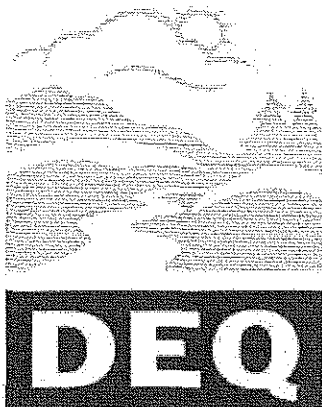


**8/21/1970**

**OREGON  
ENVIRONMENTAL QUALITY  
COMMISSION MEETING  
MATERIALS**



State of Oregon  
**Department of  
Environmental  
Quality**

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AQC

AGENDA

Environmental Quality Commission Meeting

10:00 a.m., August 21, 1970

Council Chambers, Eugene City Hall, Eugene, Oregon

A. Minutes of July 24, 1970 meeting

B. Project plans for July 1970

C. Status Reports:

- 1. B & D Paving Co., Hood River
- 2. Don H. Morris Co. Hot Mix Asphalt Plant, Lincoln City
- 3. L & H Lumber Co., Sutherlin
- 4. Harris Feedlot, Milton-Freewater

D. Field Burning Program - Staff Report

E. Tax Credit Applications

1. Publishers Paper Company, Oregon City	T-144	(\$69,393)
2. Publishers Paper Company, Oregon City	T-145	(\$27,750)
3. Fort Hill Lumber Co., Grand Ronde	T-147	(\$ 7,783.05)
4. Gray and Company, Forest Grove	T-129	(\$61,985.37)

F. Charles McKenzie Laundromat, Depoe Bay

G. J.H. Baxter and Company, The Dalles

H. Columbia Way Court Performance Bond

I. Petition Regarding Boise Cascade Pulp Mill, Salem

2:00 p.m.

K. Public Hearing Regarding Wayne's Auto Salvage

MINUTES OF FIFTEENTH MEETING  
of the  
Oregon Environmental Quality Commission  
August 21, 1970

The fifteenth regular meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 10:10 a.m., Friday, August 21, 1970, in the Council Chambers, Eugene City Hall, Eugene, Oregon. Members present were B.A. McPhillips, Chairman, Edward C. Harms, Jr., George A. McMath, Storrs S. Waterman and newly appointed member Arnold M. Cogan.

Participating staff members were E.J. Weathersbee, Deputy Director, Arnold B. Silver and John Osburn, Legal Counsel, Leo L. Baton and Harold W. Merryman, District Engineers, Harold L. Sawyer, Supervising Engineer, R. Bruce Snyder, Meteorologist, and Harold H. Burkitt, Clint A. Ayer and Paul H. Rath, Associate Engineers.

FIELD BURNING

The order of the agenda was changed to consider field burning first at the request of Mayor Lester E. Anderson of Eugene who had to leave the meeting early to meet another commitment. Mayor Anderson read a prepared statement relative to the current field burning situation. Statements were also submitted, but not read, by Mary Briscoe, President of the League of Women Voters of Central Lane County and Ronald A. Findlay, M.D. Copies of all of these statements are attached to and made a part of this record.

All of the above statements agreed that field burning atmospheric effects in the Eugene area had been better this season than last, but still were not satisfactory and all looked forward to further improvements through actual reduction and eventual elimination of field burning.

Mr. Snyder verbally presented a staff report summarizing the 1970 field burning program to date. The following salient points were made:

- There was no serious burning until the third week in July.
- The data returned so far show conditions have been pretty good, but not as good as expected.
- Priority burning has been too extensive at times and better regulation of priority burning is needed.

- Concentrated burning in the north valley, Marion and Polk Counties, can affect air quality in Eugene.
- Indications are that more acres can be burned in the south valley under southwest winds than previously thought.
- Air Quality conditions in Eugene were improved this season over last season, but more complaints were received this year from the Lebanon and Corvallis areas.
- Enforcement of burning regulations appears to be effective and action is being taken in all cases of known violation.
- People are still bothered by field burning effects but not as badly as in past years.
- Growers and fire districts are cooperating and the new regulations and procedures appear to be working quite well.

In response to a question by Mr. McMath, Mr. Snyder reported that between 50 - 60% of field burning had been completed as a conservative estimate, that 6 full days of south valley burning had been allowed so far and with a couple of more days of southwest winds, the season would be considered reasonably successful.

In response to a question by Mr. Harms, Mr. Snyder stated that the 60% burned estimate did not include cereal grain fields and referred only to perennial and annual grass fields previously registered for burning. If cereal grass fields were included the picture in Yamhill and Polk Counties would change somewhat, but not much for the overall valley. Mr. Harms also made the point that the staff should check into the allegation of Mr. Bill Lynch's article (Eugene Register-Guard, August 20, 1970) that burning was being conducted within established quotas and with permits, but without regard to priorities.

Chairman McPhillips publicly recognized Mr. Snyder as the man charged with the responsibility for directly administering the field burning program and commended him for doing an excellent job.

Mr. Osburn, in briefly reviewing the legal situation relative to the Oregon Seed Council lawsuit, reported that Marion County Circuit Court Judge Douglas L. Hay's final decree was consistent with his previously issued temporary injunction.

Judge Hay found that banning third and fourth priority burning by the Environmental Quality Commission was in excess of its statutory authority. One reason given was that SB 165 which would have eliminated the agricultural exemptions failed to pass the legislature and ORS 449.840 which did pass contains no blanket authority to ban. A permanent injunction was granted against this portion of the Environmental Quality Commission schedule and the rest was sustained.

Chairman McPhillips noted that the field burning problem had been the most emotional problem that had ever come before the Environmental Quality Commission; that it involves the livelihood of some and the livability of others and the Environmental Quality Commission is trying to steer a middle course.

MINUTES OF THE JULY 24, 1970 MEETING

It was MOVED by Mr. Waterman, seconded by Mr. Harms and carried that the minutes of the fourteenth regular meeting of the Commission held in Portland on July 24, 1970 be approved as prepared by the Director.

PROJECT PLANS

It was MOVED by Mr. McMath, seconded by Mr. Waterman and carried that the actions taken by the staff during the month of July 1970 on the following 40 water pollution control projects, the 7 air quality control projects and proposals and the 2 solid waste disposal projects be approved:

Water Pollution Control

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (39)</u>			
7/1	Oak Acres	Dry well effluent distribution	Prov. app.
7/1	Woodburn	Master plan Waste Water & Sewage	Comm. sub.
7/3	Pendleton	Improvement study report	Approval
7/3	Pendleton	Mt. Hebron - Riverside	Approval
7/4	Lake Oswego	Storm and Sanitary Sewers	Prov. app.
7/6	Fishhawk Lake	System and Treatment	Prov. app.
7/13	E. Salem S & D #1	Sanitary Sewer	Prov. app.
7/13	Ashland	Hersey St. San. Sewer	Prov. app.
7/14	Eugene	Projects #433 and #657	Prov. app.
7/13	E. Salem S & D #1	Glendale Street	Prov. app.
7/13	Gresham	Regner Creek Trunk	Prov. app.
7/14	Troutdale	Addition #1 & 2 for STP	Approval

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
7/14	McMinnville	Change Order #1 - Orig. trunk	Approval
7/14	USA	Lawndale Park (Aloha)	Prov. app.
7/15	Medford	Blossom Hill #5	Prov. app.
7/15	Green San. Dist.	Sunnyslope Subdivision	Prov. app.
7/15	McMinnville	Change Order #1 - Orig. trunk	Approval
7/15	Clackamas Co.	River Bend Mobil Ranch	Prov. app.
7/17	Tri-City S.D.	Preliminalry Report	Comments w/app.
7/20	Bear Creek Valley S.A.	Lower Bear Creek Inter. & Kirtland P.S.	Prov. app.
7/20	Clatsop County	Wauna-Westport Sewerage Study	App.
7/21	Parkdale S.D.	Add. #1 & Change Order #1&2	App.
7/21	Portland	Change Order #1 (Columbia Blvd.)	App.
7/22	Harrisburg	Simpson Park Subdivision	Prov. app.
7/23	Forest Grove	Diversion Structure	Prov. app.
7/24	St. Helens	Railroad Addition	Prov. app.
7/27	N. Roseburg S.D.	Brentwood Manor Subdivision	Prov. app.
7/27	Medford	Change Order #1 (STP)	App.
7/28	E. Salem S & D	Clarmar Drive sewer	Prov. app.
7/28	Veneta	Addition #1	Approval
7/28	White City S.D.	San Sewer	Prov. app.
7/29	Albany	Sewerage report	Approval
7/29	Rockaway	Sewage Pumping Station	Prov. app.
7/29	Albany	S.E. Area Sewers	Prov. app.
7/31	USA	Sunset Slope #8 Subdivision	Prov. app.
7/31	E. Salem S&D #1	Parkdale Add. #6	Prov. app.
7/31	Dallas	Dallas Hts. San. Sewer	Prov. app.
7/31	Bandon	C.O. No. 1	Approval
7/31	McMinnville	C.O. No. 1 - STP	Approval
<u>Industrial Projects (1)</u>			
7/31	Dillard	Roseburg Lbr. Co. Aerated Log Pond	Prov. app.
<u>Solid Waste Projects (2)</u>			
7/15	Lake Co.	Chem-Waste Inc., Alkali Lake	Not app.
7/28	Dundee	Port-West Disposal Site	Prov. app.
<u>Air Quality Control</u>			
7/15	Dillard	Round Prairie Lumber Co. WWWB modification	Cond. app.
7/15	Springfield	Weyerhaeuser Co., Compliance schedule and program	Add. info. requested
7/15	Toledo	Georgia Pacific, Compliance schedule and program	Add. info. requested

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
7/16	St. Helens	Boise Cascade Corp., Compliance schedule & program	Add. info. requested
7/17	Wauna	Crown Zellerbach, Compliance schedule and program	Add. info. requested
7/20	Gardiner	International Paper Co. Compliance schedule & program	Add. info. requested
7/22	Brookings	Brookings Plywood, Phase out of burner schedule	Cond. app.

TAX CREDIT APPLICATIONS

1. Crown Zellerbach, West Linn Paper Mill

Mr. Sawyer reported that the Commission had deferred acting on this application at the June Environmental Quality Commission meeting pending further investigation and assurance by the staff that the primary clarifier and associated equipment for which tax credit was being sought was being properly operated; that the staff met with county officials on August 19, 1970 and reviewed the operation data and operating procedures, and that the staff has concluded that the facilities are being operated at maximum efficiency within the capability of their design and application. He further noted that additional treatment will be provided by secondary treatment facilities which are scheduled for completion by July 1, 1972.

It was MOVED by Mr. Harms, seconded by Mr. McMath and carried that, in accordance with staff recommendation, a Pollution Control Facility Certificate bearing the actual cost figure of \$97,920.00 be issued under the 1967 act to Crown Zellerbach Corporation, West Linn, for the facilities claimed in application T-135.

2. Crown Zellerbach Corporation, Lebanon Pulp and Paper Mill

Action was deferred at the previous meeting on this application involving an aerated lagoon secondary treatment facility constructed as a Federal Water Quality Administration supported Research and Development project to allow time for further review by the Department's legal counsel of the question of eligibility for tax relief purposes of a facility financed to a major extent by federal funds.

Mr. Silver reported that he had reviewed the provisions of the law, did not find sufficient authority to deny the application and therefore it appears that the project is eligible.

It was MOVED by Mr. Harms, seconded by Mr. McMath and carried that a tax credit certificate in the amount of \$665,009 be issued as recommended by the staff to Crown Zellerbach Corporation, Lebanon pursuant to application T-133.

Mr. Harms requested that the staff information regarding federal support in funding this project be submitted to the State Tax Commission.

3. Publishers Paper Company, Oregon City Mill

It was MOVED by Mr. Harms, seconded by Mr. Waterman and carried that in accordance with the recommendations by the staff, pollution control tax credit certificates in the amounts of \$69,393 and \$27,750 be issued to Publishers Paper Co., Oregon City Division, pursuant to applications T-144 and T-145 for chip handling enclosure and sawdust storage silo baghouse, respectively.

4. Fort Hill Lumber Co., Grand Ronde

It was MOVED by Mr. Waterman, seconded by Mr. Harms and carried that a pollution control tax credit certificate for a flyash arrester, collector and hopper bearing the actual cost of \$7,783.05 be issued to Fort Hill Lumber Co. in accordance with staff recommendations and pursuant to application No. T-147.

5. Gray & Co., Forest Grove

Mr. Sawyer reported that the Commission deferred action on this application at the last meeting pending resolution of a question on operation of the facility; that the staff had investigated the matter and had conferred with company representatives at the plant on August 5, 1970 and is satisfied that the company has clearly demonstrated its willingness and interest to take whatever steps are necessary to properly operate and maintain the claimed facility consisting of equipment, piping, controls and tanks necessary to separate, collect, convey and treat liquid wastes containing sulfur dioxide prior to discharging the waste to the city sewer. Therefore, the staff recommends issuance of a pollution control certificate.

It was MOVED by Mr. Waterman, seconded by Mr. Harms and carried that a tax credit certificate be issued under the 1967 act to Gray and Company in the amount of \$61,985.37 for facilities claimed under application T-129.



CHARLES MCKENZIE LAUNDROMAT, DEPOE BAY

Mr. Silver, in reviewing this matter, stated that a formal hearing had been held July 23, 1970, in the State Office Building, Portland, Oregon, with Mr. Waterman sitting as hearings officer, that the hearings officer's report had been mailed to members of the Commission on August 17, 1970, and the matter was now before the Commission for its action on the hearings officer's recommendations.

Mr. Waterman noted that discharge of septic tank effluents to the bay and to the ocean is quite commonplace in the Depoe Bay area and that the only apparent solution to the problem is to install a community sewerage system. In response to his inquiry about Department of Environmental Quality staff action in conducting a survey to pinpoint the problem and to encourage a community sewerage system, Mr. Weathersbee reported that Mr. Merryman had been assigned specific responsibility in this regard. In response to a question from Chairman McPhillips, Mr. Sawyer verified that Mr. McKenzie had applied for a waste discharge permit.

It was MOVED by Mr. McMath, seconded by Mr. Cogan and carried that the recommendations of the hearings officer be approved, as follows:

1. Mr. and Mrs. Charles McKenzie, et al be required to file an application for a waste discharge permit for discharges from their self-service laundry.
2. Mr. and Mrs. McKenzie, et al be granted a temporary permit to allow them to continue to operate. The permit should contain a provision that no discharge directly to the waters of the state shall be allowed after an area-wide collection and treatment system is available.
3. A survey of the Depoe Bay area be made to determine the other discharges which are going directly into the waters of the state. Also whether all commercial and industrial sources have made application for waste discharge permits.
4. The Department of Environmental Quality require the development of a master plan for the Depoe Bay area and implement the plan as quickly as possible.
5. Notify all commercial, industrial and governmental installations in the area that waste discharge permits are required and that they must connect to an area-wide system as soon as it is available.

Chairman McPhillips directed Mr. Silver to enter an order to this effect.

It was then MOVED by Mr. Harms, seconded by Mr. McMath and carried that the legal counsel be directed to prepare a formal document requesting Lincoln County to cease the issuance of septic tank permits in those areas not suited to septic tank use, to consider the possibilities of the county providing sewerage services to the Depoe Bay area and pledging all possible cooperation and assistance of the Department of Environmental Quality staff and the Commission.

J. H. BAXTER & CO., THE DALLES

Mr. Rath presented a staff report and chronology of staff action regarding this matter dating back to August 1967. This memorandum report and chronology dated August 21, 1970, have been made a part of the Department's permanent files. The staff report recommended that, since it appeared that adequate waste water control would not be effected in accordance with conditions of the current permit issued to U.P. Railroad as owner of the property, renewal of a permit for this long-standing problem be denied until the presently proposed wastewater recirculation system is completed and placed in operation.

Mr. G.W. McDonald, Division Engineer of the U. P. Railroad stated that the company's engineering staff in Omaha is working on final plans, that they expect to make good progress on the recirculation system by September 15, 1970, and they would like an extension of 90 days beyond the schedule in their waste discharge permit.

In response to questions from Mr. McMath and Mr. Cogan, Mr. McDonald stated that the sanitary sewage disposal system would be fully operational by September 30 and Mr. Best, Technical Director of J. H. Baxter Co., estimated that the entire installation would be in full compliance by January 1, 1971.

It was MOVED by Mr. Waterman and seconded by Mr. McMath that the waste discharge permit for the U. P. Railroad Co. be extended to January 1, 1971.

Mr. Harms and Mr. Cogan voted against the motion and Mr. Waterman and Mr. McMath voted for the motion. Chairman McPhillips voted for the motion to break the tie with the understanding that the sanitary sewage system be completed by September 30, 1970. The motion carried three to two.

COLUMBIA WAY COURT PERFORMANCE BOND

Mr. Weathersbee summarized the staff memorandum report, dated August 21, 1970, which has been made a part of the Department's permanent files. The Commission's attention was directed to a letter addressed to Mr. Spies from Mr. Roger A. Nelson, attorney, and dated August 19, 1970, which proposed, on behalf of Mr. Apar M. Martin, owner of Columbia Way Court, that \$1500 in cash be deposited with the Department of Environmental Quality in lieu of providing a bond in the amount of \$11,750 in order to satisfy the bonding requirements of ORS 449.400.

It was MOVED by Mr. Harms, seconded by Mr. McMath and carried that in accordance with recommendations of the staff, a cash deposit of \$1500 in a form approved by the attorney general be accepted in lieu of a bond for a privately owned sewage treatment plant to serve Columbia Way Court.

BOISE CASCADE PULP MILL, SALEM

Mr. Ayer summarized a staff report which has been made a part of the Department's permanent files. Mr. Ayer stated that public concern regarding this air pollution problem had been stimulated at this particular time by Boise Cascade's public announcement of its water quality control program without simultaneously announcing a specific detailed program for air quality control. This increased public concern had precipitated petitions with a total of 23 signers to the Mid Willamette Valley Air Pollution Authority requesting immediate relief from excessive SO<sub>2</sub> emissions. Copies of these petitions and minutes of the MWVAPA meeting of August 18, 1970, regarding Boise Cascade, Salem were forwarded to the Department of Environmental Quality. Mr. Ayer further reported that the company had not submitted a proposal for controlling SO<sub>2</sub> emissions from its digester blow stacks to date because of difficulty in accurately measuring releases, lack of practical control methods, lack of specific SO<sub>2</sub> standards and the proposed installation of a recovery furnace which would materially change atmospheric emissions.

Mr. Weathersbee reported that it is the staff's intention to require a specific program for controlling atmospheric emissions that would be operational by the time the new recovery system is completed and placed in operation - by April or May 1972; also, it is anticipated that ambient SO<sub>2</sub> standards and

sulfite pulp mill standards would be proposed for adoption by the Commission sometime this winter.

Mr. Mike Dye appeared as a private citizen and protested Boise Cascade Company's announced expansion without a program for controlling air pollution. Mr. Dye stated that he had prolonged discussions with staff members of the Department of Environmental Quality regarding this matter and was appalled that the Department had no specific schedule or program for dealing with this very objectionable, long-standing problem. Mr. Dye claimed that Scott Paper Company's ammonia-base sulfite mill in Everett, Washington, had been satisfactorily controlling its SO<sub>2</sub> emissions for more than 20 years.

Mr. Victor Prodehl, Chief of Field Services for MWVAPA, appeared and relayed complaints on behalf of the moorage owner immediately downstream from Boise Cascade's Salem mill of excessive dust, polluted waters and rapid corrosion of metal at the marina due to Boise Cascade's atmospheric and wastewater discharges.

Chairman McPhillips requested the Department of Environmental Quality staff to report to the Commission in detail regarding this matter at the next Environmental Quality Commission meeting.

LETTER FROM OREGON ENVIRONMENTAL COUNCIL

Chairman McPhillips called Commission members' attention to a letter from Oregon Environmental Council, dated August 17, 1970, requesting the Environmental Quality Commission to hold public hearings with regard to PGE's application to discharge cooling water from its proposed Trojan Nuclear Power Plant into the Columbia River. The OEC maintained in its letter that the new Federal Water Quality Improvement Act of 1970 (PL 91-224) requires the Environmental Quality Commission to hold a hearing, after proper public notice, for the specific purpose of certifying that PGE's proposed discharges will not violate Oregon's water quality standards. Mr. McPhillips also read a letter from Governor McCall to Mr. Harold L. Price, AEC, dated July 9, 1970, in which Governor McCall states that he has designated the Environmental Quality Commission as the agency for Oregon to issue water quality certifications, and that in connection with the Trojan plant of PGE, the Department of Interior, the Federal Water Quality Administration and the Army Corps of Engineers, have acknowledged that the waste

discharge permit already issued to PGE by the Department of Environmental Quality constitutes certification under provisions of PL 91-224, and that the hearing on July 2 (1970) at St. Helens by the Nuclear Plant Siting Task Force complied with the public notice and public hearing required by the act.

Maradel K. Gale, President of Oregon Environmental Council, appeared and asked the Environmental Quality Commission to consider their letter an appeal to the Environmental Quality Commission to provide a forum for exploring all of the environmental aspects of nuclear development in Oregon. She stated that the Oregon Environmental Council is concerned about the composition of the Nuclear Development Council and that they hope to use PL 91-224 as an opportunity to inject the Environmental Quality Commission into a broad consideration of nuclear power development.

Mr. McMath stated that he thought that the Commission should find out whether or not it had complied with requirements of the new Federal Act.

Mr. Cogan said a determination should be made as to what types of hearings would be useful.

Chairman McPhillips requested that the matter be referred to the Attorney General to determine if additional hearings would be appropriate and legal.

PUBLIC HEARING IN THE MATTER OF WAYNE'S AUTO SALVAGE

The hearing in this matter was formally convened at 2:45 p.m. Mr. Silver called Mr. Baton as the first witness who testified that he had investigated alleged open burning of auto bodies at Mr. Wayne Gervais' place of business in the community of Millington within two miles of the city limits of Coos Bay. Mr. Baton also identified 9 color slides taken by him on June 24, 1970, and June 25, 1970 showing open burning and other aspects of Mr. Gervais' operation. These slides were marked for identification and received for the record.

Mr. Gervais declined Mr. Silver's invitation for him to question Mr. Baton.

Mr. Burkitt was called by Mr. Silver as second witness and identified 10 slides and 4 color photographs taken by him on June 13, 1970, showing Mr. Gervais' auto salvage operations. Mr. Burkitt also identified a copy of the staff report prepared by him, dated July 6, 1970, and presented to the Environmental Quality Commission at its July 24, 1970, meeting, and testified

that the report was to his best knowledge factually representative of Mr. Gervais' operation. The slides and photographs and a copy of the staff report were marked for identification and received for the record.

Mr. Harms took notice that the population of the city of Coos Bay is greater than 10,000.

In response to questions by Mr. Gervais, Mr. Burkitt described the location of Wayne's Auto Salvage relative to Georgia Pacific's log handling operations and he expressed the opinion that Georgia Pacific's log handling did not cause much of an air pollution problem because log handling was infrequent and occurred predominantly downwind from inhabited areas.

In response to a question from Mr. McMath, Mr. Burkitt reported that there is no zoning in the area of Wayne's Auto Salvage.

Mr. Silver then announced that he had no further witnesses.

Mr. Gervais explained to the Commission that he had tried to strip the car bodies by hand but that he needs to be allowed to burn a day or two a week for at least one year in order to continue in business and clean up all of the old car bodies in the area. He also claimed that at least one other auto salvage company open burned within 3 miles of Coos Bay.

In response to a question from Mr. Cogan, Mr. Burkitt stated that he knew of no burning at any other bay area auto salvage; there was no such evidence and there had been no complaints.

Mrs. JoAnne Gervais testified that the county has restricted disposal of tires at county dumps.

Mr. Waterman pointed out that it is extremely important to do everything we can to use waste materials and, recognizing that this may be a marginal operation, if there is a reasonable chance to develop methods other than burning within a reasonable time, he would consider a variance.

Mr. Cogan asked legal counsel what the authority of the Environmental Quality Commission was regarding this matter and Mr. Silver replied that the Commission could order the open-burning stopped or could give a variance.

It was MOVED by Mr. Waterman and seconded by Mr. Cogan that Mr. Gervais be granted a variance for 6 months with the condition that burning would not take place more than twice per week and would be limited to not more than 4 car bodies at one time.

Mr. McMath raised the question as to what would happen after 6 months, and the Commission generally agreed that it should be understood that the burning would cease after 6 months and alternative methods must be developed in the meantime.

Motion CARRIED with Mr. Harms opposed.

GRANTS PASS WASTE DISCHARGE PERMIT

Mr. Weathersbee reported that the Department was the surprised recipient on September 24 of a temporary restraining order, issued by Judge Samuel M. Bove of the Josephine County Circuit Court, restraining the Department of Environmental Quality from enforcing condition No. 1 of the waste discharge permit issued to the city of Grants Pass which prohibits new sewer connections until such time as the city provides adequate treatment of all sewage wastes before dumping them into the Rogue River.

Mr. Sawyer, in reviewing the situation for the Commission, reported that the city had not complied with the time schedule contained in its previous waste discharge permit for making improvements to its sewage collection system and expanding and upgrading its sewage treatment plant. The city's own engineering study and report, completed in 1969, showed that raw sewage was bypassed into the Rogue River an average of 127 days per year due to heavy infiltration into the sewer from a high ground water table and storm runoff. In addition, the sewage treatment plant was discharging an effluent BOD slightly in excess of 30 mg/l in comparison to Rogue River water quality standards which require treatment to produce an effluent BOD not to exceed 20 mg/l.

In making application for waste discharge permit renewal the city proposed a new time schedule for improving its sewer system and expanding and upgrading its sewage treatment plant. The new schedule represents a delay of 14 months over the previous schedule and is predicated upon the city voting bonds by not later than November 1970. The staff, recognizing that starting now, the proposed new schedule was about as soon as the project could practically be completed,

issued the city a new waste discharge permit including the new schedule and also containing a condition that specified no new sewer connections or additions to the waste load until sewerage improvements had been completed. New sewer connections were allowed in the Fruitdale-Harbeck area across the river from Grants Pass where sewers were under construction to alleviate conditions that had been declared by the County Health Officer to be a public health hazard.

The staff imposed the "no new connection" condition in order to provide incentive to the city to get busy and get its sewerage system in good order without further delay and to prevent the problem from getting much worse in the interim.

The city objected to the "no connection" condition by letter, but the staff felt it was justifiable and necessary to leave it in. The city was advised that it could and should appeal to the Environmental Quality Commission for further consideration if it desired, but instead it chose to go to the court.

In response to a question from Mr. McPhillips, Mr. Silver stated that the "no further connection" condition that Grants Pass was objecting to was essentially parallel to conditions imposed on other communities that had experienced delays in implementing needed sewerage programs.

It was MOVED by Mr. McPhillips and seconded by Mr. Cogan that legal counsel proceed forthwith to seek a hearing on the injunction.

By way of discussion, Mr. Osburn stated that it would be counsel's intention to petition the court for an order dissolving the temporary restraining order pending a hearing on the merit; that it is very unusual for the court to grant a temporary restraining order without at least a show cause hearing in which the defendant is invited to show cause why the injunction should not be issued, and in this case first notice came today and it is noted that the court has already signed the restraining order.

Mr. McPhillips with consent of the second AMENDED the motion to this effect and the motion carried unanimously.

Mr. Harms also MOVED that the staff investigate and report on the possibility of revoking the waste discharge permit for the city of Grants Pass on the basis that the conditions under which the permit had been granted would have been substantially changed by removal by the court of one of the important conditions of the permit and further, that the staff investigate and report on the possibility



of withholding state and federal aid from the city of Grants Pass. The motion was seconded by Mr. Waterman and carried.

B & D PAVING CO., HOOD RIVER

Mr. Ayer reported that this item should not have been included on the agenda inasmuch as the company had been in compliance since last month.

DON H. MORRIS HOT MIX ASPHALT PLANT, LINCOLN CITY

Mr. Ayer presented a staff report dated August 19, 1970 which has been made a part of the Department's permanent files. Mr. Ayer reported that an inspection of the subject hot mix plant made on August 18, 1970 revealed that excavation of settling ponds had been completed, but that scrubbing facilities had not been completed. It was pointed out that the company had failed to meet its compliance deadline of July 15, 1970 and had alleged financial difficulties. In response to a question from Chairman McPhillips Mr. Ayer stated that the plant had operated only two days in August and two days in July.

Mr. George Green appeared for Don H. Morris Company and stated that the plant had actually operated the entire first week in July, but not thereafter. He further stated that the scrubber had required considerable design modification, that it had become necessary to double the size of his ponds and pumping systems to permit 100% recycling of water and in spite of his best efforts to comply he had not been able to meet the July 15 deadline. He asked for an additional two weeks to complete his control system and permission to operate some in the meantime.

Mr. Harms inquired as to the severity of the problem being caused and Mr. Ayer replied that there had been no complaints.

Mr. Harms then MOVED, Mr. Waterman seconded, and the motion carried to extend the deadline to September 8, 1970 with the understanding that all essential work would be done in the meantime.

L & H LUMBER CO., SUTHERLIN

Mr. Burkitt presented the staff report, dated August 20, 1970, which has been made a part of the Department's permanent files. He reported that the company has substantially completed arrangements for a paper company to take all of the wet hemlock sawdust from this operation, and since 80% of the present log inventory is hemlock, the company feels that the existing

wigwam burner without further modifications would be adequate and in compliance with current air quality regulations and on this basis the company is requesting that the Environmental Quality Commission order Number 20, dated June 1, 1970, be stayed until such time as the wigwam waste burner is re-evaluated without the wet hemlock sawdust.

In discussing the company's request, Mr. Burkitt stated that removal of the hemlock sawdust would not necessarily make the burner work better and it is the staff's opinion that without adequate overfire and underfire air and supplemental fuel and without a damper in the top of the burner, the burner would not be able to comply with current regulations all of the time.

Mr. Ken Forrest, Superintendent and Mr. Jerome Bischoff, attorney, appeared for the L & H Lumber Co. Mr. Bischoff stated that L & H Lumber Company operated a stud mill cutting 100,000 board feet/day before the mill was shut down in order to comply with the Environmental Quality Commission order, and that the mill is still shut down and reopening is problematical. He further stated that the company has already made substantial improvements to its burner and that with removal of the wet hemlock sawdust, it is thought that the burner could handle the fir waste and some cedar that would remain if the owner elects to reopen the mill. He suggested that the Environmental Quality Commission modify its order to allow a reasonable period, such as 60 days, to see what the burner could do under the changed conditions. In response to a question from Mr. McMath, Mr. Burkitt stated that the staff knew of no other burner in the state of the size and type of the L & H burner that could operate within the standards and that it is the staff's opinion that the problem would be worse with the hemlock waste removed. He further stated that the company had submitted plans and specifications for modifying the burner, but that they had never been fully implemented, also that the plans and specifications had been prepared on the basis of hemlock sawdust in the fuel pile.

In response to a question from Mr. McPhillips, Mr. Forrest stated that it was not possible to store residual wastes and operate the burner at optimal capacity, that there was no place to store wastes except in the

burner and that they had operated in the past to let the pile build up in the burner as high as possible before starting the fire. Mr. McMath asked if it would be possible to store the wastes on land until full utilization of wastes could be arranged and Mr. Forrest replied that this would not be possible because there was not enough area and they would have a problem with the Fire Marshal. Mr. Bischoff stated that it probably would be the spring of 1971 before it would be known if all wastes could be disposed of through utilization.

Mr. McPhillips, for purposes of clarification, asked if it was the company's request that it be allowed to operate, with the wet hemlock sawdust being hauled away, for a period of 60 days and if the burner could not meet standards while burning the remaining wastes, the company would shut down until burner modifications are completed. Mr. Bischoff replied "yes."

Mr. Burkitt in reply to a question from Mr. Cogan stated that the staff feels that sufficient information is already available for design of burner modifications.

Mr. Harms stated that he viewed the company's request as a desire on its part to have the problem demonstrated in its own facility and he couldn't go along with this. It was thus MOVED by Mr. Harms, seconded by Mr. Cogan and carried that, in accordance with the recommendation of the staff, the company be required, prior to reopening the mill, to furnish sufficient documentation indicating that use of the wigwam waste burner will not be required; or if complete phase out of the burner is not possible, to complete modifications of the burner in accordance with plans prepared by a registered professional engineer which incorporate the engineering concepts developed by the Oregon State University Forest Products Research Laboratory.

HARRIS FEEDLOT, MILTON-FREEWATER

Mr. Rath presented the staff memorandum report dated August 20, 1970 which has been made a part of the Department's permanent files. He reported that a qualified engineer had been retained, plans had been submitted and it appeared that approval could be given after additional design information is submitted and that construction of control facilities should proceed without difficulty barring unforeseen problems with contracts, materials or weather.

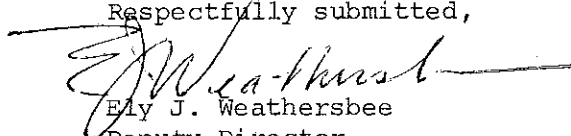
It was considered that satisfactory progress was being made and NO ACTION was required or taken by the Commission.

NEXT MEETING

The next meeting of the Environmental Quality Commission was set for September 25, 1970 at a place to be determined by the Director.

There being no further business the meeting adjourned at 4:00 p.m.

Respectfully submitted,

  
Ely J. Weathersbee  
Deputy Director

PROJECT PLANS, REPORTS, PROPOSALS:

The following project plans or reports were received and processed by the Air Quality Control Division for the month of July 1970:

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
15	Dillard	Round Prairie Lumber Co. WWWB modification	Conditional approval
15	Springfield	Weyerhaeuser Co., Com- pliance schedule and program	Additional info. requested
15	Toledo	Georgia Pacific, Com- pliance schedule and program	Additional info. requested
16	St. Helens	Boise Cascade Corp., Com- pliance schedule and program	Additional info. requested
17	Wauna	Crown Zellerbach, Com- pliance schedule and program	Additional info. requested
20	Gardiner	International Paper Co. Compliance schedule and program	Additional info. requested
22	Brookings	Brookings Plywood, Phase out of burner schedule	Conditional approval

TO : MEMBERS OF THE ENVIRONMENTAL QUALITY COMMISSION  
B. A. McPhillips, Chairman      E. C. Harms, Jr., Member  
Storrs S. Waterman, Member      George A. McMath, Member  
Arnold M. Cogan, Member

FROM : AIR QUALITY CONTROL DIVISION

DATE : August 19, 1970 for August 21, 1970 Meeting

SUBJECT: DON H. MORRIS CO., Lincoln City

At the last Commission Meeting, the staff reported that fabrication of the scrubber had been started, as had the excavation of settling ponds. At that time, the company expected that the plant would be shut down for a few weeks and that installation could be completed then.

A plant inspection on August 18, 1970 revealed that:

1. Excavation of the settling ponds had been completed.
2. Parts of the spray assembly for the scrubber have been delivered, but not assembled.

The company has indicated that some sheet metal work must be completed for the scrubber and some structural materials delivered. Also, the plant has operated only two days in August. The company has alleged financial difficulties in hampering completion.

CONCLUSIONS:

1. The plant has obviously gone well past its July 15 deadline without coming into compliance.
2. It appears to the staff that the remaining work should require no more than a few days' effort.

RECOMMENDATIONS:

Ordinarily, the staff would seriously consider judicial action to compel closing the plant until controls were installed. However, since in this case the company has claimed that the plant has operated very little, and is also claiming hardship, the staff recommends that the Commission give a representative of the company an opportunity to be heard and then direct the staff as it sees fit.

TO : MEMBERS OF THE ENVIRONMENTAL QUALITY COMMISSION

B. A. McPhillips, Chairman  
Storrs S. Waterman, Member  
Arnold M. Cogan, Member

E. C. Harms, Jr., Member  
George A. McMath, Member

FROM : AIR QUALITY CONTROL DIVISION

DATE : August 20, 1970 for August 21, 1970 Meeting

SUBJECT: L & H LUMBER COMPANY - SUTHERLIN

The attached letter from subject company attorney, Mr. Jerome S. Bischoff, discloses that arrangements have been made with a paper company to take all of the wet hemlock sawdust. At present the company states that the present inventory is approximately 80% hemlock logs.

The company feels that because of the reduction in this amount and of this species the present wigwam waste burner without any further modifications will be adequate and in compliance with current air quality regulations.

Therefore, the company requests that the Environmental Quality Commission Order #20, dated June 1, 1970, be stayed until such time as the wigwam waste burner is re-evaluated without the above wet hemlock sawdust.

DISCUSSION:

At the present time the staff is unaware of any wigwam waste burner which could comply with current emission standards that has not been modified with the engineering concepts as developed by the Oregon State University Forest Research Laboratory. Emissions from all sources, excluding hogged fuel boilers, must not exceed Ringelmann #1 and 0.1 grain for Special Control Areas. Sutherlin is located in the Umpqua Special Control Area.

Furthermore, the staff has no assurance that hemlock will continue to dominate 80% of the production at this mill.

Also, the staff would like to point out that less residues in a large burner, without considerable modification, would tend to burn at lower temperatures, resulting in incomplete combustion with more smoke and particulate emissions.

Without adequate overfire and underfire air, without supplementary fuel such as natural gas or fuel oil, and without a damper in the top of the wigwam waste burner, the burner at this mill would not be able to comply with current regulations all of the time.

STAFF RECOMMENDATIONS:

The staff feels that, if the company plans to reactivate this mill, sufficient documentation should be furnished indicating that use of the wigwam waste burner will not be required (as per the Environmental Quality Commission Order No. 20, Dated June 1, 1970); or that if complete phase-out is not possible, that, prior to reactivation, the company should submit plans from a professional engineer for the modification of the wigwam waste burner in accordance with the engineering concepts developed by the OSU Forest Products Research Laboratory, and that such modifications be completed prior to start-up.

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
RECEIVED  
AUG 18 1970  
AIR QUALITY CONTROL

VERNE P. SENBERY  
JEROME S. BISCHOFF  
WILLIAM T. MARTIN  
JOHN C. BEATTY, JR.  
DAVID TEMPLETON  
RICHARD L. BESS  
LLOYD B. ERICSSON  
FREDERICK T. SMITH  
ROBERT E. GLASGOW  
CHARLES ROBINOWITZ

SENBERY, MARTIN, BEATTY, BISCHOFF & TEMPLETON  
ATTORNEYS AT LAW  
1107 STANDARD PLAZA  
PORTLAND, OREGON 97204  
TELEPHONE 224-3113

OUR CABLE ADDRESS  
"DUSLAW"  
PORTLAND, OREGON

August 18, 1970

State of Oregon  
Air Quality Control Commission  
State Office Building  
Portland, Oregon

ATTENTION: HAROLD BURKITT

Re: L & H Lumber Company

Dear Mr. Burkitt:

Mr. Leiken has authorized me to advise you that the company has substantially completed arrangements for the sale of its wet hemlock sawdust to a paper company, which will leave for process through the burner a small volume of fir and the residue from an occasional cedar log. The L & H inventory of logs consists of about 80% hemlock. The company feels that its burner is adequate to process the refuse under these conditions without any violation of the Air Quality Control standards and hopes that no further changes be made to the burner until after there have been substantial operations under the new arrangement so as to furnish an adequate test. Under present market conditions there is certainly no need to spend money and sawmill equipment needlessly.

The company expects to receive a draft of a purchase contract within the next week or two and hopes to conclude the written arrangements shortly thereafter. It will be necessary to build adequate storage and transfer facilities to handle the operation and the shipment. When the plans are worked out we will keep you posted.

In the meantime, we would like to have the present order issued by the Commission stayed, so that the mill can operate in compliance with the Commission's orders.

Very truly yours,

  
JEROME S. BISCHOFF

JSB:mah  
cc: L & H Lumber Company



SUMMARY - 1970 FIELD BURNING SEASON

DAY	CLASS		ACRES BURNED		EUGENE AIR QUALITY						SPRINGFIELD AIR QUALITY		SALEM AIR QUALITY	
	AM	PM	North Valley	South Valley	AIRPORT			COMMERCE	LRAPA	LRAPA	Near 18th & A Street Susp.Part. (24 hrs) ug/M <sup>3</sup>	Visibility		Suspended Particulate (24 hours) ug/M <sup>3</sup>
					Visibility	Max.	Susp.	BUILDING	CITY HALL	CITY SHOPS		Min.	No.Hrs	
				Min.	No.Hrs	1 hr.	Partic.	Susp. Part.	Susp.Part.			≤ 6 mi		
July														
15	N				15	0	62	57	123	88	86	20	0	
16	S	S	3138	1603	10	0	17		55	104	162	20	0	44
17	N	P			5	2	66	50	87	33	128	5	1	
18	N				12	0	58		67	106	165	10	0	65
19	N				12	0	44			78	90	20	0	32
20	N	N			20	0	80					30	0	148
21	P	P			25	0	11	45				15	0	
22	N	N	2910	4960	12	0	67	67	89	59	139	10	0	47
23	P	P			12	0	25	53	82	75	141	7	0	49
24	N				12	0	45	45	63	89	180	20	0	40
25	S	S			25	0	16		47	60	129	4	2	38
26	S	S			25	0	66		30			15	0	25
27	S	P			1	5	90		69			15	0	30
28	P	P			25	0	7	26	60	80	129	30	0	39
29	N	N	8935	20669	3	1	75	55	64	51	184	30	0	28
30	N	N			12	0	58	57		83	242	8	0	51
31	N				8	0	72	54		68	207	10	0	
Aug.														
1	N	N			20	0	11		28			8	0	46
2	N	N			20	0	67		50			15	0	37
3	N	N			12	0	67	60	66	69	175	7	0	50
4	S	S			10	0	88	26	57	54	145	1½	8	65
5	P	P	4924	32651	7	0		32		55	142	2½	5	56
6	N	SS			25	0	89		77	88	192	15	0	
7	S	SP			25	0	50	23	62	45		10	0	42
8	N				8	0	82					10	0	94
9	N				8	0	85		89			10	0	43
10	N	NP			2	1	92	91	128	138	252	10	0	90
11	N	NP			6	2	82	95		51	192	8	0	74
12	N	P			12	0	*			121	168	15	0	
13	N	P			7	0				73	184	7	0	
14	P		2325	21519	12	0				138	294	10	0	
15	P				12	0						10	0	

\*Station changed to City Hall

Aug. 20, 1970

VISIBILITY RESTRICTIONS (6 mi. or less)  
BY SMOKE AT SALEM AND EUGENE FOR 1969 and 1970

July 15 - Aug. 19

	<u>Salem</u>		<u>Eugene</u>	
	<u>Days of</u> <u>Restriction</u>	<u>Hrs. of</u> <u>Restriction</u>	<u>Days of</u> <u>Restriction</u>	<u>Hrs. of</u> <u>Restriction</u>
1969	10	13	10	30
1970	4	16	6	12

COMPLAINTS TABULATED BY

DEQ, MWVAPA, & LRAPA

Through Aug. 19

1969 - 3172

1970 - 924

August 21, 1970

STATEMENT BY LEAGUE OF WOMEN VOTERS TO:

DEPT. OF ENVIRONMENTAL QUALITY re: EVALUATION OF FIELD  
BURNING

The League of Women Voters of Central Lane County notes with encouragement the apparent effectiveness of the techniques initiated by the Department of Environmental Quality for the dispersion of field burning pollutants during the 1970 summer months.

However, we are also aware that the total amount of field burning has not decreased and while Eugene has had a reduction in smoke from this source, it is still far from satisfactory. Because of the dispersion techniques used to ~~work~~ improve the air quality in Eugene other communities have had impaired air quality.

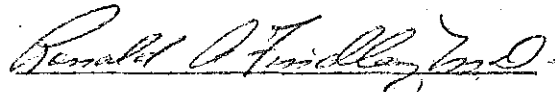
We anticipate that there will be no lessening of efforts to find a solution to the problem of weed and disease control. We also believe that a continuing effort should be made to find a utilization for straw that will relieve the necessity for field burning.

Mary Briscoe, Pres.  
League of Women Voters of Central  
Lane County

STATEMENT SUBMITTED BY RONALD A, FINDLAY, M.D.

Unquestionably there has been a reduction in the concentration of pollutants from field burning in the Eugene area this year and fewer of my patients have suffered adverse effects from this pollution.

However, I am concerned that there has been no reduction in the total quantity of pollutants emitted by field burning. There has been simply a shift of these pollutants to different areas affecting a different population group. I would hope that the Environmental Quality Commission will work for a reasonable actual reduction in the total volume of acreage permitted to be burned.



Ronald A. Findlay, M.D.

STATEMENT TO ENVIRONMENTAL QUALITY COMMISSION

Mayor Lester E. Anderson  
Eugene  
August 21, 1970

On behalf of the City of Eugene, I should like to welcome you to our city and tell you that we await with great interest the staff report on the results of field burning during the 1970 season. We congratulate you, as members of the Commission, for your efforts, along with those of the seed growers, to mitigate as far as possible the concentrations of smoke coming into our city. We consider that you have done everything in your power under the existing law to protect our citizens, and for this we thank you.

We are critical, not of the Environmental Quality Commission, but of the law under which you are forced to operate. Although this year we have not been subjected to the intense concentrations of smoke under which we suffered so severely last year, the volume of smoke generated by field burning is still serious and dangerous - it is a blight to our community, it remains a health hazard, it causes physical discomfort and mental depression, and it stands in defiance of a man's right which I enunciated to you last summer: The right to breathe clean, fresh air and to have an unobstructed view of the sun.

The smoke from field burning still contaminates the entire air shed of the Willamette Valley. The only way to reduce this contamination is to control it at its source -- just as pollutants from industry must be controlled from the smoke stack or automobiles from their exhaust pipes. In our opinion, you cannot depend upon the wind to disperse air pollution; it merely blows the smoke away from one place to another place. When we set upon our program of

shutting down wigwam burners, we did it without concern for wind direction. We did it because the burners were a source of air pollution, and the only way to reduce air pollution is to eliminate it at its source. That is why the City of Eugene banned backyard burning.

This summer, Eugene citizens have been the object of a skillfully conceived public relations program sponsored by the seed industry. In newspaper ads and television commercials, the program attempts to persuade the people of Eugene that the industry is earnestly trying to eliminate field burning and that our patience will be rewarded with clean summer air in the not too distant future. Frankly, our faith in these pronouncements was somewhat shaken when the industry challenged in court the Commission's legal right to bar cereal grain fields from the burning list. Acceptance of your program to bar cereal grains would have been a major move to convince us that the industry is interested in taking a first step toward pollution control at its source, even though it involves non-essential burning.

We submit that the present program for regulating field burning is not acceptable, other than to provide temporary relief, because it does not limit the total acreage which is permitted to be burned and because the Commission has no power to enforce its own regulations. In the 1971 Legislative session, the city of Eugene will sponsor legislation seeking to abolish the existing agricultural exemption from the general law governing air-pollution controls and abolishing all special legislation regulating field burning so that the responsibility will be where it belongs - in the Environmental Quality Commission - and so that agricultural burning will be subject to the same controls as those regulating any other industry.

These industry ads that I spoke of earlier carry the theme "We're trying!" They tell of the new regulations, an aircraft monitoring system, the smokeless incinerator now being developed, and efforts to utilize straw residues.-- and ask all of us in the Eugene area to understand the problem. I can assure you we do understand the problem, but it will be difficult to understand attempts to delay or obstruct positive efforts toward a solution. That is why we hope that the seed industry will join us in backing legislation that will call for more effective regulation and enforcement and will spell out clearly the goals your commission has set, with timetables, to eliminate open field burning as a major source of pollution in our Valley. Then we will know that they not only are trying, but are willing to try even harder.

SUMMARY - 1970 FIELD BURNING SEASON

DAY	CLASS		ACRES BURNED		EUGENE AIR QUALITY					SPRINGFIELD AIR QUALITY		SALEM AIR QUALITY		
	AM	PM	North Valley	South Valley	AIRPORT			COMMERCE BUILDING	LRAPA CITY HALL	LRAPA CITY SHOPS	Visibility		Suspended Particulate	
					Visibility Min.	No.Hrs ≤ 6 mi	Max. 1 hr. PHI	Susp. Partic. (24 hr) ug/M <sup>3</sup>	Susp. Part. (24 hours) ug/M <sup>3</sup>	Susp. Part. (24 Hours) ug/M <sup>3</sup>	Near 18th & A Street Susp. Part. (24 hrs) ug/M <sup>3</sup>	Min.	No.Hrs ≤ 6 mi	(24 hours) ug/M <sup>3</sup>
July														
15	N				15	0	62	57	123	88	86	20	0	
16	S	S	3138	1603	10	0	17		55	104	162	20	0	44
17	N	P			5	2	66	50	87	33	128	5	1	
18	N				12	0	58		67	106	165	10	0	65
19	N				12	0	44			78	90	20	0	32
20	N	N			20	0	80					30	0	148
21	P	P			25	0	11	45				15	0	
22	N	N	2910	4960	12	0	67	67	89	59	139	10	0	47
23	P	P			12	0	25	53	82	75	141	7	0	49
24	N				12	0	45	45	63	89	180	20	0	40
25	S	S			25	0	16		47	60	129	4	2	38
26	S	S			25	0	66		30			15	0	25
27	S	P			1	5	90		69			15	0	30
28	P	P			25	0	7	26	60	80	129	30	0	39
29	N	N	8935	20669	3	1	75	55	64	51	184	30	0	28
30	N	N			12	0	58	57		83	242	8	0	51
31	N				8	0	72	54		68	207	10	0	
Aug.														
1	N	N			20	0	11		28			8	0	46
2	N	N			20	0	67		50			15	0	37
3	N	N			12	0	67	60	66	69	175	7	0	50
4	S	S			10	0	88	26	57	54	145	1½	8	65
5	P	P	4924	32651	7	0		32		55	142	2½	5	56
6	N	SS			25	0	89		77	88	192	15	0	
7	S	SP			25	0	50	23	62	45		10	0	42
8	N				8	0	82					10	0	94
9	N				8	0	85		89			10	0	43
10	N	NP			2	1	92	91	128	138	252	10	0	90
11	N	NP			6	2	82	95		51	192	8	0	74
12	N	P			12	0	*			121	168	15	0	
13	N	P			7	0				73	184	7	0	
14	P		2325	21519	12	0				138	294	10	0	
15	P				12	0						10	0	

\*Station changed to City Hall



SUMMARY - 1970 FIELD BURNING SEASON

DAY	CLASS		ACRES BURNED		EUGENE AIR QUALITY					SPRINGFIELD AIR QUALITY		SALEM AIR QUALITY		
					AIRPORT			COMMERCE	LRAPA	LRAPA	Visibility		Suspended Particulate	
					North Valley	South Valley	Visibility Min. ≤ 6 mi	Max. 1 hr. PHI	Susp. Partic. (24 hr) ug/M <sup>3</sup>	BUILDING Susp. Part. (24 hours) ug/M <sup>3</sup>	LRAPA CITY HALL Susp. Part. (24 Hours) ug/M <sup>3</sup>	CITY SHOPS Near 18th & A Street Susp. Part. (24 hrs) ug/M <sup>3</sup>		Min. No. Hrs ≤ 6 mi
July														
15	N				15	0	62	57	123	88	86	20	0	
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17	N	P			5	2	66	50	87	33	128	5	1	
18	N				12	0	58		67	106	165	10	0	65
19	N				12	0	44			78	90	20	0	32
20	N	N			20	0	80					30	0	148
21	P	P			25	0	11	45				15	0	
22	N	N	2910	4960	12	0	67	67	89	59	139	10	0	47
23	P	P			12	0	25	53	82	75	141	7	0	49
24	N				12	0	45	45	63	89	180	20	0	40
25	S	S			25	0	16		47	60	129	4	2	38
26	S	S			25	0	66		30			15	0	25
27	S	P			1	5	90		69			15	0	30
28	P	P			25	0	7	26	60	80	129	30	0	39
29	N	N	8935	20669	3	1	75	55	64	51	184	30	0	28
30	N	N			12	0	58	57		83	242	8	0	51
31	N				8	0	72	54		68	207	10	0	
Aug.														
1	N	N			20	0	11		28			8	0	46
2	N	N			20	0	67		50			15	0	37
3	N	N			12	0	67	60	66	69	175	7	0	50
4	S	S			10	0	88	26	57	54	145	1½	8	65
5	P	P	4924	32651	7	0		32		55	142	2½	5	56
6	N	SS			25	0	89		77	88	192	15	0	
7	S	SP			25	0	50	23	62	45		10	0	42
8	N				8	0	82					10	0	94
9	N				8	0	85		89			10	0	43
10	N	NP			2	1	92	91	128	138	252	10	0	90
11	N	NP			6	2	82	95		51	192	8	0	74
12	N	P			12	0	*			121	168	15	0	
13	N	P			7	0				73	184	7	0	
14	P		2325	21519	12	0				138	294	10	0	
15	P				12	0						10	0	

\*Station changed to City Hall

Aug. 20, 1970

VISIBILITY RESTRICTIONS (6 mi. or less)

BY SMOKE AT SALEM AND EUGENE FOR 1969 and 1970

July 15 - Aug. 19

	<u>Salem</u>		<u>Eugene</u>	
	<u>Days of</u> <u>Restriction</u>	<u>Hrs. of</u> <u>Restriction</u>	<u>Days of</u> <u>Restriction</u>	<u>Hrs. of</u> <u>Restriction</u>
1969	10	13	10	30
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COMPLAINTS TABULATED BY

DEQ, MWVAPA, & LRAPA

Through Aug. 19

1969 - 3172

1970 - 924

TO : MEMBERS OF THE ENVIRONMENTAL QUALITY COMMISSION

B. A. McPhillips, Chairman  
Storrs S. Waterman, Member  
Arnold M. Cogan, Member

E. C. Harms, Jr., Member  
George A. McMath, Member

FROM : AIR QUALITY CONTROL DIVISION STAFF

DATE : August 18, 1970 for August 21, 1970 Meeting

SUBJECT: BOISE CASCADE - SALEM

The company is preparing a proposal for air quality controls for the blow-pit exhaust stack. Representatives of Boise Cascade have discussed the basic approaches and criteria of the system with the Department of Environmental Quality staff, and it appears that they are applying best available technology. The staff has expressed a desire that the controls should be installed no later than the completion of the chemical recovery system.

Besides the petition, there have been 11 complaints against Boise Cascade in 1970 through August 15. These all have been relayed to the Department by Mid-Willamette Valley Air Pollution Authority, who have also made some staff inspections to confirm the existence of odors.

It appears unlikely that the mill could get controls designed and installed on the present system before the chemical recovery system goes into operation. The Company has been conducting stack tests this month to get good basic data to use in designing their controls. Although earlier expectations were that sufficient progress would be made to allow requesting funds for a capital expenditure and to make a preliminary proposal this month, it appears at present that no proposal will be forthcoming until a final, detailed plan may be presented. The date for this probably will be in late 1970.

The state of control technology is such that each mill planning controls must tailor-make them. The experiences and designs from any one mill can be only in the most general terms applied to another mill. Cooking liquors differ in composition according to the type of paper to be made from the pulp, so that there are no "off-the-shelf" controls commercially available, or standard designs to be adapted to any mill.

The lack of an established technology has also hampered efforts to develop a sulfite mill emission regulation. There being no regulation at present, discussions with the company concerning these controls have been in terms of highest and best treatment, within the framework of some limits discussed with the sulfite industry and the Washington Air Quality Control Board last winter.

CONCLUSIONS:

1. The company has commenced preparing a control program for abating obnoxious SO<sub>2</sub> emissions. In the absence of adopted regulations, it intends to install the best treatment possible.
2. The staff feels it would be in the public interest at this time for the Environmental Quality Commission to adopt a resolution urging the company to assign a priority to the project sufficient to ensure its completion no later than the time at which the cooking-chemical recovery system commences operation.



**BOISE CASCADE PAPERS**

P. O. Box 2089, Salem, Oregon 97308  
Telephone (503) 362-2421

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**R E C E I V E D**

AUG 19 1970

**OFFICE OF THE DIRECTOR**

17 August 1970

Mr. Kenneth H. Spies  
Department of Environmental Quality  
State Office Building  
1400 SW 5th Avenue  
Portland, Oregon 97201

Dear Mr. Spies:

The announcement made by the Boise Cascade Corporation mill at Salem, Oregon, with regards to its plans for burning spent sulfite liquor plus secondary treatment of all the mill effluent has apparently precipitated some questions on the part of the Salem residents as to the status of the air pollution abatement program at this mill. We tried to answer these to the best of our present capability but unfortunately, the press gave little notice to these replies.

In answer to these questions, it would have given us great satisfaction to have been able to simultaneously announce plans for reducing the SO<sub>2</sub> emissions from this mill, which in this instance relates mainly to our blow stack gas emissions. However, as it is well known to those working in this field, the technology for relieving this problem is not as advanced as that for resolving water pollution problems which, admittedly, have been more critical. Although we are not presently able to define our plans for reducing the blow stack SO<sub>2</sub> emissions, we are definitely working on a program for their reduction. The basic obstacle of which I am sure you are aware, is first arriving at an accurate method for measuring and monitoring the SO<sub>2</sub> emissions from the blow stack. As this problem is resolved and meaningful standards are developed, we can further add to our engineering knowledge and properly select equipment which will reduce our emissions to an agreeable level.

We are now in the process of accelerating our program for development of a measuring method for the emission from our blow stacks plus the development of engineering and design parameters for the absorption equipment. As a part of this



Mr. Kenneth Spies - continued

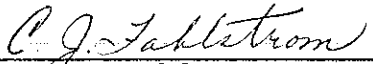
program, we have employed the services of a consultant, Mr. G. V. Palmrose. Mr. Palmrose is well known in the sulfite pulping industry for the development of testing methods and absorption systems. His participation in our program will undoubtedly give it the impetus needed to expedite the development of an accurate testing method plus an effective system for reducing our SO<sub>2</sub> emissions. We have also arranged for engineering aid from our own Central Engineering group and some preliminary design work has been started.

One of the problems facing us all is making the general public aware of the complexity of our air pollution abatement problem, particularly as related to a sulfite mill blow stack emission. This emission has never contributed much to the over all SO<sub>2</sub> problem other than as a nuisance. Thus, much has yet to be developed in the way of testing, engineering, and design work as well as meaningful legislation, and this can not be accomplished overnight.

Boise Cascade Corporation has publicly announced its desire to protect our environment and the Salem Mill will proceed to resolve this problem at the earliest possible date.

Sincerely,

BOISE CASCADE Papers

  
By: C. J. Fahlstrom  
Resident Manager

CJF/ar

August 3,

RTG.	ACT.	ACC.
VP	REV	3/10
AM		
TECH	ADM	ENF

17 names

Dear Mr. Mick:

As a result of our phone conversation of July 22, 1970, I have circulated the enclosed petition. Several more petitions are being circulated and will be sent to you later.

*Please make copy & send to DEQ.*

We appreciate anything you can do to help us gain some control over the offensive condition caused by Boise Cascade. We hope that we won't have to wait until 1972 before seeing some results of the pollution-control devices they are installing.

We have also kept a list of the times when the sulfur dioxide fumes bothered us, as you suggested. We will continue to try to write this down each day, when we start to notice the fumes.

Thank you very much for your help, and for letting us know how to go about taking some constructive action to solve this problem. Please let us know if there is anything else we can do.

Sincerely,

*Mrs. Kevin R. Brown*

Mrs. Kevin R. Brown

REC - MWVAPA

AUG 4 1970

DNF TEMP PERM

State of Oregon  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
 AUG 11 1970  
 AIR QUALITY CONTROL

The following are times when sulfur dioxide fumes were extremely noticeable and irritating inside our home at 1040 Bellevue St. S.E., Salem:

7/23/70	7:05-7:20 PM 10:15-11:00 PM
7/26/70	5:30-6:00 PM
7/27/70	3:30-4:30 PM 7:25-8:00 PM
7/28/70	7:25-8:00 PM 8:50-9:15 PM
7/29/70	6:20-6:45 PM 7:25-8:00 PM
7/30/70	7:25-8:00 PM 10:30-10:45 PM
7/31/70	5:15-6:05 PM
8/1/70	11:45-12:00 Noon 5:15-5:35 PM
8/2/70	9:15-9:35 PM

*Mrs. Kevin R. Brown*  
Mrs. Kevin R. Brown

16  
+1  
22

As residents of Marion and Polk Counties, we feel that the sulfur-dioxide fumes emitted from the Boise Cascade building at 315 Commercial Street South East, Salem, Oregon, are defiling the air and making this area an extremely disagreeable place to live. If Boise Cascade management does not choose to accept the challenge before them, we urge strict legislation to abolish such blatant devastation of our environment.

Patricia A. Brown  
1040 Bellevue St. SE  
Salem, Ore 97301

Kevin R Brown  
1040 Bellevue St SE  
Salem, Ore

Paul  
907 SE 13th  
Salem Ore

Richard A. Anderson  
~~154 Ellendale~~ (OK)

Paul N. Miller  
3320 Liberty Rd. SE  
Salem, Ore.

Dallas, Oregon  
Charlene Lupoli  
~~1040 Bellevue St SE~~  
Salem, Ore 97301

Barbara L. Power  
250 25 St SE #4  
Salem, Or 97301

Suzanne Larson  
2118 Chonoketa NE  
Salem, Oregon 97301

Linnna Martini  
169 N.W. Keith  
Salem, Oregon 97301

Peggy Klein  
4925 14th Rd. S.  
Salem, Ore. 97302

Judith L. Jones  
452 Browning Ave. S.E.  
Salem, Oregon 97302

Jayne Benneault  
1676 Georgia Ave. S.E.  
Salem, Oregon 97302

Laura Prince  
4145 Pujon Rd. N.  
Salem, Oregon

Susan Bye  
4620 39th Ave NE  
Salem, OR 97303

Pam Muddock  
3418 Liberty Rd SE #18  
Salem, Oregon 97302

Stephen B. Muddock  
address

REC - MWVAPA

AUG 4 1970

DNF TEMP PERM



1

As residents of Marion and Polk Counties, we feel that the sulfur dioxide fumes emitted from the Boise Cascade building at 315 Commercial Street South East, Salem, Oregon, are defiling the air and making this area an extremely disagreeable place to live. If Boise Cascade management does not choose to accept the challenge before them, we urge strict legislation to abolish such blatant devastation of our environment.

John M. Ringle 3855 Saxon Dr, S. Salem 97302

John J. Smith 497 Holmes Ct. S.E. 97302

Marlene Sims Rt. 1 Box 201 Stayton 97383

Valley Bond 484 Horset Ct. N. Salem 97302

Judy Edwards 2204 Reynolds Lane Salem 97304

Cynthia Ford 247 Steadlands Way N. Salem 97303

Richard J. Love 247 Bellvue Way N. Salem 97303

1x

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED  
AUG 20 1970

AIR QUALITY CONTROL

The following are times when sulfur dioxide fumes were extremely noticeable and irritating inside our home at 1040 Bellevue St. S.E., Salem:

7/23/70	7:05-7:20 PM
	10:15-11:00 PM
7/26/70	5:30-6:00 PM
7/27/70	3:30-4:30 PM
	7:25-8:00 PM
7/28/70	7:25-8:00 PM
	8:50-9:15 PM
7/29/70	6:20-6:45 PM
	7:25-8:00 PM
7/30/70	7:25-8:00 PM
	10:30-10:45 PM
7/31/70	5:15-6:05 PM
8/1/70	11:45-12:00 Noon
	5:15-5:35 PM
8/2/70	9:15-9:35 PM

*Mrs Kevin R. Brown*  
Mrs. Kevin R. Brown

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

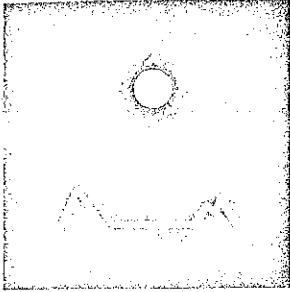
RECEIVED  
AUG 20 1970

AIR QUALITY CONTROL

The following are times when sulfur dioxide fumes were noticeable and irritating inside our home at 1040 Bellevue St. S.E., Salem:

8/4/70	6:45- 7:15 PM
8/5	12:25- 1:00 PM
	8:00- 8:20 PM
8/6	4:45- 5:05 PM
	7:15- 7:35 PM
8/7	5:45- 6:05 PM
	7:25- 7:55 PM
8/11	4:55- 6:00 PM
	6:40- 7:00 PM
8/12	5:30- 5:45 PM
	6:05- 7:15 PM
	11:15-11:35 PM
8/13	5:30- 5:40 PM
	7:15- 8:00 PM
8/14	6:45- 7:45 PM
8/15	12:15- 1:00 PM
	4:45- 6:00 PM

*Mrs Kevin R. Brown*  
Mrs. Kevin R. Brown



MICHAEL D. ROACH  
Director

# MID WILLAMETTE VALLEY AIR POLLUTION AUTHORITY

2585 STATE STREET / SALEM, OREGON 97301 / TELEPHONE AC 503 / 581-1715

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

August 19, 1970

RECEIVED  
AUG 20 1970

## AIR QUALITY CONTROL

Mr. Harold Patterson  
Department of Environmental  
Quality  
1400 SW 5th Avenue  
Portland, Oregon 97201

Gentlemen:

SUBJECT: Boise Cascade, Salem

Enclosed is an excerpt from the Mid-Willamette Valley Air Pollution Authority Board of Directors August 18, 1970, meeting minutes regarding Boise Cascade, Salem. It is transmitted as a Board of Directors directive for the Environmental Quality Commission review at its August 21, 1970, monthly meeting.

Sincerely yours,

Victor Prodehl  
Chief, Field Services

VP:ds  
Enclosures

MID-WILLAMETTE VALLEY AIR POLLUTION AUTHORITY  
2585 State Street - Salem, Oregon  
Telephone 581-1715  
Tuesday, August 18, 1970

Excerpt from the Board of Directors August 18, 1970  
Meeting Minutes Regarding Boise Cascade, Salem

Victor Prodehl presented a staff report on Boise Cascade stating the firm declined the Authority's invitation to present their pollution control program and plant expansion which will result in a net increase of sulfur dioxide emissions. He indicated that the Mid-Willamette Valley Air Pollution Authority has no jurisdiction in the pulp and paper industry but felt the need to relate to the Board the complaints of citizens and to listen to their testimonies.

Councilman Tindall commented that he attended the press conference held by Boise Cascade and spoke to a gentlemen with that firm. Although he was not an Engineer, he indicated that there were no air standards to be used as guidelines for this portion of the paper industry. Mr. Tindall stated that if the statement was true, then constructive action should be taken toward adopting air standards.

Mrs. Patricia Brown, a concerned citizen of Salem, stated that a petition was signed in her neighborhood by 23 concerned persons (petition enclosed) indicating that sulfur dioxide fumes emitted from Boise Cascade are defiling the air and making the area an extremely disagreeable place to live. She also disclosed a list of dates and times when sulfur dioxide fumes were noticeable and irritating inside her home. (List enclosed)

Mr. L. V. Blanchard, a concerned Salem Citizen, stated that he has called Boise Cascade many times and always gets the same result, "We are working on it and expect improvement in a few months."

He indicated a group of South Salem residents are fed up with this problem and intend to do something about it.

Mr. Mike Dye, an interested citizen, stated that he has done extensive research in the problems of Boise Cascade. He has talked with Victor Prodehl and Michael Roach of the Authority staff.

Realizing that Mid-Willamette Valley Air Pollution Authority has no jurisdiction over pulp and paper mills, he went to the Department of Environmental Quality about Boise Cascade. He was told by DEQ that there is no known technology for these plants. But, upon later investigation he discovered Scott Paper's Everett, Washington, plant operating at more than twice Boise Cascade's capacity implemented a recovery system in 1948 that has resulted in sulfur dioxide odor barely noticeable off the plant property. He referred to Scott Paper's control effort published in a 1965 technical paper, a copy of which he had in his hand. It was his hope that the Board of Directors urge the Department of Environmental Quality to see that Boise Cascade complies with the plant in Everett, Washington.

Mr. Gordon Walker, a businessman with offices in downtown Salem, expressed his disfavor with the plant planned expansion that will increase malodorous emissions and was "ashamed to invite clients to his office because of the overwhelming plant odor."

Mr. R.E. Noyes, an interested citizen of Salem, stated that he was "appalled to read that Boise Cascade was taking large measures to curb water pollution but sending more pollutants into the air we breathe."

Mr. Sam Bridges, owner of a marina adjacent to Boise Cascade, presented some samples of steel and water taken from the vicinity of the plant site. Three samples of steel were purchased. One was protected to stay new looking, one was taken to the airport and left outside to weather, the third was left at the plant site. After an allotted time the pieces were gathered, with the steel from the airport site showing some corrosion whereas the one from Boise Cascade site was quite pitted and very rusty in color.

Commissioner Hildebrand asked Mr. Fred Skirvin of the Department of Environmental Quality if he had any comments he wished to make.

Mr. Skirvin announced a meeting to be held in Eugene on Friday, August 21, 1970, and that staff reports and the comments from this meeting should be referred for presentation at that meeting.

Councilman Tindall suggested that results of the discussions on Boise Cascade be forwarded to DEQ as soon as possible. The other Board Members were in complete agreement.

Commissioner Hildebrand thanked all citizens for commenting and assured them that efforts would be made to forward the testimonies to DEQ.

TO : MEMBERS OF THE ENVIRONMENTAL QUALITY COMMISSION  
B. A. McPhillips, Chairman                      George A. McMath, Member  
Storrs S. Waterman, Member                      Arnold M. Cogan  
E. C. Harms, Member

FROM : AIR QUALITY CONTROL DIVISION

DATE : August 12, 1970 for the August 21, 1970 Meeting

SUBJECT: APPLICATION FOR CERTIFICATION OF POLLUTION CONTROL FACILITY  
FOR TAX RELIEF PURPOSES NO. T-144

1. Applicant:

Publishers Paper Company  
Oregon City Division  
419 Main Street  
Oregon City, Oregon 97045  
Mr. Cliff Mayer  
Assistant Mill Manager  
Phone: 656-5211

The plant produces pulp and paper.

2. The claimed facility is described to be an aluminum covered building into which large chip hauling semi-trailers are backed and dumped. The building encloses the operation on three sides, thereby containing air-borne fines. The facility was placed into operation on December 9, 1969.
3. The total cost of the facility is \$69,393. An accountant's certification of this figure is attached.

4. STAFF REVIEW:

The claimed facility prevents the escapement of wood fines onto neighboring property during the trailer unloading operation. Attached is a copy of a reply letter from the Columbia-Willamette Air Pollution Authority, together with our inquiry letter, which states that the claimed facility appears to be operating within compliance of their current rules.

The staff findings indicate that the principal purpose for installing the claimed facility was to reduce atmospheric contamination and that 100% of its cost is allocable to pollution control.

5. STAFF RECOMMENDATIONS:

The staff recommends that a "Pollution Control Facility Certificate" bearing the actual cost of \$69,393 be issued for the facility claimed in Application No. T-144.

Attachments

## ERNST &amp; ERNST

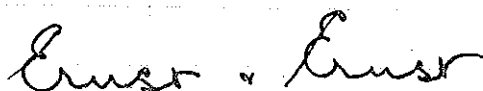
COMMONWEALTH BUILDING

PORTLAND, OREGON 97204

Publishers Paper Co.  
Oregon City, Oregon

We have examined certain of the accounting records of Publishers Paper Co. as of December 31, 1969, for the purpose of determining the total cost of the Chip Unloading Building - Pollution Control Facilities at the Oregon City, Oregon, plant site of the Company, as reflected by Exhibit D - Application for Certification of Pollution Control Facility for Tax Relief Purposes. 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 accompanying aforementioned Exhibit D presents fairly the aggregate cost (\$69,393) of the Chip Unloading Building - Pollution Control Facilities at the Oregon City, Oregon, plant site of Publishers Paper Co.



Portland, Oregon  
May 26, 1970

EXHIBIT D

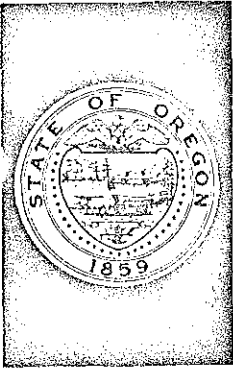
Application For Certification of Pollution Control Facility  
For Tax Relief Purposes

December 31, 1969

<u>Item No.</u>	<u>Description</u>	<u>Cost</u>
1.	Building foundation and shell	\$59,612
2.	Fire system	8,166
3.	Lighting system	<u>1,615</u>
		<u>\$69,393</u>

Cost amounts represent accumulation of invoices and other  
accounting data on file.





*SS*  
T-144

## DEPARTMENT OF ENVIRONMENTAL QUALITY

STATE OFFICE BUILDING • 1400 S.W. 5th AVENUE • PORTLAND, OREGON • 97201  
July 30, 1970

Columbia-Willamette Air  
Pollution Authority  
1010 S. E. Couch Street  
Portland, Oregon 97232

Gentlemen:

Publishers Paper Company, Oregon City Division, has filed application for certification of a pollution control facility for tax relief purposes with the Department of Environmental Quality, (Application No. T-144). The facility is located at Oregon City and is generally described to be an aluminum building to enclose the chip hauling-track dumping operation. *Trucks*

The Department of Environmental Quality would appreciate receiving the following information relative to the subject facility:

1. Did your agency require installation of the facility?
2. Did your agency review plans prior to construction?
3. Was the facility constructed in accordance with approved plans?
4. What other alternatives, if any, were considered by the company for meeting the pollution control objective?
5. Is the facility actually achieving its intended purpose?

This office would appreciate hearing from you at the earliest possible date. Your efforts in this matter are greatly appreciated.

Very truly yours,

Ron Householder, Associate Engineer  
Air Quality Control Division

RH:ahe

✓cc: H. L. Sawyer

COPY

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

DEPARTMENT OF ENVIRONMENTAL QUALITY  
1010 N. E. COUCH STREET

PORTLAND, OREGON 97232

PHONE (503) 233-7176

RECEIVED  
AUG 10 1970

6 August 1970

## AIR QUALITY CONTROL

Department of Environmental Quality  
Air Quality Control Division  
1400 Southwest 5th Avenue  
Portland, Oregon 97201

Attention: Ron Householder, Associate Engineer

BOARD OF DIRECTORS  
M. James Gleason, Chairman  
Multnomah County  
Francis J. Ivancie, Vice Chairman  
City of Portland  
Robert L. Glosenger  
Columbia County  
William J. Masters  
Washington County  
Fred Stefani  
Clackamas County  
Richard E. Hatchard  
Program Director

Gentlemen:

This is in response to your letter of 30 July 1970 requesting information concerning certification for tax relief purposes of a pollution control facility at Publishers Paper Company, Oregon City Division.

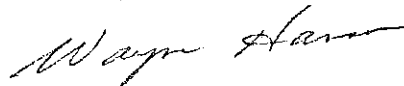
On 23 July our staff inspected the aluminum building enclosing chip hauling-track dumping operations. Based on our inspection, the answers to your questions are as follows:

1. No.
2. No.
3. Don't know.
4. Don't know.
5. Yes, to the best of our knowledge.

If we can be of further assistance, please contact us.

Very truly yours,

R. E. Hatchard  
Program Director



Wayne Hanson  
Control Director

WH: j1

TO : MEMBERS OF THE ENVIRONMENTAL QUALITY COMMISSION  
B. A. McPhillips, Chairman  
Storrs S. Waterman, Member  
E. C. Harms, Jr., Member  
George A. McMath, Member  
Arnold Cogan, Member

FROM : AIR QUALITY CONTROL DIVISION

DATE : August 6, 1970 for August 21, 1970 Meeting

SUBJECT: APPLICATION FOR CERTIFICATION OF POLLUTION CONTROL FACILITY  
FOR TAX RELIEF PURPOSES NO. T-145.

This application was received on June 11, 1970. A summary of the contents and results of the staff review are given below.

1. Applicant:

Publishers Paper Company  
419 Main Street  
Oregon City, Oregon 97045  
Mr. Cliff Mayer  
Assistant Mill Manager

The plant produces pulp and paper.

2. The claimed facility is described to be a baghouse which is installed on top of a 90-foot high silo and serves to prevent the escapement of sawdust fines from the sawdust storage silo. The facility was placed in operation on February 10, 1970.
3. The total cost of the facility is \$27,750. An accountant's certification of this figure is attached.

4. STAFF REVIEW:

The claimed facility prevents the escapement of sawdust fines from the sawdust storage silo. The material collected is returned to the silo. Attached is a copy of a reply letter from the Columbia-Willamette Air Pollution Authority, together with our inquiry letter, which states that the claimed facility appears to be operating within compliance of their current rules.

The staff findings indicate that the principal purpose for installing the claimed facility was to reduce atmospheric contamination and that 100 percent of its cost is allocable to pollution control.

5. STAFF RECOMMENDATIONS:

The staff recommends that a "Pollution Control Facility Certificate" bearing the actual cost of \$27,750 be issued for the facility claimed in Application No. T-145.

Attachment

## ERNST &amp; ERNST

COMMONWEALTH BUILDING

PORTLAND, OREGON 97204

Publishers Paper Co.  
Oregon City, Oregon

We have examined certain of the accounting records of Publishers Paper Co. as of December 31, 1969, for the purpose of determining the total cost of the Exhaust Filter System - Pollution Control Facilities at the Oregon City, Oregon, plant site of the Company, as reflected by Exhibit D - Application for Certification of Pollution Control Facility for Tax Relief Purposes. 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 accompanying aforementioned Exhibit D presents fairly the aggregate cost (\$27,750) of the Exhaust Filter System - Pollution Control Facilities at the Oregon City, Oregon, plant site of Publishers Paper Co.

*Ernst & Ernst*

Portland, Oregon  
May 26, 1970

EXHIBIT D

Application For Certification of Pollution Control Facility  
For Tax Relief Purposes

December 31, 1969

Complete filter exhaust system on chip and sawdust bin

\$27,750

88 Files



DEPARTMENT OF ENVIRONMENTAL QUALITY

STATE OFFICE BUILDING • 1400 S.W. 5th AVENUE • PORTLAND, OREGON • 97201

July 8, 1970

TOM McCALL  
GOVERNOR

KENNETH H. SPIES  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

HERMAN P. MEIERJURGEN  
Nehalem

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

Columbia-Willamette Air  
Pollution Authority  
1010 N. E. Couch Street  
Portland, Oregon 97232

T-145

Gentlemen:

Publishers Paper Co., Oregon City Division, has filed an application for certification of a pollution control facility for tax relief purposes with the Department of Environmental Quality, (Application No. T-145). The facility is located at 419 Main Street, Oregon City, and is generally described to be a baghouse for controlling emissions from a 90 feet high sawdust silo.

The Department of Environmental Quality would appreciate receiving the following information relative to the subject facility:

1. Did your agency require installation of the facility?
2. Did your agency review plans prior to construction?
3. Was the facility constructed in accordance with approved plans?
4. What other alternatives, if any, were considered by the company for meeting the pollution control objectives?
5. Is the facility actually achieving its intended purpose?

This office would appreciate hearing from you at the earliest possible date. Your efforts in this matter are greatly appreciated.

Very truly yours,

Ron Householder  
Associate Engineer  
Air Quality Control Division

RH:h

RECEIVED  
JUL 28 1970  
COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N. E. COUCH STREET

PORTLAND, OREGON 97232

PHONE (503) 233-7176

AIR QUALITY CONTROL

24 July 1970

Department of Environmental Quality  
Air Quality Control Division  
1400 S. W. 5th Avenue  
Portland, Oregon 97201

Attention: Mr. Ron Householder  
Associate Engineer

BOARD OF DIRECTORS

M. James Gleason, Chairman  
Multnomah County  
Francis J. Ivancie, Vice Chairman  
City of Portland  
Robert L. Glosenger  
Columbia County  
William J. Masters  
Washington County  
Fred Stefani  
Clackamas County  
Richard E. Hatchard  
Program Director

Gentlemen:

This is in response to your letter of 8 July 1970 requesting information concerning certification of a pollution control facility for tax purposes located at Publishers Paper Company, Oregon City Division, 419 Main Street, Oregon City.

On 23 July 1970, we inspected the baghouse installed to control particulate emissions generated during the filling of a newly constructed sawdust silo. The baghouse appeared to be properly installed and operating within compliance of the current Columbia-Willamette Air Pollution Authority Rules. According to our records, there is no information indicating that certification should be denied for reasons outlined in ORS 449.635(3) for this particular piece of control equipment.

The answers to your questions of 8 July 1970 are as follows:

1. No
2. No
3. Do not know
4. Do not know
5. Yes

If we can be of any further assistance, please do not hesitate to contact us.

Very truly yours,

R. E. Hatchard  
Program Director

*Wayne Hanson*

Wayne Hanson  
Control Director

REH: tbd

TO : MEMBERS OF THE ENVIRONMENTAL QUALITY COMMISSION  
B. A. McPhillips, Chairman  
Arnold M. Cogan, Member  
Storrs S. Waterman, Member  
E. C. Harms, Jr., Member  
George A McMath, Member

FROM : AIR QUALITY CONTROL DIVISION

DATE : August 6, 1970 for the August 21, 1970 Meeting

SUBJECT: APPLICATION FOR CERTIFICATION OF POLLUTION CONTROL FACILITY  
FOR TAX RELIEF PURPOSES NO. T-147

This application was received on June 19, 1970. A summary of the contents and results of the staff review are given below.

1. Applicant:

Fort Hill Lumber Company P. O. Box 186 Grand Ronde, Oregon	Mr. Arthur Moshofsky Vice President and Treasurer 2041 S. W. 58th Avenue Portland, Oregon Phone: 292-8861
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The company plant at Grand Ronde is a lumber mill.

2. The claimed facility is described as a fly ash arrestor and collector with a hopper. Fly ash and other pollutants are separated from the furnace exhaust gas and returned to the furnace for completion of burning. The facility was completed and placed into operation on October 20, 1969.
3. The total cost of the facility is \$7,783.05. Receipts totaling this amount were attached.
4. Staff Review:

The claimed facility replaces a water scrubber unit which had been creating a water pollution problem. Attached is a letter from the Mid-Willamette Valley Air Pollution Authority which states that the claimed facility is accomplishing its intended purpose. No water pollution results from use of the claimed facility.

The staff findings indicate that 100% of the cost of the claimed facility is properly allocable to pollution control.

5. Staff Recommendation:

The staff recommends that a "Pollution Control Facility Certificate" bearing the actual cost of \$7,783.05 be issued for the facility claimed in Application No. T-147.



# FORT HILL LUMBER COMPANY

2041 S.W. 58TH AVE., PORTLAND, OREGON 97221 • PHONE 292-8861

## FLY ASH ARRESTOR EXPENSES FOR MODIFICATIONS OF DRY KILN BOILER TO SATISFY THE AIR & WATER POLLUTION AUTHORITY

SARWELL AT GRANDI RONDI MILLON

<u>MILL-TECH</u>	FLY ASH ARRESTOR	\$2390.00 ✓	
	FREIGHT	335.00 ✓	
	ROTARY FEEDER	940.00 ✓	
	FREIGHT	55.00 ✓	
	FAN	453.00 ✓	
	6x4 VENTURI	302.00 ✓	
	EXHAUST DUCTS	680.00 ✓	
	FREIGHT	54.59 ✓	
			\$5209.59

<u>STUCK ELECTRIC</u>	4" PIPE FOR BOILER	37.20 ✓	
	WIRE IN CONDUIT MOTORS FOR BOILER	128.88 ✓	
	INV. #3036	12.40 ✓	
			178.48

<u>EMERSON SHEET METAL</u>	LABOR- 63 Hrs. @17.00	1071.00	
	1 Hrs. @25.50	25.50	
	TRANSPORTATION		
	90 miles x 8 days @.10/mile	72.00	
	1 GRINDER WHEEL	8.00	
			1176.50

<u>CECIL PHILLIPS</u>	43 hrs. LABOR @3.77		162.11
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<u>ARCHER BLOWER &amp; PIPE CO.</u>	-REPAIR FAN WHEEL		148.00
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<u>E.J. BARTELL COMPANY</u>	100# DRUM SAIRSET	12.05 ✓	
	200# CTN. HYBOND	17.20 ✓	
			29.25

<u>FARWEST STEEL COMPANY</u>	3674# Steel @8.00/cwt		293.92
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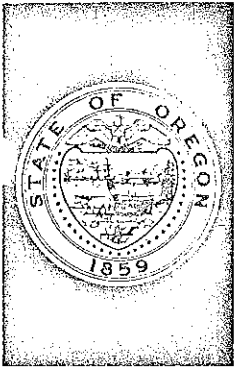
<u>UNION OIL COMPANY</u>	20 gal. gas @.285 for welder		5.70
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<u>SALEM STEEL CO.</u>	2 ALLEN BRADLEY RELOGS	38.00 ✓	
	BOLTS & NUTS - 150# @27.00/cwt	40.50 ✓	
	1 Box WELDING ROD. #35	21.00 ✓	
			99.50

<u>MILL-TECH</u>	PROFESSIONAL ENGINEERING FOR FLY ASH ARRESTOR		480.00
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TOTAL EXPENSES PAID - \$7783.05

*✓ Invoiced to  
L for test*



T-147

**DEPARTMENT OF  
ENVIRONMENTAL QUALITY**

STATE OFFICE BUILDING • 1400 S.W. 5th AVENUE • PORTLAND, OREGON • 97201  
July 30, 1970

Mid-Willamette Valley Air  
Pollution Authority  
2585 State Street  
Salem, Oregon

Gentlemen:

Fort Mill Lumber Company has filed an application for certification of a pollution control facility for tax relief purposes with the Department of Environmental Quality, (Application No. T-147). The facility is located at Grand Ronde and is generally described to be a multi-cyclone and hopper for reducing flyash and smoke emissions.

The Department of Environmental Quality would appreciate receiving the following information relative to the subject facility:

1. Did your agency require installation of the facility?
2. Did your agency review plans prior to construction?
3. Was the facility constructed in accordance with approved plans?
4. What other alternatives, if any, were considered by the company for meeting the pollution control objective?
5. Is the facility actually achieving its intended purpose?

This office would appreciate hearing from you at the earliest possible date. Your efforts in this matter are greatly appreciated.

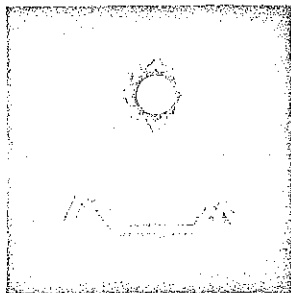
Very truly yours,

Ron Householder, Associate Engineer  
Air Quality Control Division

RH:ahe

✓cc: H. L. Sawyer

**COPY**



# MID WILLAMETTE VALLEY AIR POLLUTION AUTHORITY

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
2585 STATE STREET, SEASIDE, OREGON 97301 / TELEPHONE AC 503 / 581-1715

RECEIVED  
AUG 5 1970

August 4, 1970

## AIR QUALITY CONTROL

Mr. Ron Householder  
Department of Environmental Quality  
1400 S. W. 5th Avenue  
Portland, Oregon 97201

SUBJECT: Fort Hill Lumber Company

Dear Mr. Householder:

In response to your letter of July 30, 1970, in reference to Fort Hill Lumber Company, Grand Ronde, Oregon, the Mid-Willamette Valley Air Pollution Authority did accomplish plan review for the multiple cyclone and hopper superseding the previous water scrubbing air pollution control device.

I believe if you will check with your files, you will find that the Oregon Sanitary Authority encouraged Mr. Moshofsky of Fort Hill Lumber Company to eliminate the water scrubbing device in order to prevent polluting the public water supply for the adjacent creek. This precipitated a need for another method of controlling fly ash from the wood fired boiler plant. The Mid-Willamette Valley Air Pollution Authority was consulted only after plans had been accomplished to install a multiple cyclone and approval had been granted in accordance with the Authority's Rules and Regulations in a letter dated August 7, 1969 to Fort Hill Lumber Company.

From all observations, the multiple cyclone is accomplishing its intended purpose.

Sincerely yours,

Victor H. Prodehl  
Chief, Field Services

VHP/jb