

J.W. Ring, Partner Direct: 503-964-6724 Cell: 503-841-9380 Cell: 503-841-8415 jwring@ringbenderlaw.com www.ringbenderlaw.com

May 17, 2018

Tiffany Yelton Bram WQ Source Control Manager Oregon Department of Environmental Quality 700 NE Multnomah St., Suite 600 Portland OR 97232

Michael Pinney PE Senior Environmental Engineer Oregon Department of Environmental Quality 700 NE Multnomah St., Suite 600 Portland OR, 97232

via US Mail and Electronic Mail

RE: City of Molalla – Request for modification of NPDES Permit #101514

Tiffany and Mike:

As you know, The City of Molalla (the "City") is in the process of evaluating improvements at the Molalla wastewater treatment plant to accommodate future growth and regulatory requirements. As part of those evaluations, it was determined that modification of the permit for the existing wastewater treatment plant is warranted.

I am writing on behalf of the City to formally request a modification in the City's NPDES Permit (Permit #101514) in the following manner:

- Allow summer season discharge during the months of May, June and October;
- Replace the 18° C discharge limitation with an Excess Thermal Load allocation for each of the months May, June and October as allowed by the Molalla River TMDL;
- Allow for summer season (May 1 October 31) mass limits to be based on Willamette River water quality standard of 10-mg/L BOD5 and 10-mg/L TSS;
- Allow for winter season (November 1 April 30) mass limits to be based on Willamette River water quality standard of 30-mg/L BOD5 and 30-mg/L TSS;
- Allow for summer season (May 1 October 31) mass limits to be based on the dry weather design flow for the existing treatment plant of 2.3-mgd; and
- Allow for winter season (November 1 April 30) mass limits to be based on the wet weather design flow for the existing treatment plant of 4.1-mgd.



In support of this request, enclosed is the following:

- Richwine Environmental Technical Memorandum: Molalla WWTP Permit Modification Request;
- Geosyntec Consultants Technical Memorandum: Technical Analyses in Support of NPDES Permit Modification;
- Proposed Draft Modified Permit; and
- Domestic NPDES Permit Major Modification Fee in the amount of \$19,766. •

The revised discharge limits the City is requesting are consistent with Willamette Basin Water Quality Standards specified in OAR 340-041-0340 and the Molalla-Pudding River TMDL. We look forward to working with DEQ on this permit modification request. Once you have had an opportunity to review our request, please contact us and we will schedule a meeting to discuss.

Best Regards,

J.W. Ring

Mark Strandberg cc: Chad Jacobs Dan Huff Gerald Fisher Andy Peters