature, inaccurate information, etc. Does not include more complex issues that are identified during technical analysis of the documentation.
LUCS	Delay caused by need to clarify a LUCS, obtain additional information from a local jurisdiction, or receive an updated LUCS.
Plan limitations	Delay due to missing, incomplete, or unclear plan required to be submitted prior to permit issuance, including pretreatment plan, biosolids management plan, land application plan, recycled water plan, etc.
Facility plan	Delay due to issues receiving a complete facility plan, which could result from unexpected lack of funding.
Mixing zone	New mixing zone study or analysis required.
Ambient data	Need additional ambient data
Effluent data	Need additional effluent data to complete the analysis.
DMR data	Need additional DMR data. For example, need daily monitoring results where only statistics have been provided.
WET	Need additional WET testing
Data format	Need data submitted in a useable format. For example, applicant supplies data in hard copy only or using wrong units.
New discharger to impaired waterbody, or new 303(d) listing.	Permit applicant must demonstrate that discharge will not cause or contribute to exceedance of a water quality standard on an impaired waterbody without a TMDL. This demonstration is also required for new listings, or applicants must meet criteria at end of pipe.
Other incomplete permit application	(describe)

Other limitations	Delays related to other DEQ Water Quality Program limitations. These factors also include DEQ's decision to delay or otherwise not renew an expired permit (i.e., not place the permit on the permit issuance plan).
Assessments	Delays associated with status of WQ assessment, including pending 303(d) listing or delisting actions.
WQ Standards – new standards	Delay waiting for development/approval of a new standard that is expected soon.
WQ Standards – beneficial use	Delay associated with impractical water quality standards because of need for an obvious change in a beneficial use, for example, irrigation canals listed as essential spawning habitat.
TMDL	Delay associated with TMDL development or approval of a TMDL.
Economic-community impact	Cost of complying with permit conditions will have significant social or economic impacts on a <i>community</i> . This factor should not generally be used as delay factor when the impact is solely on a business without wider impacts on the community.
Economic-negative environmental impact	Cost of complying with permit conditions will have measurable negative environmental impacts, such as significant energy consumption, contribution to green-house gas emissions, generating large quantities of solid waste, etc.
Economic-minimal environmental gain	Cost of complying with permit conditions results in minimal environmental gain.
Economic-facility development	Delay associated with facility securing funding necessary for plant improvements, including developing a facility plan, plant upgrade, etc. Under this delay factor, DEQ could issue a permit with a compliance schedule, but has “de-prioritized” permit issuance.
Limited discharge	Permit holder has a minimal environmental impact due to no discharge or limited discharge to waters of the state.
Other:	(describe)

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

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

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