Oregon Cascade RV Co-op Water Pollution Control Facility Permit Request and the Three Basin Rule

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March 14, 2025 Environmental Quality Commission Meeting



Today's Presentation

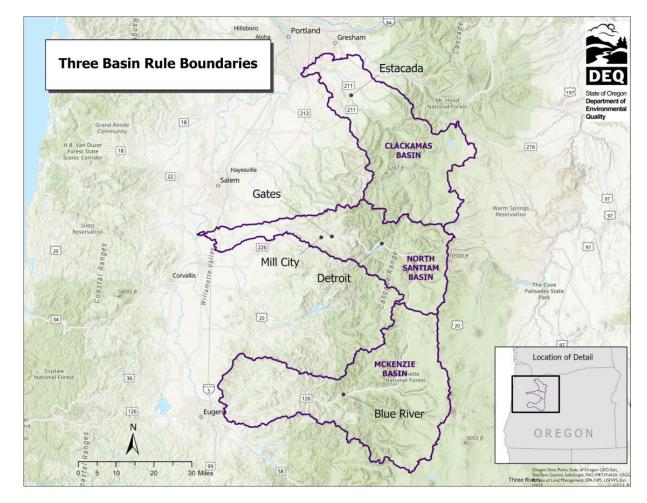
- Three Basin Rule Overview, Application, and Requirements
- Water Pollution Control Facility
 Onsite Septic Permitting
- Oregon Cascade RV Co-op Permitting
- DEQ Findings and Recommendation to EQC





Three Basin Rule

- Originally adopted in 1976
- Drinking water source protection and recreation
 - Clackamas
 - North Santiam
 - McKenzie
- Significantly amended in 1995 to include protection of aquatic life and other provisions





Three Basin Rule – Application and Protection

- General prohibition on new or increased wastewater discharges with some exceptions
 - Emergencies or for public health reasons
 - Onsite systems <5,000 gallons per day
 - Certain general permits, including construction stormwater

 Establishes a process to consider WPCF permits for new or expanded facilities designed for 5,000 gallons per day or more of wastewater treatment



Three Basin Rule – Required Findings

- To approve a Water Pollution Control Facility permit for a new or expanded onsite system with sewage flows of 5,000 gallons per day or more, 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
 - That the new treatment system or facility improves protection relative to the current treatment system.







Overview of Water Pollution Control Facility (WPCF) - Onsite Septic (OS) Permitting

- Large systems over 2,500 gallons per day and/or high strength wastewater with subsurface disposal
- WPCF-OS permits issued by DEQ
- Site evaluation, groundwater review and engineered construction plans required
- Renewable 10-year operating permits with annual reporting requirements
- Three Basin Rule applies if 5,000 gallons per day or larger for new or expanded facilities/systems

Expiration Date: Draft Permit Number: Draft File Number: 127687 Page 1 of 9 Pages WATER POLLUTION CONTROL FACILITIES PERMIT Department of Environmental Quality Western Region - Eugene Office 165 East 7th Ave, STE 100, Eugene, OR 97401 Telephone: (541) 686-7838 Issued pursuant to ORS 468B.050 ISSUED TO: SOURCES COVERED BY THIS PERMIT: Oregon Cascade RV Co-op Type of Waste System 001 Method of Treatment/Disposal 865 NE Tomahawk Island Dr #410 Domestic Sewage Recirculating Textile Filter & Portland, OR 97217 drainfield SYSTEM TYPE AND LOCATION: RIVER BASIN INFORMATION: Onsite Wastewater Treatment System Basin: Willamette Sub-Basin: McKenzie Oregon Cascade RV Co-op LLID: 1230673441173 56640 McKenzie Hwy, McKenzie Bridge River Mile: 63.14 County: Lane Located on: Township 16S, Range 5E, Nearest surface stream which would receive waste Section 13, Tax Lot 3100 @ Latitude: if it were to discharge: McKenzie River 44.1725, Longitude:-122.1536. This permit is issued in response to application number 948048 received September 18, 2024 and is based on the Land Use Compatibility Statement issued by Lane County dated August 26, 2024. Draft Sean Rochette, Manager Date Onsite Program PERMITTED ACTIVITIES Until this permit expires or is modified or revoked, the permittee is authorized to construct, install, modify, or operate a wastewater collection, treatment, control and disposal system in conformance with all the requirements limitations, and conditions set forth in the attached schedules as follows:

	Pag	l
Schedule A - Waste Disposal Limitations	-	ļ
Schedule B - Minimum Monitoring and Repo	rting Requirements	
Schedule C - Compliance Conditions and Sch		١
Schedule D - Special Conditions		5
Schedule F - General Conditions		Ş

Discharge of untreated or partially treated sewage or septic tank effluent directly or indirectly onto the ground surface or into surface waters constitutes a public health hazard and is prohibited. This permit does not relieve the permittee from responsibility for compliance with any other applicable federal, state, or local law, rule or standard.



Oregon Cascade RV Co-op Permitting

- This facility has not been on a WPCF-OS permit
 - Existing development predates WPCF-OS permitting requirements
- New WPCF-OS Permit required for major repairs to septic systems
 - New WPCF-OS permit required for design flow of 7,000 gallons per day
 - Three Basin Rule action required meets or exceeds 5,000 gallons per day
 - Proposal does not include expanding beyond current development
 - Draft permit sent out for 30-day applicant review and public notice for comments on Dec. 16, 2024 – one minor comment received from applicant due to omission of small technical detail
 - Brought to EQC in March 2025 for action



DEQ Evaluation and Findings

To grant permit approval, DEQ and the commission must find that:

- There is no discharge to surface water;
 - Wastewater will be discharged to a subsurface drainfield.
- 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
 - Draft permit includes wastewater concentration limits as well as sampling, monitoring and reporting requirements.
 - Permit allows for further assessment of impacts on groundwater quality and additional groundwater monitoring.
- That the new treatment system or facility improves protection relative to the current treatment system.
 - Existing facility with proposed upgrades to treatment system capable of reducing total nitrogen discharges by 70-80%.



DEQ Recommendation to EQC

- DEQ recommends that the Oregon Environmental Quality Commission approve issuance of the new WPCF-OS permit for the Oregon Cascade RV Co-op facility for a sewage design flow of up to 7,000 gallons per day.
- Factors for recommendation:
 - Facility is existing and is not proposing to expand
 - Wastewater will be highly treated before subsurface discharge, with no expected impact to ground or surface waters
 - Permit requires ongoing sampling, monitoring and reporting requirements; and may be amended to require more stringent monitoring or treatment
 - Combination of treatment and routine maintenance and monitoring is expected to be
 protective of the sensitive nearby water resources



Proposed Motion Language

"I move that the Oregon Environmental Quality Commission approve, under the Three Basin Rule, the Water Pollution Control Facility permit for the Oregon Cascade RV Co-op facility with an onsite wastewater design flow of up to 7,000 gallons per day."



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