



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

May 16, 2022

ANDY PETERS
PUBLIC WORKS DIRECTOR
PO BOX 248
MOLALLA, OR 97038

RE: City of Molalla STP
File No: 57613/Permit No. 101514
Clackamas County

Approved - Out of Season Discharge of Fully treated Effluent to the Molalla River from the Molalla WWTP

Dear Mr. Peters:

The Oregon Department of Environmental Quality (DEQ) has received a request from the City of Molalla (City) to discharge fully treated effluent to the Molalla River from the Molalla wastewater treatment plant (Plant) outside the permitted time period.

The current NPDES permit requires a 7-day rolling average of 350 cfs in the Molalla River prior to allowing Plant effluent discharge. However, 2022 has been unusually wet and the river at USGS River Gauge Station 14200000 has been above 2000 cfs since April 30th. More rain is forecast for the next week. As it has been wet, discharge to the disposal fields is not an option.

The factors that go into the decision whether to allow discharge are:

- The recycled water disposal fields are still too wet right now to accept recycled water according to the soil monitors. It would also take 4-5 days for all the pieces of the Plant to be ready to discharge there. There is very unlikely that the fields will be ready in that time.
- The Plant ponds are becoming full. It is anticipated they will be at a critical water elevation where they are in danger of overtopping by Monday, May 16th.
- No extended break in the rain is expected within the forecast 10 days out.
- Emergency disposal of effluent to Bear Creek is not an option except in the most dire circumstances, anticipated to be times of too much rain and influent flow where either the effluent pumps cannot handle the discharge, or they have failed completely. This option is not permitted in the current condition.

APPROVED PLAN

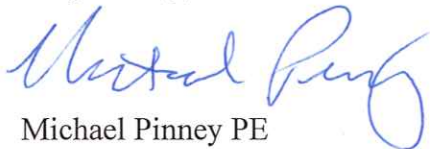
DEQ will allow the Plant to discharge to the Molalla River under these conditions:

1. Discharge is to be treated as discharge during the allowed season (November through April) complete with permit limits and sampling.
2. The City will report the discharge in a DMR as the City would during the river discharge season.
3. Discharge is allowed while Molalla River discharge is prior to the permit condition of 1,000 cfs over a 7-day rolling average. The City should use this time to get some of the operational flexibility it would normally have during the beginning of the recycled water discharge season.
4. DEQ is treating this as an upset condition by schedule F, section B4(c) of the permit. The Plant and its operation are not the cause of this condition. Allowing the discharge will lessen the danger of a catastrophic failure of the holding pond berms. At 1,000 cfs river flow and Molalla outfall's three-port diffuser, there is over 300 parts of river water to each part of treated effluent so there is a great deal of dilution.

INQUIRIES:

Please contact me at (971) 227-1765 for additional information.

Respectfully,



Michael Pinney PE
Senior Environmental Engineer

eCC: DEQ OCE

Tiffany Yelton-Bram, Manager, Source Control Section, NWR-WQ