



**Community Development Department**  
315 Kennel Avenue, PO Box 248, Molalla, Oregon 97038  
Phone: (503) 759-0205

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## **Website Posting**

**Mar 3, 2025**

Based on information at the time of required posting, the City experienced no violation of the NPDES Permit conditions (as modified by the March 2021 MAO) for the month of February 2025.

February's DEQ Correspondence is attached below:

**From:** [HYNSON Mark \\* DEQ](#)  
**To:** [Seth Kelly](#); [Mac Corthell](#)  
**Cc:** [NAVARRO Jeffrey \\* DEQ](#); [YELTON-BRAM Tiffany \\* DEQ](#); [BRITSON Aliana \\* DEQ](#); [PRICHARD Emma \\* DEQ](#); [PINNEY Mike \\* DEQ](#)  
**Subject:** 101514-City of Molalla - Permit Updates and Pending Public Notice  
**Date:** Wednesday, February 26, 2025 10:46:50 AM

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Mac and Seth,

I am providing you with a summary of the updates made by DEQ to NPDES Draft Permit No. 101514 as a result of Applicant Review that closed on February 5, 2025. DEQ reviewed the Applicant Review comments provided by the City of Molalla in the cover letter transmitting comments (dated February 5, 2025), as well as those presented in the draft permit and permit fact sheet. DEQ also considered the suggested text changes to the permit and permit fact sheet.

DEQ made no changes to the permit or permit fact sheet relative to the comments associated with TSS mass load limits, mercury limits and the financial impacts associated with the increased monitoring for the reasons listed below.

**TSS Mass Load Limits** - DEQ is maintaining the proposed wet weather mass load limits for both the existing and proposed treatment facility as presented in the draft permit. These limits are based upon the average wet weather design flows for the existing facility that have been documented in previous permits and the results of the anti-degradation analysis. DEQ maintains that the facility improvements completed from 2000 through 2007 made no changes to the lagoon system which are considered to be the primary treatment mechanisms for the facility and the basis of its design flow. Per regulation, DEQ's antidegradation analysis must be based on the previous mass load used in the existing 2014 permit, regardless if the facility design flow used to calculate that load was representative of the facility at the time the loads were calculated. The intent of the antidegradation analysis is to compare the water quality impacts of the existing loadings (in the 2014 permit) against the water quality impacts of the proposed loadings. The results of the antidegradation analysis does not allow for higher TSS mass load limit for the proposed facility as documented in the fact sheet. Additionally, DEQ tracks mass load increases so that the any cumulative impact beyond the de minimis benchmark requires an in-depth evaluation as described in DEQ's Antidegradation Policy Implementation IMD (March 2001), as well as subsequent policy memos. Even if the design flow for the existing facility were higher in the previous permit, it would result in the same outcome as described in the fact sheet because subsequent mass load increases are tracked.

**Mercury** – Based upon available information, DEQ has determined that there is reasonable potential to exceed the aquatic life water quality criteria for mercury – this requires DEQ to include a numeric mercury limit in the draft permit. Because this limit may not be able to be met upon permit issuance, a compliance schedule is included in the permit that lists the actions that will lead to limit compliance and the date in which the permittee must meet the final mercury limit. Regulations require that the duration of the compliance schedule is as short as possible, with the goal of achieving the final limit. It is outside the scope of a compliance schedule to include provisions that allow time for the collection of data or the re-evaluation of reasonable potential. However, the permittee may conduct additional sampling during this time the compliance schedule is in effect should they desire to do so. Since the length of time set in the compliance schedule is greater than 5 years, any

additional data collected by the permittee may be submitted with the next permit renewal application and the final limit can be re-evaluated as part of the next permit renewal. DEQ is maintaining the proposed mercury limit and mercury compliance schedule as presented in the draft permit. The language of the compliance schedule will not be modified.

**Financial Impacts (Due to Increased Monitoring Frequency)** – With this permit renewal, the City of Molalla WWTP will be considered a major domestic wastewater treatment facility which necessitates a higher level of effluent and ambient monitoring compared to the requirements for a minor domestic treatment facility. These increases in monitoring reflect the greater impact that permittees with larger flows have on receiving waters and ensure that there is adequate data for DEQ to determine whether the facility is in compliance with the permit limits or to ensure that DEQ has enough data to conduct accurate Reasonable Potential Analyses during the next permit renewal. DEQ understands that additional monitoring results in additional costs and endeavors to require a sample size that is no larger than necessary to accurately characterize pollutant levels that are present in effluent. However, all of the monitoring requirements listed in the draft permit are consistent with those that DEQ places in all other NPDES permits for major domestic facilities. No changes were made to the monitoring requirements in Schedule B.

**Changes Made** - DEQ made minor text edits to the permit fact sheet and permit relative to a number of text changes suggested by the City of Molalla. These changes include:

- Revisions to the descriptions of the existing and proposed facility
- Revisions to the sampling locations for influent and dissolved oxygen
- Clarifying anticipated termination of chlorine limits when ultraviolet disinfection becomes the primary method of disinfection

The next step is the Public Notice period, and we anticipate beginning Public Notice in the next week or so. Public Notice will last 40 calendar days since this Public Notice will include a virtual Public Hearing that will be held 30 calendar days after the Public Notice is issued. DEQ will coordinate with City staff on a date and time for the virtual Public Hearing. You will receive an email announcing the start of Public Notice that will include the exact start and end dates – as well as the date and time for the Public Hearing. You are welcome to submit additional comments in writing during Public Notice. At the close of the Public Notice, DEQ is required to respond to comments and may incorporate public comments into the final version of the permit. Both the public comments and DEQ's responses become part of the permanent record of the permit. You will receive a formal Response to Comment document that will be included in the delivery of your final NPDES permit.

Please feel free to contact me directly if you have questions on the changes or any of the steps involved in the permitting process.

Thanks,

Mark

Mark W. Hynson  
Water Quality Specialist  
Oregon Department of Environmental Quality  
Water Quality Program, NW Region  
700 NE Multnomah Street, Suite 600

Portland, Oregon 97232-4100

[Mark.Hynson@deq.oregon.gov](mailto:Mark.Hynson@deq.oregon.gov)

Desk: 503-229-5295

In early 2025, NPDES and WPCF permittees will begin using Your DEQ Online, a one-step place for you to manage your water quality permit.

<https://wqpermits.oregon.gov>



**Community Development Department**

315 Kennel Ave/PO Box 248

Molalla, OR 97038

Phone 503.759.0205

[www.cityofmolalla.com](http://www.cityofmolalla.com)

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February 5, 2025

Trinh Hansen, Water Quality Permit Coordinator  
DEQ Western Region  
4026 Fairview Industrial Way Dr. SE  
Salem, OR 97302  
[trinh.hansen@deq.oregon.gov](mailto:trinh.hansen@deq.oregon.gov)

RE: NPDES Permit No. 101514 Renewal  
City of Molalla

Ms. Hansen,

The City of Molalla ("City") would like to thank the Oregon Department of Environmental Quality ("DEQ") Permit writing team for working with us in the development of this draft National Pollutant Discharge Elimination System ("NPDES") Permit. We know that there are many DEQ personnel and hours that go into creating a permit that both allows our community the ability to serve our citizens and customers as well as provide a water quality that protects our precious environment and the wonderful recreational opportunities that surround our community.

The following documents, all with track changes to clearly show where changes are proposed, accompany this letter.

- Draft NPDES Permit
- Draft NPDES Permit Fact Sheet
- Public Notice

Included in those documents are additional in-line comments by Dyer Partnership in the relevant sections for context and ease of review.

After over seven years of planning, design, and bidding, the City of Molalla broke ground on its new Wastewater Treatment Plant ("WWTP") this month. The new ~\$50 million WWTP addresses long-standing issues with the existing facility and was designed to serve the rapidly growing community for the next twenty plus years.

While the City is excited to embark on the construction phase of this critically important project, there are aspects of the pending new NPDES Permit that have significant ramifications to the City and its ratepayers. This \$50 million project is a major investment into the City's wastewater infrastructure and represents a long-term commitment to its citizens with the intention that the City will no longer be in

violation of their discharge Permit and that the WWTP will not require significant upgrades during the twenty-year planning period.

The NPDES Permit is the primary basis of design for the WWTP upgrade project. Accordingly, the City has worked diligently with the DEQ to establish the anticipated discharge Permit limits to facilitate the design of the new facility. The City again appreciates the collaboration with the Oregon DEQ on the discharge Permit, as proposed, which includes opportunities for conditionally discharging to the Molalla River during the shoulder months, and concentration limits based on the Basin Standards for the Willamette Basin. The proposed Total Suspended Solids (“TSS”) winter mass load allocation, however, is a large deviation from prior commitments from the Oregon DEQ, and raises significant concerns for the City.

### **TSS Mass Load Limits**

The proposed TSS mass load restriction, as compared to prior allocations shared by DEQ with the City, significantly reduces the margin of safety with respect to discharge Permit compliance. The citizens of Molalla approved the \$50 million investment based on a known amount of risk, and an understanding that the upgrades would satisfy the Oregon DEQ requirements for the planning period. The mass load restriction increases the risk, both in the short-term and long-term, and significantly alters the characteristics of this major capital improvement project for the City of Molalla.

With the proposed TSS mass load, the margin with regard to Permit compliance would gradually narrow as the City’s population grows, until eventually, in the absence of WWTP upgrades or changes in the NPDES Permit, violations would ensue. Ultimately, in the long-term, meeting this TSS mass load restriction would likely require significant process upgrades to the WWTP, and may even bring into question the design of the overall proposed wastewater process arrangement.

The City’s current NPDES Permit has remained largely unchanged for the past twenty years and is based on concentration limits that are not the Basin Standard, as well as flows that were presumably derived by the Oregon DEQ using wastewater flow data from the 1990s. Had the NPDES Permit been established based on Basin Standards and representative flows over the course of the last twenty years, the City would not be up against an issue with exceeding the ten-percent *de minimis* threshold. The existing Permit represents a technical mistake in how the mass load limits were derived. Had this technical mistake not occurred, the renewed Permit would not be encountering an issue with the antidegradation standards. The City would prefer to address this issue with the current Permit prior to commissioning of the new plant, and to not have the problems with the current NPDES Permit continue into the future.

The City appreciates the Oregon DEQ’s efforts in development of this Permit, but respectfully requests that the Oregon DEQ only compare the new mass loads for the WWTP Upgrade project to the mass loads of the corrected Permit for the existing facility. Comparing the new mass load limits to the existing NPDES Permit, which was developed in error, allows the technical mistake associated with the past Permit to continue into the future.

The proposed TSS mass load limit represents too large of a departure from original design assumptions, as validated and approved by the Oregon DEQ, and jeopardizes too many aspects of the City's commitments to its citizens.

### **Mercury Limits**

Another major concern with this draft NPDES Permit is the requirement to both conduct a Mercury Minimization Plan (MMP) and have assigned mercury effluent limits as part of the discharge Permit. The mercury value that is driving the water quality assessment is an outlier and likely represents an anomaly as it is two orders of magnitude higher than any of the other data. If the 2/6/2024 anomalous mercury result is not used in the water quality assessment, there is no reasonable potential and thus, no need for effluent limits. A more reasonable approach, that fits the existing data, would be to see what the data shows after conducting the MMP and after constructing the SBR that is an activated sludge process (known for better mercury reduction). If there was reasonable potential following these steps for mercury in the effluent, a limit would be included in the next discharge Permit. The enhanced mercury monitoring being required with the NPDES Permit renewal will provide confirmation whether the 2/6/2024 monitoring result is or is not representative of discharge conditions. The City requests that the permit only include a requirement to develop a MMP, and conduct mercury sampling, but that an actual permit limit for mercury not be imposed in the permit until there is evidence that there is reasonable potential for exceeding the water quality standard.

### **Financial Impacts**

During the development of this Permit, we willingly conducted additional sampling and testing. Although it is understandable that some testing requirements will have changed and/or require more frequent sampling intervals, this draft Permit has significantly increased sampling requirements which will have significant fiscal impacts for the City. We would be remiss if we didn't point out how much of a lift this Permit would require. All of these items have annual revolving cost in material, energy, and staffing. Items that will affect plant operation and costs are listed below:

#### Effluent

1. Cost for coliform testing (8 additional/month)
2. Nutrient sampling (TKN, Nitrate, Nitrite, Total P) (3 more/year)
3. FOG, TDS (4 additional / year)
4. Ammonia (7 additional / month)
5. Mercury (4 new / month)

#### River Ambient

1. Ammonia (12 additional / year)
2. TSS (12 additional / year)
3. Mercury (2 additional / year)

#### Permit Cycle Testing

1. Cooper-Biotic
2. Toxicity
3. Pesticide and PCB's
4. WET testing

### Data Collection Studies

1. Mixing Zone Study
2. Outfall Inspection

As a small community just outside the metropolitan area, and without the constituents that larger communities have, the increased testing places a heavy burden on the City. We are hopeful that you might consider a reduction in the compliance sampling requirements to reduce the significant financial burden on the City. We look forward to speaking with you to discuss our options and thank you for your ongoing assistance and cooperation with the City of Molalla.

Sincerely,

Seth Kelly  
Water Quality Superintendent  
315 Kennel Ave. | PO Box 248 | Molalla, OR 97038  
Phone – [503.759.0243](tel:503.759.0243)  
Email – [skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)  
Website – <http://www.cityofmolalla.com>

CC: Mark Hynson  
Tiffany Yelton-Bram  
Mike Pinney  
Aliana Britson  
Robert Burkhart  
Jeffrey Navarro  
Rebecca Bodnar  
Jeff Linzer  
Emma Prichard

**From:** [Seth Kelly](#)  
**To:** ["HYNSON Mark \\* DEQ"; Mac Corthell](#)  
**Cc:** [NAVARRO Jeffrey \\* DEQ; YELTON-BRAM Tiffany \\* DEQ](#)  
**Subject:** RE: 101514-City of Molalla-Coordination on Public Hearing  
**Date:** Wednesday, February 26, 2025 1:07:00 PM

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Mark,

Thank you for all your work on this permit. We will reach out to Mr. Navarro about scheduling next week once we have had an opportunity to discuss schedules on our end.

Enjoy your time off.



**Seth Kelly**

**Water Quality Superintendent**

315 Kennel Ave. | PO Box 248 | Molalla, OR 97038

Phone – [503.759.0243](tel:503.759.0243)

Email – [skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)

Website – <http://www.cityofmolalla.com>

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**From:** HYNSON Mark \* DEQ <Mark.HYNSON@deq.oregon.gov>  
**Sent:** Wednesday, February 26, 2025 11:35 AM  
**To:** Seth Kelly <skelly@cityofmolalla.com>; Mac Corthell <mcorthell@cityofmolalla.com>  
**Cc:** NAVARRO Jeffrey \* DEQ <Jeffrey.NAVARRO@deq.oregon.gov>; YELTON-BRAM Tiffany \* DEQ <Tiffany.YELTON-BRAM@deq.oregon.gov>  
**Subject:** 101514-City of Molalla-Coordination on Public Hearing

Seth and Mac,

DEQ is preparing the NPDES permit package for Public Notice. The Public Notice will include a virtual Public Hearing.

I would ask that you coordinate with Jeff Navarro here at DEQ on establishing a date and time for the Public Hearing. The date and time for the Public Hearing must be included with the Public Notice. The Public Hearing is held 30 calendar days after the Public Notice is posted.

I will be out on vacation starting Thursday Feb. 27. I will be returning to the office on Monday March 10.

Thanks. Mark

Mark W. Hynson  
Water Quality Specialist  
Oregon Department of Environmental Quality  
Water Quality Program, NW Region  
700 NE Multnomah Street, Suite 600  
Portland, Oregon 97232-4100

[Mark.Hynson@deq.oregon.gov](mailto:Mark.Hynson@deq.oregon.gov)

Desk: 503-229-5295

In early 2025, NPDES and WPCF permittees will begin using Your DEQ Online, a one-step place for you to manage your water quality permit.

<https://wqpermits.oregon.gov>

**From:** [Seth Kelly](#)  
**To:** ["RUBY Tim \\* DEQ"](#)  
**Subject:** RE: Annual Biosolids Report for 2024  
**Date:** Tuesday, February 4, 2025 2:54:00 PM

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Tim,

Thank you.



**Seth Kelly**

**Water Quality Superintendent**

315 Kennel Ave. | PO Box 248 | Molalla, OR 97038

Phone – [503.759.0243](tel:503.759.0243)

Email – [skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)

Website – <http://www.cityofmolalla.com>

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**From:** RUBY Tim \* DEQ <Tim.RUBY@deq.oregon.gov>  
**Sent:** Tuesday, February 4, 2025 2:22 PM  
**To:** Seth Kelly <skelly@cityofmolalla.com>  
**Subject:** RE: Annual Biosolids Report for 2024

Thank you, Seth.

Please note that I have logged this report into DEQ's compliance tracking system as received/complete.

Sincerely,

Tim Ruby  
Natural Resource Specialist 3  
DEQ Northwest Regional Office – WPCF Permit Specialist  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
(503) 229-5292 (Office)  
(971) 275-8447 (Cell)  
Email: [Tim.Ruby@deq.oregon.gov](mailto:Tim.Ruby@deq.oregon.gov)

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**From:** Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>  
**Sent:** Monday, February 3, 2025 2:54 PM

**To:** RUBY Tim \* DEQ <[Tim.RUBY@deq.oregon.gov](mailto:Tim.RUBY@deq.oregon.gov)>

**Subject:** RE: Annual Biosolids Report for 2024

Hi Tim,

Yes, these solids were hauled by RiverCity Environmental to the Patriot Portland, OR facility.

Thank you for the receipt of receipt. I hope all is well.



**Seth Kelly**

**Water Quality Superintendent**

315 Kennel Ave. | PO Box 248 | Molalla, OR 97038

Phone – [503.759.0243](tel:503.759.0243)

Email – [skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)

Website – <http://www.cityofmolalla.com>

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**From:** RUBY Tim \* DEQ <[Tim.RUBY@deq.oregon.gov](mailto:Tim.RUBY@deq.oregon.gov)>

**Sent:** Monday, February 3, 2025 11:49 AM

**To:** Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>

**Subject:** Annual Biosolids Report for 2024

Dear Seth, this is to acknowledge receipt of the city's biosolids annual report for 2024.

**Patriot Environmental**

Pease detail where Patriot Environmental managed the wastewater solids collected from your STP during 2024. Do you know if these solids were managed at their Portland, OR facility?

Thank you for your help.

Sincerely,

Tim Ruby

Natural Resource Specialist 3

DEQ Northwest Regional Office – WPCF Permit Specialist

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5292 (Office)

(971) 275-8447 (Cell)  
Email: [Tim.Ruby@deq.oregon.gov](mailto:Tim.Ruby@deq.oregon.gov)

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**From:** Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>  
**Sent:** Friday, January 24, 2025 8:50 AM  
**To:** HEINS Pat \* DEQ <[Pat.HEINS@deq.oregon.gov](mailto:Pat.HEINS@deq.oregon.gov)>  
**Cc:** RUBY Tim \* DEQ <[Tim.RUBY@deq.oregon.gov](mailto:Tim.RUBY@deq.oregon.gov)>  
**Subject:** RE: Annual Biosolids Report

Pat,

This helps thank you!



**Seth Kelly**

**Water Quality Superintendent**

315 Kennel Ave. | PO Box 248 | Molalla, OR 97038

Phone – [503.759.0243](tel:503.759.0243)

Email – [skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)

Website – <http://www.cityofmolalla.com>

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**From:** HEINS Pat \* DEQ <[Pat.HEINS@deq.oregon.gov](mailto:Pat.HEINS@deq.oregon.gov)>  
**Sent:** Friday, January 24, 2025 8:30 AM  
**To:** Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>  
**Cc:** RUBY Tim \* DEQ <[Tim.RUBY@deq.oregon.gov](mailto:Tim.RUBY@deq.oregon.gov)>  
**Subject:** RE: Annual Biosolids Report

Seth,

It is not a state requirement to report your solids management to EPA. I only include that text in my reminders because EPA asks us to assist in getting reminders out and one of the individuals I spoke with said to include landfilling. I pushed back slightly and they insisted on the term “landfill” when I ask. So, if EPA is telling you that you do not need to submit a report to them, than you do not need to submit the report to EPA.

Hope this helps,

Pat

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**From:** Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>  
**Sent:** Friday, January 24, 2025 7:45 AM  
**To:** HEINS Pat \* DEQ <[Pat.HEINS@deq.oregon.gov](mailto:Pat.HEINS@deq.oregon.gov)>

**Cc:** RUBY Tim \* DEQ <[Tim.RUBY@deq.oregon.gov](mailto:Tim.RUBY@deq.oregon.gov)>

**Subject:** Annual Biosolids Report

Hello Pat,

Attached is the City of Molalla's Annual Biosolids Report.

I also want to make sure that I fully understand the requirement to submit to a biosolids report to the EPA. When I went to submit even though the City of Molalla is now above a population of 10,000 people but since we only did landfill (to my understanding is not considered surface disposal) in the year 2024. The CDX platform populated a response "Unless otherwise required to report (e.g., permit condition, enforcement action, state law), this facility is not required to submit a Sewage Sludge (Biosolids) Annual Report. If you are required to submit this report please select "Yes (Required to Submit)" below. If you wish to voluntarily complete and submit this report please select "Yes (Voluntary Submission)" below. Otherwise, please select "No (Exit Form)" to exit this form or simply close your internet browser. Please note that all Sewage Sludge (Biosolids) Annual Report submissions are made public by EPA through its web pages: I can voluntarily report and have no issue doing so. I am just curious for my knowledge and understanding if it is a state requirement to report to the EPA as well regardless once you have passed the any one of the triggers (>1.0 MGD or 10,000+)?"

Respectfully,



**Seth Kelly**

**Water Quality Superintendent**

315 Kennel Ave. | PO Box 248 | Molalla, OR 97038

Phone – [503.759.0243](tel:503.759.0243)

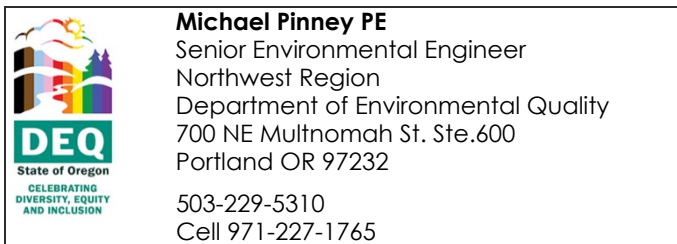
Email – [skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)

Website – <http://www.cityofmolalla.com>

**From:** [PINNEY Mike \\* DEQ](#)  
**To:** [Seth Kelly](#)  
**Cc:** [Adam Shultz](#)  
**Subject:** RE: Annual I&I Report  
**Date:** Tuesday, February 18, 2025 3:29:46 PM  
**Attachments:** [image002.png](#)

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Received!  
Thank you! Nicely done too.



In early 2025, NPDES and WPCF permittees will begin using Your DEQ Online, a one-stop place for you to manage your water quality permit.  
<https://wqpermits.oregon.gov>

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**From:** Seth Kelly <skelly@cityofmolalla.com>  
**Sent:** Tuesday, January 28, 2025 10:22 AM  
**To:** PINNEY Mike \* DEQ <Mike.PINNEY@deq.oregon.gov>  
**Cc:** Adam Shultz <ashultz@cityofmolalla.com>  
**Subject:** Annual I&I Report

Hello Mike,

Hope all is well. Attached is the City of Molalla's Annual I&I report for 2024.



**Seth Kelly**

**Water Quality Superintendent**

315 Kennel Ave. | PO Box 248 | Molalla, OR 97038

Phone – [503.759.0243](tel:503.759.0243)

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Website – <http://www.cityofmolalla.com>



**From:** [HANSEN Trinh \\* DEQ](#)  
**To:** [Seth Kelly](#)  
**Cc:** [HYNSON Mark \\* DEQ](#); [YELTON-BRAM Tiffany \\* DEQ](#); [PINNEY Mike \\* DEQ](#); [NAVARRO Jeffrey \\* DEQ](#); [BODNAR Rebecca \\* DEQ](#); [BURKHART Robert \\* DEQ](#); [BRITSON Aliana \\* DEQ](#); [LINZER Jeff \\* DEQ](#); [PRICHARD Emma \\* DEQ](#); [Mac Corthell](#); [Dan Huff](#)  
**Subject:** RE: City of Molalla's extension of applicant review period for NPDES permit: Comments due Feb. 5, 2025  
**Date:** Wednesday, February 5, 2025 12:02:32 PM  
**Attachments:** [image002.png](#)  
[image005.png](#)

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Hi Seth,

Thank you for submitting the city's comments.

Mark will review them and reach out if he has any questions.

Have a nice day!



**Trinh Hansen**

Water Quality Permit Coordinator

Oregon Department of Environmental Quality | Western and Northwest Regions  
4026 Fairview Industrial Drive SE, Salem, OR 97302

Office: 503-378-5055 | Mobile: 503-804-6594 | [trinh.hansen@deq.oregon.gov](mailto:trinh.hansen@deq.oregon.gov)

<https://www.oregon.gov/deq/wq/wqpermits/Pages/All-Permits-Applications.aspx>

**\*\*Please include file, permit, and/or application number when applicable.\*\***

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**From:** Seth Kelly <skelly@cityofmolalla.com>  
**Sent:** Wednesday, February 5, 2025 10:48 AM  
**To:** HANSEN Trinh \* DEQ <Trinh.Hansen@deq.oregon.gov>  
**Cc:** HYNSON Mark \* DEQ <Mark.HYNSON@deq.oregon.gov>; YELTON-BRAM Tiffany \* DEQ <Tiffany.YELTON-BRAM@deq.oregon.gov>; PINNEY Mike \* DEQ <Mike.PINNEY@deq.oregon.gov>; NAVARRO Jeffrey \* DEQ <Jeffrey.NAVARRO@deq.oregon.gov>; BODNAR Rebecca \* DEQ <Rebecca.Bodnar@deq.oregon.gov>; BURKHART Robert \* DEQ <Robert.BURKHART@deq.oregon.gov>; BRITSON Aliana \* DEQ <Aliana.BRITSON@deq.oregon.gov>; LINZER Jeff \* DEQ <Jeff.LINZER@deq.oregon.gov>; PRICHARD Emma \* DEQ <Emma.PRICHARD@deq.oregon.gov>; Mac Corthell <mcorthell@cityofmolalla.com>; Dan Huff <dhuff@cityofmolalla.com>  
**Subject:** RE: City of Molalla's extension of applicant review period for NPDES permit: Comments due Feb. 5, 2025

Hello Trinh,

I have attached the City of Molalla's comments with the permit documents in word that have our tracked edits that we believe could use corrections. Thank you for the time DEQ has spent on our draft permit thus far. We look forward to discussing our options with DEQ.



## Seth Kelly

### Water Quality Superintendent

315 Kennel Ave. | PO Box 248 | Molalla, OR 97038

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Email – [skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)

Website – <http://www.cityofmolalla.com>

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**From:** HANSEN Trinh \* DEQ <[Trinh.Hansen@deq.oregon.gov](mailto:Trinh.Hansen@deq.oregon.gov)>

**Sent:** Monday, January 13, 2025 11:36 AM

**To:** YELTON-BRAM Tiffany \* DEQ <[Tiffany.YELTON-BRAM@deq.oregon.gov](mailto:Tiffany.YELTON-BRAM@deq.oregon.gov)>; Mark P. Strandberg <[MStrandberg@ringbenderlaw.com](mailto:MStrandberg@ringbenderlaw.com)>

**Cc:** HYNSON Mark \* DEQ <[Mark.HYNSON@deq.oregon.gov](mailto:Mark.HYNSON@deq.oregon.gov)>; NAVARRO Jeffrey \* DEQ <[Jeffrey.NAVARRO@deq.oregon.gov](mailto:Jeffrey.NAVARRO@deq.oregon.gov)>; BODNAR Rebecca \* DEQ <[Rebecca.Bodnar@deq.oregon.gov](mailto:Rebecca.Bodnar@deq.oregon.gov)>; BURKHART Robert \* DEQ <[Robert.BURKHART@deq.oregon.gov](mailto:Robert.BURKHART@deq.oregon.gov)>; BRITSON Aliana \* DEQ <[Aliana.BRITSON@deq.oregon.gov](mailto:Aliana.BRITSON@deq.oregon.gov)>; LINZER Jeff \* DEQ <[Jeff.LINZER@deq.oregon.gov](mailto:Jeff.LINZER@deq.oregon.gov)>; J.W. Ring <[JWRing@ringbenderlaw.com](mailto:JWRing@ringbenderlaw.com)>; Sage Ertman <[sertman@ringbenderlaw.com](mailto:sertman@ringbenderlaw.com)>; Mac Corthell <[mcorthell@cityofmolalla.com](mailto:mcorthell@cityofmolalla.com)>; Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>

**Subject:** City of Molalla's extension of applicant review period for NPDES permit: Comments due Feb. 5, 2025

File no. 57613

Permit no. 101514

EPA no. OR0022381

Facility: Molalla WWTP, 12424 S. Toliver Road, Molalla  
Clackamas County

DEQ has reviewed your request received on January 10, 2025 for an extension of your applicant review period for the above referenced permit. DEQ is granting your request. Your Applicant Review period has been extended to February 5, 2025.

Please submit your comments to:

Trinh Hansen, Water Quality Permit Coordinator  
DEQ Western Region  
4026 Fairview Industrial Way Dr. SE  
Salem, OR 97302  
[trinh.hansen@deq.oregon.gov](mailto:trinh.hansen@deq.oregon.gov)

Your comments must be received **by 5 p.m. on February 5, 2025**. Please contact me at 503-378-5055 with any questions about permitting processing.

If you have any questions on your permit draft, please contact Mark Hynson at 503-229-5295 or [mark.hynson@deq.oregon.gov](mailto:mark.hynson@deq.oregon.gov).

Thank you!



**Trinh Hansen**

Water Quality Permit Coordinator  
Oregon Department of Environmental Quality | Western and Northwest Regions  
4026 Fairview Industrial Drive SE, Salem, OR 97302  
Office: 503-378-5055 | Mobile: 503-804-6594 | [trinh.hansen@deq.oregon.gov](mailto:trinh.hansen@deq.oregon.gov)  
<https://www.oregon.gov/deq/wq/wqpermits/Pages/All-Permits-Applications.aspx>

**\*\*Please include file, permit, and/or application number when applicable.\*\***

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**From:** YELTON-BRAM Tiffany \* DEQ <[Tiffany.YELTON-BRAM@deq.oregon.gov](mailto:Tiffany.YELTON-BRAM@deq.oregon.gov)>  
**Sent:** Monday, January 13, 2025 11:01 AM  
**To:** Mark P. Strandberg <[MStrandberg@ringbenderlaw.com](mailto:MStrandberg@ringbenderlaw.com)>; HANSEN Trinh \* DEQ <[Trinh.Hansen@deq.oregon.gov](mailto:Trinh.Hansen@deq.oregon.gov)>  
**Cc:** HYNSON Mark \* DEQ <[Mark.HYNSON@deq.oregon.gov](mailto:Mark.HYNSON@deq.oregon.gov)>; NAVARRO Jeffrey \* DEQ <[Jeffrey.NAVARRO@deq.oregon.gov](mailto:Jeffrey.NAVARRO@deq.oregon.gov)>; BODNAR Rebecca \* DEQ <[Rebecca.Bodnar@deq.oregon.gov](mailto:Rebecca.Bodnar@deq.oregon.gov)>; BURKHART Robert \* DEQ <[Robert.BURKHART@deq.oregon.gov](mailto:Robert.BURKHART@deq.oregon.gov)>; BRITSON Aliana \* DEQ <[Aliana.BRITSON@deq.oregon.gov](mailto:Aliana.BRITSON@deq.oregon.gov)>; LINZER Jeff \* DEQ <[Jeff.LINZER@deq.oregon.gov](mailto:Jeff.LINZER@deq.oregon.gov)>; J.W. Ring <[JWRing@ringbenderlaw.com](mailto:JWRing@ringbenderlaw.com)>; Sage Ertman <[sertman@ringbenderlaw.com](mailto:sertman@ringbenderlaw.com)>; Mac Corthell <[mcorthell@cityofmolalla.com](mailto:mcorthell@cityofmolalla.com)>; Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>  
**Subject:** RE: City of Molalla's applicant review period for NPDES permit: Comments due January 22, 2025, 5 p.m.

Hello Mark Strandberg,

We are fine extending the Applicant Review period to February 5, 2025.

Thanks

Tiffany Yelton Bram (Pronouns : she/her/hers)  
WQ Source Control Manager  
Northwest Regional Office  
Oregon Department of Environmental Quality  
700 NE Multnomah St., Suite #600  
Portland OR 97232

Desk 503 229 5219  
Mobile 503 975 0046

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**From:** Mark P. Strandberg <[MStrandberg@ringbenderlaw.com](mailto:MStrandberg@ringbenderlaw.com)>  
**Sent:** Friday, January 10, 2025 1:47 PM  
**To:** YELTON-BRAM Tiffany \* DEQ <[Tiffany.YELTON-BRAM@deq.oregon.gov](mailto:Tiffany.YELTON-BRAM@deq.oregon.gov)>; HANSEN Trinh \* DEQ <[Trinh.Hansen@deq.oregon.gov](mailto:Trinh.Hansen@deq.oregon.gov)>  
**Cc:** HYNSON Mark \* DEQ <[Mark.HYNSON@deq.oregon.gov](mailto:Mark.HYNSON@deq.oregon.gov)>; NAVARRO Jeffrey \* DEQ <[Jeffrey.NAVARRO@deq.oregon.gov](mailto:Jeffrey.NAVARRO@deq.oregon.gov)>; BODNAR Rebecca \* DEQ <[Rebecca.Bodnar@deq.oregon.gov](mailto:Rebecca.Bodnar@deq.oregon.gov)>; BURKHART Robert \* DEQ <[Robert.BURKHART@deq.oregon.gov](mailto:Robert.BURKHART@deq.oregon.gov)>; BRITSON Aliana \* DEQ <[Aliana.BRITSON@deq.oregon.gov](mailto:Aliana.BRITSON@deq.oregon.gov)>; LINZER Jeff \* DEQ <[Jeff.LINZER@deq.oregon.gov](mailto:Jeff.LINZER@deq.oregon.gov)>; J.W. Ring <[JWRing@ringbenderlaw.com](mailto:JWRing@ringbenderlaw.com)>; Sage Ertman <[sertman@ringbenderlaw.com](mailto:sertman@ringbenderlaw.com)>; Mac Corthell <[mcorthell@cityofmolalla.com](mailto:mcorthell@cityofmolalla.com)>; Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>  
**Subject:** Re: City of Molalla's applicant review period for NPDES permit: Comments due January 22, 2025, 5 p.m.

Thank you, Tiffany. Have a good weekend.

Best,  
Mark

**Mark P. Strandberg, Partner**  
Ring Bender LLP  
920 SW Sixth Avenue, Suite 600, Portland, OR 97204  
Direct: (503) 964-6725

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**From:** YELTON-BRAM Tiffany \* DEQ <[Tiffany.YELTON-BRAM@deq.oregon.gov](mailto:Tiffany.YELTON-BRAM@deq.oregon.gov)>  
**Date:** Friday, January 10, 2025 at 1:46 PM

**To:** Mark Strandberg <[MStrandberg@ringbenderlaw.com](mailto:MStrandberg@ringbenderlaw.com)>, HANSEN Trinh \* DEQ <[Trinh.Hansen@deq.oregon.gov](mailto:Trinh.Hansen@deq.oregon.gov)>  
**Cc:** HYNSON Mark \* DEQ <[Mark.HYNSON@deq.oregon.gov](mailto:Mark.HYNSON@deq.oregon.gov)>, NAVARRO Jeffrey \* DEQ <[Jeffrey.NAVARRO@deq.oregon.gov](mailto:Jeffrey.NAVARRO@deq.oregon.gov)>, BODNAR Rebecca \* DEQ <[Rebecca.Bodnar@deq.oregon.gov](mailto:Rebecca.Bodnar@deq.oregon.gov)>, BURKHART Robert \* DEQ <[Robert.BURKHART@deq.oregon.gov](mailto:Robert.BURKHART@deq.oregon.gov)>, BRITSON Aliana \* DEQ <[Aliana.BRITSON@deq.oregon.gov](mailto:Aliana.BRITSON@deq.oregon.gov)>, LINZER Jeff \* DEQ <[Jeff.LINZER@deq.oregon.gov](mailto:Jeff.LINZER@deq.oregon.gov)>, "J. Ring" <[JWRing@ringbenderlaw.com](mailto:JWRing@ringbenderlaw.com)>, Sage Ertman <[sertman@ringbenderlaw.com](mailto:sertman@ringbenderlaw.com)>, Mac Corthell <[mcorthell@cityofmolalla.com](mailto:mcorthell@cityofmolalla.com)>, Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>  
**Subject:** RE: City of Molalla's applicant review period for NPDES permit: Comments due January 22, 2025, 5 p.m.

**CAUTION:** This email originated from outside Ring Bender. Do not click links or open attachments unless you recognize the sender.

Hello Mark

I get to grant extension requests. Since I was not in yesterday's meeting and Mark Hynson is on a well deserved day off, I will check in with him on Monday and reply to your request then.

Thanks!

Tiffany Yelton Bram (Pronouns : she/her/hers)  
WQ Source Control Manager  
Northwest Regional Office  
Oregon Department of Environmental Quality  
700 NE Multnomah St., Suite #600  
Portland OR 97232

Desk 503 229 5219  
Mobile 503 975 0046

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**From:** Mark P. Strandberg <[MStrandberg@ringbenderlaw.com](mailto:MStrandberg@ringbenderlaw.com)>  
**Sent:** Friday, January 10, 2025 1:41 PM  
**To:** HANSEN Trinh \* DEQ <[Trinh.HANSEN@deq.oregon.gov](mailto:Trinh.HANSEN@deq.oregon.gov)>  
**Cc:** HYNSON Mark \* DEQ <[Mark.HYNSON@deq.oregon.gov](mailto:Mark.HYNSON@deq.oregon.gov)>; YELTON-BRAM Tiffany \* DEQ <[Tiffany.YELTON-BRAM@deq.oregon.gov](mailto:Tiffany.YELTON-BRAM@deq.oregon.gov)>; NAVARRO Jeffrey \* DEQ <[Jeffrey.NAVARRO@deq.oregon.gov](mailto:Jeffrey.NAVARRO@deq.oregon.gov)>; BODNAR Rebecca \* DEQ <[Rebecca.Bodnar@deq.oregon.gov](mailto:Rebecca.Bodnar@deq.oregon.gov)>; BURKHART Robert \* DEQ <[Robert.BURKHART@deq.oregon.gov](mailto:Robert.BURKHART@deq.oregon.gov)>; BRITSON Aliana \* DEQ <[Aliana.BRITSON@deq.oregon.gov](mailto:Aliana.BRITSON@deq.oregon.gov)>; LINZER Jeff \* DEQ <[Jeff.LINZER@deq.oregon.gov](mailto:Jeff.LINZER@deq.oregon.gov)>; J.W. Ring <[JWRing@ringbenderlaw.com](mailto:JWRing@ringbenderlaw.com)>; Sage Ertman <[sertman@ringbenderlaw.com](mailto:sertman@ringbenderlaw.com)>; Mac Corthell <[mcorthell@cityofmolalla.com](mailto:mcorthell@cityofmolalla.com)>; Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>

**Subject:** RE: City of Molalla's applicant review period for NPDES permit: Comments due January 22, 2025, 5 p.m.

All:

The City would like to thank Mark for the information provided yesterday in the applicant review kickoff meeting. As we indicated to Mark during the meeting, because of the complexity of this new permit, which covers two facilities, Molalla would like to request a short, two-week extension of the applicant review period. This would make the new due date for the City's comments February 5, 2025.

Please let us know if this is acceptable to DEQ.

Thank you,  
Mark

**Mark P. Strandberg, Partner**

Ring Bender LLP

920 SW Sixth Avenue, Suite 600, Portland, OR 97204

Direct: (503) 964-6725

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**From:** HANSEN Trinh \* DEQ <[Trinh.HANSEN@deq.oregon.gov](mailto:Trinh.HANSEN@deq.oregon.gov)>

**Sent:** Tuesday, January 7, 2025 10:14 AM

**To:** Mac Corthell <[mcorthell@cityofmolalla.com](mailto:mcorthell@cityofmolalla.com)>; Seth Kelly <[skelly@cityofmolalla.com](mailto:skelly@cityofmolalla.com)>

**Cc:** HYNSON Mark \* DEQ <[Mark.HYNSON@deq.oregon.gov](mailto:Mark.HYNSON@deq.oregon.gov)>; YELTON-BRAM Tiffany \* DEQ <[Tiffany.YELTON-BRAM@deq.oregon.gov](mailto:Tiffany.YELTON-BRAM@deq.oregon.gov)>; NAVARRO Jeffrey \* DEQ <[Jeffrey.NAVARRO@deq.oregon.gov](mailto:Jeffrey.NAVARRO@deq.oregon.gov)>; BODNAR Rebecca \* DEQ <[Rebecca.Bodnar@deq.oregon.gov](mailto:Rebecca.Bodnar@deq.oregon.gov)>; BURKHART Robert \* DEQ <[Robert.BURKHART@deq.oregon.gov](mailto:Robert.BURKHART@deq.oregon.gov)>; BRITSON Aliana \* DEQ <[Aliana.BRITSON@deq.oregon.gov](mailto:Aliana.BRITSON@deq.oregon.gov)>; LINZER Jeff \* DEQ <[Jeff.LINZER@deq.oregon.gov](mailto:Jeff.LINZER@deq.oregon.gov)>

**Subject:** City of Molalla's applicant review period for NPDES permit: Comments due January 22, 2025, 5 p.m.

File no. 57613

Permit no. 101514

EPA no. OR0022381

Facility: Molalla WWTP, 12424 S. Toliver Road, Molalla  
Clackamas County

Attached please find the applicant review drafts for your proposed National Pollutant Discharge Elimination System permit. This email includes a copy of the public notice, permit,

and fact sheet. Please review these documents and submit your comments by responding to this email or mail to:

Trinh Hansen, Water Quality Permit Coordinator  
DEQ Western Region  
4026 Fairview Industrial Way Dr. SE  
Salem, OR 97302  
[trinh.hansen@deq.oregon.gov](mailto:trinh.hansen@deq.oregon.gov)

Your comments **must be received by 5 p.m. on January 22, 2025**. DEQ will review your comments and address your concerns to the degree possible; however, we will not prepare a formal written response at this stage. DEQ will provide for additional applicant review if the permit is significantly modified in response to your comments. If there are no significant changes, DEQ will make the permit documents available for interested parties and hold a public hearing if necessary. Please be aware that the city may provide additional comment on the permit during this time. When the public participation period has ended, DEQ will take final action on your application.

Please contact me at 503-378-5055 with any questions about permitting processing.

Thank you for your attention to this matter!



**Trinh Hansen**

Water Quality Permit Coordinator

Oregon Department of Environmental Quality | Western and Northwest Regions  
4026 Fairview Industrial Drive SE, Salem, OR 97302

Office: 503-378-5055 | Mobile: 503-804-6594 | [trinh.hansen@deq.oregon.gov](mailto:trinh.hansen@deq.oregon.gov)  
<https://www.oregon.gov/deq/wq/wqpermits/Pages/All-Permits-Applications.aspx>

**\*\*Please include file, permit, and/or application number when applicable.\*\***

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