



## Board of Commissioners

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July 10, 2018

Oregon Department of Environmental Quality  
c/o Andrea Bean, Water Quality Permit Coordinator  
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via regular mail and e-mail:  
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Re: Depoe Bay Water Quality Permit Renewal (NPDES) / Biosolids Management / Permit  
No. 10183

Greetings:

The Lincoln County Board of Commissioners requests that DEQ hold a public hearing on the renewal of Depoe Bay's NPDES permit.<sup>1</sup> While the public hearing would allow testimony and information about all aspects of Depoe Bay's treatment system, our primary concern is with the biosolids management plan, which is required for renewal of the permit. Over the course of the last several months, residents of rural Lincoln County (and beyond) provided compelling testimony to the Board that years of application of treated biosolids to lands in and around the Siletz Valley (and elsewhere in the county) may have resulted in unacceptable contamination of waterways and ground water sources. Testimony was offered about questionable practices and apparent non-compliance with existing regulatory requirements in the land application process. If those allegations are true, insufficient enforcement efforts by state and federal regulators may be creating circumstances where harmful environmental impacts are taking place. Lincoln County would like those issues fully addressed during this permit renewal process. Regardless, the impact of land application of biosolids, even if within requirements, is a practice that needs to be reexamined and reconsidered on a broader scale, especially as it impacts sensitive watersheds like the Siletz River.

We understand that Depoe Bay is currently considering purchase and installation of a centrifuge dryer system that would allow the City to consider alternatives to land application of biosolids. We applaud and support those efforts. Lincoln County is currently scheduling for

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<sup>1</sup> Issued pursuant to ORS 468B.050 the federal Clean Water Act. In making this request, we note that Lincoln County is a public entity representing over 48,000 persons.

later this summer a countywide meeting of stakeholders, including cities and entities that produce biosolids, regulators including DEQ, state and local elected officials, landowners, and the community at large, to explore this issue more fully. We hope to come away from that meeting with a greater understanding of the problems and solutions, including alternatives to land application of biosolids. DEQ officials will be invited to attend and participate in this problem solving meeting.

In the meantime, we support the efforts of the both the city and the community to address these issues in a public forum.

Very Truly Yours,

Lincoln County Board of Commissioners

  
Chair

  
Commissioner

  
Commissioner

c. Mayor Leff and City Councilors, Depoe Bay