



STAFF REPORT (Item Specific)

Meeting Date:	December 3, 2025
Author:	Aaron Kunders
Department:	Public Works
Division:	Water Quality
Subject:	Local Limits Evaluation
Type of Item:	Council Action
CC:	City Administrator John Walsh

Introduction: The Department of Environmental Quality (DEQ) is requiring the City to perform an evaluation of the local limits as part of our recent NPDES permit.

Background: The local limits refer to a list of pollutants that must be monitored by industries that utilize the wastewater treatment plant. The evaluation determines the effectiveness of the treatment plant to remove the pollutants and set the limits the industries must meet in order to discharge. They were last performed in 2017 and with the closure of industries, they need to be updated. These limits apply to all categorical industries that discharge to the Wastewater Treatment Plant.

Staff Analysis: The Local Limits evaluation is required in our NPDES permit and is outside the current staff's expertise.

Budget Impact: \$150/hour. Estimated \$18,000

Alternatives: The other two unsolicited bids were from Black and Veatch for \$37,371 and Geosyntec for \$58,000.

Requested Action: Authorize the Personal Service Agreement with Steve Anderson for \$18,000.

Attachments:

- Project Description and Cost Estimate from Steve Anderson

PROJECT DESCRIPTION AND COST ESTIMATE FOR LOCAL LIMITS EVALUATION FOR THE CITY OF ST. HELENS, OREGON

Steve Anderson

October 1, 2025

PROJECT APPROACH

- Review data collected by the City and DEQ that will be used in the local limits evaluation. Make recommendations for further sampling if necessary to complete local limits calculations.
- Collect and review information relevant to performing the Maximum Allowable Headworks Loading (MAHL) analysis: the NPDES Permit, DEQ Permit Evaluation Report, Pretreatment Program Annual Reports, Biosolids Management Plan, Biosolids Annual Reports, Discharge Monitoring Reports, Mixing Zone Study reports, Local Limits Sampling and Analysis Plan (SAP), previous Local Limits Evaluation Reports, and monitoring data collected under the Local Limits SAP and NPDES monitoring requirements.
- Utilize monitoring data to calculate removal efficiencies to be used in the MAHL analysis.
- Utilize the DEQ Local Limits Workbook to complete the MAHL analysis and allocate the headworks loadings appropriately to convert to local limits.
- Utilize existing software to calculate applicable Water Quality Criteria for copper using the Biotic Ligand Model, and incorporate these results into the DEQ Local Limits Workbook.
- Conduct mass balance calculations in accordance with DEQ guidance.
- Write the draft local limits evaluation report for the City's review prior to submittal to DEQ.
- Respond to DEQ comments on the draft local limits evaluation report.
- Organize any meetings necessary to educate City staff, communicate the status of the evaluation, and request additional data and information as needed.

FEES AND COSTS

- All work performed to complete this project will be billed at a flat rate of \$150.00/hour (this is the same rate used for the past four years).
- No additional costs will be incurred by the City unless it is required to travel to the City facilities, in which case a fee based on mileage will be charged in addition to the time required to have meetings. If the client desires an initial meeting requiring travel before an agreement is reached, the City will not be charged for the travel time, meeting time, or mileage.
- Estimated number of hours for project completion is 120 hours. Estimated cost is \$18,000.