



# **2024 Annual Report**

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

Updated November 2024



This document was prepared by  
The Oregon Department of Environmental Quality  
Permitting and Program Development Program  
700 NE Multnomah Street, Portland Oregon, 97232  
Contact: Jeff Navarro  
Phone: 503-229-5257  
[www.oregon.gov/deq](http://www.oregon.gov/deq)

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800-452-4011 | TTY: 711 | [deqinfo@deq.oregon.gov](mailto:deqinfo@deq.oregon.gov)

## Executive Summary

The Oregon Department of Environmental Quality regulates the discharges of pollutants to waterways by issuing federal National Pollutant Discharge Elimination System permits to point source discharges of wastewater and stormwater. Under the federal NPDES permit program, permits are effective for a fixed term not to exceed five years (40 CFR 122.46/123.25). As of October 2024, 54 percent of the NPDES permits issued by Oregon DEQ are administratively extended. These administratively extended out-of-date permits remain in effect but may not reflect updated standards and total maximum daily loads (TMDLs).



From 2019 to 2024, Oregon DEQ reduced this backlog by greater than 30 percent and is committed to eliminating the NPDES individual permit backlog of administratively continued permits. Through continued implementation of permit development process improvements, DEQ will: 1. Protect water quality and meet all state and federal requirements; 2. Increase permit requirements continuity throughout Oregon; 3. Educate permittees (municipal and industrial) to better understand and fulfill their permit requirements; 4. Maintain a proficient permit development team of permit writers and subject matter experts; and 5. Reduce the time to develop and issue permits. To this end, during Federal Fiscal Year 2024 (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 2025
- Published NPDES five-year individual permit issuance plan for 2025-2029
- Added new processes for engagement with stormwater subject matter experts
- Continued process improvements for engagement with subject matter experts (SME's)
- Planned and prepared for state-wide implementation of the "Your DEQ Online" system in 2025 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
- Successfully completed gap analysis review with monitoring requests as needed for all FFY 2025 planned permits

As of October 31, 2024, Oregon's individual NPDES permit program included:

- 310 active municipal and industrial individual NPDES wastewater permits, of which, 169 (54 percent) are administratively continued
- There are 20 NEW permit applications under review and development for individual NPDES permits (domestic and industrial)

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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 percent) 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) 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.

## 2024 NPDES permit status

The [2024 NPDES individual permit issuance plan](#) identified 80 permits for administrative action (i.e., issuance or termination) by September 30, 2024. The federal fiscal year 2024 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 2023 permit issuance plan to populate the 2024 permit issuance plan. DEQ took final action on 38 permits in 2024 which includes 30 renewals (including 2 terminations), 1 new, and 7 modifications.

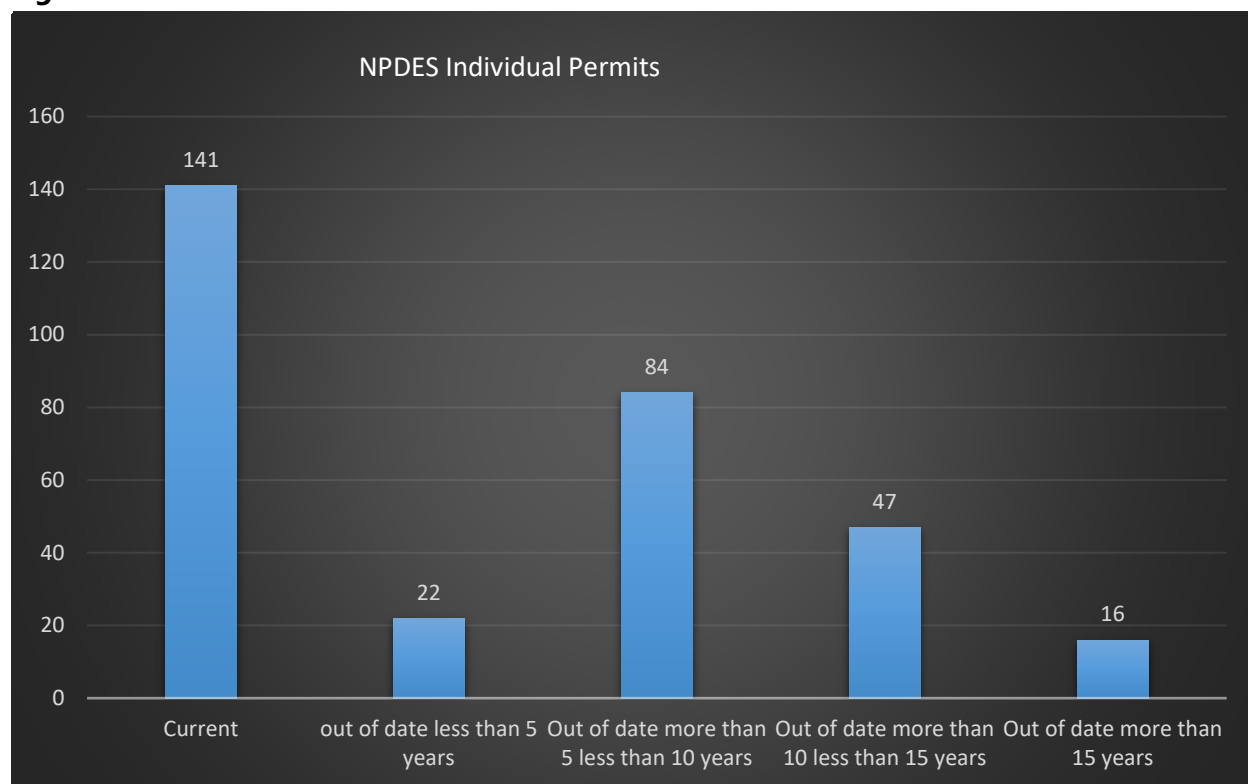
## Overall status of DEQ’s NPDES Individual Permit Program

As of October 31, Oregon had 310 active individual municipal and industrial NPDES wastewater permits (shown in Figure 1 below) that must be renewed every five years. Of those permits:

169 (54 percent) are administratively continued with

- 22 (7 percent) are administratively continued for less than five years.
- 84 (27percent) are administratively continued five years or more and less than 10 years.
- 47 (15 percent) are administratively continued 10 years or more and less than 15.
- 16 (5 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.

For 2024, DEQ issued the 100-J Cooling water/heat pumps in April and is accepting data from the registrants.

Current NPDES general permit efforts include renewing the following permits:

- 600 WPCF Off-Stream Placer Mining
- 1000 WPCF Sand and Gravel, non-metallic
- 1200-A NPDES Stormwater Sand and Gravel
- 200-J NPDES Filter backwash
- 700-PM NPDES In-Stream Placer Mining

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 2024

As of September 30, 2024, DEQ had taken 38 administrative actions on NPDES individual permits. Table 1 below shows individual permit actions according to plan in Federal Fiscal Year 2024.

**Table 1. INDIVIDUAL PERMIT ACTIONS IN FEDERAL FISCAL YEAR 2024**

No.	Facility	Permit No.	Date of Service <sup>1</sup>
1	BAY CITY, CITY OF	101025	9/30/2024
2	CLOVERDALE SANITARY DISTRICT	102139	9/13/2024
3	ODELL SANITARY DISTRICT	100669	9/11/2024
4	BANDON, CITY OF	101546	9/5/2024
5	ASHLAND MODIFICATION #4 (MINOR)	101609	8/26/2024
6	HEBO JOINT WATER & SANITARY AUTHORITY	101524	8/16/2024
7	SEASIDE, CITY OF	102579	8/12/2024
8	TILLAMOOK, CITY OF	101239	8/6/2024
9	COQUILLE, CITY OF (COQUILLE STP)	3885	8/6/2024
10	WESTPORT SEWER SERVICE DISTRICT	101520	8/2/2024
11	TEKTRONIX, INC	101534	7/23/2024
12	FOREST PARK MPH, LLC. (FOREST PARK MOBILE VILLAGE)	102323	7/16/2024
13	WESTPORT ENERGY, LLC	102935	7/12/2024
14	MYRTLE POINT STP	101192	6/14/2024
15	TRYON CREEK/LAKE OSWEGO	101614	5/3/2024
16	USDA/US FOREST SERVICE - COLUMBIA RIVER GORGE NAT'L SCENIC AREA	101507	5/2/2024

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<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	WATER ENVIRONMENT SERVICES (TRI-CITY WPCP)	101168	5/2/2024
18	TILLAMOOK RV PARK LLC.	101987	4/24/2024
19	DUCKWALL-POOLEY FRUIT CO. (ODELL)	100645	3/25/2024
20	MEDFORD, CITY OF - MODIFICATION #1 (MAJOR)	100985	3/8/2024
21	ODFW - LEABURG HATCHERY - MODIFCATION #3 (MAJOR)	101914	3/5/2024
22	ODFW - MCKENZIE RIVER HATCHERY - MODIFICATION #3 (MAJOR)	101918	3/5/2024
23	DEPOE BAY STP	101383	2/22/2024
24	POWERS, CITY OF	101694	2/14/2024
25	FALLS CITY STP - MODIFICATION #1 (MAJOR)	101808	2/13/2024
26	KLAMATH FALLS STP - MODIFICATION #2 (MAJOR)	100701	2/7/2024
27	PORT OF TILLAMOOK (TILLAMOOK INDUSTRIAL PARK STP) - MODIFICATION #1 (MAJOR)	101118	1/25/2024
28	COLLINS PRODUCTS LLC (settlement reissue)	101086	1/17/2024
29	BROOKINGS STP	101773	1/5/2024
30	YACHATS STP	103001	12/1/2023
31	FISHHAWK LAKE RECREATION CLUB, INC.	101296	11/28/2023
32	CAROLLO ENGINEERS, INC.	103298 (NEW)	11/15/2023
33	JUNCTION CITY	102396	11/13/2023
34	SILTRONIC CORPORATION	101128	11/6/2023
35	CITY OF SHERIDAN (SHERIDAN STP)	101625	10/27/2023
36	EATINGER, AL (COUNTRY VIEW MOBILE HOME ESTATES)	101990	10/27/2023
37	NORTH POWDER STP	102209	10/16/2023
38	RAY, HELEN, RICE HILL INVESTMENTS CORP.; SWEET HOME HOSPITALITY, LLC; EK ONKAR CORP. (RICE HILL EAST LAGOON)	101158	10/2/2023

### NPDES individual permits delayed in 2024 (administratively continued)

Thirty-two individual NPDES permits planned for issuance in 2024 were delayed and have been moved to the federal fiscal year 2025 NPDES individual permit issuance plan. The information in Table 2 provides the reason for delay of the 56 planned 2024 individual permits 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 2024**

No.	Facility	Permit No.	Reason for delay
1	BOISE - MEDFORD PLYWOOD	100438	Need for state-wide consistency
2	TDY INDUSTRIES LLC. (ATI MILLERSBURG TELEDYNE WAH CHANG)	100522	Policy limitation on complex issue (describe): Very old permit with ELG's and significant changes to water quality based effluent limits, and outfall relocation.
4	GMA GARNET (USA)	100860	Workload
5	WILLAMETTE FALLS PAPER CO.	100976	Workload
6	PENDLETON, CITY OF	100982	Workload
7	WATER ENVIRONMENT SERVICES (KELLOGG CREEK WWTP)	100983	Other permitting process external factor (describe): Request to develop watershed permit (not started)
8	SUNSTONE CIRCUITS, LLC	101015	Workload (expected for issuance in FFY 2025)
9	CHILOQUIN STP	101029	Enforcement – will transfer to WPCF in FFY 2025
10	INTERNATIONAL PAPER COMPANY (SPRINGFIELD PAPER MILL) <b>Issuance year 2025</b>	101081	Workload
11	VERNONIA STP	101094	Workload
12	GEORGIA PACIFIC WUANA LLC (GP WAUNA MILL)	101172	Workload
13	CITY OF ST. HELENS	101173	Renewed in FFY 2025
14	AMALGAMATED SUGAR	101174	Enforcement – Expected to terminate in FFY 2025
15	CASCADE LOCKS, CITY OF	101328	Renewed in FFY 2025
16	GEORGIA-PACIFIC TOLEDO LLC	101409	Workload
17	GRAND RONDE SANITARY DISTRICT (GRAND RONDE STP)	101429	Workload

No.	Facility	Permit No.	Reason for delay
18	WILLAMETTE LEADERSHIP ACADEMY	101441	Workload
19	MOSIER, CITY OF	101495	Workload
20	MOLALLA, CITY OF	101514	Other internal permit process limitation (describe): Complex permit including mass load limitations and significant changes related to facility upgrade
21	DALLAS, CITY OF	101518	TMDL
22	USDOJ; FISH & WILDLIFE SERVICE	101522	Workload
23	DYNO NOBEL INC.	101535	Workload
24	FOSTER POULTRY FARMS, INC.	101590	Other local/state/ federal review
25	JOSEPH, CITY OF	101602	Workload
26	ONTARIO, CITY OF	101633	Workload
27	PORT OF PORTLAND & CO- APPLICANTS	101647	Workload
29	THE DALLES, CITY OF	101728	Workload
30	CLATSOP COUNTY FISHERIES	101767	Workload
31	NESKOWIN REGIONAL SANITARY AUTHORITY	101788	Workload
32	PACIFIC SURIMI - NEWPORT, LLC	101805	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs
33	CALIFORNIA SHELLFISH COMPANY INC. (POINT ADAMS PACKING CO.)	101820	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs
34	CITY OF AMITY (AMITY STP)	101924	Workload
35	SUTHERLIN, CITY OF	101993	Renewed FFY 2025
36	ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	102024	Policy limitation on complex issue (describe): Natural treatment system and external litigation
37	ASTORIA, CITY OF	102397	Workload

No.	Facility	Permit No.	Reason for delay
38	SANDY, CITY OF	102492	Workload
39	NEWPORT STP	102497	Workload
40	OREGON SYSTEM OF HIGHER EDUCATION (JOHN L. FRYER AQUATIC HEALTH LAB)	102512	Workload
41	CITY OF ROGUE RIVER (ROGUE RIVER STP)	102588	Renewed FFY 2025
42	GARIBALDI, CITY OF	102609	Renewed FFY 2025
43	PRECISION DRYING SERVICESES INC.	102871	Workload
44	GOLD BEACH, CITY OF	103006	Policy limitation on complex issue (describe): Groundwater management plans
45	UMATILLA INDUSTRIAL WASTEWATER FACILITY	103196	Workload
46	PACIFIC COAST SEAFOOD - WARRENTON	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs
47	DA YANG	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs
48	CITY OF HERMISTON INDUSTRIAL WASTEWATER DISCHARGE SYSTEM	NEW	Workload
49	CALIFORNIA SHELLFISH - HALLMARK FISHERIES	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs
50	HALLMARK FISHERIES - CHARLESTON	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs
51	PDX-80, AWS	NEW	Workload
52	PACIFIC COAST SEAFOOD - NEWPORT EAST	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs
53	PACIFIC COAST SEAFOOD - NEWPORT CENTRAL	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs
54	PACIFIC COAST SEAFOOD - NEWPORT WEST	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs

No.	Facility	Permit No.	Reason for delay
55	PACIFIC COAST SEAFOOD - BANDON	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs
56	PACIFIC COAST SEAFOOD - BROOKINGS	NEW	Policy limitation on complex issue (describe): Communication and outreach related to complex data needs

**Table 3. NPDES INDIVIDUAL PERMITS ADMINISTRATIVELY CONTINUED  
(AS OF OCTOBER 16, 2024)**

Facility name	Permit No.	Facility type	Location	Years admin. continued
TDY INDUSTRIES, LLC	100522	Industrial	ALBANY	31.17
INTERNATIONAL PAPER COMPANY	101081	Industrial	SPRINGFIELD	26.58
AMALGAMATED SUGAR COMPANY LLC, THE	101174	Industrial	NYSSA	25.83
ARCLIN U.S.A. LLC	101235	Industrial	SPRINGFIELD	25.17
NORPAC FOODS, INC.	101265	Industrial	STAYTON	24.67
WESTROCK NORTHWEST, LLC	101299	Industrial	NEWBERG	24.41
GEORGIA-PACIFIC CHEMICALS LLC	101474	Industrial	EUGENE	23.00
CASCADE STEEL ROLLING MILLS, INC.	101487	Industrial	MCMINNVILLE	22.41
DALLAS, CITY OF	101518	Domestic	DALLAS	22.00
LEBANON, CITY OF	101771	Domestic	LEBANON	19.83
ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	102024	Domestic	ALBANY	18.99
LANE COMMUNITY COLLEGE	102116	Domestic	EUGENE	18.83

Facility name	Permit No.	Facility type	Location	Years admin. continued
ARAUCO NORTH AMERICA	100668	Industrial	ALBANY	17.83
DUFUR, CITY OF	102478	Domestic	DUFUR	17.66
NEWPORT, CITY OF	102497	Domestic	NEWPORT	17.50
ROGUE RIVER, CITY OF	102588	Domestic	ROGUE RIVER	17.16
PORT OF COLUMBIA COUNTY	102650	Industrial	CLATSKANIE	16.83
SALISHAN SANITARY DISTRICT	101273	Domestic	GLENEDEN BEACH	16.83
STARLINK LOGISTICS INC.	101180	Industrial	PORTLAND	16.33
HOLLINGSWORTH & VOSE FIBER COMPANY	101331	Industrial	CORVALLIS	16.24
MYRTLE CREEK, CITY OF	101014	Domestic	MYRTLE CREEK	16.08
LA GRANDE, CITY OF	101549	Domestic	LA GRANDE	15.99
BAKER CITY, CITY OF	101632	Domestic	BAKER CITY	15.99
HARRISBURG, CITY OF	101626	Domestic	HARRISBURG	15.91
MCMINNVILLE, CITY OF	101062	Domestic	MCMINNVILLE	15.82
CITY OF ST. HELENS	101173	Domestic	ST HELENS	15.82
ARKEMA, INC	103075	Industrial	PORTLAND	15.82
NEWBERG, CITY OF	100988	Domestic	NEWBERG	15.41
FRANK LUMBER CO., INC.	101583	Industrial	LYONS	15.41

Facility name	Permit No.	Facility type	Location	Years admin. continued
IDAHO POWER COMPANY	101287	Industrial	HELLS CANYON	15.24
IDAHO POWER COMPANY	101275	Industrial	OXBOW	15.16
SALEM, CITY OF	101145	Domestic	KEIZER	14.99
ELGIN, CITY OF	101606	Domestic	ELGIN	14.99
REEDSPORT, CITY OF	100941	Domestic	REEDSPORT	14.99
WOODBURN, CITY OF	101558	Domestic	WOODBURN	14.91
WINCHESTER BAY SANITARY DISTRICT	101254	Domestic	WINCHESTER BAY	14.91
WATER ENVIRONMENT SERVICES	100983	Domestic	MILWAUKIE	14.82
SILVERTON, CITY OF	101720	Domestic	SILVERTON	14.82
HUBBARD, CITY OF	101640	Domestic	HUBBARD	14.82
MT. ANGEL, CITY OF	101802	Domestic	MT ANGEL	14.82
PENDLETON, CITY OF	100982	Domestic	PENDLETON	14.74
SWEET HOME, CITY OF	101657	Domestic	SWEET HOME	14.58
RIDDLE, CITY OF	101196	Domestic	RIDDLE	14.58
CALIFORNIA SHELLFISH COMPANY, INC.	101820	Industrial	HAMMOND	14.49
HOOVER TREATED WOOD PRODUCTS, INC.	102834	Industrial	WINSTON	14.41
GLIDE-IDLEYLD SANITARY DISTRICT	101877	Domestic	ROSEBURG	14.41

Facility name	Permit No.	Facility type	Location	Years admin. continued
WINSTON GREEN REGIONAL TREATMENT FACILITY	100554	Domestic	ROSEBURG	14.33
ROSEBURG URBAN SANITARY AUTHORITY	100981	Domestic	ROSEBURG	14.08
PACIFIC SURIMI - NEWPORT, LLC	101805	Industrial	NEWPORT	13.91
INTERFOR U.S. INC.	100660	Industrial	GILCHRIST	13.91
TOLEDO, CITY OF	101713	Domestic	TOLEDO	13.91
RSG FOREST PRODUCTS, INC.	102858	Industrial	CLATSKANIE	13.74
TRI-CITY SERVICE DISTRICT	102229	Industrial	OREGON CITY	13.58
VERNONIA, CITY OF	101094	Domestic	VERNONIA	13.41
ADAIR VILLAGE, CITY OF	101701	Domestic	ADAIR VILLAGE	13.41
OREGON SYSTEM OF HIGHER EDUCATION	102512	Industrial	CORVALLIS	13.33
HULL-OAKES LUMBER CO.	101466	Industrial	MONROE	13.33
ALPINE COUNTY SERVICE DISTRICT	101923	Domestic	MONROE	13.33
OAKLAND, CITY OF	101975	Domestic	OAKLAND	13.24
SENECA SAWMILL COMPANY	101893	Industrial	EUGENE	13.16
CONRAD WOOD PRESERVING CO.	101901	Industrial	HAUSER	12.99
OAKRIDGE, CITY OF	102443	Domestic	OAKRIDGE	12.49
KINGSFORD MANUFACTURING COMPANY	102153	Industrial	Springfield	12.24

Facility name	Permit No.	Facility type	Location	Years admin. continued
CITY OF PORTLAND WATER BUREAU	101617	Industrial	PORTLAND	12.07
GRAPHIC PACKAGING INTERNATIONAL, INC.	101002	Industrial	PORTLAND	11.91
PORTLAND GENERAL ELECTRIC COMPANY	101209	Industrial	CLATSKANIE	11.91
CASCADE WOOD PRODUCTS, INC.	102305	Industrial	WHITE CITY	11.91
USDOD; US ARMY CORPS OF ENGINEERS BONNEVILLE DAM	102768	Industrial	CASCADE LOCKS	11.82
SUNSTONE CIRCUITS, LLC	101015	Industrial	MULINO	11.07
SANDY, CITY OF	102492	Domestic	BORING	10.91
CENTURY MEADOWS SANITARY SYSTEM, INC.	101721	Domestic	AURORA	10.91
USDOJ; FISH & WILDLIFE SERVICE	101522	Industrial	ESTACADA	10.82
SANDERS WOOD PRODUCTS, INC.	100929	Industrial	LIBERAL	10.82
OREGON DEPARTMENT OF FISH & WILDLIFE	102663	Industrial	ESTACADA	10.82
COBURG, CITY OF	102979	Domestic	COBURG	10.41
WILLAMETTE LEADERSHIP ACADEMY	101441	Domestic	GOSHEN	10.32
GOLD HILL, CITY OF	102494	Domestic	GOLD HILL	10.32
JASPER WOOD PRODUCTS, LLC	101427	Industrial	JASPER	10.32
WESTFIR, CITY OF	100811	Domestic	WESTFIR	10.32
LOWELL, CITY OF	101384	Domestic	LOWELL	10.32

Facility name	Permit No.	Facility type	Location	Years admin. continued
WILLAMETTE FALLS PAPER COMPANY, INC	100976	Industrial	WEST LINN	10.07
UNIVAR SOLUTIONS USA LLC	101613	Industrial	PORTLAND	10.07
COTTAGE GROVE, CITY OF	101300	Domestic	COTTAGE GROVE	10.07
GRANTS PASS, CITY OF	101985	Domestic	GRANTS PASS	10.07
BLOUNT, INC.	101162	Industrial	MILWAUKIE	10.07
SCAPPOOSE, CITY OF	100677	Domestic	SCAPPOOSE	9.99
EVRAZ INC. NA	101007	Industrial	PORTLAND	9.91
VIGOR INDUSTRIAL LLC	101393	Industrial	PORTLAND	9.82
ASH GROVE CEMENT COMPANY	102465	Industrial	PORTLAND	9.82
HATFIELD MARINE SCIENCE CENTER, OREGON STATE UNIVERSITY	101477	Industrial	NEWPORT	9.41
GRAND RONDE SANITARY DISTRICT	101429	Domestic	GRAND RONDE	9.32
AMITY, CITY OF	101924	Domestic	AMITY	9.32
ROYAL PACIFIC INDUSTRIES, INC.	101213	Industrial	MCMINNVILLE	9.32
COLUMBIA HELICOPTERS, INC.	101906	Industrial	AURORA	9.32
YAMHILL, CITY OF	101473	Domestic	YAMHILL	9.32
CARLTON, CITY OF	101902	Domestic	CARLTON	9.32
ATHENA, CITY OF	102125	Domestic	ATHENA	9.32

Facility name	Permit No.	Facility type	Location	Years admin. continued
JLR, LLC	101253	Industrial	WOODBURN	9.32
ESTACADA, CITY OF	101542	Domestic	ESTACADA	9.07
INDUSTRIAL HARBOR USA, LLC	101468	Industrial	GARDINER	8.99
PERMAPOST PRODUCTS CO.	101489	Industrial	HILLSBORO	8.99
J.H. BAXTER & CO., INC.	102432	Industrial	EUGENE	8.99
MCFARLAND CASCADE POLE & LUMBER COMPANY	102392	Industrial	EUGENE	8.99
CASCADE PACIFIC PULP, LLC	101114	Industrial	HALSEY	8.91
DAYTON, CITY OF	101742	Domestic	DAYTON	8.91
WILLAMINA, CITY OF	101070	Domestic	WILLAMINA	8.91
GEORGIA-PACIFIC CONSUMER OPERATIONS LLC	101488	Industrial	HALSEY	8.91
ALLWEATHER WOOD, LLC	102034	Industrial	WHITE CITY	8.91
OREGON METALLURGICAL, LLC	102223	Industrial	ALBANY	8.91
GERVAIS, CITY OF	101665	Domestic	GERVAIS	8.91
STIMSON LUMBER COMPANY	101480	Industrial	GASTON	8.82
ROGUE VALLEY SEWER SERVICES	100998	Domestic	SHADY COVE	8.57
CANYONVILLE, CITY OF	100532	Domestic	CANYONVILLE	8.32
USDA; FOREST SERVICE	100107	Domestic	TILLER	8.32

Facility name	Permit No.	Facility type	Location	Years admin. continued
USDA; FOREST SERVICE	100064	Domestic	GLIDE	8.32
SCIO, CITY OF	101503	Domestic	SCIO	8.24
MURPHY COMPANY	101777	Industrial	FOSTER	8.07
JEFFERSON, CITY OF	101780	Domestic	JEFFERSON	8.07
GREEN DIAMOND PERFORMANCE MATERIALS, INC.	101932	Industrial	RIDDLE	8.07
ASTORIA, CITY OF	102397	Domestic	ASTORIA	7.98
CORVALLIS, CITY OF	101714	Domestic	CORVALLIS	7.98
LONG CREEK, CITY OF	101751	Domestic	LONG CREEK	7.90
MT. VERNON, CITY OF	101316	Domestic	MT VERNON	7.90
PRINEVILLE, CITY OF	101433	Domestic	PRINEVILLE	7.82
US ARMY CORPS OF ENGINEERS, BONNEVILLE LOCK AND DAM	101793	Domestic	CASCADE LOCKS	7.66
CLATSKANIE, CITY OF	101595	Domestic	CLATSKANIE	7.32
HALSEY, CITY OF	101297	Domestic	HALSEY	7.32
GEORGIA-PACIFIC CHEMICALS LLC (BAKELITE)	102603	Industrial	ALBANY	7.32
VENETA, CITY OF	102480	Domestic	VENETA	7.32
TANGENT, CITY OF	102247	Domestic	TANGENT	7.32
PHILOMATH, CITY OF	102060	Domestic	Corvallis	7.32

Facility name	Permit No.	Facility type	Location	Years admin. continued
BROWNSVILLE, CITY OF	102206	Domestic	BROWNSVILLE	7.32
RAINIER, CITY OF	102571	Domestic	RAINIER	7.24
MAGAR E. MAGAR	102520	Domestic	RAINIER	7.24
BOEING COMPANY, THE	101761	Industrial	PORTLAND	7.15
FUJIMI CORPORATION	103033	Industrial	WILSONVILLE	7.15
VALLEY LANDFILLS, INC.	101545	Industrial	CORVALLIS	7.07
TOYO TANSO USA, INC.	101685	Industrial	TROUTDALE	6.82
OREGON CHERRY GROWERS, INC.	101593	Industrial	THE DALLES	6.82
OREGON CHERRY GROWERS, INC.	100841	Industrial	THE DALLES	6.82
CORVALLIS MHC LLC	102611	Domestic	CORVALLIS	6.82
DIAMOND HILL L.L.C.	101557	Domestic	HARRISBURG	6.82
ENVIRONMENTAL BUSINESS SOLUTIONS	103051	Industrial	PORTLAND	6.57
OREGON DEPARTMENT OF CORRECTIONS	101619	Industrial	SALEM	6.32
NORTHWEST NATURAL	103061	Industrial	PORTLAND	6.15
ARKEMA, INC	100752	Industrial	PORTLAND	5.57
FLORENCE, CITY OF	101703	Domestic	FLORENCE	5.49
MOLALLA, CITY OF	101514	Domestic	MOLALLA	5.40

Facility name	Permit No.	Facility type	Location	Years admin. continued
FOSTER POULTRY FARMS, INC.	101590	Industrial	CRESWELL	4.57
FORT CHICAGO HOLDINGS II U.S. LLC	101499	Industrial	NORTH BEND	4.32
Water Environment Services	100968	Domestic	BORING	3.65
PRECISION DRYING SERVICES INC.	102871	Industrial	RAINIER	3.57
CHILOQUIN, CITY OF	101029	Domestic	CHILOQUIN	3.49
GMA GARNET (USA) CORP	100860	Industrial	COOS BAY	1.32
UMATILLA, CITY OF	103196	Industrial	UMATILLA	1.32
BOISE CASCADE WOOD PRODUCTS, L.L.C.	100438	Industrial	MEDFORD	1.15
GEORGIA-PACIFIC CONSUMER OPERATIONS, LLC	101172	Industrial	CLATSKANIE	0.90
JOSEPH, CITY OF	101602	Domestic	JOSEPH	0.90
ONTARIO, CITY OF	101633	Domestic	ONTARIO	0.90
PORT OF PORTLAND & CO-APPLICANTS	101647	Industrial	PORTLAND	0.90
THE DALLES, CITY OF	101728	Domestic	THE DALLES	0.90
CLATSOP COUNTY FISHERIES	101767	Industrial	ASTORIA	0.90
GOLD BEACH, CITY OF	103006	Domestic	GOLD BEACH	0.90
MOSIER, CITY OF	101495	Domestic	MOSIER	0.73
DYNO NOBEL INC.	101535	Industrial	Deer Island	0.73

Facility name	Permit No.	Facility type	Location	Years admin. continued
GEORGIA-PACIFIC TOLEDO LLC	101409	Industrial	TOLEDO	0.40
SUTHERLIN, CITY OF	101993	Domestic	SUTHERLIN	0.32
CASCADE LOCKS, CITY OF	101328	Domestic	CASCADE LOCKS	0.23
NESKOWIN REGIONAL SANITARY AUTHORITY	101788	Domestic	NESKOWIN	0.15

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

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

1. Rollover permits from previous plan
2. 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

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

**Table 4. NPDES INDIVIDUAL PERMITS ADMINISTRATIVELY CONTINUED GREATER THAN 10 YEARS (AS OF OCTOBER 16, 2024)**

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
TDY Industries, LLC	ALBANY	Low priority based on planning criteria	31.17	2025
INTERNATIONAL PAPER COMPANY	SPRINGFIELD	Low priority based on planning criteria	26.58	2025
AMALGAMATED SUGAR COMPANY LLC, THE	NYSSA	Low priority based on planning criteria	25.83	2025
ARCLIN U.S.A. LLC	SPRINGFIELD	Low priority based on planning criteria	25.17	2026
NORPAC FOODS, INC.	STAYTON	Low priority based on planning criteria	24.67	2026
WESTROCK NORTHWEST, LLC	NEWBERG	Low priority based on planning criteria	24.41	2026
GEORGIA-PACIFIC CHEMICALS LLC	EUGENE	Low priority based on planning criteria	23.00	2026
CASCADE STEEL ROLLING MILLS, INC.	MCMINNVILLE	Low priority based on planning criteria	22.41	2025
DALLAS, CITY OF	DALLAS	Low priority based on planning criteria	22.00	2025
LEBANON, CITY OF	LEBANON	Low priority based on planning criteria	19.83	2025
ALBANY-MILLERSBURG WATER RECLAMATION FACILITY	ALBANY	Low priority based on planning criteria	18.99	2025
LANE COMMUNITY COLLEGE	EUGENE	Low priority based on planning criteria	18.83	2027
ARAUCO NORTH AMERICA	ALBANY	Low priority based on planning criteria	17.83	2026
DUFUR, CITY OF	DUFUR	EXPECTED TERMINATION IN 2025	17.66	2027
NEWPORT, CITY OF	NEWPORT	Low priority based on planning criteria	17.50	2025
ROGUE RIVER, CITY OF	ROGUE RIVER	Low priority based on planning criteria	17.16	2025
PORT OF COLUMBIA COUNTY	CLATSKANIE	Low priority based on planning criteria	16.83	2026
SALISHAN SANITARY DISTRICT	GLENEDEN BEACH	Low priority based on planning criteria	16.83	2027
STARLINK LOGISTICS INC.	PORTLAND	Low priority based on planning criteria	16.33	2026

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
HOLLINGSWORTH & VOSE FIBER COMPANY	CORVALLIS	Low priority based on planning criteria	16.24	2027
MYRTLE CREEK, CITY OF	MYRTLE CREEK	Low priority based on planning criteria	16.08	2026
LA GRANDE, CITY OF	LA GRANDE	Low priority based on planning criteria	15.99	2026
BAKER CITY, CITY OF	BAKER CITY	Low priority based on planning criteria	15.99	2026
HARRISBURG, CITY OF	HARRISBURG	Low priority based on planning criteria	15.91	2026
MCMINNVILLE, CITY OF	MCMINNVILLE	Low priority based on planning criteria	15.82	2025
CITY OF ST. HELENS	ST HELENS	Low priority based on planning criteria	15.82	2025
ARKEMA, INC	PORTLAND	Low priority based on planning criteria	15.82	2026
NEWBERG, CITY OF	NEWBERG	Low priority based on planning criteria	15.41	2026
FRANK LUMBER CO., INC.	LYONS	Low priority based on planning criteria	15.41	2026
IDAHO POWER COMPANY	HELLS CANYON	Low priority based on planning criteria	15.24	2026
IDAHO POWER COMPANY	OXBOW	Low priority based on planning criteria	15.16	2026
SALEM, CITY OF	KEIZER	Low priority based on planning criteria	14.99	2026
ELGIN, CITY OF	ELGIN	Low priority based on planning criteria	14.99	2026
REEDSPORT, CITY OF	REEDSPORT	Low priority based on planning criteria	14.99	2026
WOODBURN, CITY OF	WOODBURN	Low priority based on planning criteria	14.91	2026
WINCHESTER BAY SANITARY DISTRICT	WINCHESTER BAY	Low priority based on planning criteria	14.91	2026
Water Environment Services	MILWAUKIE	Low priority based on planning criteria	14.82	2025
SILVERTON, CITY OF	SILVERTON	Low priority based on planning criteria	14.82	2027
HUBBARD, CITY OF	HUBBARD	Low priority based on planning criteria	14.82	2028

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
MT. ANGEL, CITY OF	MT ANGEL	Low priority based on planning criteria	14.82	2028
PENDLETON, CITY OF	PENDLETON	Low priority based on planning criteria	14.74	2025
SWEET HOME, CITY OF	SWEET HOME	Low priority based on planning criteria	14.58	2026
RIDDLE, CITY OF	RIDDLE	Low priority based on planning criteria	14.58	2028
CALIFORNIA SHELLFISH COMPANY, INC.	HAMMOND	Low priority based on planning criteria	14.49	2025
HOOVER TREATED WOOD PRODUCTS, INC.	WINSTON	Low priority based on planning criteria	14.41	2028
GLIDE-IDLEYLD SANITARY DISTRICT	ROSEBURG	Low priority based on planning criteria	14.41	2028
WINSTON GREEN REGIONAL TREATMENT FACILITY	ROSEBURG	Low priority based on planning criteria	14.33	2028
ROSEBURG URBAN SANITARY AUTHORITY	ROSEBURG	Low priority based on planning criteria	14.08	2028
PACIFIC SURIMI - NEWPORT, LLC	NEWPORT	Low priority based on planning criteria	13.91	2025
INTERFOR U.S. INC.	GILCHRIST	Low priority based on planning criteria	13.91	2028
TOLEDO, CITY OF	TOLEDO	Low priority based on planning criteria	13.91	2028
RSG FOREST PRODUCTS, INC.	CLATSKANIE	Low priority based on planning criteria	13.74	2028
TRI-CITY SERVICE DISTRICT	OREGON CITY	Low priority based on planning criteria	13.58	2026
VERNONIA, CITY OF	VERNONIA	Low priority based on planning criteria	13.41	2025
ADAIR VILLAGE, CITY OF	ADAIR VILLAGE	Low priority based on planning criteria	13.41	2026
OREGON SYSTEM OF HIGHER EDUCATION	CORVALLIS	Low priority based on planning criteria	13.33	2025
HULL-OAKES LUMBER CO.	MONROE	Low priority based on planning criteria	13.33	2026
ALPINE COUNTY SERVICE DISTRICT	MONROE	Low priority based on planning criteria	13.33	2026
OAKLAND, CITY OF	OAKLAND	Low priority based on planning criteria	13.24	2028

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
SENECA SAWMILL COMPANY	EUGENE	Low priority based on planning criteria	13.16	2028
CONRAD WOOD PRESERVING CO.	HAUSER	Low priority based on planning criteria	12.99	2028
OAKRIDGE, CITY OF	OAKRIDGE	Low priority based on planning criteria	12.49	2028
KINGSFORD MANUFACTURING COMPANY	Springfield	Low priority based on planning criteria	12.24	2026
CITY OF PORTLAND WATER BUREAU	PORTLAND	Low priority based on planning criteria	12.07	2026
GRAPHIC PACKAGING INTERNATIONAL, INC.	PORTLAND	Low priority based on planning criteria	11.91	2026
PORTLAND GENERAL ELECTRIC COMPANY	CLATSKANIE	Low priority based on planning criteria	11.91	2026
CASCADE WOOD PRODUCTS, INC.	WHITE CITY	Low priority based on planning criteria	11.91	2028
USDOD; US ARMY CORPS OF ENGINEERS BONNEVILLE DAM	CASCADE LOCKS	Low priority based on planning criteria	11.82	2025
SUNSTONE CIRCUITS, LLC	MULINO	Low priority based on planning criteria	11.07	2025
SANDY, CITY OF	BORING	Low priority based on planning criteria	10.91	2025
CENTURY MEADOWS SANITARY SYSTEM, INC.	AURORA	Low priority based on planning criteria	10.91	2026
USDOJ; FISH & WILDLIFE SERVICE	ESTACADA	Low priority based on planning criteria	10.82	2025
SANDERS WOOD PRODUCTS, INC.	LIBERAL	Low priority based on planning criteria	10.82	2026
OREGON DEPARTMENT OF FISH & WILDLIFE	ESTACADA	Low priority based on planning criteria	10.82	2026
COBURG, CITY OF	COBURG	Low priority based on planning criteria	10.41	2026
WILLAMETTE LEADERSHIP ACADEMY	GOSHEN	Low priority based on planning criteria	10.32	2025
GOLD HILL, CITY OF	GOLD HILL	Low priority based on planning criteria	10.32	2026
JASPER WOOD PRODUCTS, LLC	JASPER	Low priority based on planning criteria	10.32	2028
WESTFIR, CITY OF	WESTFIR	Low priority based on planning criteria	10.32	2028

Facility	Location	Reason	Years Admin Continued	Planned Year of Issuance*
LOWELL, CITY OF	LOWELL	Low priority based on planning criteria	10.32	2028
WILLAMETTE FALLS PAPER COMPANY, INC	WEST LINN	Low priority based on planning criteria	10.07	2025
UNIVAR SOLUTIONS USA LLC	PORTLAND	Low priority based on planning criteria	10.07	2026
COTTAGE GROVE, CITY OF	COTTAGE GROVE	Low priority based on planning criteria	10.07	2026
GRANTS PASS, CITY OF	GRANTS PASS	Low priority based on planning criteria	10.07	2026
BLOUNT, INC.	MILWAUKIE	Low priority based on planning criteria	10.07	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
200-J Filter backwash	21	
300-J Fish hatcheries	16	
400-J, Log ponds	16	
500-J, Boiler blowdown	21	
1200-A Sand, gravel, other non-metallic	6	
1300-J	18	
1700-A, Vehicle and Equipment wash water	20	X
1900-J, Non-contact geothermal heat exchange	21	
2200-J Domestic wastewater floating residences (Young's Bay only).	8	
#01-2021 Confined Animal Feeding Operation	3	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.

Other competing  
priority (describe):

<b>Permitting process - internal limitation</b>	<b>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.</b>
Data analysis <sup>4</sup>	Delay caused by difficulty obtaining necessary data that DEQ has historically collected and analyzed. Also includes unexpected challenges or delays in cleaning or formatting data to be usable for analysis. For example, difficulty getting stream flow data, LASAR data, or other data sets.
No data available	Minimum data is not available to analyze reasonable potential to exceed water quality criteria.
Response to public comment	Delay caused by higher than expected time required to respond to public comment, either due to an unexpected volume or comments or complexity of comments received.
Policy limitation on complex issue (describe)	Delay caused by lack of policy on a complex permitting issue. Includes situations where no policy exists or where a policy has been developed but does not address a specific situation. Also includes IMDs that are obsolete or under revisions.
Lack of thorough program documentation (describe)	Delay caused by uncertainty in the permitting process that could have been avoided with better program documentations. This delay does not include complex policy issues that need documentation. This delay may include procedural issues associated with interpreting applications, fees, LUCS, entering information into internal systems, etc.
Permitting tool needed	Delay caused by lack of some type of technical tool that would assist with the permitting process, including items such as an update RPA spreadsheet, ammonia limit calculator, checklist, template, etc. This delay factor applies to routine permitting activities; it does not apply to non-routine special situations.
Need for state-wide consistency	Delay caused by internal review to establish cross-program, state-wide consistency on a permitting issue.
Other internal permit process limitation (describe):	

<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 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.

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Limited discharge	Permit holder has a minimal environmental impact due to no discharge or limited discharge to waters of the state.
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Other (describe):

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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.

### **Non-discrimination statement**

DEQ does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities. Visit DEQ's [Civil Rights and Environmental Justice page](#).