

Date: March 3, 2025
To: Environmental Quality Commission
From: Leah Feldon, Director
Subject: Agenda item G, Action item: Oregon Cascade RV Co-op WPCF-OS Permit Request March 13-14, 2025, EQC meeting

Why this is important The Three Basin Rule (OAR 340-041-0350) requires EQC review and approval for issuance of a new Water Pollution Control Facility (WPCF) permit where the proposed sewage design flow will exceed 5,000 gallons per day (gpd) within the Santiam, McKenzie or Clackamas River basins. As part of the needed septic system upgrades, The Oregon Cascade RV Co-op facility, has applied for a new permit exceeding this threshold.

DEQ recommendation and proposed EQC motion DEQ recommends that the Oregon Environmental Quality Commission approve issuance of the new WPCF permit for the Oregon Cascade RV Co-op facility for a sewage design flow of 7,000 gpd.

Proposed EQC motion:
I move that the Oregon Environmental Quality Commission approve, under the Three Basin Rule, Water Pollution Control Facility permit issuance for the Oregon Cascade RV Co-op facility for a wastewater design flow of 7,000 gallons per day.

Approval of this new WPCF permit allows for necessary septic system repairs and upgrades at this existing facility that are expected to significantly improve wastewater treatment.

Prior EQC involvement On May 19, 2023, DEQ staff presented an informational item to the EQC titled Onsite Program Wildfire Recovery and the Three Basin Rule. This presentation provided an overview of the onsite septic program's work to assist property owners and communities impacted by the historic 2020 wildfires. Those efforts included providing technical assistance, prioritizing permit applications for rebuilding, funding septic system repairs and replacements with pass-through federal grants and issuing a new guide for Oregon counties to plan and prepare for future natural disasters. The presentation also provided an overview of the Three Basin Rule (OAR 340-041-0350), which now applies to the current WPCF permit application for the Oregon Cascade RV Co-op facility within the McKenzie River Subbasin. This is the second Three Basin Rule action item related to WPCF-Onsite permitting brought before the EQC since the 2020 wildfires.

On May 23, 2024, DEQ staff presented an action item to the EQC, titled Lazy Days

Water Pollution Control Facility Findings for issuance of a modification to a WPCF permit to increase the design flow to 6,100 gallons per day. The Lazy Days facility action item is similar to that of the Oregon Cascade RV Co-op facility's proposal in that they are/were both existing facilities that are/were proposing to repair/upgrade their septic system(s) and are/were not proposing any development beyond what is/was already existing. The Lazy Days facility, however, was a 2020 wildfire-impacted facility to rebuild. The Lazy Days action item included a presentation that provided a brief background and history of the Three Basin Rule, and the details of the specific proposal and need for a WPCF permit from DEQ, which required approval from the EQC per the Three Basin Rule. The EQC granted the modification of the WPCF permit for the Lazy Days Mobile Home Park facility.

Background

Initially adopted by the EQC in 1976, the Three Basin Rule protects and preserves the Santiam, Clackamas, and McKenzie River basins by limiting new and increased wastewater discharges. These rules were adopted to protect these basins as the primary sources of drinking water for downstream users including, the cities of Eugene, Salem and several cities in Clackamas and Washington Counties, as well as to preserve recreational and aquatic life uses in these basins. The Three Basin Rule restricts new or increased discharges and requires EQC review of proposals for onsite septic WPCF-permitted facilities that treat 5,000 gallons per day or more of wastewater. DEQ's fact sheet on the Three Basin Rule Protection is provided as Attachment C.

According to Lane County records, Oregon Cascade RV Co-op was previously known as Hub Trailer Park, and contains 52 full hookup RV spaces, 11 mobile home spaces, a coin-operated laundry facility, and a shower facility. These records also suggest that Lane County issued permits to several septic systems between 1974 and 1998 to serve specific areas of the park. Currently, major repairs/upgrades to the existing septic systems are needed. Because the total daily sewage flow generated from the facility exceeds 2,500 gallons per day, a new WPCF-Onsite permit is required from DEQ. The new WPCF-Onsite permit requires EQC review and approval since it exceeds 5,000 gallons per day, per the Three Basin Rule. The applicant proposes to install an onsite wastewater treatment system sized with a design flow of 7,000 gallons per day, to serve the entire park's needs and decommission the older existing standard systems. A portion of the 1998 septic system's drainfield is proposed to be utilized in the new septic system design, and several existing septic tanks.

As part of the WPCF-Onsite permitting process, DEQ Onsite Program staff coordinated with agency hydrogeologists to review the submitted groundwater study and evaluate potential groundwater impacts. The analysis and subsequent review found that the proposed onsite wastewater treatment system represents a low potential to negatively impact nearby ground or surface waters (Attachments D & E). DEQ determined that the type of onsite wastewater system and technology proposed are significant improvements.

To approve a WPCF permit for a new or expanded onsite system with sewage flows greater than 5,000 gallons per day, DEQ and the commission must find that:

- There is no discharge to surface water;
- The new treatment system or facility will protect groundwater including, a groundwater monitoring plan, treated wastewater concentration limits and plans to restore conditions if groundwater quality is adversely affected; and
- The new treatment system or facility improves protection relative to the current treatment system. The permitting process can take up to two years and there is no guarantee that the proposed permit will be approved by the commission.

DEQ Onsite Program staff have drafted the new permit (Attachment A) and the permit evaluation (Attachment B) and issued it for a simultaneous 30-day public notice for comments and applicant review on Dec. 16, 2024. The applicant received one comment regarding the draft permit based on the omission of a minor technical detail about the type of system in Schedule A. That correction has since been incorporated into the current draft permit. The draft permit also includes strict monitoring, sampling, and reporting requirements for this facility. It may also be reopened if the system's performance is inadequate, or ground or surface water concerns arise. DEQ Onsite Program staff are ready to issue the WPCF-Onsite permit pending EQC approval as required by the Three Basin Rule.

Key issues

DEQ will present information regarding:

- **Septic system repair and upgrades to the Oregon Cascade RV Co-op facility.** This facility contains several existing septic systems that vary in age and need repair or replacement. A singular upgraded onsite wastewater treatment system is proposed to serve the entire facility.
- **Onsite wastewater systems with sewage flows of 5,000 gpd or more must comply with the Three Basin Rule.** The new WPCF permit for 7,000 gpd requires EQC review and approval.
- **To comply with the Three Basin Rule, DEQ and the commission must find that:**
 - There is no discharge to surface water;
 - Wastewater from the facility will be discharged to subsurface drainfields, which are not considered functionally equivalent to a direct discharge to surface water.
 - The new treatment system or facility will protect groundwater, including a groundwater monitoring plan, treated wastewater concentration limits and plans to restore conditions if groundwater quality is adversely affected; and
 - A DEQ hydrologist reviewed the proposal and drafted a memo (Appendix D) with approval to accept the information and conclusions submitted in a Groundwater Study Technical Memorandum (Appendix E). The draft WPCF-Onsite permit includes limits on treated wastewater concentration parameters and outlines sampling and reporting requirements. Additionally,

the draft permit includes language, if warranted, to require a full assessment of the facility's impact on groundwater quality with the option for DEQ to reopen the permit to include groundwater monitoring parameters.

- The new treatment system or facility must improve protection relative to the current treatment system. The permitting process can take up to two years and there is no guarantee that the commission will approve the proposed permit.
 - This facility is not currently on a DEQ WPCF-Onsite permit and wastewater is treated through the use of many standard onsite septic systems. The proposed wastewater treatment system incorporates technology that is expected to see a 70-80% reduction in total nitrogen in the wastewater effluent that is discharged to the subsurface drainfields, when compared to the previous standard septic systems that are in place currently.

EQC involvement The EQC will need to review and approve the new WPCF-Onsite permit, that the Oregon Cascade RV Co-op applied for before DEQ can issue the permit with a design flow of 7,000 gpd.

Supporting materials

- A. Draft WPCF-Onsite Permit for Homes for Oregon Cascade RV Co-op
- B. Draft WPCF-Onsite Permit Evaluation for Oregon Cascade RV Co-op
- C. [Three Basin Rule Protection Fact Sheet](#)
- D. DEQ Memorandum: *Groundwater Impact Assessment for Oregon Cascade RV Co-Op, Lane County*
- E. GSI Water Solutions, Inc. Technical Memorandum: *Groundwater Study in Support of a Large Capacity Septic System, Cascade RV Co-Op, McKenzie Bridge, Lane County, Oregon*

*Report prepared by Sean Rochette
Water Quality Division, Onsite Program Manager*

Translation or other formats

[Español](#) | [한국어](#) | [繁體中文](#) | [Русский](#) | [Tiếng Việt](#) | [العربية](#)
800-452-4011 | TTY: 711 | deqinfo@deq.oregon.gov

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](#).