

DEQ Requests Comments on Proposed City of Cascade Locks Water Quality Permit Renewal

HOW TO PROVIDE PUBLIC COMMENT

Facility name: City of Cascade Locks STP

Permit type: Domestic Minor

Comments due by: [Date] at 5 p.m.

Send written comments to:

By mail: Patty Isaak, Oregon DEQ

800 SE Emigrant Ave., Ste. 330, Pendleton, OR 97801

By email: Water.permiter@deq.oregon.gov

The Oregon Department of Environmental Quality invites the public to provide written comments on the conditions of the City of Cascade Locks Sewage Treatment Plant proposed water quality permit, known officially as a National Pollutant Discharge Elimination System permit.

Summary

Subject to public review and comment, DEQ intends to renew the proposed water quality permit, which allows City of Cascade Locks STP to discharge wastewater to the Columbia River.

About the facility

The City of Cascade Locks has applied for a water quality permit renewal for the City of Cascade Locks STP located at 105 Herman Creek Lane in Cascade Locks. DEQ last renewed this permit on October 1, 2019. The City of Cascade Locks STP operates a sequencing batch reactor plant that treats wastewater and discharges treated effluent. The regulated pollutants produced by their operations are five-day biological oxygen demand (BOD $_5$), total suspended solids (TSS), pH, *E.coli* and thermal load.

The facility discharges to the Main Stem Columbia River near Herman Creek Lane approximately 1300 feet from the bank into the Columbia River. The Main Stem Columbia River is listed as impaired (category 4 or 5) for several pollutants according to the most recent U.S. Environmental Protection Agency-approved integrated report for Oregon. The proposed permit reflects effluent limits established through reasonable potential analysis, best available technology or the Columbia and Lower Snake Rivers Temperature Total Maximum Daily Load, or TMDL, for temperature.

The most recent DEQ inspection of the City of Cascade Locks STP was on October 25, 2023. DEQ did not identify violations during this inspection. DEQ has documented violations since then, observing water quality violations in the past permit term. During construction and plant upgrades the facility discharged untreated wastewater to the Columbia River on two occurrences and discharged treated, but non-disinfected, wastewater to the Columbia River on one occurrence.



Additionally, over the last permit term, the facility exceeded effluent limits, failed to submit required reports, failed to follow monitoring and reporting protocols, and allowed operation of the wastewater treatment or collection system without proper certification. These compliance issues are currently being addressed.

The facility holds no other permits from DEQ.

What types of pollutants does the permit regulate?

This permit sets conditions for how the facility deals with the following pollutants: BOD₅, TSS, pH, *E.coli* and thermal load.

Would the draft permit change the amount of pollution the facility is allowed to release?

Yes. The draft permit would incorporate a thermal load limit consistent with the TMDL in place of the excess thermal load limit, decrease the TSS mass load limit, and decrease the BOD₅ limit in comparison to the existing CBOD₅ equivalent.

Pollutant	Change
Thermal Load	new
TSS Mass Load	-
BOD₅ Mass Load	Substitution for CBOD ₅ limits and more stringent

How did DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the water quality of the surface water or groundwater where the pollutants are proposed to be discharged and determines permit requirements to ensure the proposed discharges will meet applicable statutes, rules, regulations and effluent guidelines of Oregon and the Clean Water Act.

For this proposed permit action, DEQ evaluated the permit application, water quality online databases, monitoring data, a mixing zone analysis, previous permits, and facility plans and design. These materials may be viewed in person at the DEQ Eastern Region Office located at 800 SE Emigrant Ave., Suite #330 in Pendleton. In addition to the review and assessment of materials noted above, DEQ has exercised discretion in establishing monitoring/reporting requirements and identifying applicable data for analyses.

Discretion exists when DEQ has the power to make a choice about whether to act or not act, to approve or not approve, or to approve with conditions. The role of the decision-maker is to make a judgment that takes into account all relevant information.

How does DEQ monitor compliance with the permit requirements?

This permit will require the facility to monitor pollutants discharged using approved monitoring practices and standards. DEQ reviews the facility's discharge monitoring reports to check for compliance with permit limits.

What happens next?

Submit comments by sending an email or using mail service addressed to the permit coordinator listed in the "how to provide public comment" box above.

DEQ will hold a public hearing if it receives written requests for a hearing during the public comment period from at least 10 people or from an organization representing at least 10 people.

DEQ will consider and respond to all comments received and may modify the proposed permit based on comments.

For more information

Find more information by reviewing draft permit documents attached to this notice or contact Patty Isaak at 541-613-1125 or patty.isaak@deq.oregon.gov with questions or to view documents in person at a DEQ office.

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 <u>Civil Rights and Environmental Justice page</u>.