

4/25/1969

**OREGON STATE SANITARY
AUTHORITY MEETING
MATERIALS**



**State of Oregon
Department of
Environmental
Quality**

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AGENDA

State Sanitary Authority Meeting

10:00 a.m., April 25, 1969

Room 36, Portland State Office Building

- ✓ A. Minutes of 138th meeting (March 28, 1969)
- ✓ B. Project plans for March 1969
- ✓ C. Progress report on Wood and Bark Residue Disposal Study by Forest Research Laboratory, OSU
- D. Western Kraft proposal for Albany pulp mill expansion
- ✓ E. Boise Cascade Corp., Medford, request for variance *Approved* *Northrup*
Good Trees
- F. Timber Products Co., Medford, request for variance *Sanitary Dist. Inspection*
- G. Prairie City Timber Co. wigwam burner
- H. Waste Discharge Permits - New Systems
 1. Halsey
 2. Oakland
 3. Mountain States Investment (Airport Park)
 4. Multnomah County (Inverness)
 5. Willow Creek Mobile Villa
- I. Waste Discharge Permits - Misc.-Domestic
 1. Hayden Island, Inc. No. 1 (Mobile Home Park)
 2. Hayden Island, Inc. No. 2 (Moorage)
 3. Sweet Home
- J. Waste Discharge Permits - Misc.-Industrial
 1. Bird and Son (Fibreboard Corp.), Portland
 2. General Chain Bar, Tigard
 - approved* 3. Kogap Manufacturing, Medford
 4. Willamette Industries, Dallas
- K. Waste Discharge Permits - Renewal-Domestic
 1. Condon
 2. Gold Hill
 3. Klamath Falls (Airport)
 4. Nyssa
- L. Waste Discharge Permits - Renewal-Industrial
 1. Boise Cascade, Medford
 2. Klamath Lumber Co., Klamath Falls
 3. Mainline Foods, Brooks
 4. Mallorie's Dairy, Silverton
 5. Modoc Lumber, Klamath Falls
 6. Ore-Ida Foods, Ontario
 7. Reichhold Chemicals, White City
 8. Rhodia, Inc., Portland
 9. Shell Chemical Co., St. Helens
 10. Tektronix, Beaverton
 11. Weyerhaeuser Co., Klamath Falls

M. Tax Credit Applications

1. T-38 Georgia Pacific Corp., Springfield
2. T-71 Kenton Packing Co.
3. T-74 Western Kraft Corp.
4. T-73 Blue Lake Packers, Inc.

N. Portland International Airport Expansion - Boat and Houseboat
Moorage Relocations

O. Erdman Packing Company, Bandon - status report

MINUTES OF THE 139th MEETING
of the
Oregon State Sanitary Authority
April 25, 1969

The 139th meeting of the Oregon State Sanitary Authority was called to order by the Chairman at 10:00 a.m., April 25, 1969, in Room 36 of the State Office Building, 1400 S.W. 5th Avenue, Portland, Oregon. Members present were John D. Mosser, Chairman; B.A. McPhillips, Herman P. Meierjurgan, Storrs S. Waterman and Edward C. Harms, Jr.

Participating staff members were: Kenneth H. Spies, Secretary; E.J. Weathersbee, Deputy State Sanitary Engineer; Arnold B. Silver, Legal Counsel; Harold M. Patterson and Joseph A. Jensen, Assistant Chief Engineers; Harold L. Sawyer, Supervisor, Waste Discharge Permit Program; Lloyd O. Cox, Supervisor, Industrial Waste Treatment Program; Edgar R. Lynd, Supervisor, Municipal Waste Treatment Program; Patrick D. Curran, Supervisor, Plan Review Program; Leo L. Baton, J.R. Sheetz and Fred M. Bolton, District Engineers; Fred G. Katzel, Ernie A. Schmidt and Richard P. Reiter, Assistant District Engineers; and Clint A. Ayer, Ronald C. Householder and Harold W. McKenzie, Associate Engineers.

MINUTES

It was MOVED by Mr. McPhillips, seconded by Mr. Waterman and carried that the minutes of the 138th meeting of the Sanitary Authority held in Room 36 of the Portland State Office Building on March 28, 1969, be approved as prepared by the Secretary.

PROJECT PLANS

It was MOVED by Mr. Meierjurgan, seconded by Mr. McPhillips and carried that the actions taken by the staff on the following 27 project plans for water pollution and control and 2 air quality control projects during the month of March 1969 be approved:

Water Pollution Control

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
3/6/69	Oregon City	Port-West Construction Co. pump station	Prov. app.
3/11/69	Jacksonville	Beckman Square Subdivision sewers	Prov. app.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
3/11/69	Creswell	Evergreen Ave. sewer	Prov. app.
3/11/69	Multnomah County	Pump station and septic tank for boat ramp	Prov. app.
3/12/69	Aloha San. Dist.	Clear Creek Addition	Prov. app.
3/12/69	McMinnville	Pump Station, Project 1969-1	Prov. app.
3/12/69	Hillsboro	New high school sewers	Prov. app.
3/12/69	Gresham	N.W. Third St. sewer	Prov. app.
3/13/69	Tigard	S.W. Lynn St. sewer	Prov. app.
3/13/69	Ontario	Prel. plans for anaerobic-aerobic system for Ore-Ida Foods, Inc.	Prov. app.
3/17/69	Tillamook	Sewage treatment plant additions (WPC-Ore-250)	Prov. app.
3/17/69	Oakridge	Willamette City system	Prov. app.
3/18/69	N. Roseburg S.D.	Hughes Street Ext.	Prov. app.
3/19/69	Springfield	S. 70th St. ext. sewer	Prov. app.
3/19/69	Somerset West	Rock Creek Highlands	Prov. app.
3/19/69	Somerset West	Park View No. 4 sewers	Prov. app.
3/20/69	Springfield	Mimosa Park sewer	Prov. app.
3/20/69	Sunriver Prop.	Sewage treatment plant and two pump stations	Prov. app.
3/20/69	Portland	S.W. Stanley Court sewer	Prov. app.
3/20/69	Portland	N. Basin Avenue sewer	Prov. app.
3/20/69	Portland	S.W. Canyon Ct. sewer	Prov. app.
3/20/69	Portland	S.W. Taylors Ferry san. sewer system No. 12	Prov. app.
3/21/69	Hood River	Westside Elementary School	Prov. app.
3/25/69	Timberline Rim	Timberline Rim sewer collection system	Prov. app.
3/25/69	Forest Grove	McCue Subd. sewers	Prov. app.
3/31/69	Eugene	Prelim. College Crest sewers	Prov. app.
3/31/69	Halsey	Sewerage system	Prov. app.

Air Quality Control

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
3/3/69	Medford	Timber Products Co. Material storage and truck dumping facility	Approved
3/5/69	Medford	Timber Products Cyclone emission tests (Pralin)	Add. info. req.

WOOD AND BARK RESIDUE DISPOSAL STUDY PROGRESS REPORT

Assistant Dean Rudy M. Kallander of the School of Forestry and Mr. George Atherton of the Forest Research Laboratory, Oregon State

University, presented a progress report on the study of "Wood and Bark Residue Disposal in the Forest Products Industries" that they have been conducting during the past biennium. The final report is to be completed in August of this year. The study was authorized by the 54th Legislative Assembly in 1967 and has been financed by a one-half cent per thousand board feet tax increase paid by the industry during fiscal years 1968 and 1969 (about \$80,000), by a \$70,000 appropriation from the State General Fund, and by a \$50,000 grant from the Solid Wastes Program of the U.S. Public Health Service.

The study started with a state-wide survey of wood and bark residues, wood chip production and utilization and transportation costs. Included in the study are three methods of disposal: (1) by burning in a modified wigwam burner, (2) by dumping in landfills and (3) by burning in other types of incinerators. Also included are three methods of utilization: (1) as fuel, (2) as soil conditioner and (3) chemical extraction.

They reported that in 1953 only 6% of the wood residue from sawmills and plywood plants was used for paper and composition board but that by 1967 it had increased to 60%. At the present time most of the wood wastes consist of bark. Bark residues are finding an increased market for use on the soil.

The biggest use for wood residues is in paper and composition board production. Use as fuel ranks second.

Disposal in a landfill costs about \$2.00 per ton (\$4.00 per unit) if the haul is not over 10 miles. Fire hazards and water pollution by leachate are two problems associated with landfill operations.

Mr. Atherton expressed the opinion that with certain modifications and with proper operation and maintenance the wigwam burner might possibly be a reasonably satisfactory solution during the interim until complete utilization ends the problem. He reported that a test burner is being developed in north Eugene and should be in operation about the middle of May. It will have 3 underfire fans, 4 overfire fans, a variable speed feed conveyor and facilities for sampling gaseous and particulate emissions.

He said there are about 376 wigwam burners in operation in Oregon.

At the conclusion of the progress report Mr. Mosser stated that in his opinion they are wasting their time trying to improve the wigwam burner because he doubts that it will ever be able to meet future standards. He said it may be the most economical but it is not adequate and therefore they should concentrate on other alternatives.

Mr. McPhillips said the studies should be continued until a complete solution to the problem is found. Mr. Kallander replied that the Forest Research Laboratory has a continuous research study on utilization.

Mr. Mosser cautioned them not to spend much money on wigwam burners.

BOISE CASCADE CORPORATION VARIANCE REQUEST

Mr. McKenzie read a staff memorandum dated April 25, 1969, a copy of which has been made a part of the Authority's permanent files in this matter. He reported that on March 19 the Boise Cascade Corporation officials had decided to install a standby chipper rather than use the wigwam burner on a standby basis in the event of a breakdown in their hog at their Medford plant. He said they could not complete this installation by the April 1 deadline for phasing out the burner and therefore had asked for an extension of time until July 1.

Mr. Richard Parrish was present to represent the company. Mr. McPhillips asked if the burner would be dismantled after installation of the standby chipper. Mr. Parrish replied they planned to keep the burner but to use it only for storage.

It was MOVED by Mr. McPhillips, seconded by Mr. Waterman and carried that the variance be granted with the understanding that standby use of the burner be restricted to emergency use and only for brief periods until July 1, 1969 and that thereafter it be used only for storage.

TIMBER PRODUCTS COMPANY VARIANCE REQUEST

A staff report dated April 25, 1969, had been prepared by Mr. McKenzie regarding the variance request submitted by the Timber Products Company of Medford outlined in a letter dated April 2 by W.A. Coffindaffer, Plant Engineer. Copies of both the staff report and the company's April 2 letter have been made a part of the Authority's files in this matter.

Mr. Leo Young was present to represent the company. He said that they had recently modified the wigwam burner by installation of a gas igniter for burning sander dust to take care of an immediate problem. The cost of this installation was reported by Mr. Young to be about \$5,000.

Mr. McKenzie reported that the first attempt to improve the burner had not been successful. Mr. Baton who had observed the more recent modification stated that it appeared to be fairly satisfactory and should be able to do a reasonably good job.

Mr. Young reported further that the 60-unit storage bin installation has been unavoidably delayed because of a strike at the plant where it is being manufactured. He said they would need provision for emergency use of the burner for maybe 3 to 5 days/year in the event of particle-board plant breakdown. Otherwise they would have to truck the sander dust to a landfill.

In answer to a question by Mr. Meierjurgan he said their daily production averages about 40 units of sander dust per day.

Mr. Mosser commented that the company's request appeared reasonable except for emergency use of the burner in the future. He said after it is shut down it shall not be started up again on any basis. Mr. Young agreed to this prohibition.

It was then MOVED by Mr. McPhillips, seconded by Mr. Waterman and carried that a variance be granted allowing Timber Products Company to continue to use until July 1, 1969, if necessary, the modified wigwam burner for disposal of sander dust only and thereafter to terminate entirely the use of said burner.

PRAIRIE CITY TIMBER COMPANY WIGWAM BURNER

A staff report dated April 25, 1969, regarding air pollution caused by emissions from the Prairie City Timber Company wigwam burner had been prepared by Mr. McKenzie and a copy of the same has been made a part of the Authority's permanent files in this matter. The report pointed out that fallout from the burner has been the subject of many complaints and staff activity since August of 1967.

The Secretary reported that 25 letters of complaint had been received within the past 10 days from residents of the area including one letter from the city of Prairie City. The following is a list of the complainants:

Mr. & Mrs. O.G. McComb	Marie E. Coombs
James H. Wishart	Mrs. Carl Mirich
John G. Donaldson	Mr. & Mrs. Carl Exner, Jr.
Joe B. Donaldson	Mr. & Mrs. D. Burke
George W. Donaldson	Mrs. H.P. Ambright
Mr. & Mrs. D. Hammach	Mrs. Robert F. Jones
Tom Barrett	Mrs. L.E. Dilly, Jr.
Lieta Bradford	Mrs. Elizabeth Curtis
Mrs. D. Ackerman	Mr. & Mrs. R.L. Ketchum
Mrs. Josephine Grove	Mrs. L. VanDeWalker
Mrs. Melody McKinley	Zelma Woods, City Recorder
Mr. & Mrs. L. Boorman	Amba Morgan
Mr. & Mrs. T. Walker, Jr.	

Mr. Clayton Payne, property owner in Prairie City, was present at the meeting and complained about the excessive fallout from the burner. He said that it had on occasion caused fires to break out. He was not concerned about smoke, only excessive fallout.

Mr. E.H. McIntosh was present to represent the company. He said Mr. Ken Erne had been retained to propose modifications to the burner in an attempt to solve the problem but no proposals had been submitted thus far to the Sanitary Authority staff. He admitted that the fallout is bad but claimed that smoke is not a problem.

Mr. Erne was also present so the Chairman directed Mr. McIntosh and Mr. Erne to get together immediately with Mr. McKenzie and Mr. Sheetz and work out a satisfactory proposal for abating the air pollution.

The meeting was then recessed at 11:00 a.m. and reconvened at 11:10 a.m.

After the noon recess the following proposal was submitted by Mr. McIntosh and was accepted by the Authority members:

It is proposed that Prairie City Timber Company will install the following modifications to their wigwam burner in accordance with plans to be submitted to and approved by the Oregon State Sanitary Authority, within four weeks after approval of drawings:

1. Repair burner shell, closing all openings.
2. Install hood and hinged closure in conveyor openings in burner shell.
3. Install truss ring around burner shell at mid-height of burner.

4. Install vertical, double hinged door to replace present access and service doors.
5. Install new underfire air system.
6. Install new overfire air natural draft ports.

Following installation of the above, if fallout sampling shows violation of regulations, Prairie City Timber Company will install a hog to reduce all coarse residues, and will install a chute at the end of the conveyor per schedules then to be determined and approved by the Sanitary Authority.

Dated this 25th day of April, 1969.

PRAIRIE CITY TIMBER COMPANY

/s/ By E.H. McIntosh, Pres.

KOGAP MANUFACTURING COMPANY WASTE DISCHARGE PERMIT

Proposed conditions for a waste discharge permit for the Kogap Manufacturing Company plant at Medford were presented by Mr. Sawyer. Condition No. 1 had been modified following a conference with company officials. Mr. S.V. McQueen was present to represent the company. Mr. McPhillips asked what would happen if the receiving stream did not provide the 20 to 1 dilution required by the modified condition No. 1. Mr. McQueen replied that the wastes would be sprinkled on land when the stream flow is too low to receive the plant effluent.

It was MOVED by Mr. McPhillips, seconded by Mr. Waterman and carried that the waste discharge permit as proposed by the staff including the modification to condition No. 1 and with an expiration date of March 31, 1970 be issued to the Kogap Manufacturing Company of Medford.

WESTERN KRAFT ALBANY PULP MILL EXPANSION PROPOSAL

In letters dated March 20, April 4, April 7 and April 15, 1969, Mr. C.R. Duffie, Vice President, had outlined a company proposal for expansion of pulp production and for effecting a substantial reduction in atmospheric emissions at the Western Kraft Corporation Albany pulp mill. A staff analysis of the proposal together with copies of the afore-mentioned letters had been sent to the Authority members and other interested persons prior to the meeting. Copies of the same have also been made a part of the Authority's permanent files in this matter.

Mr. Weathersbee reviewed briefly the staff report for the benefit of those persons who were present at the meeting. He mentioned that the company now has in operation three recovery boilers with a total capacity of 530 tons/day which with 40 tons/day of reclaimed waste paper results in a daily paper production of 570 tons; that the average daily emissions of total reduced sulfur (TRS) from the recovery system are about 7,500 pounds or approximately 14 lbs./ton of pulp produced; that wet scrubbers are now used by the company for particulate control with particulate emissions amounting to an estimated 12 to 16 lbs./ton or about 7,500 lbs./day; that the proposal is to install a new 600 tons/day recovery boiler of the non-direct contact design; that this new boiler plus one existing boiler would give a rated capacity of 770 tons of pulp per day, but the mill would be limited to 705 tons/day including 200 tons/day of neutral sulfite semi-chemical pulp which is equivalent to only 50 tons/day of Kraft pulp; that with the proposed expansion the TRS emissions would be reduced to 700 lbs./day from the present 7,500 lbs./day, the particulate emissions would be reduced 30% and water vapor emissions for the total mill 9%.

He said the staff has concluded that the proposal is substantially in compliance with Sanitary Authority standards for kraft mills.

Mr. Mosser then raised questions about the relative advantages and disadvantages of neutral sulfite semi-chemical pulp as compared to kraft pulp.

Mr. Waterman inquired about the TRS emissions from the entire mill. Mr. Weathersbee replied that complete data were not available now for the entire mill, but under the Sanitary Authority regulations the company will have to monitor the other sources. He said the recovery system is considered the major source.

In response to a question by Mr. Harms, Mr. Weathersbee said that because of the lack of data a TRS limit for the entire plant cannot be set at this time, but the company will absolutely be required to monitor all sources in the future.

The possibilities for reducing the water vapor emissions were also discussed briefly.

Mr. Mosser commented that the proposal by Western Kraft raises the question of how the Sanitary Authority is to carry out its Rule No. 5 pertaining to mills located in recognized problem areas, that unfortunately we do not know what the results will actually be because the new boiler design is untried, that we could say no expansion or expansion limited to the neutral sulfite semi-chemical pulp until we know for sure what the results will be, or that we might approve expansion only after it is found that the 1975 standards can and will be met. He commented further that he is in favor of giving extra credit to a mill which reclaims waste paper for part of its production. He then asked if the company could provide a detailed schedule of construction.

Mr. C.R. Duffie, Vice-President, was present to represent the company and stated that two years will be required for delivery and installation of the new recovery boiler. He said that the Babcock Wilcox Corporation had been asked a week ago to schedule construction of such a boiler which would mean that the spring or summer of 1971 would be the earliest that it could be in operation. He said further that after the new boiler is in operation it will be evaluated so that a more definite proposal for kraft pulp expansion for 1972 can be made. He stated further that the entire project would be engineered as one package.

Mr. Mosser asked him if they would put in the NSSC production if no kraft pulp expansion were allowed and he replied that they probably would although that was a difficult question to answer. Mr. Mosser stated that if the equipment did not work out as expected the Authority could not permit expansion. Mr. Duffie replied that they would have two years to test the results.

In response to another question by Mr. Mosser, Mr. Weathersbee stated that the company's proposal for liquid waste control was in complete compliance with its waste discharge permit.

Mr. Duffie then made the following statement:

"You ask if we were agreeable to the Staff recommendations as outlined. We are in every respect, but we have two points we would like to mention. We think both of these points are compatible with our mutual desire to achieve a maximum benefit.

"We commit ourselves to the efficiency of effective destruction by burning but would like the opportunity to review with the Staff before actual proceeding the latest technological developments that may afford a system that is as efficient but have some beneficial side effects.

"Item 3 on page 5 calls for electrostatic precipitators. We agree that whatever is installed or used shall have the efficiency in particulate emissions of the electrostatic precipitator, and we believe it is the best known at this time. However, this is a day of rapid technological advances and we feel alternate methods of equal efficiency should be carefully reviewed at the time this item enters the construction schedule and that we should not be confined to a type of equipment but rather to a level of emission."

After making the above statement Mr. Duffie discussed briefly the NSSC process. He pointed out that in the kraft process only 45% of the original weight of the wood is converted to pulp, whereas with the NSSC process the yield is 75 to 78%. He said the NSSC pulp is suitable only for corrugated medium.

He then made the statement that the estimated 700 lbs./day TRS emission after installation of the new boiler was for the entire mill and not just for the recovery system. Mr. Felix Hammack, Resident Mill Manager, who was also present said they estimated one-half of that amount would be from the recovery system and one-half from the other sources in the mill.

The meeting was then recessed at 11:55 a.m. and reconvened at 12:07 p.m.

Mr. Duffie explained that their plans called for 530 tons/day of kraft pulp production which is equal to the present recovery boiler capacity, 40 tons/day of NSSC equivalent kraft production and another 20 to 30 tons per day of kraft, or in other words their total production could be handled by the new boiler until approval were obtained for further expansion.

Mr. McPhillips commented that in his opinion the gamble should be by the company and not by the public or the Sanitary Authority.

Senator Edward Fadeley of Eugene who had just arrived at the meeting then asked for permission to make a statement. He, too, said that any risk in this matter should be taken by the company, not by the public or Sanitary Authority. He stated that the operation of the mill should be limited to the extent that production will meet the approved emission

standards, that people in the vicinity of the mill are immune or have become accustomed to the emissions but the tourists and traveling public are not and so are greatly affected by the pollution, that consequently this air pollution detracts considerably from the livability of Oregon, that the stretch of freeway adjacent to the Albany mill is one of the most dangerous in the state because of poor visibility, that the mill because of its location is a definite eye sore, and that everything possible should be done to correct the situation.

Mr. Mosser replied that the people of Albany deserve clean air too. He stated further that when he accepted the job of Chairman of the Sanitary Authority he set two goals for himself, one to be able to swim in the Willamette River with pleasure and the other to have Western Kraft put their name with pride on the Albany pulp mill.

Mr. Duffie then stated that they will be most pleased to confer with the Authority's staff one year from now and again two years from now to evaluate the progress with the understanding that further steps will be based on conditions actually existing at those times. He also discussed briefly the fog conditions which occur occasionally in the vicinity of the mill.

Mr. Hammack explained that with the new proposed installation they estimate that the amount of water vapor emitted from the total mill will be only 9% less than at present, but for the recovery system it will be 23% less. He said that in changing from wet scrubbers to electrostatic precipitators they expect a 40% reduction in the relative humidity of the discharges from the mill.

Prior to the meeting letters were received from each of the following 12 persons regarding this matter and have been made a part of the Authority's permanent files: Professor Richard W. Boubel, Fred J. Burgess and R.M. Alexander, all of Oregon State University; Michael D. Roach, Director, Mid-Willamette Valley Air Pollution Authority; John R. Donaldson, Chairman, Board of Directors, Citizens for a Clean Environment, Inc., Corvallis; Verner J. Adkison, Director, Lane Regional Air Pollution Authority; Roy R. Silen, Homer J. Campbell, James D. Hall, Frank Sorenson and James J. Aasum, all of Corvallis; and Don Minore of Albany.

It was MOVED by Mr. Mosser, seconded by Mr. McPhillips and carried that expansion of the Albany mill as proposed by the Western Kraft Corporation be approved subject to the following limitations:

1. That final, detailed plans and specifications for equipment, facilities and structures that relate to air or water pollution control be submitted to the Sanitary Authority and approved in writing before start of construction of the new or expanded facilities.
2. That provisions for effective destruction by burning, or equivalent, of non-condensibles from the digesters and multiple effect evaporators be incorporated in the proposed project.
3. That particulate control by electrostatic precipitators of at least 99% efficiency be provided for all active recovery boiler capacity including the existing unit proposed to be converted to the non-direct contact design.
4. That consideration be given to minimizing the air pollution effects of water vapor emissions by discharging them through taller stacks where possible or by other feasible means.
5. That the company proceed without delay to establish an approved monitoring and reporting program and to carry out the special studies relating to "other sources" and sulfur dioxide emissions as required by Sections VII and VIII of the Sanitary Authority's Kraft mill regulations adopted March 27, 1969, and to utilize every opportunity that may occur as a result of the modernization and expansion project to minimize emissions from the "other sources."
6. That the proposed modernization and expansion be carried out in a manner such that increased emissions or waste discharges over presently existing levels will not result at any time.
7. That production expansion be limited to that which can be handled in the new 600 tons/day furnace until such time as the Authority is satisfied that emissions are going to be at, or close enough to, 1975 standards that expansion to the full amount proposed can be approved.

The meeting was recessed at 12:30 p.m. and reconvened at 2:03 p.m.

TAX CREDIT APPLICATION T-74

Mr. Ayer presented a staff memorandum regarding the application T-74 submitted by Western Kraft Corporation for a tax credit for air pollution control facilities installed at the Albany pulp mill. A copy of the memorandum has been made a part of the Authority's files in this matter.

It was MOVED by Mr. McPhillips, seconded by Mr. Waterman and carried that a tax credit certificate be approved and issued for the Western Kraft Corporation for pollution control facilities costing \$222,370.22 as covered by tax application T-74.

CITY OF OAKLAND WASTE DISCHARGE PERMIT

Recommended conditions for a waste discharge permit for the new sewerage works project which the city of Oakland proposes to build as soon as funds are available had been prepared by the staff and copies furnished to the applicant and Authority members prior to the meeting. Councilmen Melvin L. Davis, James O. Knudtson and Roland Williams were present to represent the city and expressed concern that the funds previously advanced by the Farmers Home Administration might be lost if construction of the project were not started within the near future.

The Secretary pointed out that the voters in 1962 approved a \$115,000 bond issue and in 1966 a supplemental \$50,000 bond issue to help finance construction of a sewage collection system and treatment plant project now estimated to cost between three and four hundred thousand dollars, that the city's application for a federal grant under PL 660 could not be approved by the Sanitary Authority in fiscal years '68 and '69 because sufficient federal funds were not available, but that now the city is at the top of the priority point listing of applications currently on file and should be eligible to receive a grant in fiscal year 1970 if funds are appropriated for that program. (Note: It was learned later that FHA has purchased \$133,000 in bonds from the city and in addition has reserved \$23,000 for a grant to help finance sewer construction.)

Mr. Curran commented briefly on the project.

Mr. Sawyer pointed out that in condition No. 1, line 3 "number 1" should be changed to "number 2."

It was MOVED by Mr. Waterman, seconded by Mr. Harms and carried that the waste discharge permit as recommended and corrected by the staff be issued for the city of Oakland.

PORTLAND INTERNATIONAL AIRPORT EXPANSION - HOUSEBOAT MOORAGES

Mr. Mosser excused himself from the meeting and Mr. McPhillips presided in his absence. Mr. E.A. Schmidt read the letter dated April 18, 1969, in which the Port of Portland requested an additional 18 months, from the date that expansion of the airport is given federal approval, for installation of approved sewerage facilities for the houseboats and moorages affected by the airport expansion. Mr. Schmidt also presented a brief report covering the present status of the houseboat sewage disposal program.

Mr. I.J. Church, Manager of Technical Services, was present to represent the Port. He said they had hoped to be under way with their airport expansion project before now but they are still awaiting federal approval. He stated that if the houseboat and moorage owners are required to install interim sewerage facilities on land the Port will have to pay for whatever cannot later be used because of the airport expansion.

In reply to a question by Mr. Meierjorgen, Mr. Schmidt said some 55 to 70 houseboats are involved. He estimated that they are 2 to 3 miles from any existing facilities.

It was MOVED by Mr. Harms, seconded by Mr. Meierjorgen and carried that the request of the Port of Portland for an extension of time be denied.

Mr. Mosser then returned and resumed as Chairman.

WILLOW CREEK MOBILE VILLA WASTE DISCHARGE PERMIT

Mr. Harry Kemp, Senior Sanitarian for the Washington County Health Department, was present and submitted a written statement regarding the proposed Willow Creek Trailer Park development. He reported that the Aloha Sanitary District had recently informed the County that it will now favorably consider annexation of the trailer park property and could therefore provide the owner with sewer service. He asked that the Authority delay action on the owner's waste discharge permit application until this opportunity could be given further consideration.

In reply to a question by Mr. Waterman, Mr. Kemp stated that Washington County had not yet adopted officially a master sewer plan for the Tualatin Basin. Mr. John Crockett, County Sanitary Engineer, reported that definite steps are being taken in that regard by the County. Gary Krahmer, representative of the district, confirmed the fact that the Aloha Sanitary District within the past few days had changed its policy and will now consider annexation of and sewer service for the area in question.

Mr. George Ward, Consulting Engineer for the Mobile Home project, said plans for the proposed sewerage system had been submitted some time ago to the Washington County Planning Commission so the County had been fully informed of the project.

It was MOVED by Mr. Meierjorgen, seconded by Mr. Waterman and carried that the matter of a waste discharge permit for the Willow Creek Mobile Villa be tabled until the Authority meeting near the end of May.

WASTE DISCHARGE PERMITS - New Systems

Recommended waste discharge permit conditions had been prepared by the staff and copies forwarded to the applicants and Authority members prior to this meeting for proposed new sewage treatment plants for (1) city of Halsey, (2) Mountain States Investment Co. (Multnomah County) and (3) Multnomah County (Inverness plant).

Mr. Sawyer pointed out that in condition No. 1, line three of the Halsey permit the "number 1" should read "number 2."

The members questioned the discharge of plant effluent into Columbia Slough from the proposed Mountain States Investment Co. project. Information regarding this project was supplied by Messrs. Sawyer, Curran, Katzel and Schmidt. It was decided to defer action on this permit to allow time for further consideration of the nature of the receiving stream.

It was MOVED by Mr. Harms, seconded by Mr. Waterman and carried that the waste discharge permits as recommended and corrected by the staff for the city of Halsey and the Multnomah County Inverness plants be granted.

WASTE DISCHARGE PERMITS - Misc. - Domestic

Recommended waste discharge permit conditions had been prepared by the staff and copies sent to the applicants and Authority members prior to this meeting for existing sewage treatment works for (1) city of

Sweet Home, (2) Hayden Island, Inc. No. 1 (Mobile Home Park) and (3) Hayden Island, Inc. No. 2 (moorage). They were reviewed at the meeting by Mr. Sawyer and Mr. Curran.

Mr. Harry Wyman, City Manager, was present to represent the city of Sweet Home. He reported that Cornell, Howland, Hayes and Merryfield had been retained to study the sewerage works needs of the city, that the city has applied to HUD for advance planning funds and that a bond election will be submitted to the voters shortly.

It was MOVED by Mr. McPhillips, seconded by Mr. Harms and carried that the waste discharge permit as recommended by the staff for the city of Sweet Home be granted.

It was MOVED by Mr. Harms, seconded by Mr. Waterman and carried that the waste discharge permits for Hayden Island, Inc. plants No. 1 and No. 2 be granted as recommended by the staff.

WASTE DISCHARGE PERMITS - Misc. - Industrial

Recommended waste discharge permit conditions had been prepared by the staff and copies sent to the applicants and Authority members prior to this meeting for existing waste disposal facilities for (1) Bird and Son (Fibreboard Corp.), Portland, (2) General Chain Bar, Tigard and (3) Willamette Industries, Dallas.

Mr. Katzel discussed the availability of Portland city sewers to the Bird and Son plant.

It was MOVED by Mr. Harms, seconded by Mr. Meierjurgan and carried that the waste discharge permits as recommended by the staff be granted for (1) Bird and Son, (2) General Chain Bar and (3) Willamette Industries with the exception that in condition No. 1, line 3 of the permit for Bird and Son the date September 30, 1969 be changed to September 1, 1969.

WASTE DISCHARGE PERMITS - Renewal - Domestic

Mr. Sawyer presented recommended renewal waste discharge permit conditions for (1) Condon, (2) Gold Hill, (3) Klamath Falls Airport and (4) Nyssa. Copies had been sent prior to the meeting to the applicants and Authority members.

It was MOVED by Mr. Meierjurgan, seconded by Mr. Waterman and carried that the waste discharge permits for (1) Condon, (2) Gold Hill, (3) Klamath Falls Airport and (4) Nyssa be renewed as recommended by the staff.

WASTE DISCHARGE PERMITS - Renewal - Industrial

Recommended conditions for renewed permits for the 11 industrial plants included in the following motion had been prepared by the staff and sent to the applicants and Authority members prior to the meeting and following conferences with company officials, modifications to conditions No. 4 and No. 1 respectively had been made in the recommended permits for Reichhold Chemical and Weyerhaeuser Company.

It was MOVED by Mr. McPhillips, seconded by Mr. Harms and carried that the permits be renewed as recommended and modified by the staff for (1) Boise Cascade Corp., Medford, (2) Klamath Lumber Co., Klamath Falls, (3) Mainline Foods, Brooks, (4) Mallorie's Dairy, Silverton, (5) Modoc Lumber, Klamath Falls, (6) Ore-Ida Foods, Ontario, (7) Reichhold Chemicals, White City (condition No. 4 modified), (8) Rhodia, Inc., Portland, (9) Shell Chemical Co., St. Helens, (10) Tektronix, Beaverton, and (11) Weyerhaeuser Co., Klamath Falls (condition No. 1 modified).

In reply to a question by Mr. Mosser, Mr. Richard Gitschlag of Rhodia, Inc. said he did not know when the Portland sewer would be available so that they could connect to it.

Mr. Cox discussed briefly the waste treatment facilities for the Mainline Foods plant at Brooks.

TAX CREDIT APPLICATIONS

Staff reports covering tax credit applications T-38, T-71 and T-73 submitted by Georgia Pacific Corp., Springfield, Kenton Packing Co., Portland, and Blue Lake Packers, Inc., Salem respectively, had been prepared and sent to the Authority members in advance of the meeting.

Mr. Patterson and Mr. Householder reported that the facilities installed at the Georgia Pacific Springfield plant had not completely solved the air pollution problem, but since they had alleviated the condition they recommended that the tax credit be allowed.

It was MOVED by Mr. Harms, seconded by Mr. McPhillips and carried that tax credit certificates be approved for the pollution control facilities installed by Georgia Pacific Corporation, Springfield at a cost of \$134,618.68 covered by application T-38, by Kenton Packing Co., Portland at a cost of \$14,376.20 covered by application T-71, and Blue Lake Packers, Inc., Salem at a cost of \$9,622.00 covered by application T-73.

ERDMAN PACKING CO., Bandon

Mr. Baton reported that a letter had been received from Mr. Melvin Erdman, owner of the Erdman Packing Co. slaughterhouse located in Curry County, indicating his desire to provide adequate waste disposal facilities for abatement and control of stream pollution. Mr. Baton suggested that additional time be granted in an attempt to work out a satisfactory solution to this problem.

It was MOVED by Mr. Harms, seconded by Mr. Waterman and carried that an extension of time be granted to work with Mr. Erdman to solve this pollution problem.

There being no further business, the meeting adjourned at 3:45 p.m.

Respectfully submitted,



Kenneth H. Spies
Secretary

Project Plans

During the month of March, 1969, the following 27 sets of project plans and engineering reports were reviewed and the action taken as indicated by the Water Quality Control Section.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
3/6/69	Oregon City	Port-West Construction Co. pump station	Prov. app.
3/11/69	Jacksonville	Beckman Square Subdivision sewers	Prov. app.
3/11/69	Creswell	Evergreen Avenue sewer	Prov. app.
3/11/69	Mult. Co.	Pump station and septic tank for boat ramp	Prov. app.
3/12/69	Aloha San. Dist.	Clear Creek Addition	Prov. app.
3/12/69	McMinnville	Pump Station, Project 1969-1	Prov. app.
3/12/69	Hillsboro	New high school sewers	Prov. app.
3/12/69	Gresham	N.W. Third St. sewer	Prov. app.
3/13/69	Tigard	S.W. Lynn St. sewer	Prov. app.
3/13/69	Ontario	Prel. plans for anaerobic-aerobic system for Ore-Ida Foods, Inc.	Prov. app.
3/17/69	Tillamook	Sewage treatment plant additions (WPC-Ore-250)	Prov. app.
3/17/69	Oakridge	Willamette City system	Prov. app.
3/18/69	N. Roseburg S.D.	Hughes Street Ext.	Prov. app.
3/19/69	Springfield	S. 70th St. ext.sewer	Prov. app.
3/19/69	Somerset West	Rock Creek Highlands	Prov. app.
3/19/69	Somerset West	Park View No. 4 sewers	Prov. app.
3/20/69	Springfield	Mimosa Park sewer	Prov. app.
3/20/69	Sunriver Prop.	Sewage treatment plant and two pump stations	Prov. app.
3/20/69	Portland	S.W. Stanley Court sewer	Prov. app.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
3/20/69	Portland	N. Basin Avenue sewer	Prov. app.
3/20/69	Portland	S.W. Canyon Ct. sewer	Prov. app.
3/20/69	Portland	S.W. Taylors Ferry san. sewer system No. 12	Prov. app.
3/21/69	Hood River	Westside Elementary Sch.	Prov. app.
3/25/69	Timberline Rim	Timberline Rim sewer collection system	Prov. app.
3/25/69	Forest Grove	McCue Subd. sewers	Prov. app.
3/31/69	Eugene	Prelim. College Crest sewers	Prov. app.
3/31/69	Halsey	Sewerage system	Prov. app.

PROJECT PLANS AND REPORTS

The following project plans or reports were received and processed by the Air Quality Control staff during the month of March 1969.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
3	Medford	Timber Products Co. Material storage & truck dumping facility	Approved
5	Medford	Timber Products Cyclone emission tests (Pralin)	Additional informa- tion requested
13	West Linn	Crown Zellerbach Corp. Release of jurisdiction to Columbia-Willamette Air Pollution Authority	Approved
20	St. Helens	Boise Cascade Corp. Release of jurisdiction of open burning to Columbia-Willamette Air Pollution Authority	Approved
20	Oregon City	Publishers' Paper Co. Release of jurisdiction of open burning, incinera- tors, and power boilers to Columbia-Willamette Air Pollution Authority	Approved

TO: Sanitary Authority Members
FROM: Air and Water Quality Control Staff
SUBJECT: Western Kraft Corporation, Albany Mill
DATE: April 25, 1969

534
40 work

Attached are copies of letters from Western Kraft Corporation dated 3/20/69, 4/4/69, 4/7/69, and 4/14/69, which together constitute an application for preliminary approval of the following proposal:

- 1) To construct and place in operation by spring of 1971 a 600 ton/day recovery boiler of the new non-direct contact design. This new recovery unit would be equipped with electrostatic precipitators which would control particulate emissions with an efficiency of 99 1/2% except when one field might be out for maintenance in which case the unit would operate at 98% efficiency.
- 2) After the new boiler is in operation and before its maximum capacity is reached, it is proposed that one of the three presently existing recovery boilers would be converted to the new non-direct contact design for production of Kraft pulp at a reduced capacity. No mention is made in any of Western Kraft's letters of improved particulate control for the converted unit, but Western Kraft representatives have stated in conference with Sanitary Authority staff members that efficient electrostatic precipitators would also be installed for this unit.

One of the remaining two existing boilers would be converted to steam generation with firing by natural gas, and the other is proposed to be maintained as a standby Kraft pulp production unit.

Construction of the new 600 ton/day recovery boiler and conversion of one of the existing boilers would provide a total active recovery capacity of the new non-direct contact design sufficient to accommodate 770 tons/day of Kraft pulp production. The company proposes, however, to limit its production to 705 tons/day of Kraft equivalent. Fifty tons of the 705 tons/day of Kraft production capacity would be utilized to produce 200 tons/day of semi-chemical neutral sulphite pulp which would produce the same loading on the recovery boiler as 50 tons/day of Kraft pulp production.

The company proposes an ultimate pulp production when its program is completed in 1972 of 900 tons/day. This would include the 200 tons/day of semi-chemical pulp (50 T/D Kraft Equivalent), approximately 650 tons/day of Kraft pulp and approximately 50 tons/day manufactured from reclaimed waste paper. From an air pollution standpoint the extent of the proposed expansion should be judged on the basis of increasing the present 530 tons/day of cooked Kraft pulp production to 705 tons/day of equivalent cooked Kraft pulp production.

Western Kraft has projected a decrease of 91% in total reduced sulphur (TRS) emissions, from present levels of 7500 lbs/day down to 700 lbs/day and a 9% decrease in water vapor emitted from the total mill operations. It has also stated its intention to utilize the best available equipment and to operate it efficiently to effect further reductions in TRS as may prove to be technologically feasible. Although its entire proposed program is not scheduled for completion until 1972 the major air pollution improvements are expected to be in effect by spring of 1971.

In addition, the company has confirmed its intention to install facilities to provide year-round secondary treatment of its liquid waste discharges by not later than July 1, 1970, in order to comply with its present waste discharge permit.

Staff Evaluation

Western Kraft's proposal for modernizing and expanding its Albany mill is considered to comply with the Sanitary Authority's Rules and Regulations for Kraft Pulp Mills in Oregon, adopted March 27, 1969, with the possible exception of Section V which provides that more restrictive limits may be established for new or expanding mills or mills located in recognized problem areas.

The company has projected its TRS emissions to be 700 lbs. per day for an equivalent Kraft production of 705 tons/day. This is approximately 1 lb. of TRS per ton of equivalent Kraft pulp which is double the limit of 0.5 lb. of TRS per ton of equivalent Kraft pulp specified in Sub-Section 1(b) of Section IV of the Sanitary Authority's regulations.

However, this sub-section also includes the alternative language . . . "or such other limit of TRS that proves to be reasonably attainable utilizing the latest in design of recovery furnace, equipment, controls and procedures." Western Kraft's proposal complies with this alternative language. In addition, the company has stated its intention to reach the lower pound level of TRS if at all possible.

Reduction of TRS emissions from the recovery furnace stack to less than 10% of present levels and with an estimated 30% reduction in particulate emissions and less water vapor emitted to the atmosphere should substantially reduce air pollution caused by this mill, but probably will not result in completely satisfactory air quality in the area. If the new design non-direct contact recovery boilers work as the manufacturers claim, the odorous emissions will be reduced to approximately 5% of present emission levels.

The company's proposal for treating its waste waters fully meets the conditions of its waste discharge permit.

Staff Recommendations

It is recommended that the Western Kraft proposal to modernize and expand its Albany mill be given preliminary approval subject to the following conditions:

1. That final, detailed plans and specifications for equipment, facilities and structures that relate to air or water pollution control be submitted to the Sanitary Authority and approved in writing before start of construction of the new or expanded facilities.

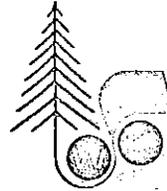
2. That provisions for effective destruction by burning of non-condensibles from the digesters and multiple effect evaporators be incorporated in the proposed project.
3. That particulate control by electrostatic precipitators of at least 99 1/2% efficiency be provided for all active recovery boiler capacity including the existing unit proposed to be converted to the non-direct contact design.
4. That consideration be given to minimizing the air pollution effects of water vapor emissions by discharging them through taller stacks where possible or by other feasible means.
5. That the company proceed without delay to establish an approved monitoring and reporting program and to carry out the special studies relating to "other sources" and sulfur dioxide emissions as required by Sections VII and VIII of the Sanitary Authority's Kraft mill regulations adopted March 27, 1969, and to utilize every opportunity that may occur as a result of the modernization and expansion project to minimize emissions from the "other sources."
6. That the proposed modernization and expansion be carried out in a manner such that increased emissions or waste discharges over presently existing levels will not result at any time.

During the time of the expansion project

committed but review with staff

Not confined to E.P.

WESTERN KRAFT CORPORATION



Standard Plaza

Portland, Oregon 97204

Phone (503) 224-3221

April 15, 1969

Oregon State Sanitary Authority
P. O. Box 231
Portland, Oregon 97207

Gentlemen:

You requested information on our proposed program as to future pounds of total reduced sulphur emitted per day, particulate matter emitted, and pounds of water vapor emitted per day. The following table and statements set forth our best judgment on these matters.

	<u>Present</u>	<u>After Program Completion</u>	<u>Percent Reduction</u>
Lbs total reduced sulphur/day	7,500	700	91%
Lbs water vapor/day Recovery area	5,050,000	3,900,000	23%
Total Mill	7,600,000	6,900,000	9%

By way of explanation, we envision completion of the entire program in 1972. However, the major pollution abatement portions are going to be our first order of business as far as installation is concerned, and we confidently expect to be at the above levels in the spring of 1971.

It should be noted that the above figure of lbs of TRS is based on our present judgment as to average total mill discharge. We intend to purchase the best equipment available and to operate it efficiently as pertains to air pollution. Equipment manufacturers have stated their belief that the new design will permit lower levels in pounds per day. If this is true, we shall reach these levels but prefer at this time to be conservative in our figures.

We have omitted reference to particulate matter emitted in pounds per day. As indicated to you previously, we are planning on installing a large recovery unit with electrostatic precipitators with 99-1/2% efficiency and 98% efficiency when one field might be out for maintenance or cleaning purposes. We would expect these precipitators to reduce our overall mill emission by approximately 30%. Because of the somewhat experimental nature of these high efficiency levels, however, and because

April 15, 1969

of difficulties in measurements, we are unwilling to state a pounds per day figure at this time.

A final word in conclusion. Several boilers of this new design will have been in operation for substantial periods of time before ours goes on the line in 1971. We would expect to incorporate in our unit the best technology and the latest findings resulting from this actual operating experience. We are confident of our ability to meet the above results subject only to the success of the new boiler design.

Yours very truly,

WESTERN KRAFT CORPORATION



C. R. Duffie
Vice President

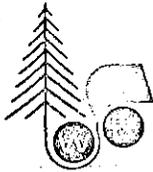
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Group & Engineering
Oregon State Board of Health

RECEIVED

APR 15 1969

ONE TEMP PERM



KHS

To: *[Handwritten initials]*
HMP

WESTERN KRAFT CORPORATION

Division of
Sanitation & Engineering
Oregon State Dept. of Health

Standard Plaza

Portland, Oregon 97204

C. R. DUFFIE
VICE-PRESIDENT

RECEIVED

APR 7 - 1969

April 7, 1969

DNF TEMP PERM

Dear Mr. Spies:

On March 20, we wrote to you concerning a proposed new program at our Albany mill, and today we delivered an additional letter clarifying our position on the recently established air quality standards.

This morning, you posed a question regarding the conversion of our existing kraft recovery system to the new non-direct contact design. As we related to you, we expect to end up with a kraft production of 705 tons a day. This plateau will not be reached until sometime after the proposed 600 ton new design recovery unit is in operation.

After the new boiler is in operation and before we have reached maximum kraft capacity, we expect to meet with you to review the performance data required for accurate evaluation. If, at that time, it is your opinion and ours that further significant gains could be made by converting one of the existing recovery units to the new design, we shall be pleased to do so. If carried out, this would mean an excess of capacity (770 ton capacity to 705 ton production) in new non-direct contact design.

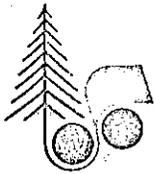
In this regard, we wish to point out that the furnace of the new design unit and our existing units are the same. It is the process recovery train after the furnace that differs. We would, therefore, expect a converted recovery unit to be as efficient in all areas of air pollution control as a new unit.

We trust this will answer your question.

Yours very truly,

Mr. K. H. Spies
Oregon State Sanitary Authority
P. O. Box 231
Portland, Oregon 97207

CRD:ch



WESTERN KRAFT CORPORATION

Standard Plaza

Portland, Oregon 97204

C. R. DUFFIE
VICE-PRESIDENT

April 4, 1969

Gentlemen:

On March 20, we delivered to you a proposed program on air and water pollution abatement for our Albany, Oregon kraft mill. It is our understanding that on March 27, the State Sanitary Authority adopted a new set of regulations for kraft mills.

We would like to advise you that in our opinion the program we outlined to you will meet the standards set forth for the year 1972.

It is our understanding the 1975 regulations are subject to a review in 1973, and we would expect to be able to advise you prior to that time as to our ability to meet 1975 standards.

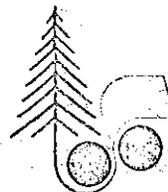
Yours very truly,

Oregon State Sanitary Authority
P. O. Box 231
Portland, Oregon 97207

CRD:ch

*Rec'd 4/7/69
KHSW*

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KHS	KHS



WESTERN KRAFT CORPORATION

Standard Plaza

Portland, Oregon 97204

Phone (503) 224-3221

March 20, 1969

Oregon State Sanitary Authority
P. O. Box 231
Portland, Oregon 97207

Gentlemen:

It has been the policy of Western Kraft Corporation to incorporate proven technological advances developed for the abatement of air and water pollution in its Albany, Oregon kraft pulp and paper operation. It is our conviction that new designs in recovery boilers offer the possibility of extremely substantial reduction of odorous materials emitted and that current advances in the art of water purification will enable us to substantially reduce our loading on the Willamette River.

We are, therefore, making application for a new installation at Albany which will incorporate these technological features, thereby resulting in a level of total odorous emissions approximately 15 percent of that realized at present and a BOD loading on the river not to exceed 2,500 pounds a day during low flow and 4,000 pounds a day during winter months.

A word of explanation on our plans. First, the production installation which we propose will incorporate a relatively new version of the semi-chemical neutral sulphite process to manufacture a single, specialized product which we believe we can adequately market, along with a modest increase of our conventional kraft facilities. The advantage of this new process is a higher yield per ton of wood, thereby affecting a substantially lower chemical requirement and black liquor production per ton of pulp than the conventional kraft process. As a point of fact, approximately 200 tons a day of semi-chemical pulp will produce the equivalent loading on a recovery boiler of 50 tons a day of kraft pulp. Our present production at Albany is approximately 570 tons a day of which approximately 40 tons comes from waste paper (a conservation item) and 530 tons from kraft pulp. We envision an ultimate production of 900 tons a day of production. This would be manufactured from waste paper, semi-chemical pulp, and kraft pulp. The total equivalent kraft pulp required for this 900 tons a day would be 705 tons. This is an increase of 175 tons a day of equivalent kraft from our present 530 ton level.

To affect this increase in production, we propose to install a 600 ton a day recovery boiler of the new non-direct contact design. This boiler would be equipped with 99-1/2 percent efficient electrostatic

precipitators. We further propose to place one of our existing boilers on standby, to convert one to steam generation with firing by natural gas, and to retain the third in recovery-boiler type operation. We would, upon conclusion of the program, have an active recovery capacity of approximately 770 tons a day versus a recovery input of 705 tons a day of kraft equivalent. It is interesting to note that even with the increased production, water vapor or visible emission from the recovery area would be reduced from that realized at present as measured in pounds per day.

Additionally, we would plan on installing aeration and stabilization basins for water treatment as required to meet a BOD loading for the entire production not to exceed amounts previously listed.

We estimate this entire program will cost approximately \$14,000,000. We further estimate the portion of that cost which can be attributed to air and water pollution abatement, and would not be required if it were not for these factors, to be in excess of \$4,500,000. Please understand, we are not attempting to establish this figure for tax purposes but rather to indicate to you the magnitude of the expenditure we are making in behalf of our responsibilities to our surroundings. We are making the application at this time because of the long delivery required on the new type of recovery unit. We estimate it could be operating two years from this date, provided we were given relatively prompt approval by yourselves on both the air and water programs. We would start up the new papermaking installation after the new boiler was in operation.

We are certain the program will result in a substantial reduction of the present level of emissions and trust it will meet any standards set by yourselves in the future. In conclusion, we solicit your questions on this broad outline and your requests for detailed information.

Yours very truly,

WESTERN KRAFT CORPORATION



C. R. Duffie
Vice President

CRD:ch

CITIZENS FOR A CLEAN ENVIRONMENT

P. O. Box 255
Corvallis, Oregon 97330

April 23, 1969

Mr. Kenneth H. Spies
Secretary and Chief Engineer
State Sanitary Authority
State Office Building
1400 S. W. Fifth Avenue
Portland, Oregon 97201

Dear Mr. Spies:

This letter is in response to your letter of April 16 asking for comments on the proposed plans of Western Kraft Corporation to expand and modernize their pulp and paper mill at Albany and on your staff evaluation and recommendations. After discussion by the Board of Directors and further special consideration by our Technical Resources Committee we have prepared the following statements.

The objective of Citizens for a Clean Environment, Inc., is to work for a more livable Willamette Valley. When industries and industrial expansion adversely affect the quality of our environment we become vitally concerned. However, we are not obstructionists. After carefully examining the facts concerning the Western Kraft Corporation proposal, we find that we cannot oppose the expansion of production at the Albany mill. However, we do have some reservations concerning projected levels of air and water pollution resulting from the proposed changes.

As you are aware, we stated in a letter and in person at your March 27 hearing our support of your rules and regulations relating to kraft pulp mills. We feel you took a great step forward in adopting them and we now ask that they be applied in full relative to Western Kraft Corporation's planned expansion of the Albany mill.

More specifically we have the following comments and recommendations to make:

1. Due to a lack of specific information in the proposal as submitted, we are not able at this time to comment on technological aspects of the proposed changes.
2. We recognize that the proposed changes will comply with the OSSA rules and regulations of 2 lb TRS per ton of kraft pulp set to be enforced in 1972. The level stated in the proposal is approximately 1 lb TRS/ton of pulp which is considerably below levels of the present operation.
3. We are very concerned with the failure of the proposal to come to grips with the suggested 1975 standard of 0.5 lb TRS/ton of pulp. We feel that Western Kraft Corporation must plan at this time to meet the proposed 0.5 TRS level by 1975, rather than to rely on the alternative language set forth in Sec. IV - 1.(b) of the Rules and Regulations for Kraft Pulp Mills.

4. Although TRS emission rates (lb/ton of pulp) are stated throughout the various documents and letters, at no time does WKC discuss the question of total or absolute emission levels per unit time (day). We strongly recommend that you exercise your option under Sec. V of the Rules and Regulations for kraft pulp mills and set minimum daily TRS emission from the Albany mill at not more than 350 pounds, and that this requirement be met by July 1, 1975.
5. We ask that the language in the permit be so stated that the installation of adequate recovery facilities precede expanded production capacity at all times. It appears in the Western Kraft Corporation proposal that increased production might occur during the expansion in advance of adequate recovery facilities. We trust that this is the intent of item 6 on page 5 of your staff recommendations.
6. We recommend that a more specific statement on emission of particulate material be included in the permit. We are not able to determine whether the estimated 30% reduction in particulate matter meets the standards set forth in Sec. IV - 2 of the Rules and Regulations for kraft pulp mills.
7. The estimated reduction of total water vapor emission is not very impressive (9%). Since the mill is located in a recognized problem area (See Sec. V, Rules and Regulations of kraft pulp mills), we ask that better or additional controls be employed to eliminate this hazard.
8. The Kraft Mill Corporation proposal did not provide us with details of their water treatment plans. We ask that the control of liquid waste discharge be specifically covered in the permit and in such a manner so as to ensure that existing standards are met.
9. We are in full accordance with your staff recommendations to the Authority Members. We especially concur with the need to have final detailed plans available before any approval is considered. The exceptions we have stated in this letter are asking for more specific wording aimed at better pollution control measures.

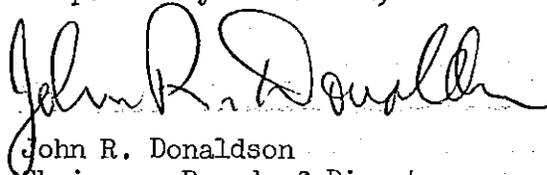
In conclusion we are asking that the OSSA proceed with preliminary consideration of this proposal at their April 25 meeting after first including all the recommendations stated in your staff report and those we are requesting in this letter. In order that the proposed plans, with the above changes incorporated, be implemented at the earliest possible date, we are not considering asking for a public hearing on this matter at the present. We request that the OSSA make it perfectly clear to Western Kraft Corporation in the permit that it is their

obligation to meet all specific air and water quality standards and that failure of newly purchased equipment to meet these requirements will not be considered justification for non-compliance.

We want to express our awareness and appreciation of the cooperative spirit exhibited by both Western Kraft Corporation and the State Sanitary Authority in this matter. We are very pleased to be directly involved and sincerely thank you for keeping us so well informed. It is only through open communication of all the parties involved that true progress can be made. We are very anxious that such conditions continue to be the case.

We would like to suggest that an open meeting be held at some date in late May at which representatives from OSSA, Western Kraft Corporation and C₂E will discuss the Albany mill plans in detail. Such a gathering could be very profitable to all those concerned in this issue. We trust that you agree.

Respectfully submitted,



John R. Donaldson
Chairman, Board of Directors
Citizens for a Clean Environment, Inc.

JRD:vk

cc: Mr. Felix M. Hammack
Resident Manager
Western Kraft Corporation
P. O. Box 339
Albany, Oregon

PARTICIPATING COUNTIES:

BENTON
LINN
MARION
POLK
YAMHILL

MID-WILLAMETTE VALLEY AIR POLLUTION AUTHORITY

2585 State Street - Salem, Oregon 97301

Telephone 581-1715

April 24, 1969

Mr. Kenneth H. Spies
Secretary and Chief Engineer
Oregon State Sanitary Authority
1400 S. W. 5th Avenue
Portland, Oregon 97201

Dear Mr. Spies:

The staff of the Mid-Willamette Valley Air Pollution Authority has reviewed Western Kraft Corporation's proposal for their plant expansion. This Authority believes the proposed program is a significant and progressive step forward in controlling air pollution from this plant. However, we fully concur with the Sanitary Authority's staff recommendations to require special studies to minimize emissions from "other sources", and to bring non-condensibles from the digesters and multiple effect evaporators under adequate control. Further, we are sure that the Sanitary Authority will at this time require Western Kraft to meet as a minimum the July 1, 1975, particulate emission standards of not more than four pounds per ton of air-dried kraft pulp.

Western Kraft discusses a 30% decrease in particulate emissions, but does not convey the scope of the particulate problem. MWVAPA is concerned with total Air Resource Management and specifically the visibility problems in the North Albany area to which Western Kraft is a significant contributor. We are sure that this area is a recognized problem area and that the Sanitary Authority would consider more restrictive emission limits for this plant as surrounding sources are eliminated or required to reduce their emissions by the Mid-Willamette Valley Air Pollution Authority. We would like to express our desire to cooperate with the Sanitary Authority in evaluating the recognized visibility reduction in the Albany area.

The Mid-Willamette Valley Air Pollution Authority would like to express its appreciation to the Sanitary Authority for inviting our comments on this important development. This type of cooperative effort cannot but help to benefit both the agencies and the public.

Mr. Kenneth Spies
April 24, 1969
Page 2

We are confident that the Sanitary Authority in their decision will reflect the joint declaration of the Regional Authorities and the Sanitary Authority that no new plant nor expansion would be allowed without adequate controls both on the new and the existing operation.

Sincerely yours,



Michael D. Roach
Director

MDR:ks
cc: H. M. Patterson

DIVISION OF
Sanitation & Engineering
Oregon State Board of Health

R E C E I V E D

APR 24 1969

DNF	TEMP	PERM
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To: E.W.

KHS



OREGON STATE UNIVERSITY
AIR RESOURCES CENTER

CORVALLIS, OREGON 97331

April 22, 1969

Mr. Kenneth H. Spies
Secretary and Chief Engineer
OREGON STATE SANITARY AUTHORITY
State Office Building
Portland, Oregon 97201

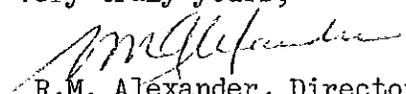
Dear Mr. Spies:

Thank you so much for your letter and the enclosed correspondence and staff memo concerning the proposal for modernizing and expanding the Western Kraft mill at Albany.

Personnel from Western Kraft met recently with a group here at the University to review their plans as they related to air emissions. I was unable to attend because of a prior commitment, but did discuss the material that had been presented with Messrs. Boubel and Hewson. It was our judgment that the proposed plan of Western Kraft appeared to be a forward step in materially reducing air-polluting emissions. The construction of the larger recovery boiler of the non-direct contact design appears to be a significant item. The evidence which has come to our attention and which we understand is in agreement with your own staff findings, is that overloading of present recovery equipment has been a major factor in air pollution emission levels from this plant.

The additional improvements or modifications which your staff covered in their evaluation and recommendations appear to be very much in order and would have our concurrence.

Again, please accept our appreciation for an opportunity to review and comment upon this proposed modernization and expansion plan for Western Kraft.

Very truly yours,

R.M. Alexander, Director
Air Resources Center

RMA/mp

cc: R.W. Boubel, E.W. Hewson, C.E. Warren, R.A. Young

Division of
Sanitation & Engineering
Oregon State Board of Health
RECEIVED
APR 23 1969



DNF | TEMP | PERM

KMS To: EW



OREGON STATE UNIVERSITY
DEPARTMENT OF CIVIL ENGINEERING

CORVALLIS, OREGON 97331

April 21, 1969

Mr. Kenneth H. Spies
Secretary and Chief Engineer
State Sanitary Authority
1400 S. W. 5th Avenue
Portland, Oregon 97201

Dear Mr. Spies:

I appreciate your invitation to present my views on the "Western Kraft" proposal at the April 25 Sanitary Authority hearing. Based upon a review of the documents you forwarded to me, it is evident that your staff have done their usual excellent job and that my suggestions would not add any significant improvement.

The proposal appears entirely adequate to control the water pollution problem. Since the air pollution control proposed is somewhat out of my field, I do not feel qualified to make specific comments on this aspect. However, I would urge the Sanitary Authority to set a stringent monitoring requirement. Hopefully, an air quality control program, based upon a discharge permit system, can be implemented in the future thereby strengthening your enforcement program. I also suggest that item 6 of your memorandum be modified by adding the words "during the interim construction period".

Sincerely,

Fred J. Burgess, Head
Department of Civil Engineering

FJB:ls

Sanitation & Engineering
Oregon State Board of Health
RECEIVED
APR 23 1969



DNF | TEMP | PERM



CORVALLIS, OREGON 97331

OREGON STATE UNIVERSITY

DEPARTMENT OF
MECHANICAL, INDUSTRIAL AND
NUCLEAR ENGINEERING

KASU

To: EJM

April 22, 1969

Mr. Kenneth H. Spies, Secretary
Oregon State Sanitary Authority
P. O. Box 231
Portland, Oregon 97207

Dear Mr. Spies:

The proposal from Western Kraft Corporation along with your staff memorandum have been given a careful review.

It is my belief that Western Kraft should be given approval for the project they have outlined. What they propose appears to be both technically and economically sound. I feel sure that this type of modernization is what the Sanitary Authority had in mind when they adopted the regulations pertaining to Kraft mills in Oregon.

Sincerely,

Richard W. Boubel, Ph.D.
Professor of Mechanical Engineering

RWB/alc

Sanitary Authority
Oregon State
RECEIVED
APR 23 1969

DNF TEMP PERM





Lane Regional Air Pollution Authority

Route 1 Box 739 AC 503 689-3221

Eugene, Oregon 97402

April 24, 1969

RECEIVED

APR 25 1969

By [Signature]

Mr. Harold M. Patterson
Oregon State Sanitary Authority
1400 S. W. 5th Avenue
Portland, Oregon 97201

Re: Western Kraft Corporation, Albany Mill

Dear Mr. Patterson:

We appreciate the opportunity to comment on the Western Kraft Albany Mill proposals.

Since this mill is under the jurisdiction of the State and is located within the boundaries of the Mid-Willamette Valley Air Pollution Authority, we will support any reasonable decisions reached by the two agencies regarding the mill under question.

The proposals under question seem to be quite good.

We hope the mill complies with the alternate language of subsection 1(b) of Section IV of the Sanitary Authority regulations, as new equipment is developed, until such time the 0.516 of TRS per ton is reached. If this were not done it is conceivable for the mill to be operating at an emission level exceeding the State's limits with prior approval from the State.

Sincerely,

Verner J. Adkison, Director
Lane Regional Air Pollution Authority

VJA/mw

TO : MEMBERS OF THE STATE SANITARY AUTHORITY

John Mosser, Chairman E. C. Harms, Jr., Member
B. A. McPhillips, Member Herman Meierjurgan, Member
Storrs Waterman, Member

FROM : AIR QUALITY CONTROL STAFF

DATE : April 25, 1969 MEETING (Revised)

SUBJECT: BOISE CASCADE CORPORATION, Medford. Request for Variance.

Under the terms of the Continuance of the Hearing on October 24, 1968 of the Authority, Boise Cascade Corporation was required to terminate use of their wigwam waste burner by April 1, 1969, and to not thereafter again place it in service unless it had first been modified in accordance with staff recommendations. It was the expressed hope of the company that its use would not again be required.

On March 19, ¹⁹⁶⁹ however, the staff was requested to present its recommendations to the Boise Cascade staff at Medford, because the company had decided that the burner would be needed on standby in the event of a breakdown in their hog. At this meeting, the Boise Cascade staff decided that a standby chipper would offer advantages over a standby burner and could be installed at comparable cost. Time would be required for its procurement and installation, however, so that an extension of the April 1 phase-out date for the burner would be necessary. It is our understanding that after April 1, the burner would be used only in the event of a hog breakdown pending installation of the chipper.

The company was advised that a request for variance from the order should be presented to the Authority. This was forwarded to us under date of March 27.

STAFF RECOMMENDATION

It is recommended that the April 1, 1969 date stipulated for discontinuing use of the waste burner be extended to July 1, 1969 as requested.

approved

October 29, 1968

George C. Flanagan
General Manager
West Oregon Region
Boise Cascade Corporation
P. O. Box 100
Medford, Oregon 97501

Dear Mr. Flanagan:

This is to advise you that as a result of the public hearing on November 24, 1968, at the Jackson County Courthouse, Medford, Oregon, in the matter of air pollution caused by Boise Cascade Corporation, the Sanitary Authority directed that the hearing be continued until April 1, 1969.

The continuance was conditional upon the Company proceeding to (1) abate the use of the wigam waste burner before April 1, 1969, and (2) plans and specifications for modification of the waste burner being submitted and approved by the Sanitary Authority, and that such modifications shall be completed before initiating use of the waste burner for combustion of wastes or residues, and thereafter shall be operated by continuous flow method as required to meet the ambient air and discharge regulations of the Sanitary Authority.

Very truly yours,

Kenneth H. Spies
Secretary and Chief Engineer

KHS
KHS:EMP:h

cc: Arnold Silver
Leo L. Raton



BOISE CASCADE TIMBER PRODUCTS
WEST OREGON REGION
P. O. Box 100 • Medford, Oregon 97501
Telephone (503) 772-7146

RECEIVED
APR - 1 1969
BY [illegible]

March 27, 1969

State of Oregon
Oregon State Sanitary Authority
State Office Building
1400 S.W. 5th Avenue
Portland, Oregon 97201

Attention: Mr. H.W. McKenzie, Associate Engineer

Gentlemen:

As a result of your visit and subsequent meetings pertaining to the best possible solution of our burner problem, we suggest certain changes and an extension of time under the continuance granted after the October 24, 1968 hearing.

The following is a summary of our findings and suggestions:

1. It has become apparent that operation of the wigwam waste burner, even as modified according to Sanitary Authority recommendations, would be unwise due to the danger of fire in nearby piles of hogged fuel and chips.
2. The cost of modifying the waste burner to Sanitary Authority specifications is approximately the same as an alternative that would eliminate the need for our waste burner. Installation of a chipper in the sawmill would allow us to chip our hog slabs and edgings in the sawmill. Since we do not now have a chipper in the sawmill, we are faced with the alternatives of either shutting down the sawmill or charging the burner with slabs and edgings whenever the hog breaks down. Both of these alternatives are unsatisfactory for obvious reasons.
3. An order for a 66 inch chipper was placed with the Soderhamn Machine Manufacturing Company on March 20, 1969, the day of your visit. We expect delivery in early June and expect to complete installation by June 30, 1969. Accordingly, we request an extension of the continuance until July 1, 1969.
4. During the period of April 1, 1969 to July 1, 1969, we propose to use the burner only when the sawmill hog breaks down, and we are faced with a sawmill shutdown. After July 1, 1969 we would permanently discontinue use of the burner.

State of Oregon
Oregon State Sanitary Authority
March 27, 1969
Page 2

If there is any further information that you desire, please contact me. Thank you for your continued assistance in this matter.

Very truly yours,

BOISE CASCADE CORPORATION
West Oregon Region



Richard B. Parrish
Medford Area Manager

RBP:ds

TO : MEMBERS OF THE STATE SANITARY AUTHORITY

John Mosser, Chairman
B. A. McPhillips, Member
Herman Meierjurgan, Member

E. C. Harms, Jr., Member
Storrs Waterman, Member

FROM : AIR QUALITY CONTROL STAFF

DATE : April 25, 1969 Meeting

SUBJECT: TIMBER PRODUCTS COMPANY, Medford. Request for Variance.

On April 2, Timber Products Co. addressed a request to the Staff for an audience before the Authority for the purpose of presenting a request for variance from certain stipulations of the November 20th Final Order of the Authority.

Specifically, the request pertains to schedules which the Company has not been able to meet. We have been informed that representatives of the company will be present to explain the reasons for the delays.

The following is a brief report on the status of the project as of April 14, 1969. Item numbers are those which appear on the Decision and Order:

<u>Item No.</u>	<u>Description</u>	<u>Date Stipulated</u>
1	a) Modify waste burner for better combustion, by STATUS: On schedule, but very little improvement noted.	Dec. 15, 1968
	b) Cease use of wigwam burner, by STATUS: Behind schedule, due to delays in installation of sanderdust burners in particle driers. In view of delay, additional \$6000 investment in wigwam modification undertaken. Completed and activated April 14. District Engineer, Leo Baton, evaluated April 14 and 15.	April 1, 1969
2	Discontinue open burning of plant refuse, by STATUS: On schedule.	Nov. 15, 1968
3	Require covers on all shavings transport trucks, by STATUS: Implemented Nov. 12 per letter from U & R Trucking Company.	Nov. 15, 1968
4	Oil or otherwise control dust in vehicular traffic areas, by STATUS: Road oiled April 1. 2nd oiling scheduled by July 1, 1969.	July 1, 1969

- 5 Agree to construct satisfactory storage and unloading facilities by August 10, 1969
STATUS: Plans approved conditionally. Contract awarded with July 15 completion date.
- 6 a) Submit study of cyclone discharges by consulting engineer, by Feb. 15, 1969
STATUS: Preliminary report submitted Feb. 24, 1969. Test procedure not approved.
- b) Submit plans and specifications for any control method found necessary, by April 1, 1969
STATUS: Behind schedule. Depends on completion of (a) above.
- 7 Submit plans and specifications covering Item 5 for activation by Aug. 10. (unloading and storage facilities as proposed are inter-related and subject to same activation date.) Aug. 10, 1969
STATUS: On schedule.
- 8 Submit tests of air volumes and filtering efficiencies of air handling systems for material storage and unloading facilities, by 30 days after activation
STATUS: Facility proposed may not require exhaust systems. Approval granted conditional upon their installation if found necessary.

STAFF COMMENT

Tests of the cyclone discharge emissions represent the greatest slip in schedules, the consequence being a similar delay in the installation of corrective methods if found necessary.

Termination of use of the wigwam burner will not be possible until its only fuel, sanderdust, can be burned in the particle driers. Delays in the shipment of components for the particle drier installation will in turn delay phase-out of the wigwam burner by 1½ to 2 months. In view of this delay, the staff advised the company on March 24, that interim improvement of the waste burner was not considered adequate. The company then responded to staff recommendations by installing a much more sophisticated sanderdust incinerator in the wigwam burner. This was activated April 14. District Engineer Baton has since surveyed and evaluated this installation.

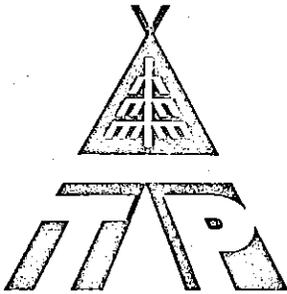
Subject to reasons for delays to be presented by Timber Products Company at the Authority Meeting, it appears that the company has proceeded in good faith, and that the delays have been due in some measure to conditions beyond their control. The major investment, that of the material storage and truck dumping facility, has been competently handled and is on schedule.

STAFF RECOMMENDATIONS

- 1. If the sanderdust incinerator installed in the wigwam burner is observed to perform satisfactorily, we recommend that conditional approval be given for its use until such date as appears reasonable for completion of the particle drier installation, and for its use thereafter only in the event of an emergency breakdown in the particle driers.
- 2. Recommendations regarding a variance from the February 15, 1969 date stipulated for submittal of cyclone emission tests will be dependent upon company proposals at the April 25 meeting of the Authority.

*5-24 hrs duration
25 explosions*

*L.B. says doing
good job
2 weeks evaluation
appears to be doing
good job*



TIMBER PRODUCTS CO

POST OFFICE BOX 1669
MEDFORD, OREGON 97501
PHONE 503/773-6681

April 2, 1969

RECEIVED

APR - 3 1969

Q Pollution

Mr. H. W. McKenzie
Oregon State Sanitary Authority
P. O. Box 231
Portland, Oregon 97201

SUBJECT: Audience at next meeting of State Sanitary Authority Air
Quality Control Commission.

Dear Mr. McKenzie:

This is a follow up letter of my progress report to you of March 24, 1969. In this letter I wish to make a formal request for a audience at your next meeting of the Air Quality Control Commission of the Oregon State Sanitary Authority. At which time I will present our problems of delay in shipment of component parts of our sander dust conversion program and also, make request of extension of time for discontinuing the use of our burner.

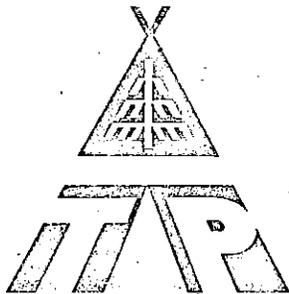
In the mean time I have contracted with Wasteco of Sherwood, Oregon to install a sander dust burner within our wigwam burner to take care of our immediate problem. Mr. Ernest O'Gieblyn has promised shipment and installation in one and half weeks which, would put it into operation on or about April 12, 1969. Should you be in the Southern Oregon area anytime after that date I would appreciate it if you would stop in and evaluate the efficiency of this burner.

This burner installation will cost us approximately \$6,000.00 and after we have had a chance to operate this burner and observe it's efficiency and if it performs satisfactorily to the Air Quality Control Commission engineers, I would like to be able to make a request that we be allowed to operate it under emergency conditions only, to keep our plant in operation. As our plans are now should the particleboard plant break down we would have to truck the sander dust out and dump in an open field or earth fill and trucking of sander dust is not the cleanest operation in the world.

Hoping this request meets with your approval. I remain-

Very truly yours,
TIMBER PRODUCTS CO.

W. A. Coffindaffer
Plant Engineer



TIMBER PRODUCTS CO

POST OFFICE BOX 1669
MEDFORD, OREGON 97501
PHONE 503/773-6681

RECEIVED

APR 22 1969

By Postage

April 22, 1969

Mr. H. W. McKenzie
Oregon State Sanitary Authority
P. O. Box 231
Portland, Oregon 97201

Subject: Disposition and progress of final order of Oregon
State Sanitary Authority at regular meeting of
November 1, 1968.

Dear Mr. McKenzie:

Item No. 1 - Modification of burner and April 1, 1969 cease of
operation of said burner.

On or about December 1, 1968 Timber Products Co. installed a gas ring around the sander dust discharge pipe for igniting the sander dust as it was blown into the burner. This worked well except when the gas pressures dropped and the air velocities would blow the gas flame out. This winter as we all know we had alot.of problems with both natural and propane gas, infact there was a few days that we could not operate our plant do to the lack of gas. Consequently, the gas burner on the sander dust was the first to shut off if we were low.

Ceasing operation of the burner hinged upon the installation of the sander dust burning equipment at our particleboard plant. Timber Products Co., in good faith entered into a contract with Peabody Engineering of New York and American Sheet Metal Works, Inc. of Portland, Oregon, for component parts and the installation of this equipment and had every intention of having this in operation on or before April 1, 1969. This installation being somewhat new to the industry we ran into a number of engineering problems in storage tank sizes and flow problems. We got these problems solved and it looked like we would receive the tanks and start installation about April 15, 1969. I received word from Reid Strutt Company, who is furnishing the 60 unit storage bin and the Ersham feeder, that the National Tank Company had our storage tank 55% completed and that the plant went on strike. As of this writing

Mr. H. W. McKenzie
Page 2
April 22, 1969

the strike has not been settled, however, they have hopes of settlement within the next few days. We have been assured that our tank will be the first one completed and shipped after the strike is over.

Most all of the other parts are on the premises but must await the installation of the 60 unit bin before they can be installed. As soon as we receive word of the settlement of the strike I can give a tentative completion date.

When we encountered this situation I contacted Wasteco of Sherwood, Oregon who manufactures a burner that has been used as a sander dust burner in the South. They installed one of their units in our wigwam burner on April 12, 1969. It has been in operation for approximately two weeks and is doing a real good job. This particular unit cost us \$5,000.00 to install and we are not burning anything in our wigwam burner other than this sander dust. At this time, with approval of the Sanitary Authority Engineers, we would like permission to leave this unit installed in our wigwam burner to be used on an emergency only basis. After we get the burner installed at the particleboard plant and divert the sander dust, should the milling and drying portion of the plant break down we would not be able to operate the finish department without trucking the sander dust to a open field. We hope that we never have to use it, however, we feel as though it is good insurance for continued operation of a portion of the plant.

Item No. 2 - Discontinue all open burning.

This order has been complied with.

Item No. 3 - Cover on trucks transporting shavings.

The shaving transportation is on a contract basis with two different truckers and the only control we have is a warning of contract cancellation. However, we have contacted both truckers and they assured us that they would comply with this order.

Item No. 4 - Oil all open areas subject to vehicular traffic.

These areas were oiled the latter part of March, 1969 and we will oil them again the latter part of June, 1969.

Item No. 5 - Truck Dump and open storage coverage.

The concrete work is approximately 75% completed and the work seems to be progressing on schedule, we should have no problem in meeting date set forth.

Mr. H. W. McKenzie
Page 3
April 22, 1969

Item No. 6 - Cyclone discharge survey.

Timber Products Co., entered into a contract with C H ² M Engineering firm of Corvallis, Oregon and they promised the study required for this survey to be in our hands February 1, 1969. I received their final report April 21, 1969, and inturn sent it to Mr. McKenzie for evaluation.

Item No. 7 - Plans and specifications.

Timber Products Co. engaged Armstrong & Silvis Engineering consultants to prepare plans as required, these have been completed and are in the authorities hands.

Very truly yours,
TIMBER PRODUCTS CO.



W. A. Coffindaffer
Plant Engineer

WAC/jw

cc: Mr. Mm C. Smith
Mr. Thomas Brownhill

BEFORE THE SANITARY AUTHORITY OF THE STATE OF OREGON

IN THE MATTER OF:

J. A. PRITZKER, Trustee for W. H. Gonyea,
and Rockwood & Co., a Delaware corporation,
as its interest may appear, doing business
as TIMBER PRODUCTS CO.,

FINAL ORDER

CONCERNING AIR POLLUTION IN
JACKSON COUNTY, STATE OF OREGON.

This matter having come on regularly for hearing on the 24th day of October, 1968, at the Jackson County Courthouse, Medford, Oregon, after due notice of said hearing was given to Timber Products Co. by registered mail, before the Sanitary Authority for the State of Oregon. Those members present and constituting a majority were John D. Mosser, Chairman, Herman Meierjurgan and Storrs Waterman. Arnold B. Silver, Assistant Attorney General, appeared for the Sanitary Authority, and Timber Products Co. appeared by its general manager; that at its duly called regular meeting of November 14, 1968, Timber Products Co. appeared by its attorney, Thomas E. Brownhill, of Eugene, Oregon, before the Sanitary Authority to submit alternative proposals to abate the air pollution existing in or near the City of Medford, County of Jackson, and State of Oregon, and to control discharge of air contaminants from the plant's facilities. The Sanitary Authority, having heard the testimony and evidence in this matter and received exhibits and after considering the alternative proposals submitted by Timber Products Co., and being fully advised in the premises, does hereby make and adopt the following:

FINDINGS OF FACT

1. That prior to 1965 and continuing to the within date of hearing, Timber Products Co. was informed and made aware of various air contaminants being emitted into the atmosphere from facilities and plants under its operation and control located on McAndrews Road in or near the City of Medford, County of Jackson, and State of Oregon.
2. That prior to 1965 and continuing to the within date of hearing, the Sanitary Authority has consulted with and sought the cooperation of Timber Products Co. in reducing or rendering less noxious

- the firm's discharge of air contaminants into the atmosphere.
3. That private individuals have also brought their complaints of public nuisance conditions to the attention of Timber Products Co. over a long period of time.
 4. That despite the attempts and efforts of the Sanitary Authority to enlist the voluntary cooperation of Timber Products Co. to arrive at methods and procedures reducing or rendering less noxious the firm's discharge of air contaminants, the company continued to discharge and emit air contaminants which pollute the air and surrounding area up to the date of this hearing.
 5. That at the date of the hearing Timber Products Co. submitted proposals which were wholly insufficient to rectify the conditions of pollution and to offer substantial compliance with ORS Chapter 449 and the rules and regulations promulgated thereunder, or involved unreasonable delays, or both.
 6. That Timber Products Co. has open burned refuse materials at dump sites within its facilities and plant area.
 7. That dust, odors, soot, smoke, cinders and particulate matter and combinations thereof are being discharged into the air, atmosphere and surrounding area from the facilities and plants under the ownership, right, title and control of Timber Products Co. and have been and are causing pollution of the air and atmosphere and surrounding area in or near the City of Medford, County of Jackson, State of Oregon, for at least several hours per day and often on a continuous basis several days per week. The facilities include the company's unloading operations, cyclone collectors, wigwam burner, storage areas and open burning areas.
 8. The abovementioned air contaminants unreasonably interfere with the enjoyment of life and property in the area in or near the City of Medford in the following manner:

- (a) Dust, soot, smoke, cinders and particulate matter collect upon and cover automobiles and residences and other property, cause soiling and the constant necessity for washing and cleaning.
 - (b) Ashes, soot, cinders, dust and particles have warped roofs by collecting under shingles and expanding.
 - (c) That the citizens of Medford and of the state of Oregon have been prevented from utilizing their yards and patios during warm weather months and have been compelled to keep windows and doors closed in extremely hot days.
 - (d) That businesses engaged in commercial body and fender work and painting have been compelled to re-paint vehicles and have lost clients because of the various air contaminants discharged by Timber Products Co.
 - (e) That visibility has been curtailed in many instances and interfered with normal human activity.
 - (f) That swimming pools and filters have been covered and plugged with particles of dust and cinders and other particulate matter preventing their reasonable use.
10. That the discharge of such air contaminants is a public nuisance in that it has and will continue to affect public health in the form of nose, ear and mouth conditions and irritations and that it unreasonably interferes with the recreational enjoyment and aesthetic beauty of public areas utilized by the people of the state of Oregon and of private property owned and utilized by the citizens of the City of Medford, Oregon.

Based upon the said Findings of Fact, the following Conclusions are made:

CONCLUSIONS

1. That the discharges of dust, fumes, odors, soot, smoke, cinders and particulate matter and combinations thereof into the air of the state of Oregon and upon surrounding areas are air contaminants, air pollution and air contamination within the meaning of the following statute of the state of Oregon:

ORS 449.760(2), (3), (4)
2. That Timber Products Co. is the air contamination source of air contaminants, air pollution and contamination within ORS 449.760(5).
3. That the discharge and emission of air contaminants into the atmosphere and upon surrounding areas is air pollution and air contamination and is a violation of the public policy of the state of Oregon as set forth in ORS 449.765(1) and 449.770 and violates ORS 449.760(3).
4. That the discharge of air contaminants in the form of dust, odors, soot, smoke, cinders and particulate matter and the combinations thereof into the air of the state and upon surrounding areas are violations of the following standards, rules and regulations of the Sanitary Authority promulgated into Oregon Administrative Rules, Chapter 334:

Section 21-006(2), (3), (4), (5), (8), (24), (27)

Section 21-011

Section 21-016

Section 21-021

Section 22-006

Section 22-011

Based upon the foregoing Findings of Fact and Conclusions, the following Decision and Order is entered and adopted:

DECISION AND ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

1. That on or before December 15, 1968, Timber Products Co. shall modify its wigwam waste burner to obtain better combustion of material and on or before April 1, 1969 shall cease and abate the operation and utilization of its wigwam burner for the combustion of any type of material. The burner shall not be reactivated until it and facilities for storing and feeding material to it have been reconstructed in accordance with plans and specifications submitted to the Sanitary Authority for approval not less than 30 days prior to the start of such reconstruction, and then only for such periods and in such manner as will result in no violation of applicable laws and regulations.
2. That on or before November 15, 1968, Timber Products Co. shall discontinue all open burning of plant refuse and residues and shall not deposit such substances on areas where previous open burning has occurred, nor shall it contract for nor permit said materials to be open burned at any location. In the event fire continues to burn or smolder in materials previously deposited in burning areas after December 15, 1968, flooding or other control procedures shall be undertaken to permanently extinguish it.
3. That on or before November 25, 1968, Timber Products Co. shall provide and require that all vehicles used for the transport of shavings or other wood residues to and from its plant's facilities shall at all times be fitted with covers, except for the process of loading or unloading, to prevent the escape of wood particles.
4. That on or before July 1, 1969, Timber Products Co. shall oil all open areas subject to vehicular traffic and utilize all other control procedures as are necessary to thereafter maintain and control dust of all kinds on a regular, continuous basis.

5. That on or before January 1, 1969, Timber Products Co. shall cease open storage and truck discharge of shavings and other wood residues, provided, however, that such deadline shall be extended to August 10, 1969, if on or before January 1, 1969, it has otherwise complied with this order and has agreed in writing to construct satisfactory unloading and storage facilities by August 10, 1969. Without prejudice to other satisfactory facilities which might be designed by the company, the following would be considered satisfactory:

I.

An enclosure with roof around its truck unloading facility, equipped with an exhaust ventilation and filtering system, with the exhaust air openings to be located at the end of the enclosure adjacent to the rear of the truck. The exhaust system shall:

- (a) Have a capacity to provide at least a three minute air change in the enclosure, or a velocity of 300 feet per minute through any and all enclosure openings, whichever is greater.
- (b) Incorporate filters having a manufacturer's certified rating of 90% removal of three micron-size particles.

II.

An enclosure with roof for the storage and bulk handling of all shavings or other wood residues. The enclosure shall be equipped with an exhaust ventilation and filtering system of such capacity as is necessary to produce a minimum negative pressure of 0.006 water gauge within the structure or a minimum inward velocity of 300 feet per minute through all exterior openings. The doors or other exterior openings shall be fitted with interlocks so that

those doors or exterior openings in opposite walls cannot be open at the same time. The exhaust system shall incorporate filters having a manufacturer's certified rating of 90% removal of three micron-size particles.

The truck unloading facility described above may be incorporated within the storage enclosure in which case its exhaust system may also serve as the exhaust system for the storage enclosure; provided that its capacity shall then be determined as the greater of the requirements specified for either facility.

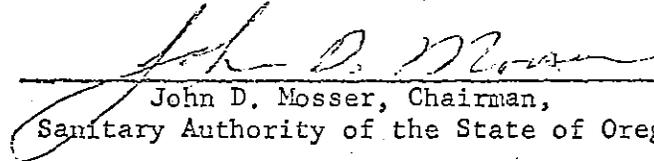
6. That on or before February 15, 1969, Timber Products Co. shall submit a complete study by an independent consulting engineer to the Sanitary Authority of discharges from all cyclone collectors and by April 1, 1969 shall submit plans and specifications to the Sanitary Authority for any necessary air cleaning or control devices that should be installed. The air cleaning or control devices shall be installed by Timber Products Co. on a schedule then to be directed by the Sanitary Authority. The schedule shall be made part of and incorporated by reference into this order.
7. That plans and specifications prepared by a registered engineer encompassing the above construction program shall be submitted to the Sanitary Authority for approval before construction and shall conform to the following schedules:

	<u>Plan Submittal</u>	<u>Construction Complete</u>	<u>Checkout and Activation</u>
(a) Item 5 I	Jan. 1, 1969	June 1, 1969	June 10, 1969
(b) Item 5 II	Feb. 1, 1969	Aug. 1, 1969	Aug. 10, 1969

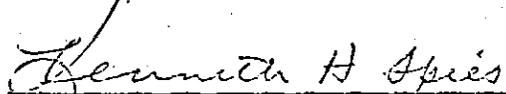
8. An independent testing concern shall be retained by Timber Products Co. who shall conduct tests of the air volumes, velocities and filtering efficiencies of the air handling systems within 30 days of their activation, the results of which shall be submitted to the Sanitary Authority for examination upon completion of said

tests. Any deficiencies shall be promptly corrected.

Dated this 26 day of November, 1968.


John D. Mosser, Chairman,
Sanitary Authority of the State of Oregon

ATTEST:


Kenneth H. Spies, Secretary



Office Memorandum

OREGON STATE BOARD OF HEALTH

To : ~~K. H. Spies~~ *KHS / Shaver*

Date: April 24, 1969

From : H. M. Patterson

Subject: Prairie City Timber Company, Letters of Complaint

The following people have written letters to the Sanitary Authority registering complaints against Prairie City Timber Company as a source of air pollution. Their individual letters are attached.

<u>Date Written</u>	<u>Name</u>	<u>Address</u>
4/16/69	Mr. & Mrs. O. G. McComb	Box 412, Prairie City 97869
4/17/69	James H. Wishart	Prairie City
4/17/69	John E. Donaldson	Donaldson's Chevron Station, Prairie City
4/17/69	Joe B. Donaldson	" " " " "
4/17/69	George W. Donaldson	" " " " "
4/21/69	Mr. & Mrs. D. Hammach	Box 496, Prairie City
4/21/69	Tom Barrett	Golden West Motel, Prairie City
4/21/69	Lieta Bradford	Prairie City
4/22/69	Mrs. D. Ackerman	Box 26, Prairie City
4/22/69	Mrs. Josephine Grove	The Park Motel, Prairie City
4/22/69	Mrs. Melody McKinley	Box 466, Prairie City
4/22/69	Mr. & Mrs. L. Boorman	Box 18, Prairie City
4/22/69	Mr. & Mrs. T. Walker, Jr.	Box 513, Prairie City
4/22/69	Marie E. Coombs	Box 302, Prairie City
4/22/69	Mrs. Carl Mirich	Prairie City
4/22/69	Mr. & Mrs. Carl Exner, Jr.	Box 37, Prairie City
4/22/69	Mr. & Mrs. D. Burke	Box 121, Prairie City
4/21/69	Mrs. H. P. Ambright	Box 202, Prairie City
4/22/69	Mrs. Robert F. Jones	Box 281, Prairie City
4/22/69	Mrs. L. E. Dilly, Jr.	Box 321, Prairie City
4/23/69	Mrs. Elizabeth Curtis	Box 381, Prairie City
4/23/69	Mr. & Mrs. R. L. Ketchum	Box 374, Prairie City
4/23/69	Mrs. L. VanDeWalker	Box 14, Prairie City

Total of 23 letters received as of April 24, 1969

NOTE: The staff was advised that Mr. Clayton Payne would appear on behalf of some citizens of Prairie City.

4/16/69

Zelma Woods, City Recorder

City Hall

4/22/69

Cecilia Morgan

Star Route, John Day

It is proposed that Prairie City Timber Company will install the following modifications to their wigwam burner in accordance with plans to be submitted to and approved by the Oregon State Sanitary Authority, within four weeks after approval of drawings:

1. Repair burner shell, closing all openings.
2. Install hood and hinged closure in conveyor openings in burner shell.
3. Install truss ring around burner shell at mid-height of burner.
4. Install vertical, double hinged door to replace present access and service doors.
5. Install new underfire air system.
6. Install new overfire air natural draft ports.

Following installation of the above, if fallout sampling shows violation of regulations, Prairie City Timber Company will install a hog to reduce all coarse residues, and will install a chute at the end of the conveyor per schedules then to be determined and approved by the Sanitary Authority.

Dated this 25th day of April, 1969.

PRAIRIE CITY TIMBER COMPANY

By E. H. McIntosh Pres
E. H. McIntosh

TO : MEMBERS OF THE STATE SANITARY AUTHORITY
John Mosser, Chairman E. C. Harms, Jr., Member
B. A. McPhillips, Member Herman Meierjurgan, Member
Storrs Waterman, Member

FROM : AIR QUALITY CONTROL STAFF

DATE : April 25, 1969

SUBJECT: PRAIRIE CITY TIMBER COMPANY, Wigwam Waste Burner

INTRODUCTION

Prairie City Timber Company, which is owned by Brand "S" Corporation, operates a sawmill and planer mill within the city limits of Prairie City. Residues from the sawmill, consisting of long edgings, slabs, trim, bark and sawdust are delivered to a wigwam waste burner by chain conveyor. Shavings from the planer mill are air conveyed to a cyclone located at the wigwam burner, with its tailpipe discharging into the burner.

Fallout from the burner has been the subject of complaints and of Staff activity since 1967. Improvement during this period has not been evident.

FILE SUMMARY

- Aug. 24, 1967 - In response to many complaints, District Engineer, Fred Bolton first surveyed the burner, found that it had not been modified as required by the then effective wigwam burner regulations, and that fallout was the principal problem. Complaints received had been from the city, and from the Game Commission which was concerned about fallout into a nearby stream (Dixie Creek).
- Aug. 28, 1967 - In a letter to Mr. E. H. McIntosh of Brand "S" Corporation, H. M. Patterson advised of the violation of regulations, offered staff assistance if desired, and requested advice within 30 days as to the company's intent in the matter.
- Sept. 5, 1967 - Mr. McIntosh telephoned H. W. McKenzie, who requested that he determine the residue quantities and burner size and advise us, following which we would be able to forward recommendations to him.
- July 5, 1968 - A letter of complaint was received from Mr. O. G. McComb of Prairie City. It stated "Most of the people cannot grow a decent lawn, hang clothes outside, paint their houses, or even use their yards to just sit in. The sawdust and soot are constantly falling, like snow". He also stated that he believed the sawdust was polluting the John Day River.

- July 9, 1968 - Letter to Mr. McIntosh of Brand "S" Corporation advising him of the complaint and offering staff assistance.
- July 22, 1968 - In conference with Mr. McIntosh at his North Portland office, H. W. McKenzie discussed the principles of combustion in a wigwam burner, provided a wigwam burner manual, and outlined recommendations applicable to the burner at Prairie City.
- July 25, 1968 - Content of the July 22 conference was confirmed in a letter to Mr. McIntosh, and early advice was requested as to the methods which he proposed to employ together with a schedule for their installation.
- Mar. 12, 1969 - James Sheetz, District Engineer, surveyed the burner and the residential area approximately 500 feet East (across Dixie Creek), and interviewed city officials. He reported observing accumulations of unburned material in the residential area, learned of fallout of lighter material over all of the city, and was informed by city officials that they have had to extinguish fires started by ignition of accumulations of unburned fallout from the burner. The burner doors appeared to have been repaired to some extent, but otherwise little appeared to have been accomplished in implementing previous staff recommendations. Long pieces of material were observed to stack up and form an open fuel pile nearly to the conveyor entrance.
- Mar. 26, 1969 - James Sheetz and H. W. McKenzie conferred with Mr. McIntosh at his office. Findings of the March 12 survey were outlined and photos exhibited to illustrate the fallout problem. H. W. McKenzie again outlined staff recommendations toward correction of the problem, stressing that a reduction in material lengths was a necessity in reducing fallout, overshadowing the other recommendations in importance.

Mr. McIntosh questioned the wisdom or necessity of investing in what he considered to be experimental methods. Mr. McKenzie suggested that he contact a certain mill owner who had had a similar problem to his and had followed similar recommendations. Mr. McIntosh was advised, however, that it was his prerogative to solve the problem by whatever methods he might choose.

- Apr. 2, 1969 - Copy of a letter to Governor Tom McCall from Mr. and Mrs. McComb dated March 27, was forwarded to the staff from Governor McCall's office. The writers complained of a continuing problem from fallout of sawdust, and of live embers which had set fire to their tool shed, to sawdust near their neighbor's house and had burned holes in Mr. McComb's shirt sleeve. Enclosed were photos which illustrated the fallout accumulation.

CONCLUSIONS

It is apparent that a serious air pollution problem exists at Prairie City and that the source is the wigwam waste burner at Prairie City Timber Company. The staff has repeatedly informed the company of complaints, and of violations of Oregon Administrative Rules pertaining to air pollution.

The staff has provided the company published data, and with recommendations toward a solution to the problem, but has advised that it is the company's prerogative to solve the problem by whatever method it chooses.

Staff activity since August, 1967, has failed to induce a constructive response from the company. Repeated requests for proposals and schedules have received no reply. The file is devoid of any written communications from the company.

RECOMMENDATIONS

It is recommended that unless the company provides the Authority with an acceptable proposal and schedule for solving its air pollution problem, that an abatement hearing be held as early as Authority schedules permit.

Office Memorandum

OREGON STATE BOARD OF HEALTH

To : H.W. McKenzie

Date: April 4, 1969

From : J.R. Sheetz

Subject: AP₆ - Grant County (Prairie City Lumber Company)

RECEIVED

APR 10 1969

10/10/69

This memo is to record the results of my survey of the Prairie City Lumber Company wigwam waste burner on March 12, 1969. During my survey I observed a layer of unburned and partially burned material on the lawns and homes of 3 residences located due east of the burner for Prairie City Lumber Company. The residences are located on Johnson Avenue south of Short Street and the lumber company burner is located west of Dixie Creek about 500 feet due west of the homes. Both the burner and the affected homes are within the city limits of Prairie City.

Burner Construction

During my survey I observed that the burner doors had been repaired to some extent to make them air tight as a result of previous letters written to the company. Deficiencies still remain, however, in that the overfire airports consist of approximately 2-foot squares cut in in the south side of the burner. There is no effective means to control the quantity, direction, or velocity of the overfire air.

Underfire air consists of one 5-Hp 2-foot diameter vertical centrifugal fan. To the best of my knowledge, this capacity remains unchanged since the last survey of June 28, 1967.

Planer shavings and sawdust enter the burner with the sticks by way of the conveyor. I observed long sticks entering the burner and stacking up to form an open fuel pile nearly to the conveyor entrance.

Burner Operation

At the time of my survey, 12:30 p.m. to about 2:00 p.m. March 12, 1969, I observed heavy fallout on the ground and homes east of the burner. Smoke did not appear to be a problem compared to fallout. I observed accumulations of unburned material near the homes and on the ground surrounding the burner. In talking with the local people and observing areas around the city, I learned that fallout of the lighter material frequently occurs over the rest of the city. City officials reported to me they have had to put out fires started by ignition of the unburned fallout matter from the burner.

No fallout samples were collected because the burner construction remains essentially unchanged, except for repairing the doors, since the date of the last survey by Fred Bolton on June 28, 1967.

Jim

July 25, 1968

E. H. McIntosh
Brand "S" Corporation
P. O. Box 03068
Portland, Oregon

Re: Prairie City Timber Co.

Dear Mr. McIntosh:

As discussed in our very pleasant conversations of July 22nd, at your Portland office, you have calculated that the residues burned in the wigwam waste burner at Prairie City Timber Co. total approximately 40,000 pounds per hour for the nine hour work day. Our recommendations for this material delivery rate are as follows:

UNDERFIRE AIR

Total Volume (cfm) 12,300
Approximate cfm per outlet 410
Number of outlets - 30
Outlet spacing - 5 feet

OVERFIRE AIR

Total volume (cfm) - 130,000
Total Port Areas
Modified bellmouth - 52 sq. ft.
Flanged - 60
Raw edged - 67
Recommended Burner Diameter - 55 ft.

Outlet spacing refers to the distance between centers of outlets. Types of inlet port listed are as shown on page 2.4 of the Sanitary Authority publication "Wigwam Waste Burner Guide and Data Book". Two prints of an assembly drawing showing the construction of the modified bellmouth port are enclosed for your reference.

From our discussions, it was determined that the refuse being burned consists of long edgings, sawdust, slabs, trim and bark, all of which are delivered to the burner by a chain conveyor, and planer mill shavings which are air conveyed to a cyclone mounted to the side of the burner and thence introduced into the burner through the cyclone tailpipe. The shavings are discharged into the burner off-center so that the fuel pile is not symmetrical.

Based on the above information, my observation was that the long strips of edging and slab material pose a difficult problem from the standpoint of controlling fallout due to their tendency to form an open arrangement of vertical firebrands. The strong, vertical flame pattern exhibited by this

E. H. McIntosh
Page 2
July 25, 1968

type of fuel pile usually results in a high velocity gas column at the center of the burner which readily transports fine materials out the top of the burner before they are burned. As you have noted that the fallout material appears to be composed very largely of sawdust, it would appear that such material is picked up as it leaves the end of the chain conveyor.

Sawdust can be successfully delivered to the fuel pile from the end of a chain conveyor by means of a chute, but unfortunately the presence of long edging material precludes its use. This situation is discussed in detail on page 5.1 and 5.2 of the manual. You will note that, as stated in the manual, "the only apparent solution to this problem is to reduce the size of the pieces so that they will form a more compact fuel pile and so that they can be delivered to the fuel pile in a chute. Our first recommendation is thus that the long strips be reduced to four feet or less and that a chute be installed in manner similar to that described in the manual.

You may further find it necessary to install the cyclone above and with its tailpipe discharging to the conveyor, preferably through an intermediate hopper with a screw conveyor out-feed to the conveyor. The conveyor should be covered in this area to prevent the material becoming wind blown. Sometimes a fine water spray is found desirable to assist in agglomerating the fines with the other conveyed materials.

In addition to the above we also recommend that the burner shell be repaired so as to present a reasonably air-tight construction, that door leakage be minimized, and that the overfire inlet ports be replaced by approximately 25 - 24" x 12" modified bellmouth ports. The ports should be mounted so as to discharge horizontally at an angle of 45° with the burner shell at a height of four to five feet above the grate line.

As stated, the fallout from your burner has been the subject of recent complaints received by this office and we request that corrective measures be undertaken as early as possible. Please advise us as soon as possible of the methods which you propose to employ and a schedule for their anticipated installation.

Respectfully,

H. W. McKenzie
Associate Engineer

cc: District Office
Prairie City Timber Co.

July 5, 1968

COPY

Mr. Kenneth H. Spies, Secretary
Sanitary Authority, State of Oregon
968 Portland Office Bldg.,
Portland, Oregon.

Dear Sir:

I am writing to make a formal protest against the Air Pollution caused by the Prairie City Timber Co. Enclosed is a set of pictures showing accumulation of sawdust on our property inside the city limits of Prairie City.

I have only been retired from the Highway department since May 31st and was District Maintenance Superintendent of Ontario when you were making your investigation of the Hot Mix Plant owned by Rex Johnson, last year. I am hoping you can work on this situation and get it remedied as you did the one in Ontario. The effects are a lot similar in these two cases; one was dust, this is sawdust. I believe this sawdust is also polluting the John Day River, as it is near by.

I truly hope you can and will help as I believe this is a very vital problem to the entire City of Prairie. It not only affects the health of everyone, but is the worst nuisance that can be imagined. Most of the people cannot grow a decent lawn, hang clothes outside, paint their houses or even use their yards to just sit in. The sawdust and soot are constantly falling, like snow.

I believe this situation has been drawn to your attention by several other people in Prairie City, and if necessary we might have to write the Governor and Legislators as the situation is becoming critical.

Hoping you can do something constructive soon, I am

Sincerely yours

O. D. W. Cook
Box 412,

Prairie City, Oregon. 97869

TO : MEMBERS OF THE STATE SANITARY AUTHORITY

John Mosser, Chairman
B. A. McPhillips, Member
Storrs Waterman, Member

E. C. Harms, Jr., Member
Herman Meierjurgan, Member

FROM : AIR QUALITY CONTROL STAFF

DATE : April 10, 1969 for Meeting of April 25, 1969

SUBJECT: Application for Certification of Pollution Control Facility for Tax Relief Purposes, No. T-38.

This application was received on January 3, 1969. A summary of the contents and results of the staff review are given below.

1. Applicant: Georgia Pacific Corporation, Springfield Division
P. O. Box 311
Portland, Oregon 97207
Phone: 222-5561
Mr. Kenneth R. Boehme, Asst. Property Tax Mgr.

The Springfield Division produces rough and sanded forms of softwood plywood.

2. The facility claimed in this application in general consists of an induced draft system for 2 boilers, automatic boiler controls, multi-cone fly ash collectors, a meter equipped sander dust storage bin, and a sander dust injection system. Operation of this facility began on September 1, 1968.
3. The total installed cost of the facility is \$134,618.68. An accountants certification of this figure is attached.
4. Staff Review:

The Springfield Division of Georgia Pacific Corporation burns hogged fuel and sander dust in its boilers to generate steam for production operations. Before the installation of the sander dust storage bin and metering system, the sander dust had been discharged into the boilers as it was produced from various operations within the plywood plant. The installation of this system alone would tend to reduce the amount of unburned and partially burned fine material being emitted from the boiler stacks. The installation of an induced draft system and automatic controls should be particularly helpful in reducing smoke emissions from the boilers. The application estimated that the fly-ash collection system removes 90 to 95% of the fly-ash from the boiler stacks.

The collected fly ash is screened and the fine material is stored on the applicant's property. The remaining material is sold to Kingsford Company at \$15.00 per ton. The original estimation that 750 tons per year of fly ash would be sold has been revised downward to approximately 390 tons a year per the attached letter from the applicant dated March 18, 1969. The revised return on the installation would thus amount to approximately \$5,800 per year.

Staff members have observed this facility in operation, and have made limited contacts with persons in the area, which indicate that there has been a noticeable decrease in the amount of fly ash type fallout.

On March 3, 1969, staff members observed a violation of the visible emission standard by this facility. We have been informed by the Lane Regional Air Pollution Authority that they also have observed visible emission standard violations by this facility. The attached letter from Georgia Pacific of March 18, 1969, indicates their recognition of this problem and their intention to provide additional instructions and training of operators to alleviate this situation.

The staff findings indicate that the principal purpose for installing this facility was to reduce atmospheric emissions and that a significant reduction in the emission of carbonaceous fallout material was achieved.

5. Staff Recommendations:

The staff recommends that a "Pollution Control Facility Certificate" bearing the actual cost of \$134,618.68 be issued for the facility claimed in Application No. T-38.

ARTHUR ANDERSEN & Co.

MORGAN BUILDING
PORTLAND, OREGON 97205

December 6, 1968

File No.
OREGON STATE SANITARY AUTHORITY Waste Disposal Permit Program
Received: DEC 13 1968
Appl. No: T-38

Georgia-Pacific Corporation
Commonwealth Building
Portland, Oregon 97204

Gentlemen:

We, as independent public accountants, have examined the attached Certificate of Actual Cost of Fly Ash Collection System, Pollution Control Project, Springfield, Oregon. Our examination was made in accordance with generally accepted auditing standards, and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the certificate referred to above presents fairly the cost of \$134,618.68 incurred by Georgia-Pacific Corporation in the construction of the project.

Very truly yours,

Arthur Andersen & Co.

GEORGIA-PACIFIC CORPORATION

CERTIFICATE OF ACTUAL COST OF
FLY ASH COLLECTION SYSTEM
POLLUTION CONTROL PROJECT

SPRINGFIELD, OREGON

File No.
OREGON STATE SANITARY AUTHORITY Waste Disposal Permit Program
Received: DEC 13 1968
Appl. No. T-38

Sander dust injection	\$ 24,382.00
Fly ash arrestor-	
Mechanical items	50,483.14
Installation	20,140.00
Fabrication	11,350.00
Other	2,481.18
Other purchased material and services	17,242.04
Company labor	3,917.36
Labor burden	764.18
Miscellaneous	3,858.78

	\$134,618.68
	=====

I hereby certify that the actual cost of the pollution control project installed in the plywood mill of Georgia-Pacific Corporation, Springfield, Oregon, is \$134,618.68, as set forth above.

RH Wilson

TO : MEMBERS OF THE STATE SANITARY AUTHORITY

John D. Mosser, Chairman
B. A. McPhillips, Member
Storrs Waterman, Member

E. C. Harms, Jr. Member
Herman Meierjurgan, Member

FROM : AIR QUALITY CONTROL STAFF

DATE : April 3, 1969 for Meeting on April 25, 1969

SUBJECT: APPLICATION FOR CERTIFICATION OF POLLUTION CONTROL FACILITY
FOR TAX RELIEF PURPOSES, NO. T-71.

1. Applicant: *Mr. [unclear]*
Kenton Packing Co.
Columbia Blvd., and N. Burrage Avenue
Portland, Oregon

This applicant owns and operates a rendering plant at the above location.

2. The facility claimed in this application collects and condenses gases and water vapor from a rendering cooker, and incinerates uncondensed, odorous gases. It consists of ductwork, a condenser, and a gas-fired incinerator.
3. The total certified cost is \$14,376.20. An accountant's certification of the cost is attached.
4. This facility was installed in response to the Sanitary Authority order of March, 1968, which directed all rendering plants in North Portland to install odor control equipment. The facility meets the requirements of that order in providing incineration at 1200°F for at least 0.3 seconds. Inspections after installation have indicated satisfactory control.
5. Recommendations:

It is recommended that a "Pollution Control Facility Certificate" bearing the cost figure of \$14,376.20 be issued for the facility claimed in tax application T-71.

7 1/2 years

Exhibit "E"

Metz Engineering Co. \$ 13,640.00

A. J. Zinda Company 493.04

Ace Electric Company 181.87

Portland Provision Co.

Material	16.74	
Labor	<u>44.55</u>	61.29

\$ 14,376.20

This is to certify that I have compared the original of the bills with the enclosed photo copies of the bills for the cost of the claimed facility and found these to be exact copies of the original bills. The cost of these facilities are shown on above.

Very truly yours,

Arthur Young & Company

By Frank H. Eiseman
Frank H. Eiseman

TO : MEMBERS OF THE STATE SANITARY AUTHORITY

John D. Mosser, Chairman
B. A. McPhillips, Member
Storrs Waterman, Member

E. C. Harms, Jr., Member
Herman Meierjurgan, Member

FROM : AIR QUALITY CONTROL STAFF

DATE : April 3, 1969 for Sanitary Authority Meeting on April 25, 1969

SUBJECT: APPLICATION FOR CERTIFICATION OF POLLUTION CONTROL FACILITY
FOR TAX RELIEF PURPOSES, NO. T-74.

This application was received on March 7, 1969. A summary of the contents and results of the staff review are given below:

1. Applicant: Western Kraft Corporation
Albany Mill Division
P. O. Box 339
Albany, Oregon 97321

The applicant produces kraft pulp and paper at its Albany Division mill on the west side of I-5, 3 miles north of Albany.

2. The facility claimed consists of duct work, dilution fans, and a 200 foot stack for combining gas discharges from recovery furnaces, smelt dissolver vents, and power boilers.
3. The total certified cost of the facilities is \$222,370.22. An accountant's certification of the cost is attached.
4. Staff Review:

The purpose of this facility is to collect two sources (smelt tank and recovery furnace) which has been emitting pollutants at roof-top level and low velocity. Also, the recovery furnace plume was saturated with water vapor. After combining sources, the resulting plume is dryer, is emitted at a higher elevation and with a greater velocity. The effects are to decrease ground-level concentrations close to the mill and reduce the visible plume. No pollutants are collected or destroyed by this system.

5. Staff Recommendation:

It is concluded that the principal purpose of this facility is to abate the effects of air pollution. Therefore, it is recommended that a "Pollution Control Facility Certificate" bearing the actual cost figure of \$222,370.22 be issued for the facility claimed in tax application T-74.

PEAT, MARWICK, MITCHELL & CO.

CERTIFIED PUBLIC ACCOUNTANTS

1010 STANDARD PLAZA

PORTLAND, OREGON 97204

March 5, 1969

Mr. C. W. Knodell
Western Kraft Corporation
1601 Standard Plaza
Portland, Oregon 97204

Dear Mr. Knodell:

In connection with your revised application to the Oregon State Sanitary Authority for certification of pollution control facilities for tax relief purposes, we have examined the costs (as detailed in the respective Exhibit E of the application) of the facility summarized below. It is our understanding that the detailed listing in Exhibit E to the application was prepared by the Engineering Department of Western Kraft Corporation, and in making our examination, we have relied upon such listing as being complete itemization of labor and materials devoted to the construction of the facility described. Our examination consisted of a detailed inspection of vendors' invoices and other documentation of disbursement, and we have examined recent correspondence from the respective vendors showing costs of the cyclone, totaling \$37,637.10, originally included and now removed from the application. We have also traced the costs shown into the plant and equipment accounts of the Company.

The following is a summary of the amount of capital expenditures detailed in Exhibit E to the application:

Combined recovery stack:	
Machinery and equipment	\$ 15,794.83
Materials	2,019.63
Time and materials	<u>204,555.76</u>
	\$ <u>222,370.22</u>

In our opinion, the foregoing summary fairly presents the actual costs incurred by Western Kraft Corporation in the construction of the facility listed above.

Very truly yours,

PEAT, MARWICK, MITCHELL & CO.



R. M. Alexander, Partner

RMA:OL

MEMORANDUM

TO: Members of the Sanitary Authority

FROM: Water Pollution Control Staff

DATE: April 25, 1969

SUBJECT: Application for Certification of Pollution Control
Facility for Tax Relief Purposes, No. T-73

This application was received on March 7, 1969. A summary of the contents and results of the staff review are given below.

1. Applicant:

Blue Lake Packers, Inc.
P. O. Box 5038
Salem, Oregon 97304

The applicant owns and operates a food processing plant located at 637 N. Ninth Street in Corvallis, Oregon, Benton County.

2. The facility claimed in the application consists of:

2 Dorr-Oliver 50° DSM screens, 3 ft. Type P, Model A Special MS
2 trash pumps
2 steel tanks and valves
flow meter and sampling system

The installation was completed on July 25, 1968, and placed in operation on August 2, 1968.

3. The cost of the facility as claimed in the application is as follows:

2 screens	\$ 7,532.00
2 trash pumps	1,148.00
2 tanks and valves	942.00
flow meter and sampling system	<u>2,623.00</u>
Total	\$12,245.00

4. Staff review:

The applicant's wastes are discharged into the city of Corvallis sewerage system for treatment and disposal. The installed screens are installed in parallel with an existing vibrating type screen facility in order to obtain better and more efficient suspended solids removal. The applicant claims that the new facility reduced the quantity of suspended solids discharged to the Corvallis sewer system from 8,920 lbs./day to 5,093 lbs./day. Such a reduction in

solids load would be beneficial to the city sewage treatment plant and would be expected to reduce the quantity of suspended solids discharged to the river.

The plant manager indicated that the solids removed are picked up by a farmer for use as cattle feed. The applicant indicates that a salable commodity is not recovered, however.

The facility will undoubtedly reduce the waste treatment charges levied by the city. The amount of any such reduction is not known but is estimated to be small based on information obtained from the city when compared to the cost of the facility.

The installation of the flow meter and sampling equipment was apparently required by the city for purposes of establishing the waste treatment charge each year. As such, its only pollution control function would be to encourage the plant owners to reduce the waste quantity and strength in order to reduce treatment charges. The flow metering and sampling equipment is not related to the operation of the screen facility.

5. Recommendation:

Since the screen facility should ultimately reduce the quantity of suspended solids discharged to the river, the staff recommends that it be certified as a pollution control facility.

Since the flow meter and sampling equipment were installed for the principal purpose of establishing treatment charges rather than the prevention, control, or reduction of water pollution by reducing waste quantities, the staff recommends that it not be certified.

The staff, therefore, recommends that a "Pollution Control Facility Certificate" be issued for the following items and costs claimed on Application T-73:

2 screens	\$7,532.00
2 trash pumps	1,148.00
2 tanks and valves	<u>942.00</u>
Total Cost	\$9,622.00

TOUCHE, ROSS, BAILEY & SMART

910 STANDARD PLAZA
PORTLAND, OREGON 97204

February 28, 1969

Blue Lake Packers, Inc.
P. O. Box 5038
Salem, Oregon

We have examined the cost of Claimed Pollution Control Facility in the accompanying Application for Certification of Pollution Control Facility for Tax Relief Purposes.

The details of cost for the claimed facility which are included in the application amount to \$12,245.00 as follows:

<u>Purchased From</u>	<u>Item Description</u>	<u>Amount</u>
Martig's, Inc.	Flowmeter and sampling system	\$ 2,623.00
Dorr-Oliver, Inc.	Sanitary facility screens	7,532.00
Northwest Process Co.	2 - Trash pumps	1,148.00
Northwest Process Co.	2 - Steel tanks and valves	<u>942.00</u>
		<u>\$ 12,245.00</u>

In our opinion the costs included for the claimed facility fairly present the information contained therein.

Touche, Ross, Bailey & Smart
Certified Public Accountants