



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters/Water Quality
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08/26/2020

Gerald Fisher
City of Molalla
PO Box 248
Molalla, OR 97038

RE: Request for Additional Information/Data
Molalla STP
NPDES Permit # 101514, EPA # OR 0022381
File # 57613

Dear Gerald Fisher:

DEQ has scheduled your National Pollutant Discharge Elimination System (NPDES) permit (#101514) for renewal. Initially this renewal was scheduled for 2021. In order to provide an appropriate amount of time for planning and continued monitoring, DEQ will be scheduling your renewal in 2022. DEQ received your permit renewal application on 04/01/2019 and has reviewed this application and the associated information that we have in your NPDES file. Based on this review, DEQ has determined that supplemental information is necessary to fully evaluate your facility's site specific conditions and proceed with the renewal of your permit. DEQ is requiring that you collect and submit this supplemental information as noted below.

A listing of the required information follows:

- Copper Biotic Ligand Model and Aluminum Parameter Data (Please see the attachment for detailed information on monitoring and reporting requirements)
- Tier I and Tier II Toxics (Please see attachment for detailed information on monitoring and reporting requirements)

Unless otherwise approved by DEQ in writing, the requested information must be submitted in electronic format via NetDMR with the following timeframes:

- Copper Biotic Ligand Model and Aluminum Parameter Data: on the 15th of the month after the sampling event
- Tier I and Tier II Toxics: on January 15th 2021, April 15th 2021, January 15th 2022, and April 15th 2022

The information must be submitted following the directions and formatting found here:

<https://www.oregon.gov/deq/wq/wqpermits/Pages/Electronic-Data-Delivery-for-Toxics-Data.aspx>

DEQ is requiring this information pursuant to Schedule F, Condition D.7 of your NPDES permit and OAR 340-045-0030(5)(b). While DEQ may consider timely requests for extensions or modifications to this request, as the permit holder you may be subject to certain actions if you do not submit the requested information to DEQ. These actions may include:

- Renewal with permit effluent limits based on conservative assumptions, default values, and/or
- Effluent limits without the consideration of a mixing zone,
- Civil penalties.

Please contact Aliana Britson (britson.aliانا@deq.state.or.us, (503) 229-6044) within two weeks of the date of this letter if you would like to request an extension or modifications to this request, or if you have questions regarding the information requested.

Sincerely,

Aliana Britson
Permit Developer

AB:tem
cc: Tiffany Yelton-Bram, Portland, DEQ
Mike Pinney, Portland, DEQ

ATTACHMENT

Copper Biotic Ligand Model and Aluminum Parameter Monitoring and Reporting

Monitoring of the receiving (ambient) stream, upstream of the outfall, and the effluent must be conducted for copper biotic ligand model and aluminum parameters as specified in the table below. The required monitoring frequency is also specified in the table.

The monitoring must start by **November, 2020** and continue while the permittee is discharging until either the permit is renewed or until 24 monthly samples are collected, whichever comes first. Each data set must be reported to DEQ, in DEQ Electronic Data Delivery¹ format, on the 15th of the month after the sampling event (example: results for samples collected in November would be due December 15th). The data must be submitted electronically via NetDMR.

The laboratory quantitation limits (QLs) (adjusted for any dilutions) for analyses performed must be at or below the QLs specified here unless one of the conditions below is met.

- i. The monitoring result shows a detect above the laboratory reported QL.
- ii. The monitoring result indicates non-detect at a Detection Limit which is less than the QL.
- iii. Matrix effects are present that prevent the attainment of QLs and these matrix effects are demonstrated according to procedures described in EPA's "Solutions to Analytical Chemistry Problems with Clean Water Act Methods", March 2007. If using alternative methods and taking appropriate steps to eliminate matrix effects does not eliminate the matrix problems, DEQ may authorize in writing re-sampling or allow a higher QL to be reported.

Effluent and ambient monitoring must be conducted concurrently. Ambient samples must be taken in a location outside of the influence of the effluent using appropriate sampling techniques and procedures. It is the responsibility of the permittee to ensure safe and practical sampling techniques and procedures are used. DEQ recommends that these procedures be included in a sample and analysis plan that can be reviewed by DEQ when necessary.

Copper Biotic Ligand Model and Aluminum Sampling Requirements

Parameter See note a.	CAS See note b.	Units	Sampling Frequency See note c.	Sampling Location See note d.
Copper, Total and Dissolved See note e.	7440097	µg/L	1/month	Upstream and Effluent
Aluminum, Total See note f.	7429905	µg/L	1/month	Upstream and Effluent
Hardness (as CaCO ₃)	–	mg/L	1/month	Upstream and Effluent
Dissolved Organic Carbon	–	mg/L	1/month	Upstream and Effluent
pH	–	S.U.	1/month	Upstream and Effluent
Temperature	–	°C	1/month	Upstream and Effluent
Calcium, dissolved	7440702	mg/L	1/month	Upstream and Effluent
Magnesium, dissolved	7439954	mg/L	1/month	Upstream and Effluent
Sodium, dissolved	7440235	mg/L	1/month	Upstream and Effluent
Potassium, dissolved	7440097	mg/L	1/month	Upstream and Effluent
Sulfate, dissolved	14808798	mg/L	1/month	Upstream and Effluent
Chloride, dissolved	16887006	mg/L	1/month	Upstream and Effluent
Alkalinity, dissolved	–	mg/L	1/month	Upstream and Effluent

Notes:

- a. All effluent samples must be 24-hr composite samples except grab samples must be collected for pH, alkalinity and temperature. All receiving stream samples must be grab samples.
- b. Chemical Abstract Service
- c. Samples must be collected monthly for a period of 24 months beginning in November 2020
- d. Samples must be collected upstream (outside the influence of the effluent) and from the effluent on the same day.
- e. QL is 2.0 µg/L for copper
- f. QL is 50.0 µg/L for aluminum

¹ Electronic Data Delivery (EDD) format and submission information is available here:
<https://www.oregon.gov/deq/wq/wqpermits/Pages/Electronic-Data-Delivery-for-Toxics-Data.aspx>

Tier I/Tier II Monitoring Requirements

The permittee must collect and analyze effluent and ambient samples for the parameters listed in the tables below. Whether the sample needs to be collected for effluent or ambient is noted in each table. **A total of 4 samples must be collected for each parameter, with sampling to occur in November 2020, February 2021, November 2021, and February 2022. In addition to this sampling, an equipment blank for Mercury (total) and Bis (2-ethylhexyl) phthalate must be collected for each sampling event.**

The laboratory quantitation limits (QLs) (adjusted for any dilutions) for analyses performed must be at or below the QLs specified here unless one of the conditions below is met.

- iv. The monitoring result shows a detect above the laboratory reported QL.
- v. The monitoring result indicates non-detect at a Detection Limit which is less than the QL.
- vi. Matrix effects are present that prevent the attainment of QLs and these matrix effects are demonstrated according to procedures described in EPA’s “Solutions to Analytical Chemistry Problems with Clean Water Act Methods”, March 2007. If using alternative methods and taking appropriate steps to eliminate matrix effects does not eliminate the matrix problems, DEQ may authorize in writing re-sampling or allow a higher QL to be reported.

For Mercury (total) it is recommended that EPA Method 1631 is used to be able to obtain the required QL.

Effluent samples must be 24 hour composites, except as noted in the tables below for total cyanide and free cyanide. Ambient samples must be grab samples. Ambient samples must be taken in a location outside of the influence of the effluent using appropriate sampling techniques and procedures. It is the responsibility of the permittee to ensure safe and practical sampling techniques and procedures are used. DEQ recommends that these procedures be included in a sample and analysis plan that can be reviewed by DEQ when necessary.

Each data set must be reported to DEQ, in DEQ Electronic Data Delivery¹ format, by January 15th 2021, April 15th 2021, January 15th 2022, and April 15th 2022. The data must be submitted electronically via NetDMR.

Effluent: Metals, Cyanide, and Hardness

(µg/L unless otherwise specified)

Pollutant See note a.	CAS See note b.	QL	Pollutant See note a.	CAS See note b.	QL
Thallium (Total)	7440280	0.10	Mercury (Total) see note c.	7439976	0.001

Notes:

- a. The term “total” used in reference to metals is intended to cover all EPA-accepted standard digestion methods and is considered to be equivalent to the term “total recoverable”.
- b. Chemical Abstract Service
- c. An equipment blank must be collected for Mercury samples.

Ambient: Metals, Cyanide, and Hardness

(µg/L unless otherwise specified)

Pollutant See note a.	CAS See note b.	QL	Pollutant See note a.	CAS See note b.	QL
Cyanide (Free) See note c. & d.	57125	0.50	Mercury (Total) see note e.	7439976	0.001

Notes:

- The term “total” used in reference to metals is intended to cover all EPA-accepted standard digestion methods and is considered to be equivalent to the term “total recoverable”.
- Chemical Abstract Service
- There are multiple approved methods for testing for free cyanide. For more information, refer to DEQ’s analytical memo on the subject of cyanide monitoring at <https://www.oregon.gov/deq/FilterDocs/sToxicscyanide.pdf>
- When sampling for Cyanide (free and total), the permittee must collect ambient samples as grab samples. The aliquot must be at least 100 mL and collected into a container that has been preserved with sodium hydroxide to insure sample integrity.
- An equipment blank must be collected for Mercury samples.

Effluent : Base-Neutral Compounds

(µg/L unless otherwise specified)

Pollutant	CAS	QL See note a.	Pollutant	CAS	QL See note a.
Bis (2-ethylhexyl)phthalate See note c.	117817	1.0	Tetrachlorobenzene,1,2,4,5 See note b.	95943	1.0
Pentachlorobenzene See note b.	608935	1.0			

Notes:

- Some QLs may need methods with modification allowed in 40 CFR 136.6 or EPA’s *Solutions for Analytical chemistry Problems w/Clean Water Methods, March 2007*.
- To analyze for Pentachlorobenzene and Tetrachlorobenzene 1,2,4,5, use EPA 625.1
- An equipment blank must be collected for Bis (2-ethylhexyl) phthalate samples

¹ Electronic Data Delivery (EDD) format and submission information is available here:
<https://www.oregon.gov/deq/wq/wqpermits/Pages/Electronic-Data-Delivery-for-Toxics-Data.aspx>