



# **2023 Annual Report**

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

Updated April 2024



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# Executive summary

The Oregon Department of Environmental Quality regulates the discharges of pollutants to waterways by issuing federal National Pollutant Discharge Elimination System permits to point source discharges of wastewater and stormwater. Under the federal NPDES permit program, permits are effective for a fixed term not to exceed five years (40 CFR 122.46/123.25). As of December 2023, 58 percent of the NPDES permits issued by Oregon DEQ have not been renewed within their five years. These out-of-date permits remain in effect but may not reflect updated standards and water quality conditions.



From 2018 to 2023, Oregon DEQ reduced this backlog by greater than 25% and is committed to eliminating the NPDES individual permit backlog. Through continued implementation of permit development process improvements, DEQ will: 1. Protect water quality and meet all state and federal requirements; 2. Increase permit requirement continuity throughout Oregon; 3. Educate permittees (POTWs and Industrial) to better understand and fulfill their permit requirements; 4. Maintain a proficient permit development team; and 5. Reduce the time to develop and issue permits. To this end, during Federal Fiscal Year 2023 (October 1 through September 30), DEQ successfully accomplished several program improvements, including:

- Published significant updates to NPDES Domestic Major NPDES individual permit template
- Published significant updates to NPDES Domestic Minor NPDES individual permit template
- Published significant updates to NPDES Domestic Fact Sheet template
- Published NPDES individual permit issuance plan for FFY 2024
- Published NPDES five-year individual permit issuance plan for 2023-2027
- Added new processes for engagement with stormwater subject matter experts
- Refined process for subject matter experts and deliverables for permit development
- Planned and prepared for state-wide implementation of the "Your DEQ Online" system in 2024 for individual and general WPCF and NPDES permits
- Continued standardized regular training and collaboration for the NPDES individual permit writing team
- Continued to improve quality assurance reviews on all individual NPDES permit modifications, renewals, and initial issuance
- Added four new NPDES permit writers and additional support staff for permitting and program continued internal process for data gap and reasonable potential analysis for planned permits; successfully completed gap analysis review with monitoring requests as needed for all FFY 2024 planned permits

As of Dec. 27, 2023, Oregon's individual NPDES permit program included:

- 312 active municipal and industrial individual NPDES wastewater permits, of which, 182 (58 percent) are administratively continued

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# Introduction

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

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

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

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

# 2023 NPDES permit status

The [2023 NPDES individual permit issuance plan](#) identified 65 permits for administrative action (i.e., issuance or termination) by Sep. 30, 2023. The federal fiscal year 2023 NPDES individual permit issuance plan was developed considering the results of the “Permit Readiness Review” efforts, regional or local priorities, and technical or policy barriers present in a geographic region, such as development of a new TMDL. Additionally, DEQ prioritized rollover permits from the 2022 work plan to populate the 2023 permit issuance plan. DEQ took final action on 36 permits in 2023 which includes 28 renewals (4 terminations) and 8 modifications.

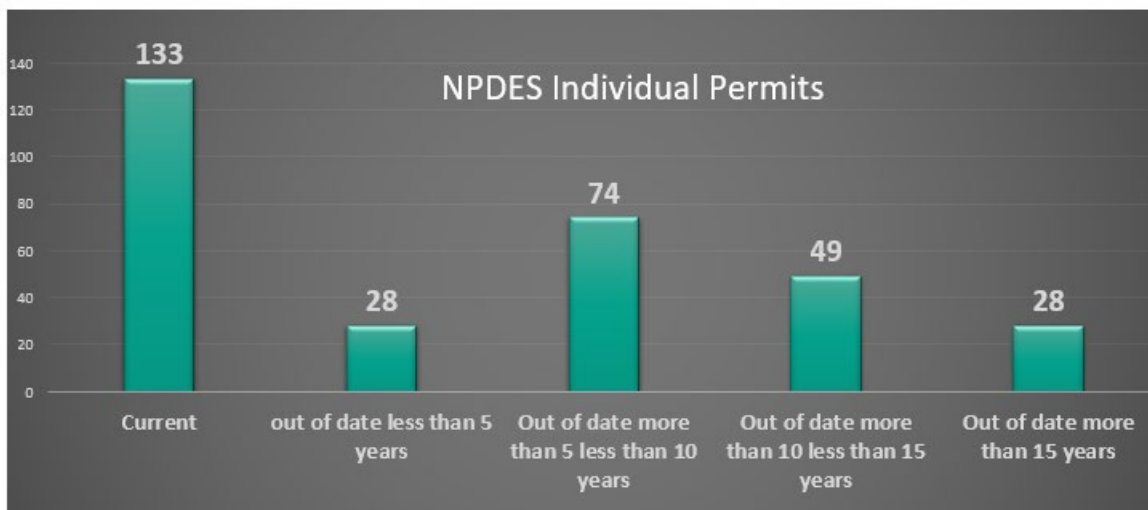
## Overall status of DEQ’s NPDES individual permit program

As of December 27, 2023, Oregon had 312 active individual municipal and industrial NPDES wastewater permits (shown in Figure 1 below) that must be renewed every five years. Of those permits:

182 (58 percent) are administratively continued with

- 28 (9 percent) are administratively continued for less than five years.
- 74 (23 percent) are administratively continued five years or more and less than 10 years.
- 49 (16 percent) are administratively continued 10 years or more and less than 15.
- 28 (9 percent) are administratively continued for 15 years or more.

Figure 1



# DEQ's NPDES 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 reporting. Federal regulations provide that NPDES general permits may not be issued for a term longer than five years.

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

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

- 600 Off-Stream Placer Mining (WPCF)
- 1000 WPCF Sand and Gravel, non-metallic
- 1000 NPDES Sand and Gravel, non-metallic
- 1200-A NPDES Stormwater Sand and Gravel
- 200-J Filter backwash
- 100-J Cooling water/heat pumps (Issued April 2024)

There were not any general permits renewed or issued in FFY 2023.

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 2023

As of Sept. 30, 2023, DEQ had taken 36 administrative actions on NPDES individual permits. Table 1 below shows individual permit actions according to plan in Federal Fiscal Year 2023.

**Table 1. Individual Permit Actions in 2023**

No.	Facility	Permit No.	Date of Service <sup>1</sup>
1	DUCKWALL FRUITE CO. - VAN HORN COLD STORAGE	102876	9/28/2023
2	SILETZ STP	101680	9/18/2023
3	CITY OF TROUTDALE WATER POLLUTION CONTROL FACILITY	101044	8/17/2023
4	ECHO STP	102054	7/18/2023
5	NEHALEM BAY STP	101515	7/6/2023
6	WALLOWA STP	101994	6/21/2023
7	PARKDALE STP	101322	6/7/2023
8	JOSEPH STP (MODIFICATION - MAJOR)	101602	6/7/2023
9	UNION STP	101624	5/8/2023
10	LAKEVIEW, TOWN OF (LAKEVIEW STP) (MINOR MODIFICATION #1)	101594	5/4/2023
11	PNW VEG CO. LLC PREVIOUSLY NORPAC FOODS #5, BROOKS	100907	4/21/2023
12	TERMINAL ICE & COLD STORAGE - VAN HORN	100517	4/12/2023
13	DYNO NOBEL INC (Modification #2 - Major)	101535	4/3/2023
14	HERMISTON STP	101294	2/28/2023
15	PORT OF PORTLAND - TROUTDALE	100757	2/23/2023
16	RICE HILL OWNERS ASSOCIATION, INC.	101725	2/6/2023

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



No.	Facility	Permit No.	Date of Service <sup>1</sup>
17	CANBY STP (Modification - Minor)	101064	1/19/2023
18	CITY OF UMATILLA (UMATILLA STP)	101059	1/12/2023
19	ODFW - MARION FORKS	101917	12/20/2022
20	CANBY STP	101063	12/9/2022
21	TWIN ROCKS SANITARY DISTRICT (TWIN ROCKS STP)	102487	12/9/2022
22	CLEAN WATER SERVICES (DURHAM STP)	101141	12/8/2022
23	CLEAN WATER SERVICES (FOREST GROVE STP)	101142	12/8/2022
24	CLEAN WATER SERVICES (HILSBORO-WESTSIDE STP)	101143	12/8/2022
25	CLEAN WATER SERVICES (ROCK CREEK STP)	101144	12/8/2022
26	CLEAN WATER SERVICES (MS4)	101309	12/8/2022
27	DIAMOND FRUIT GROWERS, INC. (ODELL)	100516	11/15/2022
28	PACIFIC SURIMI CO., INC.	102859	11/10/2022
29	ROCKAWAY BEACH STP	102580	11/9/2022
30	NORTH BEND (MINOR MODIFICATION #1)	100703	11/4/2022
31	SJC SHERIDAN (STELLA JONES) - MODIFICATION #1 (Major)	101267	11/4/2022
32	COOS BAY STP #1 (MINOR MODIFICATION #1)	100669	10/26/2022
33	CRESWELL STP	101639	10/20/2022
34	STANFIELD STP	101136	10/17/2022
35	METROPOLITAN WASTEWATER MANAGEMENT COMMISSION (EUGENE/SPRINGFIELD STP)	102486	10/10/2022
36	ASHLAND STP (MINOR MODIFICATION #3)	101609	10/4/2022

## Administratively continued NPDES individual permits that were delayed in 2023

Thirty-two individual NPDES permits planned for issuance in 2023 were delayed and have been moved to the federal fiscal year 2024 NPDES individual permit issuance plan. The information in Table 2 provides the reason for delay of the 33 planned 2023 individual permits based on standardized permit delay factors developed by the permit program in 2015 (Appendix A).

**Table 2. NPDES Permits Delayed in Federal Fiscal Year 2023**

No.	Facility	Permit No.	Reason for delay
1	FOSTER POULTRY FARMS, INC.	101590	Other local/state/ federal review
2	DA YANG	NEW	Public commentDelay caused by an unexpected request for a public hearing or extension of the public comment period.
3	JUNCTION CITY	102396	Issued in FFY 2024
4	SILTRONIC CORPORATION	101128	Issued in FFY 2024
5	RAY, HELEN, RICE HILL INVESTMENTS CORP.; SWEET HOME HOSPITALITY, LLC; EK ONKAR CORP. (RICE HILL EAST LAGOON)	101158	Issued in FFY 2024
6	CITY OF SHERIDAN (SHERIDAN STP)	101625	Issued in FFY 2024
7	NORTH POWDER STP	102209	Issued in FFY 2024
8	EATINGER, AL (COUNTRY VIEW MOBILE HOME ESTATES)	101990	Issued in FFY 2024
9	FISHHAWK LAKE RECREATION CLUB, INC.	101296	Issued in FFY 2024
10	POWERS, CITY OF	101694	Issued in FFY 2024
11	CAROLLO ENGINEERS, INC.	NEW	Issued in FFY 2024
12	MYRTLE POINT STP	101192	Vacancy
13	PACIFIC COAST SEAFOOD - WARRENTON	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs

No.	Facility	Permit No.	Reason for delay
14	COQUILLE, CITY OF (COQUILLE STP)	3885	Vacancy
15	CALIFORNIA SHELLFISH - HALLMARK FISHERIES	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs
16	WATER ENVIRONMENT SERVICES (TRI-CITY WPCP)	101168	Issued in FFY 2024
17	CITY OF AMITY (AMITY STP)	101924	Vacancy
18	CITY OF ST. HELENS	101173	Staff Leave
19	DEPOE BAY STP	101383	Issued in FFY 2024
20	BROOKINGS STP	101773	Issued in FFY 2024
21	NEWPORT STP	102497	Vacancy
22	GMA GARNET (USA)	100860	Vacancy
23	BOISE - MEDFORD PLYWOOD	100438	Technical Staff Unavailable
24	FOREST PARK MPH, LLC. (FOREST PARK MOBILE VILLAGE)	102323	Vacancy
25	GRAND RONDE SANITARY DISTRICT (GRAND RONDE STP)	101429	High priority WQ permit program or policy development
26	UMATILLA INDUSTRIAL WASTEWATER FACILITY	103196	Staff Leave
27	YACHATS STP	103001	Issued in FFY 2024
28	WILLAMETTE FALLS PAPER CO.	100976	Vacancy
29	VERNONIA STP	101094	Policy limitation on complex issue (describe): Functionally equivalent discharge
30	OREGON SYSTEM OF HIGHER EDUCATION (JOHN L. FRYER AQUATIC HEALTH LAB)	102512	Vacancy
31	CITY OF ROGUE RIVER (ROGUE RIVER STP)	102588	Vacancy
32	TRYON CREEK/LAKE OSWEGO (ISSUANCE YEAR 2024)	101614	Issued in FFY 2024
33	ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	102024	Policy limitation on complex issue (describe): Natural treatment system and external litigation

No.	Facility	Permit No.	Reason for delay
34	TILLAMOOK RV PARK LLC.	101987	Issued in FFY 2024
35	GOLD BEACH, CITY OF	103006	Policy limitation on complex issue (describe): Groundwater and potential functionally equivalent discharge
36	ONTARIO, CITY OF	101633	Vacancy
37	THE DALLES, CITY OF	101728	Vacancy
38	CLATSOP COUNTY FISHERIES	101767	Vacancy
39	GEORGIA PACIFIC WUANA LLC (GP WAUNA MILL)	101172	Vacancy
40	JOSEPH, CITY OF	101602	Vacancy
41	TILLAMOOK, CITY OF	101239	Issued in 2024
42	USDA/US FOREST SERVICE - COLUMBIA RIVER GORGE NAT'L SCENIC AREA	101507	Vacancy
43	DUCKWALL-POOLEY FRUIT CO. (ODELL)	100645	Issued in 2024
44	CITY OF HERMISTON INDUSTRIAL WASTEWATER DISCHARGE SYSTEM	NEW	Policy limitation on complex issue (describe): New discharger
45	PORT OF PORTLAND & CO-APPLICANTS	101647	Vacancy
46	SEASIDE, CITY OF	102579	Vacancy
47	TDY INDUSTRIES LLC. (ATI MILLERSBURG TELEDYNE WAH CHANG)	100522	Vacancy
48	PENDLETON, CITY OF	100982	Vacancy
49	WATER ENVIRONMENT SERVICES (KELLOGG CREEK WWTP)	100983	Vacancy
50	SUNSTONE CIRCUITS, LLC	101015	Vacancy
51	CHILOQUIN STP	101029	Enforcement – Will transfer to WPCF in 2025
52	AMALGAMATED SUGAR	101174	Vacancy
53	MOLALLA, CITY OF	101514	Vacancy
54	DALLAS, CITY OF	101518	Vacancy
55	USDOI; FISH & WILDLIFE SERVICE	101522	Vacancy
56	TEKTRONIX, INC	101534	Vacancy
57	ASTORIA, CITY OF	102397	Vacancy
58	SANDY, CITY OF	102492	Vacancy

**Table 4. NPDES individual permits administratively continued (as of April 18, 2024)**

Facility name	Permit No.	Facility type	Location	Years admin. continued
TDY INDUSTRIAL INDUSTRIES, LLC	100522	INDUSTRIAL	ALBANY	30.66
INTERNATIONAL PAPER COMPANY	101081	INDUSTRIAL	SPRINGFIELD	26.08
AMALGAMATED SUGAR COMPANY LLC, THE	101174	INDUSTRIAL	NYSSA	25.33
ARCLIN U.S.A. LLC	101235	INDUSTRIAL	SPRINGFIELD	24.66
NORPAC FOODS, INC.	101265	INDUSTRIAL	STAYTON	24.16
WESTROCK NORTHWEST, LLC	101299	INDUSTRIAL	NEWBERG	23.91
GEORGIA-PACIFIC CHEMICALS LLC	101474	INDUSTRIAL	EUGENE	22.49
CASCADE STEEL ROLLING MILLS, INC.	101487	INDUSTRIAL	MCMINNVILLE	21.91
DALLAS, CITY OF	101518	DOMESTIC	DALLAS	21.49
LEBANON, CITY OF	101771	DOMESTIC	LEBANON	19.32
ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	102024	DOMESTIC	ALBANY	18.49
LANE COMMUNITY COLLEGE	102116	DOMESTIC	EUGENE	18.32
ARAUCO NORTH AMERICA	100668	INDUSTRIAL	ALBANY	17.32
DUFUR, CITY OF	102478	DOMESTIC	DUFUR	17.16
NEWPORT, CITY OF	102497	DOMESTIC	NEWPORT	16.99
ROGUE RIVER, CITY OF	102588	DOMESTIC	ROGUE RIVER	16.65
SALISHAN SANITARY DISTRICT	101273	DOMESTIC	GLENEDEN BEACH	16.32

<b>Facility name</b>	<b>Permit No.</b>	<b>Facility type</b>	<b>Location</b>	<b>Years admin. continued</b>
PORT OF COLUMBIA COUNTY	102650	INDUSTRIAL	CLATSKANIE	16.32
STARLINK LOGISTICS INC.	101180	INDUSTRIAL	PORTLAND	15.82
HOLLINGSWORTH & VOSE FIBER COMPANY	101331	INDUSTRIAL	CORVALLIS	15.74
MYRTLE CREEK, CITY OF	101014	DOMESTIC	MYRTLE CREEK	15.57
LA GRANDE, CITY OF	101549	DOMESTIC	LA GRANDE	15.48
BAKER CITY, CITY OF	101632	DOMESTIC	BAKER CITY	15.48
HARRISBURG, CITY OF	101626	DOMESTIC	HARRISBURG	15.41
CITY OF ST. HELENS	101173	DOMESTIC	ST HELENS	15.32
COQUILLE, CITY OF	3885	DOMESTIC	COQUILLE	15.32
MCMINNVILLE, CITY OF	101062	DOMESTIC	MCMINNVILLE	15.32
ARKEMA, INC	103075	INDUSTRIAL	PORTLAND	15.32
NEWBERG, CITY OF	100988	DOMESTIC	NEWBERG	14.90
FRANK LUMBER CO., INC.	101583	INDUSTRIAL	LYONS	14.90
IDAHO POWER COMPANY	101287	INDUSTRIAL	HELLS CANYON	14.74
IDAHO POWER COMPANY	101275	INDUSTRIAL	OXBOW	14.65
PORTLAND, CITY OF	101614	DOMESTIC	LAKE OSWEGO	14.57
SALEM, CITY OF	101145	DOMESTIC	KEIZER	14.48

Facility name	Permit No.	Facility type	Location	Years admin. continued
ELGIN, CITY OF	101606	DOMESTIC	ELGIN	14.48
REEDSPORT, CITY OF	100941	DOMESTIC	REEDSPORT	14.48
WOODBURN, CITY OF	101558	DOMESTIC	WOODBURN	14.40
WINCHESTER BAY SANITARY DISTRICT	101254	DOMESTIC	WINCHESTER BAY	14.40
Water Environment Services	100983	DOMESTIC	MILWAUKIE	14.32
SILVERTON, CITY OF	101720	DOMESTIC	SILVERTON	14.32
HUBBARD, CITY OF	101640	DOMESTIC	HUBBARD	14.32
MT. ANGEL, CITY OF	101802	DOMESTIC	MT ANGEL	14.32
PENDLETON, CITY OF	100982	DOMESTIC	PENDLETON	14.23
SWEET HOME, CITY OF	101657	DOMESTIC	SWEET HOME	14.07
RIDDLE, CITY OF	101196	DOMESTIC	RIDDLE	14.07
CALIFORNIA SHELLFISH COMPANY, INC.	101820	INDUSTRIAL	HAMMOND	13.99
HOOVER TREATED WOOD PRODUCTS, INC.	102834	INDUSTRIAL	WINSTON	13.90
GLIDE-IDLEYLD SANITARY DISTRICT	101877	DOMESTIC	ROSEBURG	13.90
WINSTON GREEN REGIONAL TREATMENT FACILITY	100554	DOMESTIC	ROSEBURG	13.82
ROSEBURG URBAN SANITARY AUTHORITY	100981	DOMESTIC	ROSEBURG	13.57
PACIFIC SURIMI - NEWPORT, LLC	101805	INDUSTRIAL	NEWPORT	13.40

<b>Facility name</b>	<b>Permit No.</b>	<b>Facility type</b>	<b>Location</b>	<b>Years admin. continued</b>
INTERFOR U.S. INC.	100660	INDUSTRIAL	GILCHRIST	13.40
TOLEDO, CITY OF	101713	DOMESTIC	TOLEDO	13.40
RSG FOREST PRODUCTS, INC.	102858	INDUSTRIAL	CLATSKANIE	13.23
TRI-CITY SERVICE DISTRICT	102229	INDUSTRIAL	OREGON CITY	13.07
VERNONIA, CITY OF	101094	DOMESTIC	VERNONIA	12.90
ADAIR VILLAGE, CITY OF	101701	DOMESTIC	ADAIR VILLAGE	12.90
OREGON SYSTEM OF HIGHER EDUCATION	102512	INDUSTRIAL	CORVALLIS	12.82
HULL-OAKES LUMBER CO.	101466	INDUSTRIAL	MONROE	12.82
ALPINE COUNTY SERVICE DISTRICT	101923	DOMESTIC	MONROE	12.82
DIAMOND FRUIT GROWERS, INC.	100516	INDUSTRIAL	Hood River	12.74
OAKLAND, CITY OF	101975	DOMESTIC	OAKLAND	12.74
SENECA SAWMILL COMPANY	101893	INDUSTRIAL	EUGENE	12.65
CONRAD WOOD PRESERVING CO.	101901	INDUSTRIAL	HAUSER	12.48
OAKRIDGE, CITY OF	102443	DOMESTIC	OAKRIDGE	11.99
KINGSFORD MANUFACTURING COMPANY	102153	INDUSTRIAL	Springfield	11.73
CITY OF PORTLAND WATER BUREAU	101617	INDUSTRIAL	PORTLAND	11.57
WESTPORT ENERGY, LLC	102935	INDUSTRIAL	COOS BAY	11.48



<b>Facility name</b>	<b>Permit No.</b>	<b>Facility type</b>	<b>Location</b>	<b>Years admin. continued</b>
GRAPHIC PACKAGING INTERNATIONAL, INC.	101002	INDUSTRIAL	PORTLAND	11.40
PORTLAND GENERAL ELECTRIC COMPANY	101209	INDUSTRIAL	CLATSKANIE	11.40
CASCADE WOOD PRODUCTS, INC.	102305	INDUSTRIAL	WHITE CITY	11.40
USDOD; US ARMY CORPS OF ENGINEERS BONNEVILLE DAM	102768	INDUSTRIAL	CASCADE LOCKS	11.31
SUNSTONE CIRCUITS, LLC	101015	INDUSTRIAL	MULINO	10.57
CENTURY MEADOWS SANITARY SYSTEM, INC.	101721	DOMESTIC	AURORA	10.404
SANDY, CITY OF	102492	DOMESTIC	BORING	10.40
USDOJ; FISH & WILDLIFE SERVICE	101522	INDUSTRIAL	ESTACADA	10.31
SANDERS WOOD PRODUCTS, INC.	100929	INDUSTRIAL	LIBERAL	10.31
OREGON DEPARTMENT OF FISH & WILDLIFE	102663	INDUSTRIAL	ESTACADA	10.31
COBURG, CITY OF	102979	DOMESTIC	COBURG	9.90
GOLD HILL, CITY OF	102494	DOMESTIC	GOLD HILL	9.82
JASPER WOOD PRODUCTS, LLC	101427	INDUSTRIAL	JASPER	9.82
WESTFIR, CITY OF	100811	DOMESTIC	WESTFIR	9.82
LOWELL, CITY OF	101384	DOMESTIC	LOWELL	9.82
WILLAMETTE LEADERSHIP ACADEMY	101441	DOMESTIC	GOSHEN	9.82
COTTAGE GROVE, CITY OF	101300	DOMESTIC	COTTAGE GROVE	9.57

Facility name	Permit No.	Facility type	Location	Years admin. continued
WILLAMETTE FALLS PAPER COMPANY, INC	100976	INDUSTRIAL	WEST LINN	9.57
GRANTS PASS, CITY OF	101985	DOMESTIC	GRANTS PASS	9.57
UNIVAR USA INC	101613	INDUSTRIAL	PORTLAND	9.57
BLOUNT, INC.	101162	INDUSTRIAL	MILWAUKIE	9.57
SCAPPOOSE, CITY OF	100677	DOMESTIC	SCAPPOOSE	9.48
FOREST PARK MHP, LLC	102323	DOMESTIC	OREGON CITY	9.40
EVRAZ INC. NA	101007	INDUSTRIAL	PORTLAND	9.40
VIGOR INDUSTRIAL INDUSTRIAL LLC	101393	INDUSTRIAL	PORTLAND	9.31
ASH GROVE CEMENT COMPANY	102465	INDUSTRIAL	PORTLAND	9.31
HATFIELD MARINE SCIENCE CENTER, OREGON STATE UNIVERSITY	101477	INDUSTRIAL	NEWPORT	8.90
ROYAL PACIFIC INDUSTRIAL INDUSTRIES, INC.	101213	INDUSTRIAL	MCMINNVILLE	8.82
MYRTLE POINT, CITY OF	101192	DOMESTIC	MYRTLE POINT	8.82
GRAND RONDE SANITARY DISTRICT	101429	DOMESTIC	GRAND RONDE	8.82
COLUMBIA HELICOPTERS, INC.	101906	INDUSTRIAL	AURORA	8.82
YAMHILL, CITY OF	101473	DOMESTIC	YAMHILL	8.82
CARLTON, CITY OF	101902	DOMESTIC	CARLTON	8.82
ATHENA, CITY OF	102125	DOMESTIC	ATHENA	8.82

Facility name	Permit No.	Facility type	Location	Years admin. continued
AMITY, CITY OF	101924	DOMESTIC	AMITY	8.82
JLR, LLC	101253	INDUSTRIAL	WOODBURN	8.82
ESTACADA, CITY OF	101542	DOMESTIC	ESTACADA	8.57
INDUSTRIAL INDUSTRIAL HARBOR USA, LLC	101468	INDUSTRIAL	GARDINER	8.48
PERMAPOST PRODUCTS CO.	101489	INDUSTRIAL	HILLSBORO	8.48
J.H. BAXTER & CO., INC.	102432	INDUSTRIAL	EUGENE	8.48
MCFARLAND CASCADE POLE & LUMBER COMPANY	102392	INDUSTRIAL	EUGENE	8.48
GEORGIA-PACIFIC CONSUMER OPERATIONS LLC	101488	INDUSTRIAL	HALSEY	8.40
CASCADE PACIFIC PULP, LLC	101114	INDUSTRIAL	HALSEY	8.40
ALLWEATHER WOOD, LLC	102034	INDUSTRIAL	WHITE CITY	8.40
OREGON METALLURGICAL, LLC	102223	INDUSTRIAL	ALBANY	8.40
DAYTON, CITY OF	101742	DOMESTIC	DAYTON	8.40
WILLAMINA, CITY OF	101070	DOMESTIC	WILLAMINA	8.40
GERVAIS, CITY OF	101665	DOMESTIC	GERVAIS	8.40
STIMSON LUMBER COMPANY	101480	INDUSTRIAL	GASTON	8.31
SHADY COVE, CITY OF	100998	DOMESTIC	SHADY COVE	8.07
Water Environment Services	101168	DOMESTIC	OREGON CITY	8.02

Facility name	Permit No.	Facility type	Location	Years admin. continued
CANYONVILLE, CITY OF	100532	DOMESTIC	CANYONVILLE	7.82
USDA; FOREST SERVICE	100064	DOMESTIC	GLIDE	7.82
USDA; FOREST SERVICE	100107	DOMESTIC	TILLER	7.82
SCIO, CITY OF	101503	DOMESTIC	SCIO	7.73
MURPHY COMPANY	101777	INDUSTRIAL	FOSTER	7.56
GREEN DIAMOND PERFORMANCE MATERIALS, INC.	101932	INDUSTRIAL	RIDDLE	7.56
JEFFERSON, CITY OF	101780	DOMESTIC	JEFFERSON	7.56
ASTORIA, CITY OF	102397	DOMESTIC	ASTORIA	7.48
CORVALLIS, CITY OF	101714	DOMESTIC	CORVALLIS	7.48
LONG CREEK, CITY OF	101751	DOMESTIC	LONG CREEK	7.40
MT. VERNON, CITY OF	101316	DOMESTIC	MT VERNON	7.40
PRINEVILLE, CITY OF	101433	DOMESTIC	PRINEVILLE	7.31
US ARMY CORPS OF ENGINEERS, BONNEVILLE LOCK AND DAM	101793	DOMESTIC	CASCADE LOCKS	7.15
TANGENT, CITY OF	102247	DOMESTIC	TANGENT	6.82
CLATSKANIE, CITY OF	101595	DOMESTIC	CLATSKANIE	6.82
HALSEY, CITY OF	101297	DOMESTIC	HALSEY	6.82
PHILOMATH, CITY OF	102060	DOMESTIC	Corvallis	6.82

Facility name	Permit No.	Facility type	Location	Years admin. continued
GEORGIA-PACIFIC CHEMICALS LLC	102603	INDUSTRIAL	ALBANY	6.82
VENETA, CITY OF	102480	DOMESTIC	VENETA	6.828
BROWNSVILLE, CITY OF	102206	DOMESTIC	BROWNSVILLE	6.82
RAINIER, CITY OF	102571	DOMESTIC	RAINIER	6.73
MAGAR E. MAGAR	102520	DOMESTIC	RAINIER	6.73
BOEING COMPANY, THE	101761	INDUSTRIAL	PORTLAND	6.65
FUJIMI CORPORATION	103033	INDUSTRIAL	WILSONVILLE	6.65
VALLEY LANDFILLS, INC.	101545	INDUSTRIAL	CORVALLIS	6.56
OREGON CHERRY GROWERS, INC.	101593	INDUSTRIAL	THE DALLES	6.31
OREGON CHERRY GROWERS, INC.	100841	INDUSTRIAL	THE DALLES	6.31
CORVALLIS MHC LLC	102611	DOMESTIC	CORVALLIS	6.31
TOYO TANSO USA, INC.	101685	INDUSTRIAL	TROUTDALE	6.31
DIAMOND HILL L.L.C.	101557	DOMESTIC	HARRISBURG	6.31
ENVIRONMENTAL BUSINESS SOLUTIONS	103051	INDUSTRIAL	PORTLAND	6.07
OREGON DEPARTMENT OF CORRECTIONS	101619	INDUSTRIAL	SALEM	5.82
NORTHWEST NATURAL	103061	INDUSTRIAL	PORTLAND	5.65
TEKTRONIX, INC.	101534	INDUSTRIAL	BEAVERTON	5.07

Facility name	Permit No.	Facility type	Location	Years admin. continued
ARKEMA, INC	100752	INDUSTRIAL	PORTLAND	5.07
FLORENCE, CITY OF	101703	DOMESTIC	Florence	4.98
MOLALLA, CITY OF	101514	DOMESTIC	MOLALLA	4.90
FOSTER POULTRY FARMS, INC.	101590	INDUSTRIAL	Creswell	4.06
FORT CHICAGO HOLDINGS II U.S. LLC	101499	INDUSTRIAL	NORTH BEND	3.81
WATER ENVIRONMENT SERVICES - KELLOG	100968	DOMESTIC	BORING	3.15
PRECISION DRYING SERVICES INC.	102871	INDUSTRIAL	RAINIER	3.06
CHILOQUIN, CITY OF	101029	DOMESTIC	CHILOQUIN	2.98
HERMISTON, CITY OF	101294	DOMESTIC	HERMISTON	2.73
GMA GARNET (USA) CORP	100860	INDUSTRIAL	COOS BAY	0.81
UMATILLA, CITY OF	103196	INDUSTRIAL	UMATILLA	0.81
BOISE CASCADE WOOD PRODUCTS, L.L.C.	100438	INDUSTRIAL	MEDFORD	0.64
TILLAMOOK, CITY OF	101239	DOMESTIC	TILLAMOOK	0.39
USDA/US FOREST SERVICE - COLUMBIA RIVER GORGE NAT'L SCENIC AREA	101507	DOMESTIC	MULTNOMAH FALLS	0.39
GOLD BEACH, CITY OF	103006	DOMESTIC	GOLD BEACH	0.39
SEASIDE, CITY OF	102579	DOMESTIC	SEASIDE	0.39
PORT OF PORTLAND & CO-APPLICANTS	101647	INDUSTRIAL	PORTLAND	0.39

Facility name	Permit No.	Facility type	Location	Years admin. continued
ONTARIO, CITY OF	101633	DOMESTIC	ONTARIO	0.39
THE DALLES, CITY OF	101728	DOMESTIC	THE DALLES	0.39
GEORGIA-PACIFIC CONSUMER OPERATIONS, LLC	101172	INDUSTRIAL	CLATSKANIE	0.39
CLATSOP COUNTY FISHERIES	101767	INDUSTRIAL	ASTORIA	0.39
JOSEPH, CITY OF	101602	DOMESTIC	JOSEPH	0.39
MOSIER, CITY OF	101495	DOMESTIC	MOSIER	0.22
DYNO NOBEL INC.	101535	INDUSTRIAL	Deer Island	0.2

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

Table 5 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. Implement recommendations of DEQ's 2017 readiness review
3. Geographic location
4. DEQ resources
5. Local priorities

The readiness review criteria are:

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

However, detailed, fact-specific reasoning for permit delays will not be available prior to permit development.

**Table 5. NPDES individual permits administratively continued greater than 10 years (as of April 18, 2024)**

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
TDY INDUSTRIES, LLC	ALBANY	Low priority based on planning criteria	30.66	2024
INTERNATIONAL PAPER COMPANY	SPRINGFIELD	Low priority based on planning criteria	26.08	2024
AMALGAMATED SUGAR COMPANY LLC, THE	NYSSA	Low priority based on planning criteria	25.33	2024
ARCLIN U.S.A. LLC	SPRINGFIELD	Low priority based on planning criteria	24.66	2025
NORPAC FOODS, INC.	STAYTON	Low priority based on planning criteria	24.16	2025
WESTROCK NORTHWEST, LLC	NEWBERG	Low priority based on planning criteria	23.91	2025
GEORGIA-PACIFIC CHEMICALS LLC	EUGENE	Low priority based on planning criteria	22.49	2025



Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
CASCADE STEEL ROLLING MILLS, INC.	MCMINNVILLE	Low priority based on planning criteria	21.91	2025
DALLAS, CITY OF	DALLAS	Low priority based on planning criteria	21.49	2024
LEBANON, CITY OF	LEBANON	Low priority based on planning criteria	19.32	2025
ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	ALBANY	Low priority based on planning criteria	18.49	2024
LANE COMMUNITY COLLEGE	EUGENE	Low priority based on planning criteria	18.32	2027
ARAUCO NORTH AMERICA	ALBANY	Low priority based on planning criteria	17.32	2025
DUFUR, CITY OF	DUFUR	EXPECTED TERMINATION IN 2025	17.16	2025
NEWPORT, CITY OF	NEWPORT	Low priority based on planning criteria	16.99	2024
ROGUE RIVER, CITY OF	ROGUE RIVER	Low priority based on planning criteria	16.65	2024
SALISHAN SANITARY DISTRICT	GLENEDEN BEACH	Low priority based on planning criteria	16.32	2027
PORT OF COLUMBIA COUNTY	CLATSKANIE	Low priority based on planning criteria	16.32	2028
STARLINK LOGISTICS INC.	PORTLAND	Low priority based on planning criteria	15.82	2025
HOLLINGSWORTH & VOSE FIBER COMPANY	CORVALLIS	Low priority based on planning criteria	15.74	2027
MYRTLE CREEK, CITY OF	MYRTLE CREEK	Low priority based on planning criteria	15.57	2025
LA GRANDE, CITY OF	LA GRANDE	Low priority based on planning criteria	15.48	2025
BAKER CITY, CITY OF	BAKER CITY	Low priority based on planning criteria	15.48	2025
HARRISBURG, CITY OF	HARRISBURG	Low priority based on planning criteria	15.41	2024
CITY OF ST. HELENS	ST HELENS	Low priority based on planning criteria	15.32	2024
COQUILLE, CITY OF	COQUILLE	Low priority based on planning criteria	15.32	2024
MCMINNVILLE, CITY OF	MCMINNVILLE	Low priority based on planning criteria	15.32	2025

<b>Facility</b>	<b>Location</b>	<b>Reason</b>	<b>Years Admin Continued</b>	<b>Planned Year of Issuance*</b>
ARKEMA, INC	PORTLAND	Low priority based on planning criteria	15.32	2025
NEWBERG, CITY OF	NEWBERG	Low priority based on planning criteria	14.90	2026
FRANK LUMBER CO., INC.	LYONS	Low priority based on planning criteria	14.90	2026
IDAHO POWER COMPANY	HELLS CANYON	Low priority based on planning criteria	14.74	2026
IDAHO POWER COMPANY	OXBOW	Low priority based on planning criteria	14.65	2026
SALEM, CITY OF	KEIZER	Low priority based on planning criteria	14.48	2026
ELGIN, CITY OF	ELGIN	Low priority based on planning criteria	14.48	2026
REEDSPORT, CITY OF	REEDSPORT	Low priority based on planning criteria	14.48	2026
WOODBURN, CITY OF	WOODBURN	Low priority based on planning criteria	14.40	2026
WINCHESTER BAY SANITARY DISTRICT	WINCHESTER BAY	Low priority based on planning criteria	14.40	2026
WATER ENVIRONMENT SERVICES - KELLOG	MILWAUKIE	Low priority based on planning criteria	14.32	2024
SILVERTON, CITY OF	SILVERTON	Low priority based on planning criteria	14.32	2027
HUBBARD, CITY OF	HUBBARD	Low priority based on planning criteria	14.32	2028
MT. ANGEL, CITY OF	MT ANGEL	Low priority based on planning criteria	14.32	2028
PENDLETON, CITY OF	PENDLETON	Low priority based on planning criteria	14.23	2024
SWEET HOME, CITY OF	SWEET HOME	Low priority based on planning criteria	14.07	2025
RIDDLE, CITY OF	RIDDLE	Low priority based on planning criteria	14.07	2028
CALIFORNIA SHELLFISH COMPANY, INC.	HAMMOND	Low priority based on planning criteria	13.99	2024
HOOVER TREATED WOOD PRODUCTS, INC.	WINSTON	Low priority based on planning criteria	13.90	2028
GLIDE-IDLEYLD SANITARY DISTRICT	ROSEBURG	Low priority based on planning criteria	13.90	2028

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
WINSTON GREEN REGIONAL TREATMENT FACILITY	ROSEBURG	Low priority based on planning criteria	13.82	2028
ROSEBURG URBAN SANITARY AUTHORITY	ROSEBURG	Low priority based on planning criteria	13.57	2028
PACIFIC SURIMI - NEWPORT, LLC	NEWPORT	Low priority based on planning criteria	13.40	2024
INTERFOR U.S. INC.	GILCHRIST	Low priority based on planning criteria	13.40	2028
TOLEDO, CITY OF	TOLEDO	Low priority based on planning criteria	13.40	2028
RSG FOREST PRODUCTS, INC.	CLATSKANIE	Low priority based on planning criteria	13.23	2028
VERNONIA, CITY OF	VERNONIA	Low priority based on planning criteria	12.90	2024
ADAIR VILLAGE, CITY OF	ADAIR VILLAGE	Low priority based on planning criteria	12.90	2025
OREGON SYSTEM OF HIGHER EDUCATION	CORVALLIS	Low priority based on planning criteria	12.82	2024
HULL-OAKES LUMBER CO.	MONROE	Low priority based on planning criteria	12.82	2025
ALPINE COUNTY SERVICE DISTRICT	MONROE	Low priority based on planning criteria	12.82	2026
DIAMOND FRUIT GROWERS, INC.	HOOD RIVER	Low priority based on planning criteria	12.74	2024
OAKLAND, CITY OF	OAKLAND	Low priority based on planning criteria	12.74	2028
SENECA SAWMILL COMPANY	EUGENE	Low priority based on planning criteria	12.65	2028
CONRAD WOOD PRESERVING CO.	HAUSER	Low priority based on planning criteria	12.48	2028
OAKRIDGE, CITY OF	OAKRIDGE	Low priority based on planning criteria	11.99	2028
KINGSFORD MANUFACTURING COMPANY	SPRINGFIELD	Low priority based on planning criteria	11.73	2026
CITY OF PORTLAND WATER BUREAU	PORTLAND	Low priority based on planning criteria	11.57	2025
WESTPORT ENERGY, LLC	COOS BAY	Low priority based on planning criteria	11.48	2028

<b>Facility</b>	<b>Location</b>	<b>Reason</b>	<b>Years Admin Continued</b>	<b>Planned Year of Issuance*</b>
GRAPHIC PACKAGING INTERNATIONAL, INC.	PORTLAND	Low priority based on planning criteria	11.40	2025
PORTLAND GENERAL ELECTRIC COMPANY	CLATSKANIE	Low priority based on planning criteria	11.40	2025
CASCADE WOOD PRODUCTS, INC.	WHITE CITY	Low priority based on planning criteria	11.40	2028
USDOD; US ARMY CORPS OF ENGINEERS BONNEVILLE DAM	CASCADE LOCKS	Low priority based on planning criteria	11.31	2025
SUNSTONE CIRCUITS, LLC	MULINO	Low priority based on planning criteria	10.57	2024
CENTURY MEADOWS SANITARY SYSTEM, INC.	AURORA	Low priority based on planning criteria	10.40	2025
SANDY, CITY OF	BORING	Low priority based on planning criteria	10.40	2024
USDOJ; FISH & WILDLIFE SERVICE	ESTACADA	Low priority based on planning criteria	10.31	2024
SANDERS WOOD PRODUCTS, INC.	LIBERAL	Low priority based on planning criteria	10.31	2026
OREGON DEPARTMENT OF FISH & WILDLIFE	ESTACADA	Low priority based on planning criteria	10.31	2026

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

## Summary of general NPDES permits administratively continued

Facility name	Years admin. continued	2024 issuance plan
100-J Cooling water/heat pumps	21	X
200-J Filter backwash	20	
300-J Fish hatcheries	15	
400-J, Log ponds	15	
500-J, Boiler blowdown	20	
1200-A Sand, gravel, other non-metallic	5	
1300-J	17	
1700-A, Vehicle and Equipment wash water	19	X
1900-J, Non-contact geothermal heat exchange	20	
2200-J Domestic wastewater floating residences (Young's Bay only).	7	
#01-2021 Confined Animal Feeding Operation	2	X

# Appendix A: Water Quality permitting delay factors

**To:** WQ Permit Program

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

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

<b>Competing priorities</b>	<b>Delays related to DEQ resources focused on other tasks</b>
Technical assistance	Staff resources have been identified and assigned to permit issuance. Delay is caused by higher than expected time spent providing <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 <sup>3</sup>	Staff resources have been identified and assigned to permit issuance (specifically a renewal for this delay factor). Delay is caused by reassignment to work on unexpected new permit applications.
High priority WQ permit program or policy development	Staff resources have been identified and assigned to permit issuance. Delay is caused by reassignment to work on program or policy development specifically related to the permit program. Examples may include development of an IMD, strategic planning on permit issuance strategies, etc. This does not include non-permitting related projects, such as standard development TMDL, NPS support etc.
High priority regional or state-wide permitting project	Staff resources have been identified and assigned to permit issuance. Delay is caused by reassignment to work on a high- priority water quality permit-related project, such as Jordan Cove, Pioneer Mountain, or Eddyville.
High priority non-permit related special project	Staff resources have been identified and assigned to permit issuance. Delay is caused by reassignment to work on a non- permit related special project. May include providing assistance to other water quality subprograms, such as assessments, standards, TMDL, etc. This also includes special regional or agency projects such as breakthrough teams, problem solving, IT-related projects.

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Other competing  
priority (describe):

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**Permitting process  
- internal  
limitation**      **Delays related to limitations or barriers in the DEQ WQ permitting  
process. These are delays that are within the permitting program’s  
scope of control.**

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Data analysis<sup>4</sup>      Delay caused by difficulty obtaining necessary data that DEQ has historically collected and analysed. Also includes unexpected challenges or delays in cleaning or formatting data to be usable for analysis. For example, difficulty getting stream flow data, LASAR data, or other data sets.

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No data available      Minimum data is not available to analyse reasonable potential to exceed water quality criteria.

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

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

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

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

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

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Other internal permit process limitation (describe):

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



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

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

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

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

Since we will be reporting delays on the state-wide permit issuance plan and making the information publicly available, all regions and water quality subprograms (i.e., NPDES, WPCF, MS4, Stormwater, UIC, general permits, etc.) are expected to use this list. However, as we implement this system, we may identify the need to modify, change, or otherwise clarify the list

of delay factors. Moreover, the list will be used as a starting place for uncovering root causes for permitting challenges and finding opportunities for improvement.