

2018 Annual Report on Oregon's Water Quality National Pollutant Discharge Elimination System Permit Program

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



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Executive summary

The Oregon Department of Environmental Quality (DEQ) regulates the discharges of pollutants to waterways by issuing federal National Pollutant Discharge Elimination System (NPDES) permits to point source discharges of wastewater and stormwater. Under the federal NPDES permit program, permits normally are for a five-year term. However, approximately 80 percent of the NPDES permits in Oregon have not been renewed on time. These out-of-date permits remain in effect, but may not contain conditions that reflect updated standards and water quality conditions. This situation has existed for a long period of time in Oregon, and has attracted the attention of the U.S. Environmental Protection Agency (EPA), regulated entities (i.e., permit holders), non-governmental organizations, Oregon legislators, and the public.

Under the direction of the 2015 Oregon Legislature, DEQ hired an external consultant who conducted a thorough program review and provided recommendations in December 2016 to improve the NPDES permit program. During Federal Fiscal Year 2018, DEQ successfully accomplished a number of program improvements, including:

- Communicating NPDES permit issuance as a top agency priority through communications from DEQ's Director and Water Quality Division Administrator.
- Creating a team of eight dedicated NPDES individual permit writers under central oversight.
- Initiating standardized monthly training and collaboration for the NPDES individual permit writing team.
- Completing quality assurance reviews on all individual NPDES permit modifications, renewals, and initial issuance.
- Publishing the FFY2019 permit issuance work plan.
- Partnering with EPA's NPDES contractor, PG Environmental, to develop two NPDES individual permits and recommend a list of prioritized technical improvements to the permit program.
- Sun setting the Blue Ribbon Committee on wastewater improvements and establishing two new external advisory bodies to support Oregon's Water Quality Program, including the NPDES permit program.
- Completing an inventory on the "readiness" of all expired NPDES individual permitted facilities (permit readiness reviews) that identifies potential data and information gaps that would be potential barriers to permit development.
- Developing a procedure and standardized tool to assist NPDES permit writers with identifying critical gaps in permit data and information.
- Mapping the processes for NPDES permit development, permit coordination, permit quality assurance review, and operator certification.

As of Dec. 20, 2018, Oregon's individual NPDES permit program included:

- 348 active municipal and industrial individual NPDES wastewater and stormwater permits.
- 273 (78 percent) administratively continued permits.

Introduction

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

Oregon faces challenges implementing the NPDES permit program, including addressing an excessive proportion of administratively continued permits. A permit that is administratively continued has not been reissued within five years. As of Dec. 20, 2018, Oregon had 348 active municipal and industrial individual NPDES wastewater and stormwater permits that must be renewed every five years. Of those permits, 273 (78 percent) were administratively continued, and 46 (13 percent) were administratively continued 10 years or more.

In 2015, the Oregon Legislature, concerned about Oregon's NPDES permit backlog, directed DEQ to hire an outside consultant to evaluate the NPDES permitting program. Goals of the evaluation were to identify improvements that would allow DEQ to:

- Issue permits that are environmentally protective and that meet state water quality standards;
- Reissue permits before their five year term ends; and
- Reduce the total number of administratively continued permits to less than 10 percent.

DEQ retained MWH, an independent contractor with expertise in NPDES permitting programs, to evaluate DEQ's program, make recommendations, and propose an implementation plan to reduce the permit backlog. As a direct result of MWH's [Recommendation and Implementation Plan](#), DEQ initiated a number of actions to improve the NPDES permit program and reduce the number of administratively continued permits. An update on the status of DEQ's NPDES permit improvement process is provided in the NPDES Program Improvements section of this report.

In 2017, Northwest Environmental Advocates (NWEA) sued DEQ, alleging DEQ "unreasonably delayed taking action or failed to make decisions on pending National Pollutant Discharge Elimination System permit renewal applications." The lawsuit was resolved in November 2018, with DEQ agreeing to significantly reduce (<10%) the number of permits administratively continued five years or more within 10 years, and to implement a number of actions to improve program operations and transparency.

As part of the settlement of this litigation, DEQ agreed to report annually on the NPDES permit program's performance and include the following information:

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

NPDES program improvements

DEQ received the Recommendations and Implementation Plan from the consultant, MWH, on Dec. 8, 2016. The report identified recommended actions and implementation approaches covering a number of different topics related to permit issuance improvements.

The report's overarching message is that eliminating the permit backlog and achieving a sustainable level of NPDES permitting is dependent on widespread changes at the systems level of permit development. If recommended actions are only partially implemented, the existing backlog problem that has persisted for over 15 years is unlikely to measurably diminish, and Oregon's NPDES permitting program will fail to achieve the desired level of operation.

An overview of the final report including excerpts of the consultants' key findings and recommended actions is provided below, along with a status update on specific NPDES program improvement actions taken by DEQ in 2018.

Action area: leadership

The lack of clear decision-making authority, the decentralized structure of DEQ, and the distribution of water quality personnel across several organizational programs inhibits DEQ's ability to overcome its permit backlog.

Recommended Action: Elevate permit renewal to a top priority of the Water Quality Program and centralize authority for permit issuance.

***Status: complete.** DEQ established NPDES permit issuance as a priority for the Water Quality Program; the message was communicated to program staff by agency leadership. Although permit development continues to be completed primarily by permit writers who are in different DEQ regional offices, the permit development process was reorganized to a centralized oversight organizational structure to improve permit consistency and to identify recurring technical or policy issues. Additionally, permit writers will work with regional compliance personnel and managers on site visits and during permit development. This connection enables the permit writer to learn about regional issues not included in the written permit administrative record.*

Recommended Action: Update individual and organizational performance metrics to emphasize the elevated importance of permit renewals.

***Status: complete.** In December 2017, the NPDES permit program set an organizational performance metric to take final administrative action on 36 individual NPDES permits by Dec. 31, 2018, and was increased by one when a new permit was added. As of Dec. 31, 2018, DEQ took final administrative action (i.e., issuance, renewal, or termination) on 32 NPDES individual permits; an additional three permits were on public notice. This is a significant increase in recent years for NPDES individual permit issuance.*

In December 2017, DEQ created a team dedicated to the development of individual NPDES wastewater permits. The team consisted of eight permit writers located in DEQ's three regions as well as at DEQ's headquarters. Standardized position descriptions and work agreements were developed for team members. Each permit writer was assigned individual permit assignments that represented their individual performance metrics. In addition, each permit writer was directed to track permit development actions and activities at a task level to establish a data set on which to evaluate overall program

performance. The individual performance metrics and task-level data from calendar year 2018, will be analyzed and used to inform program management decisions in 2019.

Recommended Action: Sunset the Blue Ribbon Committee and convene one or more new advisory bodies for the program that has a well-defined role in helping to implement the report's recommendations.

Status: complete. DEQ officially ended the Blue Ribbon Committee on Wastewater Permitting in August 2018, and established two new stakeholder engagement groups:

- **Water Quality Roundtables:** DEQ Water Quality Roundtables are held quarterly to provide DEQ an opportunity to engage with all sectors of Oregon's environmental community, both regulated and unregulated, in collaboration and partnership for successful environmental protection. The Roundtables allow for frequent and focused information exchange among DEQ's water quality stakeholders.
- **Water Quality Forum:** DEQ Water Quality Forums are held quarterly with a representative group of the water quality regulated community, environmental interest groups, and industry. The Forums are intended to provide a rounded perspective on water quality issues within the state.

Action area: community capacity

Many of Oregon's communities lack the technical or financial resources or both to comply with their NPDES permits. This contributes to the permit backlog in two ways: In some instances, DEQ permit writers have provided technical support to permit holders that extends beyond their core permit-writing responsibilities. This reduces the amount of time devoted to permit renewal. DEQ has also been reluctant to issue permits at times due to concerns about a community's ability to afford or carry out required facility upgrades.

Recommended Action: Develop an inventory of permitted facilities that includes information about their ability to comply with existing and anticipated future permit requirements.

Status: partially complete. DEQ staff completed high-level reviews of the administrative records for all NPDES individual permits. These "Permit Readiness Reviews" included a high-level summary on each facility's ability to comply with permit requirements. While the readiness reviews provided a broad perspective on the ability of Oregon municipalities to comply with NPDES permit requirements, a review of the permit administrative record alone is insufficient to fully assess the ability of a permitted facility to comply with existing and future permit requirements. Since more detailed and facility-specific information is necessary to fully complete this recommendation, more detailed information must be obtained from permitted facilities. DEQ intends to develop a voluntary "water quality needs survey" to solicit additional information from individual NPDES permit holders. The NPDES Permit Program expects to accomplish this work in collaboration with the Clean Water State Revolving Fund program as well as external stakeholders that have more established and cooperative relationships with individual permitted facilities. The information from the survey and information gathered by partnering organization will inform DEQ on each individual facility's ability to comply with existing and future permit requirements.

Recommended Action: Estimate additional resources needed to build treatment facilities or natural systems to achieve compliance.

Status: incomplete. Estimating the resource needs for each individual treatment facility to achieve compliance with current and future permit requirements is beyond the scope of DEQ's regulatory

authority. However, DEQ expects to gather this information from a voluntary “water quality needs survey” and partner with external stakeholder groups with established relationships with permitted facilities to obtain this information.

Recommended Action: Convene an advisory group to identify and develop strategies to assist individual municipal and industrial NPDES permit holders with both the technical expertise needed to develop, design, and operate wastewater facilities, and the financial assistance necessary to pay for facility upgrades, expansions, or other changes. The advisory group should include representation from the legislature, as it is likely that legislative action will be required for the program to succeed in the long term.

State: partially complete. DEQ has established two new stakeholder groups to facilitate information exchanges and discuss strategies and priorities. DEQ expects to work with these stakeholder groups, including the regulated community, environmental interest groups, and industry, to develop strategies for delivering technical assistance to small and economically disadvantaged communities. Additionally, DEQ convened a meeting in December 2018 with representatives of the regulated community to specifically discuss technical assistance needs and possible next steps for developing solutions. It is anticipated that this was the first of multiple meetings to focus on this topic.

Action area: alignment across programs and with Federal requirements

NPDES permits must comply with federal requirements, including but not limited to implementation of water quality standards and Total Maximum Daily Load (TMDL) requirements. DEQ has not always integrated its work in water quality standards and TMDLs with its NPDES permit program, to assure that standards and TMDLs can be readily implemented in permits. Draft permits have not consistently aligned with these requirements and sometimes require rework, adding to time it takes to issue or renew a permit.

Recommended Action: Work with stakeholders to identify effective strategies and procedures to implement water quality standards and TMDLs in permits, including strategic use of permitting tools such as site-specific standards, multiple discharger variances, and trading programs.

Status: partially complete. Integration of permit improvement efforts with other water quality subprograms (e.g., water quality standards, assessments, TMDLs, Clean Water State Revolving Fund) will be most efficient with resources dedicated to these efforts. In September 2018, the Water Quality Program filled a temporary position to achieve the goals of program integration specifically pertaining to issues related to mercury in the Willamette Basin. The position has been very effective in integrating water quality standards, TMDLs and NPDES permitting. The temporary position ends Jun. 30, 2019. The Water Quality Program identified this as a critical need in its 2019-21 Agency Request Budget.

DEQ initiated work with an individual permit holder and EPA Region 10 on the first variance in Oregon. DEQ also initiated a project team and external advisory committee to issue a multi-discharger variance for mercury discharges throughout the Willamette Basin. Resolving complex technical and policy issues around mercury discharges involves multiple water quality subprograms, including standards, TMDLs, and NPDES permitting. To facilitate multiple subprogram activities around mercury in the Willamette Basin, the Water Quality Program created a temporary position dedicated to facilitating cross alignment. The Water Quality Program identified this as a critical need in its 2019-21 Agency Request Budget.

DEQ also initiated work to align cross-program work around controlling discharge of excess thermal load to Oregon’s waters. Internally, the Water Quality Standards, TMDL, and NPDES permit programs

have been evaluating the ability of individual NPDES point sources to comply with the existing water quality standards. In the initial phase of the project, DEQ partnered with the Willamette Partnership, which has been assisting with a technical review of wastewater discharges with Oregon's existing water quality standards and TMDLs. In a second phase of the project, DEQ will identify technical and policy alternatives with both the water quality standards and TMDL program that will allow individual permit holders to meet temperature requirements in permits.

Recommended Action: Evaluate DEQ's process for developing water quality standards. Develop methods to address cases where it has been problematic to attain beneficial uses and water quality standards associated with those uses.

Status: partially complete. Integration of permit improvement efforts with other water quality subprograms (e.g., water quality standards, assessments, TMDLs, Clean Water State Revolving Fund) will be most efficient with resources dedicated to these efforts. In September 2018, the Water Quality Program filled a temporary position to achieve the goals of program integration specifically pertaining to issues related to mercury in the Willamette Basin. The position has been very effective in integrating water quality standards, TMDLs, and NPDES permitting. The temporary position ends Jun. 30, 2019. The Water Quality Program identified this as a critical need in its 2019-21 Agency Request Budget.

Action area: quality and efficiency

A series of process improvements are needed to improve and ensure consistent permit quality and address significant inefficiencies in the NPDES permit renewal process.

Recommended Action: Execute a plan to efficiently gather and deliver data that is needed routinely as part of the permitting process.

Status: partially complete. DEQ convened a team of internal technical staff to improve data delivery and analyses associated with individual permit development. The "Data Bridging Team" issued an initial report with high-level recommendations. A second technical implementation team, the "Data Bridging Implementation Team," developed process maps and technical tools to improve data delivery and technical analyses during permit development. Specifically, the team developed a process and the technical tools to assist permit writers with assessing gaps in data and information necessary for permit development. In addition, DEQ hired a dedicated data steward for water quality permitting. The data steward plays a critical role in bringing together effluent and ambient data and ensuring the data is of the necessary quality and quantity to develop NPDES permits. DEQ's 2019-21 budget request for expanding this capacity as a program priority was included in the Governors Recommended Budget.

Recommended Action: Establish electronic reporting systems, and consult with the regulated community to develop a process for accepting monitoring data electronically in a manner that makes it easily accessible to permit writers.

Status: partially complete. DEQ initiated efforts for electronic reporting of NPDES permit compliance data. Currently, all individual major NPDES permit holders are reporting NPDES permit compliance data electronically to EPA's NetDMR system. DEQ is currently working on electronic reporting of NPDES compliance data for NPDES minor facilities, which is expected to be complete in spring 2019.

DEQ also developed a standard Excel template for electronic reporting of daily effluent data and is working with DEQ laboratory staff on the development of templates for electronic reporting of ambient data.

DEQ identified ongoing coordination with the regulated community on electronic reporting as a critical need for the NPDES program. The agency's 2019-21 budget request for additional resources in this area was included in the Governors Recommended Budget.

Recommended Action: Review and update permit renewal process maps to remedy inefficiencies and roadblocks.

Status: partially complete. *DEQ developed "current-state" process maps in 2017 and identified specific roadblocks to NPDES permit development, which required more focused and detailed descriptions of the permit renewal process. A critical area for improved clarity of process was the assembling and analysis of data and information to develop permit limits. The Data Bridging Team and Data Bridging Implementation Team developed a process map that better defines this process as well as provides recommended solutions for overcoming long-term challenges and inefficiencies.*

DEQ also developed detailed process maps for the following permitting actions:

- *NPDES permit administration (i.e., permit coordination);*
- *NPDES permit quality assurance review; and*
- *Operator Certification processes.*

Recommended Action: Formalize the updated procedures and train staff in their use. Verify that standardized procedures are consistently used.

Status: partially complete. *DEQ initiated monthly meetings of the dedicated team of NPDES individual permit writers. The team is regularly trained on new or updated procedures. Each individual permit goes through a standardized quality assurance review to ensure consistency and standardization in permit development. Ongoing training will be provided as additional procedures and permit development tools are developed.*

Recommended Action: Develop a comprehensive permit writer's guidance manual and training program.

Status: partially complete: *DEQ established a contract with EPA's NPDES permit contractor, PG Environmental, to assist with development of two permits and provide a list of prioritized recommendations for development of a permit writers' manual and training program. PG Environmental provided DEQ with a final report, the "NPDES Permit Program Enhancement Report" that provides an evaluation of DEQ's organization, permitting procedures, permitting resources, and training needs. The report identifies and prioritizes specific technical and policy enhancements that will potentially maximize DEQ's capacity to achieve its permit issuance goals. PG Environmental recommendations were classified as high, intermediate, and low-priority. DEQ intends to use this report as a guide for program improvements in 2019 and 2020. Moreover, DEQ expects to initiate development of a statewide permit writers' guidance based on the findings of this report.*

Recommended Action: Implement the training program. Conduct post-permit issuance reviews to determine effectiveness of tools and training, and update tools or retrain staff as needed.

Status: incomplete. *DEQ expects this to occur after development of the NPDES permit writers' guidance manual.*

Recommended Action: Update and improve user-friendliness of permit templates and tools. Implement processes to ensure they are kept up-to-date with changing policies, water quality standards, and legal decisions.

Status: partially complete. DEQ compiled comments from internal staff and regulated entities (via the public notice process) on the current NPDES permit and fact sheet templates. Proposed changes have been reviewed internally. An updated permit template and fact sheets template are expected in early 2019.

Action area: staffing and workload

Differences in the level of skills and expertise among permitting staff contributes to inefficiencies and inconsistent permit quality. Given Oregon's current need to reduce backlogs and to increase the average number of annual permit renewals, additional short-term resources will be essential to address the backlog. DEQ must also develop the data necessary to provide information needed to support long-term resource planning.

Recommended Action: Implement the following measures to achieve an immediate short-term infusion of additional staff resources. Some may require additional program funding or create deficits in other program areas if existing staff are reassigned to do permit-related work.

- Realign work tasks so that permit writing specialists focus only on permit renewals, and not on technical assistance or enforcement.
- Secure contractors and reassign staff to accomplish high-priority tasks, including moving resources as needed within and between regions to achieve permit issuance objectives.
- Add temporary staff to supplement the pool of permit writers.

Status: complete. In December 2017, DEQ assembled a team of eight dedicated individual NPDES permit writers. In addition, DEQ secured the assistance of EPA's NPDES permit contractor, PG Environmental, to assist with the development of two individual NPDES permits. The resource shifts to prioritize individual permit development have resulted in a reduction in resource availability in other key permit program areas, including: compliance assurance, Water Pollution Control Facilities permit development, technical assistance and complaint response. The agencies request for additional resources in this area was included in the Governors Recommended Budget.

Recommended Action: Collect and utilize data on the amount of time it takes to complete permitting tasks to determine the staffing level needed to eliminate the permit backlog and meet state and federal requirements over the long term.

Status: partially complete. The team of dedicated NPDES individual permit writers were directed to provide detailed time accounting at a task level so that program management had the necessary information to accurately assess the permit development resource needs. Approximately one year of data is currently available and DEQ expects to complete a first analysis of the data in 2019.

Action area: program funding

Circumstances outside of DEQ's control drive the budget process. When permit renewals are delayed due to inadequate program resources, the delay increases the ultimate cost of permit renewal due to inefficiencies and data problems. Funding uncertainty and fluctuations may also impede DEQ's ability to develop and implement effective permit renewal plans.

Recommended Action: Develop a per-permit funding formula for renewals.

Status: in progress. The team of dedicated NPDES individual permit writers were directed to provide detailed time accounting at a task level so that program management had the necessary information to accurately assess the permit development resource needs. Approximately one year of data is currently available and DEQ expects to complete a first analysis of the data in 2019. DEQ expects to use this data in developing a per-permit funding formula for permit renewals.

Recommended Action: Establish a realistic annual funding estimate based on a five-year work plan. Initial iterations must consider workload related to routine and backlogged permit work, and establish a process for flagging and addressing annual funding gaps.

Status: in progress. The Water Quality Program submitted a comprehensive permitting budget policy option package to support long term permitting resources. The Governor's office has acknowledged the need and recommends that the Legislature provide full-funding of the request. Agency leadership is providing support and engaging in significant communications with legislators and interested parties regarding the funding proposal.

In addition, the team of dedicated NPDES individual permit writers were directed to provide detailed time accounting at a task level so that program management had the necessary information to accurately assess the permit development resource needs. Approximately one year of data is currently available and DEQ expects to complete a first analysis of the data in 2019. DEQ expects to use this data in developing a per-permit funding formula for permit renewals. DEQ plans to publish a five-year permit issuance work plan by Oct. 1, 2019, that considers the resources currently available to renew permits, as well as the "readiness" individual discharges, and regional priorities.

Action area: communications and progress reporting

Tracking and reporting progress is essential to ensure staff and stakeholders are informed, involved, and committed to success. Early reporting measures should focus on progress toward implementing short-term changes necessary to improve efficiency and quality control. Course corrections and schedule adjustments are inevitable due to the high number of variables. It will be critical to promptly communicate these to internal and external stakeholders.

Recommended Action: Develop and resource a Permit Backlog Reduction Communications Plan.

Status: incomplete. A Water Quality Administrator and Deputy Administrator were hired in April 2018 and a WQ work plan is in development to communicate progress and milestones.

Recommended Action: Create metrics and institute reporting methods to track implementation progress. Ensure sufficient measures to allow for plan or schedule adjustments if needed.

Status: in progress. DEQ's Water Quality Permit Manager provides weekly permit issuance updates to agency leadership. The Water Quality Division Administrator provides agency wide updates, and holds quarterly Water Quality Roundtables, and Forums twice each year to inform and discuss topics related to permit issuance with interested parties and stakeholders. The notes from these meetings are on [DEQ's website](#). In addition, the permit program maintains information on permit issuance status and copies of permit issuance work plans [online](#). A broader formal Water Quality Communications Plan is currently under development.

2018 NPDES permit status

The [2018 NPDES permit issuance plan](#) identified 37 permits for administrative action (i.e., issuance, or termination) by Dec. 31, 2018. The 2018 NPDES permit issuance plan was developed considering the results of the “Permit Readiness Review” efforts, regional or local priorities, and technical or policy barriers present in a geographic region, such as development of a new mercury TMDL in the Willamette Basin. The plan originally established a target goal of taking final administrative action on 36 permits, but this goal was increased by one when DEQ received a new permit application mid-year.

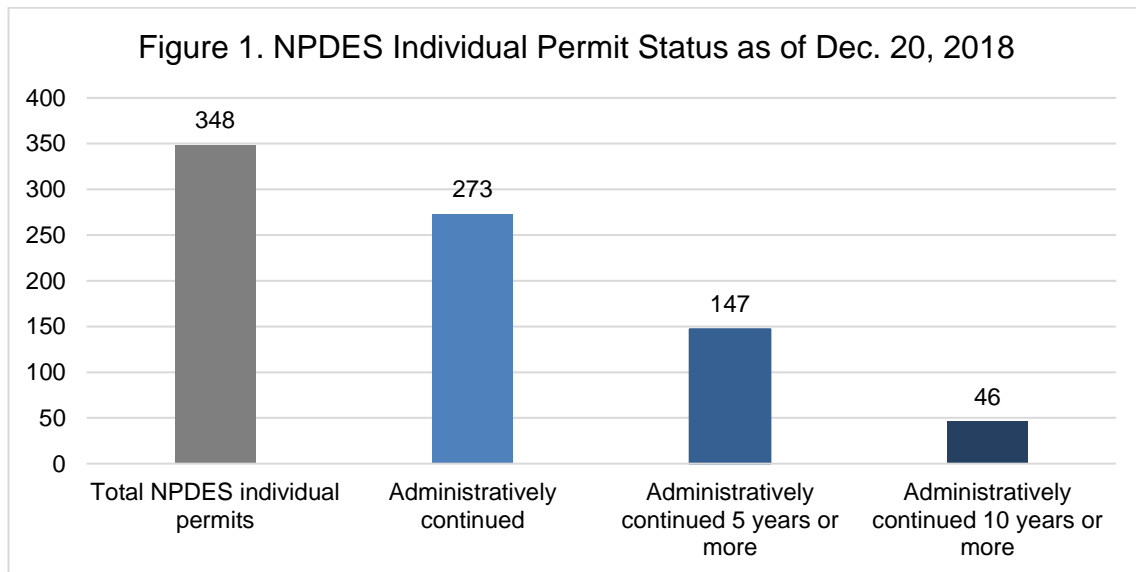
Although DEQ expects to provide annual permit issuance targets and updates based on the federal fiscal year (Oct. 1 through Sept. 30) the 2018 permit issuance plan was based on calendar year 2018. The calendar-based target coincided with formation of the dedicated NPDES individual permit writer team, which occurred in December 2017. Looking forward, permit issuance plans are expected to be based on the federal fiscal year.

In addition to successfully working on all 37 permits, DEQ successfully performed an internal, quality assurance step at multiple permit stages for 33 permits that were part of the plan, and completed multiple permit modifications.

Overall status of DEQ’s NPDES individual permit program

As of Dec. 20, 2018, Oregon had 348 active individual municipal and industrial NPDES wastewater permits (shown in figure 1 below) that must be renewed every five years. Of those permits:

- 273 (78 percent) were administratively continued, which means the permit has been administratively continued 180 days or more.
- 147 (42 percent) were administratively continued five years or more.
- 46 (13 percent) were administratively continued 10 years or more.



DEQ's NPDES general permit program

General permits provide environmental protection for water quality through management practices, discharge limits, recordkeeping, and reporting. Not all discharges are regulated under a general permit. DEQ issues a single, general permit to provide permit coverage for a similar category of dischargers that have similar types of operations and waste. Each general permit requires similar effluent limitations, operating conditions and monitoring requirements for its category. General permits provide consistent administration for smaller discharges at a lower cost than individual permits. Federal regulation requires a NPDES general permit to be effective for five years.

A majority of DEQ NPDES general permits are expired and have been in effect for more than five years. Permit registrants with permit coverage prior to its expiration have an effective permit in place. There are many new businesses and potential applicants waiting for NPDES permits that are expired.

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

Priorities for non-stormwater general permits include the 900-J seafood processing effluent discharge permit, 2000-J irrigation system pesticide general permit, 2300-A pesticide general permit, and 1500-A for wastewater from clean-up of petroleum products. Permitting for these general permits are in progress. Irrigation districts, water control districts and water improvement districts will use a 2000-J permit to minimize pesticide use in irrigation systems. A 2000-J will result in one lower-cost permit for pesticide use in irrigation systems and remove ten individual permits from the individual permit backlog. The 2300-A is a widely-used pesticide general permit. Without it, pesticide use associated with protection from invasive species, riparian restoration projects, mosquito control for public health are hampered. The 900-J is a general permit that regulates seafood processing discharges that will align with federal regulations for discharging these types of effluent to waters of the state. The 1500-A is used to manage wastewater from clean-up sites. The 200-J renewal will provide public water suppliers with a current permit for start-up of a new facility, upgrades for growth or to meet other state and federal requirements. A majority of 200-J registrants are cities and districts with some non-public water suppliers.

Other general permits are used for wastewater discharges from treated domestic wastewater, outflow from log ponds or hatcheries, and the use of other mechanical equipment in warehouses, services, or manufacturing with wastewater disposal needs. Issuing expired general permits and keeping current general permits from expiring takes more resources than DEQ has staff.

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

1.NPDES permits issued during 2018

As of Dec. 31, 2018, DEQ had taken administrative action on 32 of the 37 NPDES Individual Permits planned for permit issuance, and three general permits. An additional three individual permits were on public notice as of the end of 2018, one of the final steps in the permit development and issuance process. Table 1 below shows individual permits issued according to plan and general permit actions in Federal Fiscal Year 2018.

Table 1. Individual permits issued in 2018		
No.	Facility	Date of Service¹
1	City of Rockaway Beach	10/16/2017
2	Twin Rocks Sanitary District, Roackaway Beach	1/10/2018
3	Nehalem Bay Wastewater Agency	3/20/2018
4	City of North Powder	4/25/2018
5	City of Siletz	5/16/2018
6	Parkdale Sanitary District	5/25/2018
7	City of Wallowa	5/25/2018
8	City of Troutdale Water pollution Control Facility	7/01/2018
9	ORC Properties LLC, Coos Bay	7/12/2018
10	City of Umatilla Industrial Wastewater Facility	7/17/2018
11	Fish Hawk Lake Recreation, Birkenfeld	9/1/2018
12	Boise Cascade Wood Products, Medford	9/10/2018
13	City of Depoe Bay	9/17/2018
14	Duckwall-Pooley Fruit Co., Van Horn Cold Storage Hood River	10/05/2018
15	City of Yachats	10/11/2018
16	Terminal Ice & Cold Storage Co., Pine Grove	10/26/2018
17	Tillamook RV Park*	11/14/2018
18	City of Brookings*	12/6/2018
19	City of Seaside, STP*	12/6/2018
20	Clatsop County Fisheries (CEDC Fisheries) *	12/7/2018
21	City of Joseph, STP*	12/14/18
22	City of Ontario, STP*	12/21/18
23	Multnomah Falls Lodge, STP*	12/21/18
24	City of The Dalles, STP*	12/28/18
25	Duckwall-Pooley Fruit Co., Duckwall Fruit*	12/28/18
26	Georgia Pacific Consumer Products LP, Wuana Mill	12/28/18
27	City of Gold Beach, STP*	12/31/18
28	City of Tillamook, STP*	1/2/19
29	Port of Portland & Co-applicants, PDX*	1/2/19
30	International Paper Company (Terminated)	12/4/17
31	Cascade Corporation (Terminated)	4/25/18
32	Oregon System of Higher Education (Terminated)	3/28/18
General Permit Actions		
1	1200-Z modification	10/22/18
2	700-PM modification	5/3/18
3	MS4 Phase II issued	11/30/18

* Issued according to the 2018 plan based on calendar year instead of federal fiscal year. All NPDES permit issuance plans going forward will be federal fiscal year (Oct. 1 – September 31).

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

2. Administratively continued NPDES permits that were delayed in 2018

Nine individual NPDES permits planned for issuance in 2018 were delayed and are expected to be issued in early 2019, or have been moved to the Federal Fiscal Year 2019 NPDES individual permit issuance work plan. In 2018, the individual permits delayed were not due to contingencies described in the November 2018 settlement agreement². The information in Table 2 shows the reason for each of the nine 2018 individual permits that were delayed, based on standardized permit delay factors developed by the permit program in 2015 (Appendix A).

Table 2. NPDES individual permits delayed in Federal Fiscal Year 2018		
No.	Facility	Reason for delay
1	Dyno Nobel Inc., Deer Island	Permitting process – external limitation. Additional EPA, and other local/state/federal review.
2	Sundial Marine Construction and Repair, Inc., Troutdale	Permitting process – internal limitation. Policy limitation on complex issue related to stormwater discharges and effluent limit guidelines.
3	Bourne Mining Corporation (E&E Mine), Bourne	Permitting process – internal limitation. Data analysis related to quality and availability of seasonal monitoring.
4	Odell Sanitary District	Permitting process – internal limitation. Data analysis related to shared outfall
5	City of Lincoln City	Permitting process – alternative development. Compliance schedule, significant delays due to city requests for more time to develop compliance schedule strategy.
6	Amalgamated Sugar Co. LLC, Nyssa	Permitting process – alternative development. NPDES permit to be terminated upon completion of MAO due to potential compliance issues.
7	City of Sutherlin	Permitting process – internal and external limitation. EPA review and guidance does not align with DEQ permitting process for waters of the state.
8	City of Waldport	Permitting process – alternative development. Compliance schedule, and lack of thorough program documentation for development of mass limits.
9	City of Lakeside	Permitting process – alternative development. Compliance schedule, and lack of thorough program documentation for development of mass limits.

NPDES general permits delayed in 2018 were not due to contingencies outlined in the November 2018 settlement agreement. The information in Table 3 shows the reason for the 2018 general permits that were delayed.

² Contingencies are provided in the settlement, and are events that may affect DEQ’s ability to meet the milestone requirements in the November 2018 settlement. Future DEQ reports will provide the relevant contingency if applicable, for each permit delayed.

3.NPDES general permits that were delayed in 2018

Table 3. NPDES general permits, on the 2018 issuance plan, delayed in Federal Fiscal Year 2018		
No.	Permit	Reason for delay
1	900-J	Permitting process – external factor – Additional public comment
2	2300-A	Other local/state/federal/ review; Other limitations. Uncertainty in the federal definition of Waters of the United States.
3	1500-A	Competing priorities – High priority water quality permit program or policy development.

4.Age of all administratively continued individual NPDES permits

Table 4. NPDES individual permits administratively continued			
Facility name	Facility type	Location	Years admin. continued
Columbia Plywood Corporation, Forest Products	Industrial	Klamath Falls	29.0
TDY Industries, LLC, Teledyne Wah Chang	Industrial	Albany	25.3
City Of Klamath Falls Wastewater Treatment And Reclamation Facility (Spring Street)	Domestic	Klamath Falls	23.3
South Suburban Sanitary District	Domestic	Klamath Falls	23.3
Collins Products LLC	Industrial	Klamath Falls	20.7
International Paper Company, Springfield Paper Mill	Industrial	Springfield	20.7
Amalgamated Sugar Company, LLC.	Industrial	Nyssa	19.9
Arclin U.S.A., LLC.	Industrial	Springfield	19.3
Norpac Foods, Inc., Plant #1, Stayton	Industrial	Stayton	18.8
Westrock Northwest, LLC., Newberg Mill	Industrial	Newberg	18.5
Georgia-Pacific Chemicals LLC.	Industrial	Eugene	17.1
Cascade Steel Rolling Mills, Inc.	Industrial	McMinnville	16.5
City of Dallas	Domestic	Dallas	16.1
City of Lebanon	Domestic	Lebanon	13.9
Oregon Department Of Transportation	Statewide Stormwater MS4	Salem	13.5
City of Monmouth	Domestic	Monmouth	13.3
Albany-Millersburg Water Reclamation Facility	Domestic	Albany	13.1

Table 4. NPDES individual permits administratively continued			
Facility name	Facility type	Location	Years admin. continued
Lane Community College	Domestic	Eugene	12.9
Metropolitan Wastewater Management Commission, Eugene/Springfield	Domestic	Eugene	11.9
Flakeboard America Limited, Duraflake	Industrial	Albany	11.9
City of Dufur	Domestic	Dufur	11.8
City of Newport	Domestic	Newport	11.6
Klamath Irrigation District	Industrial	Klamath Falls	11.4
Westland Irrigation District	Industrial	Echo	11.3
West Extension Irrigation District	Industrial	Umatilla	11.3
Stanfield Irrigation District	Industrial	Stanfield	11.3
Hermiston Irrigation District	Industrial	Hermiston	11.3
City of Rogue River	Domestic	Rogue River	11.3
North Unit Irrigation District	Industrial	Madras	11.2
Owyhee Irrigation District	Industrial	Nyssa	11.2
Vale Oregon Irrigation District	Industrial	Vale	11.2
Owyhee Ditch Company	Industrial	Ontario	11.2
Ochoco Irrigation District	Industrial	Prineville	11.2
City of North Bend	Domestic	North Bend	10.9
Port Of St. Helens	Industrial	Clatskanie	10.9
City of Waldport	Domestic	Waldport	10.9
City of Lincoln City	Domestic	Lincoln City	10.9
City of Coos Bay, No. 2 - Empire	Domestic	Coos Bay	10.9
Salishan Sanitary District	Domestic	Gleneden Beach	10.9
Starlink Logistics Inc.	Industrial	Portland	10.4
Hollingsworth & Vose Fiber Co.	Industrial	Corvallis	10.3
City of Myrtle Creek	Domestic	Myrtle Creek	10.2
City of La Grande	Domestic	La Grande	10.1
Baker City	Domestic	Baker City	10.1
City of Harrisburg, Lagoon Treatment Plant	Domestic	Harrisburg	10.0
Bourne Mining Corporation, E & E Mine	Industrial	Bourne	10.0
Arkema, Inc	Industrial	Portland	9.9
City of McMinnville, Water Reclamation Facility	Domestic	McMinnville	9.9
City of Ashland	Domestic	Ashland	9.9
City of Coquille, City Of	Domestic	Coquille	9.9
Boise White Paper, LLC	Domestic	St. Helens	9.9
Jeld-Wen, Inc.	Industrial	Klamath Falls	9.8
City of Ontario	Domestic	Ontario	9.8
City of Joseph	Domestic	Joseph	9.5
Newberg, City Of, Wyooski Road	Domestic	Newberg	9.5
Eugene Water & Electric Board, Carmen-Smith	Industrial	Eugene	9.5

Table 4. NPDES individual permits administratively continued			
Facility name	Facility type	Location	Years admin. continued
Frank Lumber Co., Inc.	Industrial	Lyons	9.5
Idaho Power Company, Hells Canyon Power Plant	Industrial	Hells Canyon	9.3
Idaho Power Company, Oxbow Power Plant	Industrial	Oxbow	9.3
Odell Sanitary District	Domestic	Odell	9.2
City of Portland, Tryon Creek	Domestic	Lake Oswego	9.2
City of Elgin	Domestic	Elgin	9.1
City of Reedsport	Domestic	Reedsport	9.1
City of Salem, Salem Willow Lake	Domestic	Keizer	9.1
City of Union	Domestic	Union	9.1
Ray, Helen; Rice Hill Investments Corp.; Sweet Home Hospitality, LLC; Rice Hill East Lagoon, EK Onkar Corp.	Domestic	Rice Hill	9.0
Winchester Bay Sanitary District	Domestic	Winchester Bay	9.0
City of Drain	Domestic	Drain	9.0
City of Woodburn	Domestic	Woodburn	9.0
Covanta Marion, Inc.	Industrial	Brooks	9.0
Oak Lodge Water Services District	Domestic	Milwaukie	9.0
Clackamas County Service District #1, Kellogg Creek	Domestic	Milwaukie	8.9
City of Mt. Angel	Domestic	Mt. Angel	8.9
City of Hubbard	Domestic	Hubbard	8.9
City of Lakeside	Domestic	Lakeside	8.9
City of Silverton	Domestic	Silverton	8.9
City of Pendleton	Domestic	Pendleton	8.8
City of Riddle	Domestic	Riddle	8.7
City of Sweet Home	Domestic	Sweet Home	8.7
California Shellfish Company, Inc., Point Adams Packing Co.	Industrial	Hammond	8.6
Glide-Idleyld Sanitary District	Domestic	Roseburg	8.5
Hoover Treated Wood Products, Inc.	Industrial	Winston	8.5
Winston Green Regional Treatment Facility	Domestic	Roseburg	8.4
Georgia-Pacific Toledo LLC	Industrial	Toledo	8.3
Roseburg Urban Sanitary Authority	Domestic	Roseburg	8.2
Oregon Department of Fish and Wildlife, Marion Forks Hatchery	Industrial	Idanha	8.1
Toledo, City Of	Domestic	Toledo	8.0
Interfor U.S. Inc.	Industrial	Gilchrist	8.0
Pacific Surimi - Newport, LLC	Industrial	Newport	8.0
RSG Forest Products, Inc., Olympic Forest Products	Industrial	Clatskanie	7.8
City of Yoncalla	Domestic	Yoncalla	7.8
Pacific Surimi Co., Inc.	Industrial	Warrenton	7.7

Table 4. NPDES individual permits administratively continued			
Facility name	Facility type	Location	Years admin. continued
Rice Hill Owners Association, Inc., West Lagoon	Domestic	Yoncalla	7.7
Tri-City Service District, Blue Heron Paper Co.	Industrial	Oregon City	7.7
City of Vernonia	Domestic	Vernonia	7.5
City of Adair Village	Domestic	Adair Village	7.5
Hull-Oakes Lumber Co.	Industrial	Monroe	7.4
Alpine County Service District	Domestic	Monroe	7.4
Oregon System Of Higher Education, OSU John L. Fryer Aquatic Animal Health Lab	Industrial	Corvallis	7.4
City of Monroe	Domestic	Monroe	7.4
City of Junction City	Domestic	Junction City	7.4
City of Oakland	Domestic	Oakland	7.3
Diamond Fruit Growers, Inc., Odell Plant	Industrial	Hood River	7.3
Diamond Fruit Growers, Inc., Parkdale Plant	Industrial	Parkdale	7.3
Diamond Fruit Growers, Inc., Central Plant	Industrial	Odell	7.3
Duckwall-Pooley Fruit Co.	Industrial	Hood River	7.3
Seneca Sawmill Co.	Industrial	Eugene	7.3
City of Sutherlin	Domestic	Sutherlin	7.2
Sundial Marine Construction & Repair, Inc.	Industrial	Troutdale	7.1
Conrad Wood Preserving Co.	Industrial	Hauser	7.1
City of Echo	Domestic	Echo	7.0
Tillamook County Creamery Association	Industrial	Tillamook	6.9
City of Halfway	Domestic	Halfway	6.9
Lane County Public Works	Municipal Stormwater, MS4	Eugene	6.9
City of Springfield	Municipal Stormwater, MS4	Springfield	6.9
City of Bend	Municipal Stormwater, MS4	Bend	6.8
City of Ashland	Municipal Stormwater, MS4	Ashland	6.8
City of Medford	Municipal Stormwater, MS4	Medford	6.8
Rogue Valley Sewer Services (RVSS)	Municipal Stormwater, MS4	Phoenix	6.8
City of Keizer	Municipal Stormwater, MS4	Keizer	6.8
Marion County Public Works	Municipal Stormwater, MS4	Salem	6.8
Polk County	Municipal Stormwater, MS4	Dallas	6.8
City of Turner	Municipal Stormwater, MS4	Turner	6.8
City of Oakridge	Domestic	Oakridge	6.6
Oregon Department of Fish and Wildlife, Leaburg Hatchery	Industrial	Leaburg	6.6
City of Troutdale	Municipal Stormwater, MS4	Troutdale	6.6
City of Wood Village	Municipal Stormwater, MS4	Wood Village	6.6
Benton County	Municipal Stormwater, MS4	Corvallis	6.6
City of Corvallis	Municipal Stormwater, MS4	Corvallis	6.6
City of Philomath	Municipal Stormwater, MS4	Philomath	6.6

Table 4. NPDES individual permits administratively continued			
Facility name	Facility type	Location	Years admin. continued
Eatinger, Al, Country View Mobile Home Estates	Domestic	Trail	6.5
Oregon Department of Fish and Wildlife, Mckenzie River Hatchery	Industrial	Leaburg	6.4
City of Falls City	Domestic	Falls City	6.4
Rosboro Company, LLC	Industrial	Springfield	6.4
Clatsop County Fisheries	Industrial	Astoria	6.3
Kingsford Manufacturing Company, Springfield Plant	Industrial	Springfield	6.3
City of The Dalles	Domestic	The Dalles	6.2
City Of Portland Water Bureau	Industrial	Portland	6.2
Port Of Portland	Industrial	Troutdale	6.1
Westport Energy, LLC	Industrial	Coos Bay	6.1
Bio-Oregon Protein, Inc.	Industrial	Warrenton	6.0
Graphic Packaging International, Inc.	Industrial	Portland	6.0
Portland General Electric Company	Industrial	Clatskanie	6.0
Cascade Wood Products, Inc.	Industrial	White City	6.0
U.S. Department of Defense; U.S. Army Corps of Engineers Bonneville Dam	Industrial	Cascade Locks	5.9
Dyno Nobel Inc.	Industrial	Deer Island	5.9
Georgia-Pacific Consumer Operations, LLC, Wauna Mill	Industrial	Clatskanie	5.9
Sunstone Circuits, LLC	Industrial	Mulino	5.2
Century Meadows Sanitary System, Inc.	Domestic	Aurora	5.0
City of Sandy	Domestic	Boring	5.0
Oregon Department of Fish and Wildlife, Clackamas River Hatchery	Industrial	Estacada	4.9
U.S. Department of Interior; Fish & Wildlife Service, Eagle Creek National Fish Hatchery	Industrial	Estacada	4.9
Sanders Wood Products, Inc.	Industrial	Liberal	4.9
City of Aumsville	Domestic	Aumsville	4.9
City of Coburg	Domestic	Coburg	4.5
Port of Portland and Co-Applicants	Industrial	Portland	4.5
City of Westfir	Domestic	Westfir	4.4
Willamette Leadership Academy	Domestic	Goshen	4.4
City of Lowell	Domestic	Lowell	4.4
Siltronic Corp.	Domestic	Portland	4.4
City of Gold Hill	Domestic	Gold hill	4.4
Jasper Wood Products, LLC	Industrial	Jasper	4.4
West Linn Paper Company	Industrial	West Linn	4.2
City of Cottage Grove	Domestic	Cottage Grove	4.2
City of Grants Pass	Domestic	Grants Pass	4.2
Blount, Inc. Oregon Cutting Systems Division	Industrial	Milwaukie	4.2

Table 4. NPDES individual permits administratively continued			
Facility name	Facility type	Location	Years admin. continued
Univar USA Inc.	Industrial	Portland	4.2
City of Tillamook	Domestic	Tillamook	4.1
Scappoose	Domestic	Scappoose	4.1
Evraz Inc. North America	Industrial	Portland	4.0
Forest Park Mobile Village	Domestic	Oregon City	4.0
Ash Grove Cement Company, Rivergate Lime Plant	Industrial	Portland	3.9
City of Wilsonville, City Of	Domestic	Wilsonville	3.9
City of Canby, City Of	Domestic	Canby	3.9
Vigor Industrial LLC	Industrial	Portland	3.9
Arclin surfaces, Inc.	Industrial	Portland	3.9
Oregon Health Sciences University	Industrial	Portland	3.8
Hatfield Marine Science Center, Oregon State University	Industrial	Newport	3.5
Norpac Foods, Inc. Brooks Plant no. 5	Industrial	Salem	3.4
Grand Ronde Sanitary District	Domestic	Grand Ronde	3.4
City of Athena, City Of	Domestic	Athena	3.4
City of Myrtle point, City Of	Domestic	Myrtle Point	3.4
City of Amity, City Of	Domestic	Amity	3.4
Royal pacific industries, inc.	Industrial	McMinnville	3.4
Sheridan, City Of	Domestic	Sheridan	3.4
Jlr, LLC	Industrial	Woodburn	3.4
Columbia Helicopters, inc.	Industrial	Aurora	3.4
City of Carlton, City Of	Domestic	Carlton	3.4
City of Yamhill, City Of	Domestic	Yamhill	3.4
City of Estacada, City Of	Domestic	Estacada	3.2
Oregon Racing, Inc, Portland meadows	Industrial	Portland	3.2
J.H. Baxter & Co., Inc.	Industrial	Eugene	3.1
Mcfarland Cascade Pole & Lumber Co.	Industrial	Eugene	3.1
Permapost Products Co.	Industrial	Hillsboro	3.1
Industrial Harbor USA, LLC	Industrial	Gardiner	3.1
City of Dayton, City Of	Domestic	Dayton	3.0
City of Gervais, City Of	Domestic	Gervais	3.0
City of Powers, City Of	Domestic	Powers	3.0
Allweather Wood, LLC	Industrial	White City	3.0
Oregon Metallurgical, LLC., ATI Albany Operations	Industrial	Albany	3.0
Cascade Pacific Pulp, LLC	Industrial	Halsey	3.0
Willamina, City Of	Domestic	Willamina	3.0
Georgia-Pacific Consumer Operations LLC, Halsey Mill	Industrial	Halsey	3.0
Cities of Gresham and Fairview	Municipal Stormwater, MS4	Gresham/Fairview	2.9
City of Eugene/Oregon Department of Transportation	Municipal Stormwater, MS4	Eugene	2.9
City of Salem	Municipal Stormwater, MS4	Salem	2.9

Table 4. NPDES individual permits administratively continued			
Facility name	Facility type	Location	Years admin. continued
Multnomah County	Municipal Stormwater, MS4	Troutdale	2.9
Stimson Lumber Company, Forest Grove	Industrial	Gaston	2.9
Intel Corporation, Aloha Campus	Industrial	Aloha	2.9
City of Portland and co-applicants	Municipal Stormwater, MS4	Portland	2.8
Water Environment Services	Municipal Stormwater, MS4	Clackamas	2.8
City of Gold Beach	Domestic	Gold Beach	2.8
City of Shady cove	Domestic	Shady Cove	2.7
Tri-city Service District	Domestic	Oregon City	2.6
Tillamook RV Park, LLC	Domestic	Tillamook	2.5
Mapleton Commercial Area Owners Association, Inc.	Domestic	Mapleton	2.5
City of Portland, Columbia Blvd.	Domestic	Portland	2.4
USDA: Forest Service, Umpqua National Forest; Wolf Creek Civilian Conservation Center	Domestic	Glide	2.4
USDA: Forest Service, Umpqua National Forest; Tiller Ranger Station	Domestic	Tiller	2.4
Cloverdale Sanitary District	Domestic	Cloverdale	2.4
City of Glendale	Domestic	Glendale	2.4
City of Cannon Beach	Domestic	Cannon Beach	2.4
Canyonville	Domestic	Canyonville	2.4
City of Scio	Domestic	Scio	2.3
City of Dundee	Domestic	Dundee	2.3
Neskowin Regional Sanitary Authority	Domestic	Neskowin	2.3
City of Jefferson	Domestic	Jefferson	2.2
City of Huntington	Domestic	Huntington	2.2
Green Diamond Performance Materials, Inc.	Industrial	Riddle	2.2
Murphy Company, Veneer Foster Division	Industrial	Foster	2.2
City of Corvallis	Domestic	Corvallis	2.1
Pacific City Joint Water-Sanitary Authority	Domestic	Pacific City	2.1
City of Bay City	Domestic	Bay City	2.1
City of Garibaldi	Domestic	Garibaldi	2.1
City of Astoria	Domestic	Astoria	2.1
City of Brookings	Domestic	Brookings	2.1
City of Mt. Vernon	Domestic	Mt. Vernon	2.0
City of Long Creek	Domestic	Long Creek	2.0
City of Medford	Domestic	Central Point	2.0
Hebo Joint Water and Sanitary Authority	Domestic	Hebo	2.0
Netarts-Oceanside Sanitary District	Domestic	Oceanside	1.9
City of Prineville	Domestic	Prineville	1.9
City of Seaside	Domestic	Seaside	1.9
City of Stanfield	Domestic	Stanfield	1.8
Knife River Corporation - Northwest	Industrial	Troutdale	1.8

Table 4. NPDES individual permits administratively continued			
Facility name	Facility type	Location	Years admin. continued
U.S. Army Corps of Engineers, Bonneville Lock and Dam, Tanner Creek Wastewater Treatment Plant	Domestic	Cascade Locks	1.8
Port of Tillamook Bay, Industrial Park	Domestic	Tillamook	1.7
City of Brownsville	Domestic	Brownsville	1.4
City of Clatskanie	Domestic	Clatskanie	1.4
USDA/US Forest Service - Columbia River Gorge National Scenic Area, Multnomah Falls Lodge	Domestic	Multnomah Falls	1.4
City of Veneta	Domestic	Veneta	1.4
City of Halsey	Domestic	Halsey	1.4
City of Tangent	Domestic	Tangent	1.4
City of Philomath	Domestic	Corvallis	1.4
Georgia-Pacific Chemicals, LLC, Millersburg Resin Plant	Industrial	Albany	1.4
City of Rainier	Domestic	Rainier	1.3
Magar e. Magar, Riverwood Mobile Home Park	Domestic	Rainier	1.3
Fujimi Corporation, SW Commerce Circle	Industrial	Wilsonville	1.3
Boeing Company, Fabrication Division	Industrial	Portland	1.3
Valley Landfills, Inc., Coffin Butte Landfill	Industrial	Corvallis	1.2
Westport Sewer Service District	Domestic	Westport	1.0
SFPP, LP	Industrial	Eugene	1.0
Koppers Inc., Northwest Terminal	Industrial	Portland	0.9
Corvallis MHC, LLC, Knoll Terrace	Domestic	Corvallis	0.9
Diamond Hill LLC Sherman Bros. Trucking	Domestic	Harrisburg	0.9
Toyo Tanso USA, Inc.	Industrial	Troutdale	0.9
Cascade Locks	Domestic	Cascade Locks	0.9
City of Mosier	Domestic	Mosier	0.9
Oregon Cherry Growers, Inc.	Industrial	The Dalles	0.9
Oregon Cherry Growers, Inc., Riverside plant	Industrial	The Dalles	0.9
Sundown Sanitary Sewer District	Domestic	Astoria	0.9
City of Warrenton	Domestic	Warrenton	0.9
Environmental Business Solutions	Industrial	Portland	0.7
City of Coos bay, STP No.1	Domestic	Coos bay	0.6
Rainbow Rock Service Association, Inc.	Domestic	Brookings	0.4
Oregon Department of Corrections, Oregon State Penitentiary	Industrial	Salem	0.4
Northwest Natural	Industrial	Portland	0.3
City of Umatilla	Domestic	Umatilla	0.2
City of Arlington	Domestic	Arlington	0.2

5. Age of all administratively continued general NPDES permits

Table 5. general NPDES permits administratively continued			
Permit type	Facility type	Location	Years admin. continued
100-J Cooling water/heat pumps	Industrial	Statewide	17
200-J Filter backwash	Industrial		16
300-J Fish hatcheries	Industrial		11
400-J Log ponds	Industrial		11
500-J Boiler blowdown	Industrial		16
900-J Seafood processing	Industrial		7
1200-A Sand, gravel, other non-metallic	Stormwater		1
1200-CA Construction	Stormwater		13
1300-J Oily stormwater runoff, oil/water separators	Industrial		14
1500-A NPDES Petroleum Hydrocarbons Cleanup	Industrial		13
1700-A, Vehicle and Equipment wash water	Industrial		15
1900-J, Non-contact geothermal heat exchange	Industrial		16
2200-J treated from floating residences. (Young's Bay only).	Domestic		3
2300-A Pesticide general permit	Industrial		2

6. Summary of individual NPDES permits administratively continued for 10 or more years

Table 6 below represents a list of NPDES individual permits that have been administratively continued for 10 or more years. To reduce this backlog of permits to less than 10 percent of the total issued permits, a systematic approach must be implemented that includes multiple criteria. For consistency, DEQ has implemented four criteria that are used in workload planning for permit development of all NPDES individual permits:

1. Results of DEQ's 2017 readiness review
2. Geographic location
3. DEQ resources
4. Local priorities

The local priorities, combined with a readiness review provides rationale for DEQ's work plan development. The readiness review criteria are:

1. Compliance history
2. New or outstanding TMDL work
3. New or outstanding standards or monitoring assessments

4. Data availability, including mixing zone studies and specific data used for reasonable potential analysis

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

Table 6. NPDES individual permits administratively continued 10 or more years				
Facility name	Location	Years admin. continued	Reason	2019 work plan
Columbia Plywood Corporation, Forest Products	Klamath Falls	29.0		✓
TDY Industries, LLC, Teledyne Wah Chang	Albany	25.3	Low priority based on planning criteria	
City Of Klamath Falls Wastewater Treatment And Reclamation Facility (Spring Street)	Klamath Falls	23.3		✓
South Suburban Sanitary District	Klamath Falls	23.3		✓
Collins Products LLC	Klamath Falls	20.7		✓
International Paper Company, Springfield Paper Mill	Springfield	20.7	Low priority based on planning criteria	
Amalgamated Sugar Company LLC	Nyssa	19.9	Planned for termination in Q2 FFY 2019	
Arclin U.S.A. LLC	Springfield	19.3	Low priority based on planning criteria	
Norpac Foods, Inc., Plant #1, Stayton	Stayton	18.8	Low priority based on planning criteria	
Westrock Northwest, LLC, Newberg Mill	Newberg	18.5	Low priority based on planning criteria	
Georgia-Pacific Chemicals LLC	Eugene	17.1	Low priority based on planning criteria	
Cascade Steel Rolling Mills, Inc.	McMinnville	16.5	Low priority based on planning criteria	
City of Dallas	Dallas	16.1	Low priority based on planning criteria	
City of Lebanon	Lebanon	13.9	Low priority based on planning criteria	
Oregon Department of Transportation	Salem	13.5	Municipal Stormwater, MS4	

Table 6. NPDES individual permits administratively continued 10 or more years				
Facility name	Location	Years admin. continued	Reason	2019 work plan
			due for reissuance	
City of Monmouth	Monmouth	13.3	Low priority based on planning criteria	
Albany-Millersburg Water Reclamation Facility	Albany	13.1	Low priority based on planning criteria	
Lane Community College	Eugene	12.9	Low priority based on planning criteria	
Metropolitan Wastewater Management Commission, Eugene/Springfield	Eugene	11.9	Low priority based on planning criteria	
Flakeboard America Limited, Duraflake	Albany	11.97	Low priority based on planning criteria	
City of Dufur	Dufur	11.8	Low priority based on planning criteria	
City of Newport	Newport	11.6	Lack of resources and low priority based on planning criteria	
Klamath Irrigation District	Klamath Falls	11.4	General permit due to be issued in 2019	
Westland Irrigation District	Echo	11.3	General permit due to be issued in 2019	
West Extension Irrigation District	Umatilla	11.3	General permit due to be issued in 2019	
Stanfield Irrigation District	Stanfield	11.3	General permit due to be issued in 2019	
Hermiston Irrigation District	Hermiston	11.3	General permit due to be issued in 2019	
City of Rogue River	Rogue River	11.3	Lack of resources and low priority based on planning criteria	
North Unit Irrigation District	Madras	11.2	General permit due to be issued in 2019	

Table 6. NPDES individual permits administratively continued 10 or more years				
Facility name	Location	Years admin. continued	Reason	2019 work plan
Owyhee Irrigation District	Nyssa	11.2	General permit due to be issued in 2019	
Vale Oregon Irrigation District	Vale	11.2	General permit due to be issued in 2019	
Owyhee Ditch Company	Ontario	11.2	General permit – 2019 issuance	
Ochoco Irrigation District	Prineville	11.2	General permit due to be issued in 2019	
City of North Bend	North Bend	10.9		✓
Port of St. Helens	Clatskanie	10.9	Lack of resources and low priority based on planning criteria	
City of Waldport	Waldport	10.9	2018 Permit	
City of Lincoln City	Lincoln City	10.9	2018 Permit	
City of Coos Bay, No. 2 - Empire	Coos Bay	10.9		✓
Salishan Sanitary District	Gleneden Beach	10.9	Lack of resources and low priority based on planning criteria	
Starlink Logistics Inc.	Portland	10.4	Low priority based o DEQ	
Hollingsworth & Vose Fiber Co.	Corvallis	10.3	Lack of resources and low priority based on planning criteria	
City of Myrtle Creek	Myrtle Creek	10.2	Low priority based on planning criteria	
City of La Grande	La Grande	10.1	Low priority based on planning criteria	
City of Baker City	Baker City	10.1	Lack of resources and low priority based on planning criteria	
City Of Harrisburg Lagoon Treatment Plant	Harrisburg	10.0	Lack of resources and low priority based on planning criteria	
Bourne Mining Corporation, E & E Mine	Bourne	10.0	2018 permit	

7. Summary of general NPDES permits administratively continued for 10 or more years

Table 7. NPDES general permits administratively continued 10 or more years				
Facility name	Location	Years admin. continued	Reason	2019 work plan
100-J, Cooling water/heat pumps	Statewide	17	Staffing levels to complete general permits have been inadequate.	
200-J Filter backwash		16		
300-J Fish hatcheries		11		
400-J, Log ponds		11		
500-J, Boiler blowdown		16		
1200-CA		13		
1300-J		14		
1500-A, Petroleum hydrocarbon clean-up (scheduled to be issued in FFY 2019, Q4: July 1 – September 30)		13		✓
1700-A, Vehicle and Equipment wash water		15		
1900-J, Non-contact geothermal heat exchange		16		

Appendix A

Water Quality permitting delay factors

To: WQ Permit Program

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

Date: 18 September 2015

Subject: Permit issuance – delay factors

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

When updating the statewide 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.
Competing priorities	Delays related to DEQ resources focused on other tasks
Technical assistance	Staff resources have been identified and assigned to permit issuance. Delay is caused by higher than expected time spent

providing *external* technical assistance, including TA inspections.

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

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

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

Other competing priority (describe):	
Permitting process - internal limitation	Delays related to limitations or barriers in the DEQ WQ permitting process. These are delays that are within the permitting program’s scope of control.
Data 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.
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 statewide consistency	Delay caused by internal review to establish cross-program, statewide consistency on a permitting issue.
Other internal permit process limitation (describe):	

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

Permitting process – alternative development	Delays related to development of alternatives to address challenging effluent limits. Delays associated with internal or external review should be also be identified.
Compliance schedule	Delay caused by negotiating with permit applicant to develop a compliance schedule.
Variance	Delay caused by need to gather information necessary to support the development of a variance.
Trading	Delay associated with development of a WQ Trading plan.
Other permitting process alternative development (describe):	
Permitting process – external factor	Delays related to aspects of the permitting process that are external to DEQ. These delays occur as a normal aspect of the administrative process followed with the permitting process.
Applicant review ⁵	Delay caused due to longer than anticipated period of applicant review on the draft permit. This includes “negotiations” that may occur on proposed permit conditions as well as language in the permit evaluation report.
EPA review	Delay cause by extended or unexpected EPA review of a permit. Includes informal review during the pre-public comment phase as well as extended review requested during or after the formal public comment period.
Other local/state/ federal review	Delay caused by extended or unexpected review by another local, state, or federal organization.
Public information	Delay caused by additional need to provide public information on a proposed permitting action. This includes public meetings and outreach that occur <i>prior</i> to the formal public comment period.
Public comment	Delay caused by an unexpected request for a public hearing or extension of the public comment period.

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

Additional public comment	Delay caused by need to provide a 2 nd public comment period on a proposed permit. This generally applies to significant changes to the draft permit that resulted from an initial public comment period. This delay does not apply to requested extensions on the initial public comment period.
Permit appeal	Delay in final issuance due to an appeal <i>by the permittee</i> during the permit appeal period.
Request for reconsideration	Delay in final permit issuance due to a request for reconsideration by a 3 rd party.
Other permitting process external factor (describe):	
Incomplete permit application	Delays that result from incomplete permit applications, including incomplete data submissions by the permit applicant and where a compliance schedule or special condition cannot be used.
Administratively incomplete	Delay caused by an administratively incomplete application, including missing documentation, wrong signature, inaccurate information, etc. Does not include more complex issues that are identified during technical analysis of the documentation.
LUCS	Delay caused by need to clarify a LUCS, obtain additional information from a local jurisdiction, or receive an updated LUCS.
Plan limitations	Delay due to missing, incomplete, or unclear plan required to be submitted prior to permit issuance, including pretreatment plan, biosolids management plan, land application plan, recycled water plan, etc.
Facility plan	Delay due to issues receiving a complete facility plan, which could result from unexpected lack of funding.
Mixing zone	New mixing zone study or analysis required.
Ambient data	Need additional ambient data
Effluent data	Need additional effluent data to complete the analysis.
DMR data	Need additional DMR data. For example, need daily monitoring results where only statistics have been provided.

WET	Need additional WET testing
Data format	Need data submitted in a useable format. For example, applicant supplies data in hard copy only or using wrong units.
New discharger to impaired waterbody, or new 303(d) listing.	Permit applicant must demonstrate that discharge will not cause or contribute to exceedance of a water quality standard on an impaired waterbody without a TMDL. This demonstration is also required for new listings, or applicants must meet criteria at end of pipe.
Other incomplete permit application (describe):	
Other limitations	Delays related to other DEQ Water Quality Program limitations. These factors also include DEQ's decision to delay or otherwise not renew an expired permit (i.e., not place the permit on the permit issuance plan).
Assessments	Delays associated with status of WQ assessment, including pending 303(d) listing or delisting actions.
WQ Standards – new standards	Delay waiting for development/approval of a new standard that is expected soon.
WQ Standards – beneficial use	Delay associated with impractical water quality standards because of need for an obvious change in a beneficial use, for example, irrigation canals listed as essential spawning habitat.
TMDL	Delay associated with TMDL development or approval of a TMDL.
Economic-community impact	Cost of complying with permit conditions will have significant social or economic impacts on a <i>community</i> . This factor should not generally be used as delay factor when the impact is solely on a business without wider impacts on the community.
Economic-negative environmental impact	Cost of complying with permit conditions will have measurable negative environmental impacts, such as significant energy consumption, contribution to green-house gas emissions, generating large quantities of solid waste, etc.
Economic-minimal environmental gain	Cost of complying with permit conditions results in minimal environmental gain.
Economic-facility development	Delay associated with facility securing funding necessary for plant improvements, including developing a facility plan,

plant upgrade, etc. Under this delay factor, DEQ could issue a permit with a compliance schedule, but has “de-prioritized” permit issuance.

Limited discharge

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

Other (describe):

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

Alternative formats

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