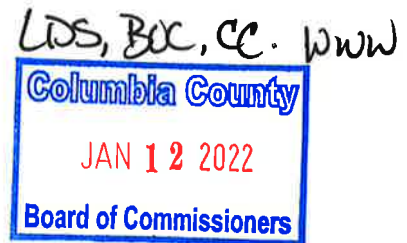




1/12/2022

NEXT Renewable Fuels Project
Port Westward
File(s): V 21-05, CU 21-04, DR 21-03



Responding Agency: Columbia County Onsite Wastewater

V 21-05, CU 21-04- No comment, specific proposals do not have a wastewater consideration.

DR 21-03 Comments-

- During a 2020 pre-application conference with the applicant, it was advised that the proposed new facility would likely need to construct an onsite wastewater system to serve the use. The applicant stated more than once that they planned to connect to existing facilities. That may or may not be appropriate/allowed in this case. The applicant was encouraged to contact DEQ Onsite staff to look into whether existing onsite septic infrastructure operated under a Water Pollution Control Facilities Permit at adjacent facilities would support this additional use, and if not, what would be needed in order to obtain approval to site and construct a new onsite wastewater system.
- The report (SDR 00RPT) issued for this projects Site Design Review includes the following statements:
 - Water, wastewater, and storm drainage utilities operated by the Port will be extended to the site to accommodate this rural industrial development (see Exhibit 16). Electrical, natural gas, and telecommunications facilities will also be extended to the site. (page 3)
As stated above during the pre-application meeting and specific to wastewater, this should not be assumed. Onsite wastewater systems are designed specifically for a use and design flow calculated. Connecting to another onsite system located within the facility would have to go through a formal approval process.
 - The site is currently undeveloped wetlands and agricultural cropland. Wetlands are present over most of the property, (page 2)
If it is determined that a new onsite wastewater system is required to serve the use, the fact that the majority of the site is impacted by wetlands is of concern in being able to meet siting criteria for sewage disposal. OAR 340-071-0150 for Site Evaluation Procedures describes the criteria necessary to support sewage disposal. If areas proposed for sewage disposal on the site do not meet minimum requirements, then the site would be denied and a Variance would be applicable. This is an in depth process that takes time and a favorable outcome would be

required in order to issue a permit for system construction. Weather restrictions and/or considerations may also apply.

- C. The requested use can be shown to comply with the following standards for available services:
 - .2 Sewage will be treated by a subsurface sewage system, or a community or public sewer system, approved by the County Sanitarian and/or the State DEQ. Response: Port Westward Industrial Park has a private industrial wastewater system and a discharge system for tenants' process water (see Exhibit 16). As illustrated on Exhibit 3 Sheet C1.11, the applicant is proposing a wastewater pretreatment facility for all storm and greywater prior to discharging to the sewer system near the north end of the site. Discharge from domestic use within buildings may be stored in holding tanks prior to being hauled off or may be treated via sand filters and leach fields pending results of on-site system evaluation. The applicant will obtain all necessary permits from County Sanitarian and/or the Oregon Department of Environmental Quality, as applicable. (page 19/20)

Due to the challenging nature of the site presented in the report, comments made above, and then also based off of first-hand knowledge of the area, there is not currently enough information to ensure that onsite sewage disposal for the facility is guaranteed. While there are several applicable tools and steps to potentially overcome this hurdle, this office cannot commit to a viable onsite sewage disposal solution without actually going through the necessary evaluation steps needed to obtain formal approval. It should be noted that storm water and domestic sewage typically have very different regulatory needs.

The applicant is strongly encouraged to start to take the steps to ensure that all domestic sewage generated at the proposed facility can be adequately disposed of. A Variance process, a WPCF groundwater study, and/or other significant design steps may be needed in order to support this facility. It should be noted that the applicant would need to be able to demonstrate that an approved method of sewage disposal is achievable and the issuance of any required septic permits before building permits could be issued.

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