

Jake Renney

From: Erin O'Connell
Sent: Monday, October 2, 2023 1:16 PM
To: Jake Renney
Subject: Columbia County Christian School

Good afternoon Jake,

To follow are my comments regarding the CCCS proposal to site a school on the subject parcel 4119-AC-00700 located on Church Rd. I understand that there are concerns around the site's drainage and how that impacts the septic system. Hopefully this information will provide further clarification:

- The Site Evaluation report issued for this property does take into account several site factors. Site Evaluations are conducted following requirements listed in Oregon Administrative Rule 340-071-0150. Site Evaluations processes do evaluate several site conditions including surface waters and water table levels. Both indicators in the actual soil profile, onsite observations, and other data is reviewed before finding a site suitable for sewage disposal.
- Several areas on this property were examined for suitability. Many of the low lying areas were denied for septic system purposes due to the depth to water table. The site has historically experienced winter surface water ponding in the lower areas. This is a result of natural topography, drainage features existing, water table levels, and the general ability of the soil to process water which is exacerbated in the winter months. Ponding and drainage was an expressed concern as part of the evaluation process and was considered to the greatest extent possible.
- The area that was ultimately approved for septic system construction was able to demonstrate that all required setbacks could be maintained under existing conditions. The site was approved for a Sand Filter or Alternative Treatment Technology system which uses advanced treatment to treat wastewater before it is introduced into the soil profile. This significantly reduces the pollutant levels in the water being discharged so that it can safely be disposed on the site and the existing soil can finish processing the water before it interacts with any water tables or surface waters. Sewage disposal is highly regulated in Oregon and advanced treatment options have been thoroughly tested to ensure that levels of treatment can be achieved in order to prevent pollution and a public health hazard.
- The drainfield area was shown by evaluation and stake out to be able to meet minimum setback requirements listed in OAR 340-071-0220 Table 1. The highest level impacted by collecting surface water was located by professional consultant staff and the system was shown to be able to be installed a sufficient distance from this area. Setbacks to the existing creek were also considered. All of this information was reviewed and discussed by Onsite technical staff prior to issuing an approval letter.
- The site has subsequently been required to assess site drainage by preparing an Engineered storm water design plan that will be reviewed as part of development processes. These plans will be in addition to the existing conditions that the septic system site evaluation approval considered, so it is anticipated that these provisions will allow for greater separation to surface water issues.
- The Site Evaluation approval letter was issued with a design flow limit which considered numbers of students proposed, OAR 340-071-0220 Table Quantities of Sewage Flow, and other supplemental information. The report included a cap that was based off of information received at the time. Since the time the approval letter was issued, this office has had several conversations and data submitted and reviewed which further characterize quantities of sewage flows derived from Table 2 and from the

proposed and similar uses in the state, and then actual data information on the current school use on the adjacent property; Oregon DEQ was consulted through this preliminary phase. It should be noted that final student and staff numbers will likely vary from the original site evaluation report and will be based off of all design information submitted.

- A septic system design plan has been submitted which is intended to observe the maximum design flow number of 2,500 gallons per day, while using infrastructure to support anticipated capacities of wastewater flow. The design flow is a maximum that can be discharged and treated by the soil daily. The system will be subjected to rigorous monitoring and annual reporting to ensure that design flow allowances are being met and not exceeded. Exceedances would trigger additional requirements and would likely result in the permit being transferred for state oversight. This office is unable to proceed with review and issuance of the submitted permit until which time the site is formally approved by Land Use Planning for the school use. A permit will be issued as long as all requirements listed in OAR 340-071-0160 for Permit Application Procedures are met.

Erin O'Connell
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Please note: Land Development Services has moved to a new location at 445 Port Avenue, St. Helens 503-397-1501 and email, onsite@columbiacountyor.gov