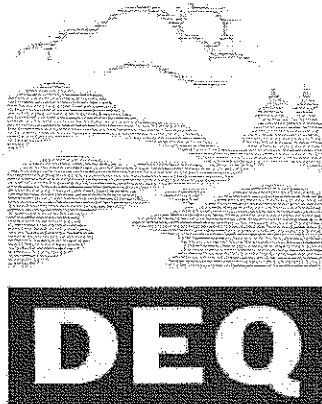


**10/4/1972**

**OREGON  
ENVIRONMENTAL QUALITY  
COMMISSION MEETING  
MATERIALS**



State of Oregon  
**Department of  
Environmental  
Quality**

This file is digitized in **black and white** using Optical Character Recognition (OCR) in a standard PDF format.

Standard PDF Creates PDF files to be printed to desktop printers or digital copiers, published on a CD, or sent to client as publishing proof. This set of options uses compression and downsampling to keep the file size down. However, it also embeds subsets of all (allowed) fonts used in the file, converts all colors to sRGB, and prints to a medium resolution. Window font subsets are not embedded by default. PDF files created with this settings file can be opened in Acrobat and Reader versions 6.0 and later.

AGENDA

Environmental Quality Commission Meeting  
October 4, 1972  
Auditorium, Portland Water Bureau Bldg.  
1800 S.W. 6th Ave., Portland

HOLD

9:00 a.m.

- A. Minutes of July 27, 1972 EQC Meeting
- B. Project Plans for July and August, 1972
- C. River Island Sand & Gravel, Clackamas County (Staff Report)
- D. Authorization for Public Hearings (Air Quality Regulations)
  - a) Proposed Emission Regulations for Kraft Mills (replaces existing rule) *taken off of agenda*
  - b) Proposed Amendments to OAR, Chapter 340, Division 2, Section 25-105 through 25-130, Hot Mix Asphalt Plants
  - c) Proposed Amendments to OAR Chapter 340, Division 2, Section 25-315 (Board Products Industries) Establishing Emission Standards for Veneer Driers
  - d) Proposed Amendments to OAR Chapter 340, Division 2, Section 20-050 through 20-070, Parking Facilities and Highways in Urban Areas.

E. Parking Facilities (Request for Approval)

- a) Habitat Too Apartments, Portland
- b) Port of Portland, Terminal #1
- c) City of Portland, Park Block #1
- d) Portland Osteopathic Hospital
- e) White Stag Mfg. Co., Portland
- f) Portland Commons Office Building
- g) Port of Portland/U. S. Navy
- h) Valley River Inn, Eugene
- i) Pringle Creek Parking Structure, Salem

F. Allocation of State Funds to Regional Air Pollution Authorities for period July 1, 1972 through June 30, 1973

G. Variances Granted by the CWAPA (Request for EQC Approval)

- a) No. 72-4 Wasteco, Inc., Tualatin
- b) No. 72-5 Publisher's Paper Co., Molalla Division
- c) No. 72-6 J. C. Compton, Alder Creek

H. Statewide Solid Waste Action Plan (Status Report)

I. Tax Credit Applications

J. EQC Meeting October 25, 1972 (Officially Schedule for Opening Bids and Awarding Sale of Pollution Control Bonds)

3:00 p.m.

K. Zidell Explorations, Inc. (Continue Formal Hearing begun Sept. 7, 1972)

AGENDA

Environmental Quality Commission Meeting  
October 4, 1972  
Auditorium, Portland Water Bureau Bldg.  
1800 S.W. 6th Ave., Portland

9:00 a.m.

- A. Minutes of July 27, 1972 EQC Meeting (Chairman)
- B. Project Plans for July and August, 1972 (Weathersbee)
- C. River Island Sand & Gravel, Clackamas County (Staff Report) (R. Gilbert)
- D. Authorization for Public Hearings (Air Quality Regulations)
- a) Proposed Emission Regulations for Kraft Mills (replaces existing rule) (Ayer)
  - b) Proposed Amendments to OAR, Chapter 340, Division 2, Section 25-105 through 25-130, Hot Mix Asphalt Plants (Phillips)
  - c) Proposed Amendments to OAR Chapter 340, Division 2, Section 25-315 (Board Products Industries) Establishing Emission Standards for Veneer Driers (Phillips)
  - d) Proposed Amendments to OAR Chapter 340, Division 2, Section 20-050 through 20-070, Parking Facilities and Highways in Urban Areas. (Downs)
- E. Parking Facilities (Request for Approval) (Downs)
- a) Habitat Too Apartments, Portland
  - b) Port of Portland, Terminal #1
  - c) City of Portland, Park Block #1
  - d) Portland Osteopathic Hospital
  - e) White Stag Mfg. Co., Portland
  - f) Portland Commons Office Building
  - g) Port of Portland/U. S. Navy
  - h) Valley River Inn, Eugene
  - i) Pringle Creek Parking Structure, Salem
- F. Allocation of State Funds to Regional Air Pollution Authorities for period July 1, 1972 through June 30, 1973 (Patterson)
- G. Variances Granted by the CWAPA (Request for EQC Approval) (Snyder)
- a) No. 72-4 Wasteco, Inc., Tualatin
  - b) No. 72-5 Publisher's Paper Co., Molalla Division
  - c) No. 72-6 J. C. Compton, Alder Creek
- H. Statewide Solid Waste Action Plan (Status Report) (Schmidt)
- I. Tax Credit Applications (Sawyer)
- J. EQC Meeting October 25, 1972 (Officially Schedule for Opening Bids and Awarding Sale of Pollution Control Bonds) (Gildow)

3:00 p.m.

- K. Zidell Explorations, Inc. (Continue Formal Hearing begun Sept. 7, 1972) (Silver)

MINUTES OF THE THIRTY-EIGHTH MEETING  
of the  
Oregon Environmental Quality Commission  
October 4, 1972

The thirty-eighth regular meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 9:00 a.m., Wednesday, October 4, 1972 in the Portland Water Bureau Building Auditorium, 1800 S.W. 6th Avenue, Portland, Oregon. All members were present and included B.A. McPhillips, Chairman, Arnold M. Cogan, Edward C. Harms, Jr., George A. McMath and Storrs S. Waterman.

Participating staff members were L.B. Day, Director; E.J. Weathersbee and K.H. Spies, Deputy Directors; Harold M. Patterson, Harold L. Sawyer and Fred M. Bolton, Division Directors; T.M. Phillips, Chief, AQC Technical Services Section; R. Bruce Snyder, Meteorologist; R.E. Gilbert, District Engineer; R.D. Jackman, Supervising Sanitarian; M.J. Downs and F.A. Skirvin, Program Supervisors; B.J. Seymour, Information Director; and A.B. Silver and R. Haskins, Legal Counsel.

MINUTES OF JULY 27, 1972 MEETING

It was MOVED by Mr. McMath, seconded by Mr. Waterman and carried that the minutes of the thirty-sixth regular meeting of the Commission held in Portland on July 27, 1972 be approved as prepared.

PROJECT PLANS FOR JULY AND AUGUST, 1972

It was MOVED by Mr. Waterman, seconded by Mr. McMath and carried that the actions taken by the Department during the months of July and August 1972 (and June for 2 industrial waste disposal projects) as reported by Mr. Weathersbee regarding the following 123 domestic sewerage, 4 industrial waste disposal, 32 air quality control, and 6 solid waste management projects be approved:

Water Pollution Control

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Industrial Waste</u>			
6/72	Nyssa	Amalgamated Sugar Co. concept proposal	Prov. app.
6/72	Mapleton	U.S. Plywood-Champion Papers, Inc., treatment facilities	Prov. app.

Water Pollution Control

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (46)</u>			
7/5/72	Gresham	Kay Subdivision sewers	Prov. app.
7/5/72	Lake Oswego	Parrish St. & Palisades Heights No. 5 sewers	Prov. app.
7/5/72	USA (Metzger)	Royal Oak Subd. sewers	Prov. app.
7/10/72	Dundee	Dundee Terrace Subd. sewers	Prov. app.
7/10/72	Bear Creek Valley Sanitary Auth.	Addendum No. 1 to contract for ripraping interceptor	Approved
7/10/72	USA (Fanno)	West Greenlea Park Subd. sewers	Prov. app.
7/11/72	North Roseburg SD	Hill Place sanitary sewer ext.	Prov. app.
7/12/72	Gladstone	Forest Park Subd. sewers	Prov. app.
7/12/72	Sweet Home	Stonebrook Improvement District sewers	Prov. app.
7/12/72	Seaside	Sunset Hills Subd. sewers	Prov. app.
7/12/72	Gresham	Mossytrees Park Subd. sewers	Prov. app.
7/13/72	Rainier	0.5 MGD activated sludge sewage treatment plant and "A" Street interceptor	Prov. app.
7/13/72	Eugene	Five sanitary sewer projects	Prov. app.
7/17/72	Fremont National Forest	U.S. Forest Service sewage sludge study	Approved
7/17/72	Eugene	Willakenzie pump station overflow structure modifications	Not approved
7/18/72	Wilsonville	Eilers Run sewer - Phase II Charbonneau Subd.	Prov. app.
7/18/72	Neskowin	Taho Dev. Co. sewage treatment plant expansion, 0.05 MGD activated sludge with holding pond and disinfection	Prov. app.
7/19/72	Gresham	Columbia Village sewers	Prov. app.
7/19/72	Prairie City	Sanitary sewer extension	Prov. app.
7/19/72	Grants Pass	Two sanitary sewer projects	Prov. app.
7/19/72	Portland	Two sanitary sewer projects	Prov. app.
7/19/72	East Salem Sewer & Drainage Dist. I	O & C Tracts #3 Subd. sewers	Prov. app.
7/19/72	Sunriver	Ranch Cabin Model Homes sewer	Prov. app.
7/19/72	Canby	North Cedar Street sewer	Prov. app.
7/19/72	Eugene	Sanitary sewer project No. 786	Prov. app.
7/19/72	Carlton	North Yamhill St. san. sewer	Prov. app.
7/19/72	Oak Lodge San.D.	Vineyard Hts. Subd. sewers	Prov. app.
7/19/72	Gresham	McKeel Heights Subd. sewers	Prov. app.
7/19/72	USA (Banks)	Wilkes St. sanitary sewer	Prov. app.
7/20/72	The Dalles	13th St. sewer extension	Prov. app.
7/20/72	Gresham	212th Street sewer extension	Prov. app.
7/21/72	Long Creek	Sewerage study	Approved
7/21/72	Maupin	Sewerage study	Approved
7/26/72	Lebanon	Pletzer's Green Subd. sewer	Prov. app.
7/26/72	USA (Aloha)	Rosemeade Subd. Plat #2 sewers	Prov. app.
7/26/72	Keizer	Rawlins & Gardner Subd. sewers	Prov. app.
7/26/72	Salem	Schurman Drive sewer	Prov. app.

Water Pollution Control - continued

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (46) - continued</u>			
7/26/72	Silverton	The Trees Subd. sewers	Prov. app.
7/26/72	Canyonville	Mont St. sewer extension	Prov. app.
7/26/72	Salem	Pacwood Court sewer	Prov. app.

Municipal Forced Annexations

7/21/72	Coquille	Ferbasche Heights sewers	Approved
7/21/72	Salem	College Heights sewers	Approved

Air Quality Control

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
7/19/72	Multnomah	Oregon Automobile Ins. Co. Proposal for surface automobile parking facility	Approved
7/19/72	Multnomah	Kaiser Medical Center Proposal for surface automobile parking facility	Approved
7/19/72	Multnomah	Good Samaritan Hospital Proposal for surface automobile parking facility	Approved
7/19/72	Multnomah	Westmoreland Union Manor Proposal for surface automobile facility	Approved
7/20/72	Lake	Dame Lumber & Moulding Co. Proposal to phase-out WWB through utilization of shavings	Approved
7/20/72	Douglas	Robert Dollar Lumber Co. Plans and specifications for baghouse control systems	Approved
7/20/72	Douglas	Glendale Plywood Company Plans and specifications for baghouse control systems	Approved
7/25/72	Curry	Western States Plywood Coop. Plans and specifications for modification of one (1) of two (2) wigwam waste burners.	Approved
7/25/72	Curry	Western States Plywood Coop. Proposal to phase-out one (1) remaining WWB	Approved
7/25/72	Curry	Brookings Plywood Corporation Plans and specifications for modification of WWB	Approved
7/27/72	Multnomah	Portland State College Proposal for surface automobile parking facility	Add'l info req. by EQC

Air Quality Control - continued

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
7/27/72	Multnomah	Terminal Sales Bldg. Proposal to construct parking structure	Denied by EQC
7/28/72	Linn	Crown Zellerbach Corp. Proposal for control of digester emissions	App. subject to execution of Stip. & Order
7/28/72	Clackamas	Publishers Paper Co. Proposal for recovery furnace control	Approved
7/28/72	Yamhill	Publishers Paper Co. Proposal for recovery furnace control	Approved

Solid Waste Management

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
7/12/72	Harney County	Ponderosa Ranch San. Landfill	Prov. app.
7/19/72	Seneca	Seneca Landfill	Prov. app.

Water Pollution Control

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (75)</u>			
8/1/72	Keizer Sewer Dist. I	Lawndale Subdivision sewers	Prov. app.
8/1/72	USA ( Aloha)	Farmington West II sewers	Prov. app.
8/1/72	Siletz	Weaver Trailer Park sewers	Prov. app.
8/2/72	USA (Sunset)	143rd Street sewer ext.	Prov. app.
8/2/72	Eugene	3 sewer projects, Jobs #778 863, 855	Prov. app.
8/2/72	Lebanon	Hansard Ave., Market St. sewers	Prov. app.
8/2/72	Newberg	Northwood Park #3 sewers	Prov. app.
8/2/72	USA (Beaverton)	Little Tree Subd. sewers	Prov. app.
8/2/72	Wilsonville	Charbonneau pump sta. water supply	Approved
8/2/72	Astoria	Modified plans - interceptor project	Approved
8/2/72	Clackamas County Service Dist. I	Interceptor sewer, Phase III	Prov. app.
8/8/72	Tualatin	K-Mart sewer	Prov. app.
8/8/72	Gresham	Hyster Co. sanitary sewer	Prov. app.
8/8/72	Inverness	Unit 5A-2, pump station and force main	Prov. app.
8/8/72	Ashland	Sewage treatment plant flow measurement	Prov. app.
8/8/72	Multnomah Co. (E)	Union Avenue Motel sewer	Prov. app.
8/8/72	Deschutes County	Black Butte Ranch - irrigation waste disposal and sewer ext.	Prov. app.

Water Pollution Control - continued

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (75) - continued</u>			
8/8/72	Scio	Thomas Creek pumping station	Prov. app.
8/8/72	Green San. Dist.	Change Order #1 to pond construction contract	Approved
8/8/72	Lebanon	Edgewater Square Dev. sewers	Prov. app.
8/9/72	Newberg	Hess Creek sanitary sewer	Prov. app.
8/9/72	Silverton	Bridge Creek Apts. sewage pumping station	Prov. app.
8/9/72	USA (Beaverton)	Randall Apts. sewers	Prov. app.
8/9/72	Canby	Green Tree Manor Subd. sewers	Prov. app.
8/9/72	North Bend	Modification of water line at sewage treatment plant	Approved
8/9/72	Bend	Riverside Motel pump station	Prov. app.
8/10/72	Brookings	Sewer rehabilitation project	Approved
8/15/72	Wilsonville	Brown Road sewer & Parkway pump station	Prov. app.
8/15/72	Medford	Rogue Terrace Subd. sewers	Prov. app.
8/15/72	Central Point	Sierra Vista-Temple Court Subd. sewers	Prov. app.
8/15/72	North Umpqua S.D.	Sanitary sewer extensions	Prov. app.
8/17/72	Wasco County	Sportsmans Park #3 Subd. sewers	Prov. app.
8/17/72	Woodburn	Parkview Court Subd. sewers	Prov. app.
8/17/72	Gresham	Drew Addition Subd. sewers	Prov. app.
8/17/72	Clackamas County Service Dist. I	Change Order #2, Phase I, interceptor	Approved
8/17/72	Lincoln City	South 49th Street sewer	Prov. app.
8/17/72	Odell San. Dist.	Mid-Valley Subd. sewers	Prov. app.
8/17/72	Klamath Falls	Airport interceptor sewer and pump station	Prov. app.
8/17/72	Troutdale	Fairfax Heights Subd. sewer	Prov. app.
8/17/72	Medford	Springdale area sewer	Prov. app.
8/17/72	The Dalles	Chenoweth Rim complex sewer	Prov. app.
8/17/72	Gresham	Binford Farms, Phase II, Subdivision sewers	Prov. app.
8/17/72	Gresham	Wayfarer Addition sewer	Prov. app.
8/17/72	Keizer Sewer Dist. I	Andrew Park Subd. sewer	Prov. app.
8/17/72	East Salem Sewage & Drainage Dist. I	Lancaster Estates sewers	Prov. app.
8/17/72	Hillsboro (Rock Cr.)	Hollman Park Subd. #3 sewers	Prov. app.
8/17/72	Brookings	Addendum No. 1 Brookings sewer sealing project	Prov. app.
8/17/72	Wilsonville	Addendum No. 1 Brown Road sewer and pump station project	Approved
8/22/72	Tualatin	Sewage treatment plant expansion -- 0.445 MGD activated sludge-split flow effluent polishing	Prov. app.
8/22/72	Hillsboro (Westside)	Sanitary sewer extensions	Prov. app.
8/22/72	Hillsboro (Rock Cr.)	Val Park Subd. sewers and pump station	Prov. app.



Water Pollution Control - continued

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (75) - continued</u>			
8/23/72	USA (Sherwood)	Allan Olson Subd. sewers	Prov. app.
8/23/72	Salem (Willow Lake)	Two sewer projects	Prov. app.
8/23/72	USA (Tigard)	Burnham Park Subd. sewers	Prov. app.
8/23/72	Lincoln City	North Lincoln Hospital sewer	Prov. app.
8/24/72	Gresham	Key Estates Subdivision sewer	Prov. app.
8/28/72	Molalla	Briarcroft Addition #3 sewers	Prov. app.
8/29/72	East Salem Sewage & Drainage Dist. I	Jan Ree East #2 Subd. sewers	Prov. app.
8/29/72	USA (Aloha)	Jersey Park #2 Subd. sewers	Prov. app.
8/29/72	Gresham	7th Day Adventist Sch. sewer	Prov. app.
8/29/72	Gresham	Kelly Avenue sewer	Prov. app.
8/29/72	Amity	Sanitary sewer laterals	Prov. app.
8/29/72	Lake Oswego	LID 133 sewers	Prov. app.
8/29/72	USA (Beaverton)	Central Park Condominium sewer	Prov. app.
8/29/72	USA (Sunset)	The Bluffs Subd. sewers	Prov. app.
8/30/72	Rainier	Fern Hill Subd. sewers	Prov. app.
8/30/72	Hillsboro (Rock Cr.)	Sanitary sewer extensions	Prov. app.
8/30/72	Brookings	Change Order #1 to sewage treatment plant contract	Approved
8/30/72	Salem (Willow Lake)	12th Street sewer	Prov. app.
8/31/72	Umatilla	Change Order #3 to sewage treatment plant contract	Prov. app.
8/31/72	Clackamas County	Promontory Park sewage treatment plant	Prov. app.
8/31/72	USA (Tigard)	Pathfinder Subd. sewers	Prov. app.
<u>Industrial Waste</u>			
8/1/72	Coos Bay	Mayflower Farms, Inc. whey evaporation facilities	Prov. app.

Air Quality Control

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8/1/72	Union County	Boise Cascade Corporation Plans to install bolometer to monitor smoke emissions from boiler	Cond. app.
8/3/72	Corvallis	Good Samaritan Hospital Construction	Approved
8/4/72	Multnomah Co.	Deer Run Apartments Plans to construct 52-space surface parking facility	Approved
8/9/72	Jackson County	Timber Products Co. Plans to install roto-clone scrubber to control sander- dust emissions	Approved

Air Quality Control - continued

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8/9/72	Medford	Skylark Subdivision (near airport)	Not approved
8/9/72	Hood River Co.	B & D Paving Company Proposal to install wet scrubber system on asphalt plant	Not approved
8/15/72	Clatsop County	Warrenton School District Plans to install single chambered incinerator	Not approved
8/16/72	Crook County	Prineville Forest Products Plans to install two (2) hog fuel fired boilers with scrubber controls	Approved
8/21/72	Multnomah Co.	Good Samaritan Medical Bldg. Plans to construct 192-space, 3 level, parking facility	Approved
8/22/72	Deschutes Co.	Bend Veterinary Hospital Plans and specifications for installation of pathological incinerator	Approved
8/24/72	Multnomah Co.	Sizzler Family Steak House Plans to construct 55-space surface parking facility	Approved
8/24/72	Washington Co.	Cedar Hills Professional Assn. Plans to construct 87-space surface parking facility	Approved
8/24/72	Multnomah Co.	Reuben's & Coco's Restaurants Plans to construct 140-space surface parking facility	Approved
8/28/72	Multnomah Co.	Freightliner Corp. Plans to construct 125-space surface parking facility	Approved
8/28/72	Multnomah Co.	Port of Portland Plans to construct 400-space surface parking facility	Approved
8/30/72	Multnomah Co.	Harbor Drive Closure	Add. inf. req.

Solid Waste Management

8/9/72	Curry County	R.D. Tucker Landfill	Prov. app.
8/11/72	Region 9 COG	Mid-Columbia District Solid Waste Study & Plan	Comments
8/23/72	Lane County	Florence Sludge Site	Prov. app.
8/31/72	Grant County	Hendrix Landfill	Prov. app.

RIVER ISLAND SAND & GRAVEL, CLACKAMAS COUNTY

Mr. Gilbert presented the staff report dated September 26, 1972 regarding the operations of the River Island Sand & Gravel Company plant located in the flood plain at approximately river mile 14 adjacent to the Clackamas River in Clackamas County. He reported that seepage from the operations causes turbidity in the river in violation of the special water quality standards covering the Clackamas River. The company has been operating under a non-conforming land use permit from Clackamas County, a dredging or gravel removal permit from the Division of State Lands, and since December 26, 1969 a waste discharge permit from DEQ. The company through its attorney Robert E. Glasgow earlier this year objected to the conditions proposed by the DEQ staff for renewal of its waste discharge permit. The main objection was to the condition that the plant be relocated on higher ground having an elevation above the flood plain. The company claimed it does not own any such land and cannot obtain any.

Mr. Gilbert used several colored slides to show the location, site development and effect on the river of the sand and gravel operations.

The staff report contained the Director's recommendations as follows:

1. River Island Sand & Gravel, Inc., be directed to immediately retain a professional engineer registered in the state of Oregon to develop a water quality management program and time schedule for its Clackamas River operation which will insure adequate protection of the Clackamas River from wastewater discharges.
2. The water quality management program shall be completed and submitted to the Department as soon as practicable but not later than November 30, 1972 and upon approval by the staff be immediately implemented.
3. A waste discharge permit encompassing the above recommendations be issued by the Department to River Island Sand & Gravel, Inc.
4. The Division of State Lands be requested to include as an integral part of its material removal permit for River Island Sand & Gravel, Inc. the water quality management implementation plan as per its Waste Discharge Permit.
5. River Island Sand & Gravel, Inc. be requested to limit rock crushing operations to the hours between 8 a.m. and 6 p.m., Monday through Friday.

In response to questions from the Commission members Mr. Gilbert said the conditions shown in the slides were typical of operating conditions and that the problem is not seasonal but exists throughout the year.

Mr. Robert E. Glasgow, Attorney, was present to represent the company. He said the owner recognizes the potential water pollution problem and is most willing to cooperate to solve it. He claimed however that past efforts on the part of the company have gone unrecognized by DEQ. He claimed further that the complaints have been from only a few persons who are more interested in stopping the operation of the sand and gravel plant than they are in abating the pollution.

He stated again that the company does not own any higher elevation property but it thinks that other alternatives are available for solving the water pollution problem. He denied that there is a noise problem and claimed that the nearest residence is about one-third mile away. He indicated, however, that the owner plans to plant trees as a buffer and also to install facilities in the screening plant to control or reduce the noise.

He also reported that Mr. Bryan M. Johnson, Consulting Engineer, had recently been retained by the company to develop a water quality management program and time schedule for the purpose of preserving the quality of the Clackamas River and that Mr. Johnson's recommendations were expected to be completed by not later than November 30, 1972, the deadline proposed by Mr. Day.

Mr. Glasgow stated that the plant normally operates from 6:45 or 7:00 a.m. to not later than 8:00 or 8:30 p.m. on Monday through Saturday of each week.

Mrs. Hazel Stevens who lives across the Clackamas River from the sand and gravel plant then presented a rather lengthy but well prepared statement objecting to the operations and describing in considerable detail their environmental impact. She used several colored slides to substantiate her statements. In addition to pollution in the river she complained about noise and dust from the truck traffic on Sundays as well as on week days.

Mrs. Stevens also submitted for the files a letter dated October 2, 1972 from Lloyd E. Bryant, Route 1, Box 173, Eagle Creek, objecting to the operations of the gravel plant.

Mr. John Dodd, General Manager for the Oak Lodge Water District, complained that the turbidity caused in the Clackamas River by the River

Island Sand and Gravel Company operations increases the cost of water treatment for his district. He estimated there are presently some 90,000 persons who use water from the lower Clackamas for domestic and municipal purposes and that by the year 2000 the figure would be 500,000 persons. He expressed the opinion that sand and gravel aggregate can and should be obtained from sources other than the Clackamas River flood plain.

Mrs. Earl R. Marsh, property owner adjacent to Barton Park, was the next person to make a statement in opposition to the River Island Sand & Gravel Company. She complained about the turbidity in the river and the excessive noise caused by the plant operations and the truck traffic. She said the truck traffic occurs practically every day including Saturdays, Sundays and some holidays.

Mr. William Sanderson who lives near the confluence of Big and Little Creeks also spoke in opposition to the gravel company.

Mr. Day emphasized that the hearing in this matter at this meeting was only for the purpose of gathering information and was not a formal hearing. He also pointed out that the permits referred to by Mrs. Stevens and others were the permits issued by the Division of State Lands and by Clackamas County and not the ones issued by DEQ.

There being no one else who wished to be heard in this matter Mr. Harms made the statement that a great deal of information had been received which added to the Commission's total knowledge concerning the situation on the Clackamas River but which did not indicate that the Director's recommendations were not the only appropriate ones at this time.

It was therefore MOVED by Mr. Harms, seconded by Mr. McMath and Mr. Waterman and carried that the Director's recommendations be adopted.

#### AUTHORIZATION FOR PUBLIC HEARINGS

- (a) Proposed Emission Regulations for Kraft Mills. The Director said this matter would be deferred until the October 25, 1972 meeting of the Commission.
- (b) Proposed Amendments to Hot Mix Asphalt Plant Regulations.

Mr. Skirvin read the staff report dated September 22, 1972 covering the Department's proposed amendments to OAR, Chapter 340, Division 2,

Section 25-105 through 25-130, pertaining to Hot Mix Asphalt Plants. Mr. Patterson pointed out that copies had been distributed to the industry for comment.

It was MOVED by Mr. McMath, seconded by Mr. Harms and carried that the Commission authorize the Director to schedule a public hearing, at a time and place to be determined, for the purpose of receiving testimony relevant to the adoption of proposed amendments to OAR Chapter 340, Division 2, Section 25-105 through 25-130, Hot Mix Asphalt Plants.

- (c) Proposed Amendment to Regulations Covering Emission Standards for Veneer Driers.

Mr. Phillips briefed the staff report dated September 22, 1972 concerning the Department's proposed amendment to OAR Chapter 340, Division 2, Section 25-315 (Board Products Industries) Establishing Particulate Emission Standards for Veneer Driers.

It was MOVED by Mr. Waterman, seconded by Mr. Cogan and carried that the Commission authorize the Director to schedule a public hearing, at a time and place to be determined, for the purpose of receiving testimony relevant to the adoption of a proposed amendment to OAR Chapter 340, Division 2, Section 25-315, Subsection (1) establishing particulate emission standards for veneer driers.

- (d) Proposed Amendments to Regulations Governing Parking Facilities and Highways in Urban Areas.

Mr. Downs presented the staff's report dated September 25, 1972 regarding the Department's proposed amendments to OAR Chapter 340, Division 2, Sections 20-050 through 20-070, Parking Facilities and Highways in Urban Areas.

Mr. Harms commented about urban core areas in Springfield and Corvallis, requirements for the city of Medford, and about provisions for amendments to parking plans.

Mr. Cogan pointed out the close relationship of transportation and parking plans.

It was MOVED by Mr. Cogan, seconded by Mr. Waterman and carried that the Commission authorize the Director to schedule a public hearing before the Commission, at a time and place to be determined, for the purpose of receiving testimony relevant to the adoption of proposed amendments to OAR Chapter 340, Division 2, Sections 20-050 through 20-070, Parking Facilities and Highways in Urban Areas.

The meeting was then recessed at 11:55 a.m. and reconvened at 1:30 p.m.

PARKING FACILITIES (Request for Approval)

Mr. Downs read the staff reports pertaining to the requests for approval of parking structures in Portland, Salem and Eugene covered by the following motions:

- (a) It was MOVED by Mr. McMath, seconded by Mr. Waterman and carried that the Commission approve the construction of the Habitat Too Apartments 397-space surface parking facility in Portland.
- (b) It was MOVED by Mr. Cogan, seconded by Mr. Waterman and carried that the Commission approve construction of the Port of Portland Terminal No. 1, 59-space surface parking lot in Portland with the condition that no net increase in available parking spaces at Terminal No. 1 shall result from this construction.
- (c) It was MOVED by Mr. McMath, seconded by Mr. Harms and carried that the Commission approve construction of the proposed 95-space underground parking facility by the city of Portland in Park Block No. 1 with the condition that the city remove all curb parking on the park side of S.W. Park and Ninth Streets between S.W. Washington and Stark Streets immediately upon completion of construction of the parking facility.

This project is to be financed by a federal HUD grant of \$600,000, private gifts totaling \$175,000 and a \$600,000 revenue bond issue.

Mr. Don Jeffrey, Senior Attorney for the city of Portland; Dr. Chas. Gardner, Chairman of the Sloan Fountain Committee; and Mr. Donald Edmundson, Architect, spoke in favor of the project and presented arguments why the project had to be started at once and without awaiting the final adoption of the city's transportation control strategy and associated comprehensive parking plan scheduled to be submitted to DEQ by October 10, 1972.

Mr. Cogan abstained from voting on this motion.

- (d) It was MOVED by Mr. Harms, seconded by Mr. Waterman and carried that the Commission approve construction of the proposed Portland Osteopathic Hospital 94-space surface parking lot in Portland.
- (e) It was MOVED by Mr. Cogan, seconded by Mr. Waterman and carried that the Commission approve construction of the proposed White Stag Manufacturing Company 80-space surface parking lot at 5100 S.E. Harney Drive, Multnomah County.
- (f) It was MOVED by Mr. Harms, seconded by Mr. McMath and carried that the Commission approve the construction of the proposed 214-space parking facility within the Portland Commons office building on block No. 114 and the 146-space parking facility on block No. 115 with the condition that the Director determines the parking facilities are consistent with the city's transportation control strategy to be submitted October 10, 1972.

Mr. Larry Williams of the Oregon Environmental Council objected to the wording of the motion as he felt it made no provision for disapproval of the project if the city's transportation control strategy itself were found to be unacceptable.

- (g) It was MOVED by Mr. Harms, seconded by Mr. Cogan and carried that the Commission approve the construction of the proposed 100-space surface parking lot at 6735 N. Basin Avenue on Swan Island in the city of Portland for the U.S. Navy with the conditions that said parking lot be paved no later than June 1973 and that the existing gravel lot not be used for parking after construction of the new lot is completed.
- (h) It was MOVED by Mr. Cogan, seconded by Mr. Waterman and carried that the Commission approve construction of the proposed Valley River Inn 481-space surface parking facility in the Valley River Center shopping mall, Eugene, near the intersection of the Delta Freeway and Goodpasture Island Road.



- (i) It was MOVED by Mr. McMath, seconded by Mr. Waterman and carried that the Commission approve the construction by the city of Salem of the proposed Pringle Creek 480-space parking structure to be bounded by Liberty, High and Trade Streets and Pringle Creek in Salem.
- (j) It was MOVED by Mr. Cogan, seconded by Mr. McMath and carried that the Commission approve the construction of the proposed Pioneer Industries Apartments 95-space surface parking facility on S.W. 35th Drive near the Baldock Freeway (I-5), Portland, and that the Director be instructed to inform the appropriate local governmental agencies of the Department's concerns about the location and design of this apartment complex.

STATE GRANTS TO REGIONAL AIR POLLUTION AUTHORITIES

Mr. Patterson presented the staff report pertaining to the requests of the regional air pollution authorities for allocation of state funds for fiscal year 1973.

It was MOVED by Mr. Waterman seconded by Mr. Cogan and carried that the Commission approve state money allocations to each of the three Regional Air Pollution Authorities to assist them in financing their programs during fiscal year July 1, 1972 to June 30, 1973 as follows:

CWAPA \$53,771; LRAPA \$30,269; and MWVAPA \$22,809.

VARIANCES GRANTED BY CWAPA (Request for EQC Approval)

Mr. Snyder presented the reports prepared by the staff covering the Department's review and recommendations of the variances granted by CWAPA and which had been submitted for approval of the Commission.

- (a) It was MOVED by Mr. Harms, seconded by Mr. McMath and carried that CWAPA variance 72-4 granted to Wasteco, Inc. be approved as submitted.
- (b) It was MOVED by Mr. McMath, seconded by Mr. Waterman and carried that CWAPA variance No. 72-5 granted to Publishers Paper Company, Molalla Division, be approved with the following modification: Condition 5 of the variance shall be modified to read "After May 15, 1973 and prior to June 15, 1973, Publishers Paper Company, a Corporation, Molalla Division, shall submit to the Authority a written statement describing research and development completed on utilization, disposal or other methods specifically for handling present and expected future wood waste from the Molalla Mill in a manner which complies with Authority emission standards, including estimated implementation costs and time schedules for each method explored."

(c) It was MOVED by Mr. Waterman, seconded by Mr. Cogan and carried that the CWAPA variance of September 20, 1972 to the J.C. Compton Company paving plant at Alder Creek be approved as submitted.

TAX CREDIT APPLICATIONS

Mr. Sawyer presented the Department's evaluations and recommendations regarding the 7 tax credit applications covered by the following motion:

It was MOVED by Mr. Cogan, seconded by Mr. Waterman and carried that Pollution Control Facility Tax Credit Certificates be issued to the following applicants for facilities claimed in the respective tax credit applications and for the costs as claimed with 80% or more of said costs being allocated to pollution control as follows:

<u>Appl. No.</u>	<u>Applicant</u>	<u>Claimed Cost</u>
T-243	Little River Box Co., Glide	\$ 11,825.00
T-360	Willamette Industries, Inc., Albany	138,975.69
T-362	Weyerhaeuser Co., North Bend	24,006.00
T-363	Weyerhaeuser Co., North Bend	3,204.00
T-364	Weyerhaeuser Co., North Bend	167,042.00
T-367	3-G Lumber Co., Philomath	110,640.04
T-375	Herbert Malarkey Roofing Co., Portland	114,880.60

BID OPENING FOR SALE OF STATE POLLUTION CONTROL BONDS

The Director made the official announcement that at the next regular meeting of the Environmental Quality Commission to be held in the Second Floor Auditorium of the Public Service Building, 920 S.W. 6th Avenue, Portland, Oregon on Wednesday, October 25, 1972 bids will be received and opened for the sale of \$45,000,000 in state bonds to be designated "OREGON POLLUTION CONTROL BONDS, SERIES 1972" pursuant to authority granted by Article XI-H of the State Constitution and by Chapter 662, 1971 Oregon Laws.

STATEWIDE SOLID WASTE ACTION PLAN

Mr. Jackman presented a brief report on the present status of the Department's statewide solid waste management action plan.

ZIDELL EXPLORATIONS, INC.

The formal hearing begun September 7, 1972, regarding Zidell's waste discharge permit was reconvened at 3 p.m.

Mr. Silver advised the Commission that the DEQ staff had worked out with Mr. Alterman, Zidell's attorney, what was thought to be an acceptable revised permit which the Director was prepared to recommend be issued to Zidell, Inc., to supersede the contested permit. Copies of the revised proposed permit were passed out to members of the Commission and the differences between the revised version and the contested version were pointed out by Mr. Sawyer. The principal difference is that the requirement for Zidell to provide a slip or dry dock, immediately, was revised to make this requirement contingent upon the inability of Zidell to adequately control oil and other wastes during a year of operation utilizing Zidell's proposed control procedures. A copy of the revised proposed permit is attached and made a part of these minutes.

Mr. Silver reported that he had just been informed by Mr. Alterman that the proposed revised permit was not acceptable to Zidell in its present form and suggested two changes which he stated would make it acceptable to them. These suggested changes were to insert the word "uncontrolled" ahead of "spills" in the second line of condition 1b. and to terminate the wording of condition 4. after "debris" in line 3.

After some discussion it became apparent that agreement as to wording could not be reached between the Department and Zidell, Inc., within a reasonable time. Mr. Day then inquired of Mr. Silver if it would be appropriate for the Commission to issue the proposed revised permit in lieu of the company's existing permit. Mr. Silver responded affirmatively.

It was then MOVED by Mr. Harms, seconded by Mr. McMath and carried that the proposed revised permit be issued to Zidell without change, and that October 25 be set as a hearing date in the event Zidell desires a hearing on this permit.

Mr. Thomas Levak, attorney for the Metal Trades Council, spoke in support of their previously filed motion for intervention.

It was MOVED by Mr. Harms, seconded by Mr. McMath, and carried that intervention by the Metal Trades Council be allowed and that such an order be prepared.

The hearing and the meeting were then adjourned by the Chairman.

PROPOSED WASTE DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 12-1-73

Page 1 of 4

APPLICANT:

Zidell Explorations, Incorporated  
3121 S. W. Moody Avenue  
Portland, Oregon 97201

REFERENCE INFORMATION

File Number: 99762  
Appl. No.: 1089 Received: 7-1-70  
Major Bns: Willamette Minor Bns: \_\_\_\_\_  
Receiving Stream: Willamette River  
River Miles: 13.6  
County: Multnomah

Until such time as this permit expires or is modified or revoked, Zidell Explorations, Incorporated, is herewith permitted to:

- a. Construct and operate approved oily waste water separation and oil storage facilities.
- b. Discharge adequately treated effluents to the Willamette River in a controlled manner.

All of the above activities must be carried out in conformance with the requirements, limitations and conditions which follow.

All other waste discharges are prohibited.

1. Prior to December 1, 1972, the permittee shall submit to the Department of Environmental Quality detailed plans and specifications for constructing and installing by not later than May 1, 1973, such facilities as are necessary to achieve the following with an assured factor of safety:

- a. All liquid discharges from the permittee's operation including but not limited to storm water, yard drainage, tank draw waters, bilge waters and ballast waters shall be collected and treated to meet the following standards prior to discharge to public waters:

Oil (ether solubles)	Shall not exceed 10 ppm
BOD	Shall not exceed 20 ppm
Suspended solids	Shall not exceed 50 ppm
pH	Within range 6.5 to 8.5

Facilities shall also be provided for flow metering and collection of composite samples.

- b. Dockside operations including but not limited to ship dismantling and scrapping shall be performed in a manner so as to prevent all spills of oil or other waste into the river.
- c. Facilities shall be provided for handling, transporting, storing and loading of waste oils in a manner so as to meet all fire and safety codes and so as to provide positive containment of spills.

# PROPOSED WASTE DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recom. Expir. Date: 12-1-73

Page 2 of 4

Plans for the above required facilities shall be prepared by a professional engineer licensed to practice engineering in Oregon. Plans shall be approved by the Department of Environmental Quality prior to start of construction as required by ORS 449.395.

2. The permittee shall submit a detailed spill prevention, control and cleanup plan (spill contingency plan) to the Department by not later than December 1, 1972 for review and approval.
3. Prior to December 1, 1972, the permittee shall submit a detailed plan and timetable for providing by the earliest practicable date, restoration of the river bank areas adjacent to the operations to a reasonably aesthetically acceptable condition. Deposited debris and waste materials shall be removed and disposed of in an approved manner.
4. In the event the permittee is unable during the period of this permit to provide adequate control of spillage of oil or debris to the Willamette River, it shall institute a method for positive containment of spilled oil or debris, including but not limited to a slip, dry dock or other facility isolated from the Willamette River.
5. Plant and shipboard operations and waste oil collection, storage and disposal facilities shall be conducted and maintained in a manner which will prevent accidental oil spills and debris from entering the Willamette River.
6. The quantity and quality of liquid effluent discharge directly or indirectly to the Willamette River shall be limited as follows:

<u>Parameter</u>	<u>Discharge Limits</u>
Oil (ether solubles)	Shall not exceed 10 ppm
BOD	Shall not exceed 20 ppm
Suspended solids	Shall not exceed 50 ppm
pH	Within range 6.5 to 8.5

7. All waste solids and debris shall be utilized or disposed of in a manner which will prevent their entry into the waters of the state and such that health hazards and nuisance conditions are not created.
8. No petroleum base products or other substances other than authorized by this permit shall be discharged or otherwise allowed to reach any of the waters of the state.
9. Sanitary wastes shall be disposed of to a septic tank and drainfield system which has been installed in accordance with the recommendations of the Oregon State Board of Health and the local county health department or by other approved means.

# PROPOSED WASTE DISCHARGE-PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recom. Expir. Date: 12-1-73  
Page 3 of 4

10. The permittee shall observe and inspect all waste handling, treatment and disposal facilities and the receiving stream above and below its operations at least three times per day to insure compliance with the conditions of this permit. A written record of all such observations shall be maintained at the plant and shall be made available to the Department of Environmental Quality staff for inspection and review upon request.
11. Upon completion of an approved oil/water separator, the permittee shall effectively monitor the operation and efficiency of said separator and the quantity and quality of the wastes discharged. A record of all such data shall be maintained and submitted to the Department of Environmental Quality at the end of each calendar month. Unless otherwise agreed to by the Department of Environmental Quality, data collected and submitted shall include, but not necessarily be limited to the following parameters and minimum frequencies:

<u>Parameter</u>	<u>Minimum Frequency</u>
Oil (ether solubles)	Daily
Suspended solids	Daily
pH	Daily
Flow	Daily

12. In the event a spill or breakdown of equipment or facilities causes a violation of any of the conditions of this permit or results in any unauthorized discharge, the permittee shall:
- Immediately take action to stop, contain and clean up the unauthorized discharges and correct the problem.
  - Immediately notify the Department of Environmental Quality so that an investigation can be made to evaluate the impact and the corrective actions taken and determine additional action that must be taken.
  - Submit a detailed written report describing the breakdown, the actual quantity and quality of resulting waste discharges, corrective action taken, steps taken to prevent a recurrence and any other pertinent information.

Compliance with these requirements does not relieve the permittee from responsibility to maintain continuous compliance with the conditions of this permit or the resulting liability for failure to comply.

13. Authorized representatives of the Department of Environmental Quality shall be permitted access to the premises of all facilities owned and operated by the permittee at all times for the purpose of making inspections, surveys, collecting samples, obtaining data and carrying out other necessary functions related to this permit.
14. Whenever a significant change in the character of the waste is anticipated or whenever a change in the waste to be discharged in excess of the conditions of this permit is anticipated, a new application shall be submitted together with the necessary reports, plans, and specifications for the proposed changes. No change shall be made until plans are approved and a new permit issued.

PROPOSED WASTE DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recom. Expir. Date: 12-1-73  
Page 4 of 4

---

15. In the event that a change in the conditions of the receiving waters results in a dangerous degree of pollution, the Department of Environmental Quality may specify additional conditions to this permit.
16. This permit is subject to termination if the Department of Environmental Quality finds:
  - a. That it was procured by misrepresentation of any material fact or by lack of full disclosure in the application.
  - b. That there has been a violation of any of the conditions contained herein.
  - c. That there has been a material change in quantity or character of waste or method of waste disposal.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

### MEMORANDUM

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item No. B; Oct. 4, 1972, EOC Meeting

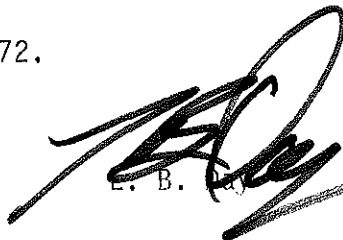
#### Industrial Waste Project Plans for June 1972

During the month of June, 1972, staff action was taken relative to plans, specifications and reports for industrial waste facilities as follows:

1. Provisional approval given for
  - a) Amalgamated Sugar Co., Nyssa, concept proposal.
  - b) U. S. Plywood-Champion Papers, Inc., Mapleton treatment facilities.

#### Director's Recommendation

It is recommended that the Commission give its confirming approval to staff action on the industrial waste project plans for the month of June, 1972.

  
L. B. DAY

8/8/72

DEQ-1

TELEPHONE: (503) 229-5696





## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

Memorandum

L. B. DAY  
Director

To: Environmental Quality Commission

From: Director

ENVIRONMENTAL QUALITY  
COMMISSION

Subject: Agenda Item No. B, October 4, 1972 EQC Meeting

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

### Project Plans for July 1972

During the month of July, 1972, staff action was taken relative to plans, specifications and reports as follows:

#### Water Quality Control

1. Forty-six (46) domestic sewage projects were reviewed:
  - a) Provisional approval was given to:
    - 40 plans for sewer extensions
    - 1 plan for sewage treatment works improvements
  - b) Approval without conditions given to
    - 3 sewerage studies
    - 1 contract modification for riprapping interceptor
  - c) Not approved was:
    - 1 plan for Willakenzie pump station overflow structure.
2. One (1) Industrial waste facility concept proposal was given provisional approval--Tillamook County Creamery.

#### Air Quality Control

1. Fifteen (15) project plans, reports or proposals were received and reviewed:
  - a) 6 Proposals for Surface Auto Parking Facilities
    - 1) 4 approved
    - 2) 1 additional information requested
    - 3) 1 denied

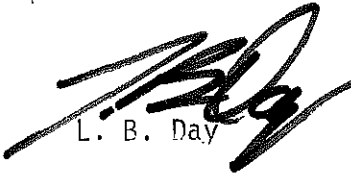
- b) Wigwam burner phase out or modification
  - 1) 4 approved
- c) Baghouse control
  - 1) 2 approved
- d) Industrial AQC proposals other than above:
  - 1) Approved (2 proposals for recovery furnace control)
  - 2) Approved subject to execution of stipulation and order - Crown Zellerbach proposal for control of digester emissions.

Solid Waste Disposal

- 1. Two project plans were provisionally approved:
  - Ponderosa Ranch Sanitary Landfill--Harney County
  - Seneca Landfill--Seneca

Directors Recommendation

It is recommended that the Commission give its confirming approval to staff action on project plans for the month of July.

  
L. B. Day



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

Memorandum

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. B, October 4, 1972 EQC Meeting  
Project Plans for August 1972

During the month of August 1972 staff action was taken relative to plans, specifications and reports as follows:

### Water Quality Control

1. Seventy-Five (75) domestic sewage projects were reviewed:
  - a) Provisional approval was given to:
    - 56 plans for sewer extensions
    - 3 plans for sewage treatment works improvements
    - 6 plans for sewage lift stations
  - b) 1 Contract modification
  - b) Approval without conditions was given to:
    - 6 contract modifications
    - 1 sewer extension
    - 1 treatment works proposal
    - 1 pump station
2. One (1) project plan for industrial waste facilities was given provisional approval - Mayflower Farms whey evaporation, Coos Bay

## Air Quality Control

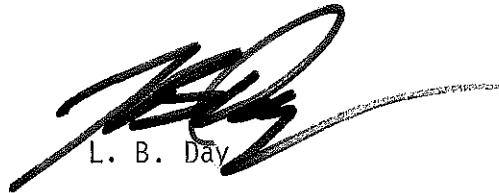
1. Seventeen (17) project plans, reports or proposals were received and reviewed:
  - a) Approval given to:
    - 7 parking facilities (6 surface-1 three-level)
    - 2 hog fuel boilers - Prineville Forest Products
    - 1 Incinerator (pathological) Bend Veterinary Hospital
    - 1 Roto-clone scrubber to control sanderdust-Timber Products Co.
    - 1 Hospital construction - Good Samaritan - Corvallis
  - b) Conditional approval given to:
    - 1 plan to install bolometer to monitor smoke emissions-Boise-Cascade
  - c) Additional information requested on
    - 1 plan for Harbor Drive Closure
  - d) Not approved were plans for
    - 1 Subdivision (Skylark)
    - 1 Wet scrubber on asphalt plant - B & D Paving Co., Hood River
    - 1 Single chamber incinerator - Warrenton School District

## Solid Waste Management

1. Four (4) plans and reports were received and reviewed:
  - a) Provisional approval given to:
    - 2 Landfills (R.D. Tucker-Curry Co. and Hendrix, Grant Co.)
    - 1 Sludge site (Florence)
  - b) Comments
    - 1 Solid waste study and plan (Mid Columbia District-Region 9 COG.)

Director's Recommendation

It is recommended that the Commission give its confirming approval to staff action on project plans for the month of August 1972.



L. B. Day

PROJECT PLANS

Water Quality Division

During the month of July, 1972, the following project plans and specifications and/or reports were reviewed by the staff. The disposition of each project is shown, pending ratification by the Environmental Quality Commission.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (46)</u>			
7/5/72	Gresham	Kay Subdivision sewers	Prov. approval
7/5/72	Lake Oswego	Parrish St. & Palisades Heights No. 5 sewers	Prov. approval
7/5/72	USA (Metzger)	Royal Oak Subd. sewers	Prov. approval
7/10/72	Dundee	Dundee Terrace Subd. sewers	Prov. approval
7/10/72	Bear Creek Valley Sanitary Auth.	Addendum No. 1 to contract for rirapring interceptor	Approved
7/10/72	USA (Fanno)	West Greenlea Park Subd. sewers	Prov. approval
7/11/72	North Roseburg SD	Hill Place sanitary sewer ext.	Prov. approval
7/12/72	Gladstone	Forest Park Subd. sewers	Prov. approval
7/12/72	Sweet Home	Stonebrook Improvement District sewers	Prov. approval
7/12/72	Seaside	Sunset Hills Subd. sewers	Prov. approval
7/12/72	Gresham	Mossytree Park Subd. sewers	Prov. approval
7/13/72	Rainier	0.5 MGD activated sludge sewage treatment plant and "A" Street interceptor	Prov. approval
7/13/72	Eugene	Five sanitary sewer projects	Prov. approval
7/17/72	Fremont National Forest	U.S. Forest Service sewage sludge study	Approved
7/17/72	Eugene	Willakenzie pump station over-flow structure modifications	Not approved

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
7/18/72	Wilsonville	Eilers Run sewer - Phase II Charbonneau Subd.	Prov. approval
7/18/72	Neskowin	Taho Dev. Co. sewage treatment plant expansion, 0.05 MGD activated sludge with holding pond and disinfection	Prov. approval
7/19/72	Gresham	Columbia Village sewers	Prov. approval
7/19/72	Prairie City	Sanitary sewer extension	Prov. approval
7/19/72	Grants Pass	Two sanitary sewer projects	Prov. approval
7/19/72	Portland	Two sanitary sewer projects	Prov. approval
7/19/72	East Salem Sewer & Drainage Dist. I	O&C Tracts No. 3 Subd. sewers	Prov. approval
7/19/72	Sunriver	Ranch Cabin Model Homes sewer	Prov. approval
7/19/72	Canby	North Cedar Street sewer	Prov. approval
7/19/72	Eugene	Sanitary sewer project No. 786	Prov. approval
7/19/72	Carlton	North Yamhill St. san. sewer	Prov. approval
7/19/72	Oak Lodge San. D.	Vineyard Hts. Subd. sewers	Prov. approval
7/19/72	Gresham	McKeel Heights Subd. sewers	Prov. approval
7/19/72	USA (Banks)	Wilkes St. sanitary sewer	Prov. approval
7/20/72	The Dalles	13th St. sewer extension	Prov. approval
7/20/72	Gresham	212th Street sewer extension	Prov. approval
7/21/72	Long Creek	Sewerage study	Approved
7/21/72	Maupin	Sewerage study	Approved
7/26/72	Lebanon	Pletzer's Green Subd. sewer	Prov. approval
7/26/72	USA (Aloha)	Rosemeade Subd. Plat #2 sewers	Prov. approval
7/26/72	Keizer	Rawlins & Gardner Subd. sewers	Prov. approval
7/26/72	Salem	Schurman Drive sewer	Prov. approval

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
7/26/72	Silverton	The Trees Subd. sewers	Prov. approval
7/26/72	Canyonville	Mont St. sewer extension	Prov. approval
7/26/72	Salem	Pacwood Court sewer	Prov. approval
<u>Municipal Forced Annexations</u>			
7/21/72	Coquille	Ferbasche Heights sewers	Approved
7/21/72	Salem	College Heights sewers	Approved

Industrial Waste

7/21/72	Tillamook County Creamery	Concept Proposal	Prov. app.
---------	------------------------------	------------------	------------



15  
 AP - 9 PROJECT PLANS, REPORTS, PROPOSALS FOR AIR QUALITY CONTROL DIVISION FOR  
 JULY, 1972

<u>DATE</u>	<u>LOCATION</u>	<u>PROJECT</u>	<u>ACTION</u>
July 19	Multnomah	<u>Oregon Automobile Ins.Co.</u> Proposal for surface auto- mobile parking facility.	Approved
19	Multnomah	<u>Kaiser Medical Center</u> Proposal for surface auto- mobile parking facility.	Approved
19	Multnomah	<u>Good Samaritan Hospital</u> Proposal for surface auto- mobile parking facility.	Approved
19	Multnomah	<u>Westmoreland Union Manor</u> Proposal for surface auto- mobile facility.	Approved
20	Lake	<u>Dame Lumber &amp; Moulding Co.</u> Proposal to phase-out wwb through utilization of shavings.	Approved
20	Douglas	<u>Robert Dollar Lumber Co.</u> Plans and specifications for baghouse control systems.	Approved
20	Douglas	<u>Glendale Plywood Company</u> Plans and specifications for baghouse control systems.	Approved
25	Curry	<u>Western States Plywood Coop.</u> Plans and specifications for modification of one (1) of two (2) wigwam waste burners.	Approved
25	Curry	<u>Western States Plywood Coop.</u> Proposal to phase-oue one (1) remaining wigwam waste burner.	Approved
25	Curry	<u>Brookings Plywood Corpation</u> Plans and specifications for modification of wigwam waste burner.	Approved
27	Multnomah	<u>Portland State College</u> Proposal for surface auto- mobile parking facility.	Add'l.in- formation requested by EQC
27	Multnomah	<u>Terminal Sales Bldg.</u> Proposal to construct parking structure.	Denied by EQC

PROJECT PLANS, REPORTS, PROPOSALS FOR AIR QUALITY CONTROL DIVISION FOR  
JULY 1972 (cont.)

<u>DATE</u>	<u>LOCATION</u>	<u>PROJECT</u>	<u>ACTION</u>
28	Linn	<u>Crown Zellerbach Corp.</u> Proposal for control of digester emissions.	Approved subject to execution of Stipula- tion & Order
28	Clackamas	<u>Publishers Paper Co.</u> Proposal for recovery furnace control.	Approved
28	Yamhill	<u>Publishers Paper Co.</u> Proposal for recovery furnace control.	Approved

PROJECT PLANS

SOLID WASTE MANAGEMENT DIVISION

During the month of July, 1972, the following project plans and specifications and/or reports were reviewed by the staff. The disposition of each project is shown, pending confirmation by the Environmental Quality Commission.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
12	Harney County	Ponderosa Ranch Sanitary Landfill	Prov. approval
19	Seneca	Seneca Landfill	Prov. approval

PROJECT PLANS

Water Quality Division

During the month of August, 1972, the following project plans and specifications and/or reports were reviewed by the staff. The disposition of each project is shown, pending ratification by the Environmental Quality Commission.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (75)</u>			
8-1-72	Keizer Sewer Dist. I	Lawndale Subdivision sewers	Prov. approval
8-1-72	USA (Aloha)	Farmington West II sewers	Prov. approval
8-1-72	Siletz	Weaver Trailer Park sewers	Prov. approval
8-2-72	USA (Sunset)	143rd Street sewer ext.	Prov. approval
8-2-72	Eugene	3 sewer projects, Jobs #778, 863, 855	Prov. approval
8-2-72	Lebanon	Hansard Ave., Market St. sewers	Prov. approval
8-2-72	Newberg	Northwood Park #3 sewers	Prov. approval
8-2-72	USA (Beaverton)	Little Tree Subd. sewers	Prov. approval
8-2-72	Wilsonville	Charbonneau pump sta. water supply	Approved
8-2-72	Astoria	Modified plans - interceptor project	Approved
8-2-72	Clackamas County Service Dist. I	Interceptor sewer, Phase III	Prov. approval
8-8-72	Tualatin	K-Mart sewer	Prov. approval
8-8-72	Gresham	Hyster Co. sanitary sewer	Prov. approval
8-8-72	Inverness	Unit 5A-2, pump station and force main	Prov. approval
8-8-72	Ashland	Sewage treatment plant flow measurement	Prov. approval
8-8-72	Multnomah Co. (E)	Union Avenue Motel sewer	Prov. approval

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-8-72	Deschutes County	Black Butte Ranch - irrigation waste disposal and sewer ext.	Prov. approval
8-8-72	Scio	Thomas Creek pumping station	Prov. approval
8-8-72	Green San. Dist.	Change Order #1 to pond construction contract	Approved
8-8-72	Lebanon	Edgewater Square Dev. sewers	Prov. approval
8-9-72	Newberg	Hess Creek sanitary sewer	Prov. approval
8-9-72	Silverton	Bridge Creek Apts. sewage pumping station	Prov. approval
8-9-72	USA (Beaverton)	Randall Apts. sewers	Prov. approval
8-9-72	Canby	Green Tree Manor Subd. sewers	Prov. approval
8-9-72	North Bend	Modification of water line at sewage treatment plant	Approved
8-9-72	Bend	Riverside Motel pump station	Prov. approval
8-10-72	Brookings	Sewer rehabilitation project	Approved
8-15-72	Wilsonville	Brown Road sewer & Parkway pump station	Prov. approval
8-15-72	Medford	Rogue Terrace Subd. sewers	Prov. approval
8-15-72	Central Point	Sierra Vista-Temple Court Subd. sewers	Prov. approval
8-15-72	North Umpqua S.D.	Sanitary sewer extensions	Prov. approval
8-17-72	Wasco County	Sportsmans Park #3 Subd. sewers	Prov. approval
8-17-72	Woodburn	Parkview Court Subd. sewers	Prov. approval
8-17-72	Gresham	Drew Addition Subd. sewers	Prov. approval
8-17-72	Clackamas County Service Dist. I	Change Order #2, Phase I, interceptor	Approved
8-17-72	Lincoln City	South 49th Street sewer	Prov. approval
8-17-72	Odell San. Dist.	Mid-Valley Subd. sewers	Prov. approval

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-17-72	Klamath Falls	Airport interceptor sewer and pump station	Prov. approval
8-17-72	Troutdale	Fairfax Heights Subd. sewer	Prov. approval
8-17-72	Medford	Springdale area sewer	Prov. approval
8-17-72	The Dalles	Chenowith Rim complex sewer	Prov. approval
8-17-72	Gresham	Binford Farms, Phase II, Subdivision sewers	Prov. approval
8-17-72	Gresham	Wayfarer Addition sewer	Prov. approval
8-17-72	Keizer Sewer Dist. I	Andrew Park Subd. sewer	Prov. approval
8-17-72	East Salem Sewage & Drainage Dist. I	Lancaster Estates sewers	Prov. approval
8-17-72	Hillsboro (Rock Cr.)	Hollman Park Subd. #3 sewers	Prov. approval
8-17-72	Brookings	Addendum No. 1 Brookings sewer sealing project	Prov. approval
8-17-72	Wilsonville	Addendum No. 1 Brown Road sewer and pump station project	Approved
8-22-72	Tualatin	Sewage treatment plant expansion -- 0.445 MGD activated sludge-split flow effluent polishing	Prov. approval
8-22-72	Hillsboro (Westside)	Sanitary sewer extensions	Prov. approval
8-22-72	Hillsboro (Rock Cr.)	Val Park Subd. sewers and pump station	Prov. approval
8-23-72	USA (Sherwood)	Allan Olson Subd. sewers	Prov. approval
8-23-72	Salem (Willow Lake)	Two sewer projects	Prov. approval
8-23-72	USA (Tigard)	Burnham Park Subd. sewers	Prov. approval
8-23-72	Lincoln City	North Lincoln Hospital sewer	Prov. approval
8-24-72	Gresham	Key Estates Subdivision sewer	Prov. approval
8-28-72	Molalla	Briarcroft Addition #3 sewers	Prov. approval

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-29-72	East Salem Sewage & Drainage Dist. I	Jan Ree East #2 Subd. sewers	Prov. approval
8-29-72	USA (Aloha)	Jersey Park #2 Subd. sewers	Prov. approval
8-29-72	Gresham	7th Day Adventist Sch. sewer	Prov. approval
8-29-72	Gresham	Kelly Avenue sewer	Prov. approval
8-29-72	Amity	Sanitary sewer laterals	Prov. approval
8-29-72	Lake Oswego	LID 133 sewers	Prov. approval
8-29-72	USA (Beaverton)	Central Park Condominium sewer	Prov. approval
8-29-72	USA (Sunset)	The Bluffs Subd. sewers	Prov. approval
8-30-72	Rainier	Fern Hill Subd. sewers	Prov. approval
8-30-72	Hillsboro (Rock Cr.)	Sanitary sewer extensions	Prov. approval
8-30-72	Brookings	Change Order #1 to sewage treatment plant contract	Approved
8-30-72	Salem (Willow Lake)	12th Street sewer	Prov. approval
8-31-72	Umatilla	Change Order #3 to sewage treatment plant contract	Prov. approval
8-31-72	Clackamas County	Promontory Park sewage treatment plant	Prov. approval
8-31-72	USA (Tigard)	Pathfinder Subd. sewers	Prov. approval
8-1-72	Coos Bay	Mayflower Farms, Inc. Whey Evaporation Facilities	Prov. Approval

AP - 9 PROJECT PLANS, REPORTS, PROPOSALS FOR AIR QUALITY CONTROL  
DIVISION FOR AUGUST, 1972

	<u>DATE</u>	<u>LOCATION</u>	<u>PROJECT</u>	<u>ACTION</u>
August	1	Union County	<u>Boise Cascade Corporation</u> Plans to install bolometer to monitor smoke emissions from boiler.	Conditional Approval
	3	Corvallis	<u>Good Samaritan Hospital</u> <u>Construction</u>	Approved
	4	Multnomah Co.	<u>Deer Run Apartments</u> Plans to construct 52-space surface parking facility.	Approved
	9	Jackson County	<u>Timber Products Company</u> Plans to install roto-clone scrubber to control sander- dust emissions.	Approved
		Medford	<u>Skylark Subdivision (near</u> <u>Airport)</u>	Not Approved
		Hood River Co.	<u>B &amp; D Paving Company</u> Proposal to install wet scrubber system on asphalt plant.	Not Approved
	15	Clatsop County	<u>Warrenton School District</u> Plans to install single chambered incinerator.	Not Approved
	16	Crook County	<u>Prineville Forest Products</u> Plans to install two (2) hog fuel fired boilers with scrubber controls.	Approved
	21	Multnomah Co.	<u>Good Samaritan Medical Bldg.</u> Plans to construct 192-space, 3 level, parking facility.	Approved
	22	Deschutes Co.	<u>Bend Veterinary Hospital</u> Plans and specifications for installation of pathological incinerator.	Approved
	24	Multnomah Co.	<u>Sizzler Family Steak House</u> Plans to construct 55-space surface parking facility	Approved



	<u>DATE</u>	<u>LOCATION</u>	<u>PROJECT</u>	<u>ACTION</u>
August	24	Washington Co.	<u>Cedar Hills Professional Assn.</u> Plans to construct 87-space surface parking facility	Approved
	24	Multnomah Co.	<u>Reuben's &amp; Coco's Restaurants</u> Plans to construct 140-space surface parking facility	Approved
	28	Multnomah Co.	<u>Freightliner Corporation</u> Plans to construct 125-space surface parking facility	Approved
	28	Multnomah Co.	<u>Port of Portland</u> Plans to construct 400-space surface parking facility	Approved
	30	Multnomah Co.	<u>Harbor Drive Closure</u>	Additional Information Requested

PROJECT PLANS

SOLID WASTE MANAGEMENT DIVISION

During the month of August 1972, the following project plans and specifications and/or reports were reviewed by the staff. The disposition of each project is shown, pending confirmation by the Environmental Quality Commission.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
9	Curry County	R.D. Tucker Landfill	Prov. Approval
11	Region 9 COG	Mid-Columbia District Solid Waste Study and Plan	Comments
23	Lane County	Florence Sludge Site	Prov. Approval
31	Grant County	Hendrix Landfill	Prov. Approval



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

I. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

### MEMORANDUM

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item No. C, October 4, 1972, EQC Meeting  
River Island Sand & Gravel, Incorporated  
Clackamas County

### Introduction

This subject is being presented to the Environmental Quality Commission due to the numerous water pollution complaints which have been issued against River Island Sand & Gravel, Inc. It was felt that local concern and staff activities related to the operation should be brought to the attention of the Environmental Quality Commission for its information and guidance.

### Background

#### Site

1. River Island Sand & Gravel, Inc., operates a rock crushing, retail sand and gravel plant at approximately river mile 14.0 adjacent to the Clackamas River. The plant site is located on relatively low flat ground in the Clackamas River flood plain and part of the northern site area is an old channel of the river. A drawing of the plant site is included for your reference.
2. The gravel removal operations are primarily on the northern area of the property and due to the elevation differential between the Clackamas River and the removal area, ground water is observable in much of the borrow area.
3. To protect the borrow area and rock crushing plant from flood waters of the Clackamas River, a dike has been constructed on the east side of the property. Nevertheless, during the past several winters, flooding of this area has occurred either due to breaching of the dike or flow around the dike.

4. Seepage has developed through the toe of the dike and a shallow ditch has been constructed to collect and discharge this water to the old river channel. Dikes have been constructed in the old channel to provide for settling but these dikes have washed out during periods of high runoff.
5. The gravel plant is located adjacent to the borrow area and is susceptible to flooding. Wash waters from the gravel plant are discharged to a series of settling basins located in the borrow area.

#### History

1. As a result of numerous complaints and investigations by the staff, River Island Sand & Gravel, Inc., submitted an application for a Waste Discharge Permit on October 13, 1969. This application indicated that gravel wash waters from the plant would be discharged into settling ponds and recirculated. The application was submitted by a previous owner of River Island Sand & Gravel, Inc., Loren Obrist.
2. The Department sent a letter to Loren Obrist, dated October 27, 1969, informing him of the adopted water quality standards (attached) for the Clackamas River basin.
3. A Waste Discharge Permit was issued to River Island Sand & Gravel, Inc., on December 26, 1969. Condition No. 1 of this permit required that the permittee submit a program and time schedule for providing before May 1, 1970, such facilities as are necessary to meet the water quality standards for the Clackamas River.
4. At the beginning of 1970, Mr. Frank M. Lamb purchased River Island Sand & Gravel, Inc. At this time settling ponds had been constructed in the borrow area to receive gravel wash waters from the plant.
5. In October, 1970, River Island Sand & Gravel, Inc. began construction of the shear dike adjacent to the Clackamas River to protect the borrow area and plant site from river flooding.

6. River Island Sand & Gravel, Inc. submitted an application for renewal of their Waste Discharge Permit dated December 7, 1970.
7. A Waste Discharge Permit was issued on May 18, 1971, which required the following:
  - a. Prior to August 1, 1971 - complete construction of the shear dike to protect the gravel wash water settling ponds from flooding.
  - b. Perform no activities which would violate the Water Quality Standards for the Clackamas River.
8. On July 14, 1971 a written complaint was received of turbid waste water discharge from River Island Sand & Gravel, Inc., from Jay Massey, District Fishery Biologist, Oregon Game Commission. In addition numerous telephone complaints were received regarding the operation.
9. River Island Sand & Gravel, Inc. submitted an application for renewal of their Waste Discharge Permit on December 21, 1971.
10. Based on the above considerations, the Department completed its evaluation of River Island Sand & Gravel, Inc. operation and issued proposed permit provisions on April 26, 1972. Condition No. 1 of this proposed permit stated:
  1. Prior to September 1, 1972 the permittee shall submit a detailed proposal and timetable for providing as soon as practicable but not later than July 1, 1973, such facilities and controls as are necessary to:
    - a. Relocate the gravel crushing plant to a site acceptable to the Department of Environmental Quality.
    - b. Provide a gravel wash water recirculation system adequate to insure no discharge of wash waters to the Clackamas River except by means of seepage at a controlled rate so as to reduce turbidities to the lowest possible level and such that the requirements of condition number 2 are not violated.

11. On May 12, 1972 the Department received comments from Robert E. Glasgow, Attorney at Law, representing River Island Sand & Gravel, Inc., indicating his client does not own any property at a higher elevation and objecting to condition 1 (a) of the proposal.
12. On May 16, 1972 a copy of a report dated May 12, 1972 prepared by Dames and Moore, Consulting Engineers, regarding the River Island Sand & Gravel, Inc. rock removal and crushing operation was submitted.
13. On July 21, 1972, the Department sent a letter to the Division of State Lands requesting that the material removal permit for River Island Sand & Gravel, Inc. which was currently on file for renewal be denied until such time as the Environmental Quality Commission has reviewed the operation and taken appropriate action.
14. On August 2, 1972, the Division of State Lands sent a letter to Mr. Lamb, President of River Island Sand & Gravel, Inc., denying the issuance of the material removal permit.
15. During 1972 numerous telephone and written complaints were issued against the operation for discharge of turbid waters to the Clackamas River, and for noise produced by the crusher, front end loader and trucks.

#### Evaluation

1. The staff has thoroughly investigated the site and found the following deficiencies in the location and operation of the facilities:
  - a. The borrow area is located in the flood plain and during winter high water conditions the dike protecting the area can be breached and or circumvented causing severe erosion of the excavation area. At this time, silt and other debris are then washed downstream.
  - b. The soil conditions of the area are natural river run rock allowing water to filter rapidly through the excavation area and to the river.

- c. Seepage through the dike also collects silt and discharges to the river.
  - d. Gravel wash waters are discharged to a series of settling ponds constructed from river run rock, these ponds are ineffective in providing adequate settling or entrapment of the waters. The waste waters filter rapidly through the pond and discharge to the river, containing varying concentrations of silt.
2. In addition the report presented by Dames and Moore indicated that due to the high ground water table and the permeability of the sand and gravel exposed in the area a recirculation system is not feasible.
  3. Noise from the crushing operation varies according to the size of rock being crushed, and the operation was relatively quiet during noise surveys conducted by the staff. Many of the neighbors object to the noise when large rocks are crushed or when the crusher is operated in the evening, early morning, or on the weekend. Gravel trucks using the facility are also a significant source of neighborhood complaint, but most of these trucks are not owned or operated by River Island Sand and Gravel, Inc.

#### Conclusions

1. Serious water quality problems result from the operation of River Island Sand & Gravel, Inc. The location of the seepage ponds in the flood plain, and movement of water through the borrow area, allow turbid waters to seep through the river run rock and into the river. This results in discharges exceeding the turbidity standards established for the Clackamas River.

2. To effectively control these water quality problems, two alternatives exist:
  - a. Remove the crushing plant, close the area to gravel removal and initiate a program of rehabilitation for the area.
  - b. Relocate the gravel crushing plant and seepage ponds to an acceptable site. In addition, this would require that River Island Sand & Gravel, Inc., develop a total (including a removal and rehabilitation plan) water quality management program to protect the Clackamas River.
3. Noise from the crushing operation is excessive for evening, early morning and weekend operation. When large rocks are crushed, noise is occasionally excessive for week day operation. Many trucks using the facility create excessive noise, but are not under the direct control of River Island Sand and Gravel, Inc.

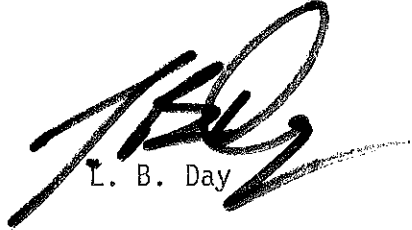
#### Recommendations

It is the recommendations of the Director that:

1. River Island Sand & Gravel, Inc., be directed to immediately retain a professional engineer registered in the state of Oregon to develop a water quality management program and time schedule for its Clackamas River operation which will insure adequate protection of the Clackamas River from waste-water discharges.
2. The water quality management program shall be completed and submitted to the Department as soon as practicable but not later than November 30, 1972 and upon approval by the staff be immediately implemented.
3. A Waste Discharge Permit encompassing the above recommendations be issued by the Department to River Island Sand & Gravel, Inc.
4. The Division of State Lands be requested to include as an integral part of its material removal permit for River Island Sand & Gravel, Inc. the water quality management implementation plan as per its Waste Discharge Permit.



5. River Island Sand & Gravel, Inc. be requested to limit rock crushing operations to the hours between 8 a.m. and 6 p.m., Monday through Friday.



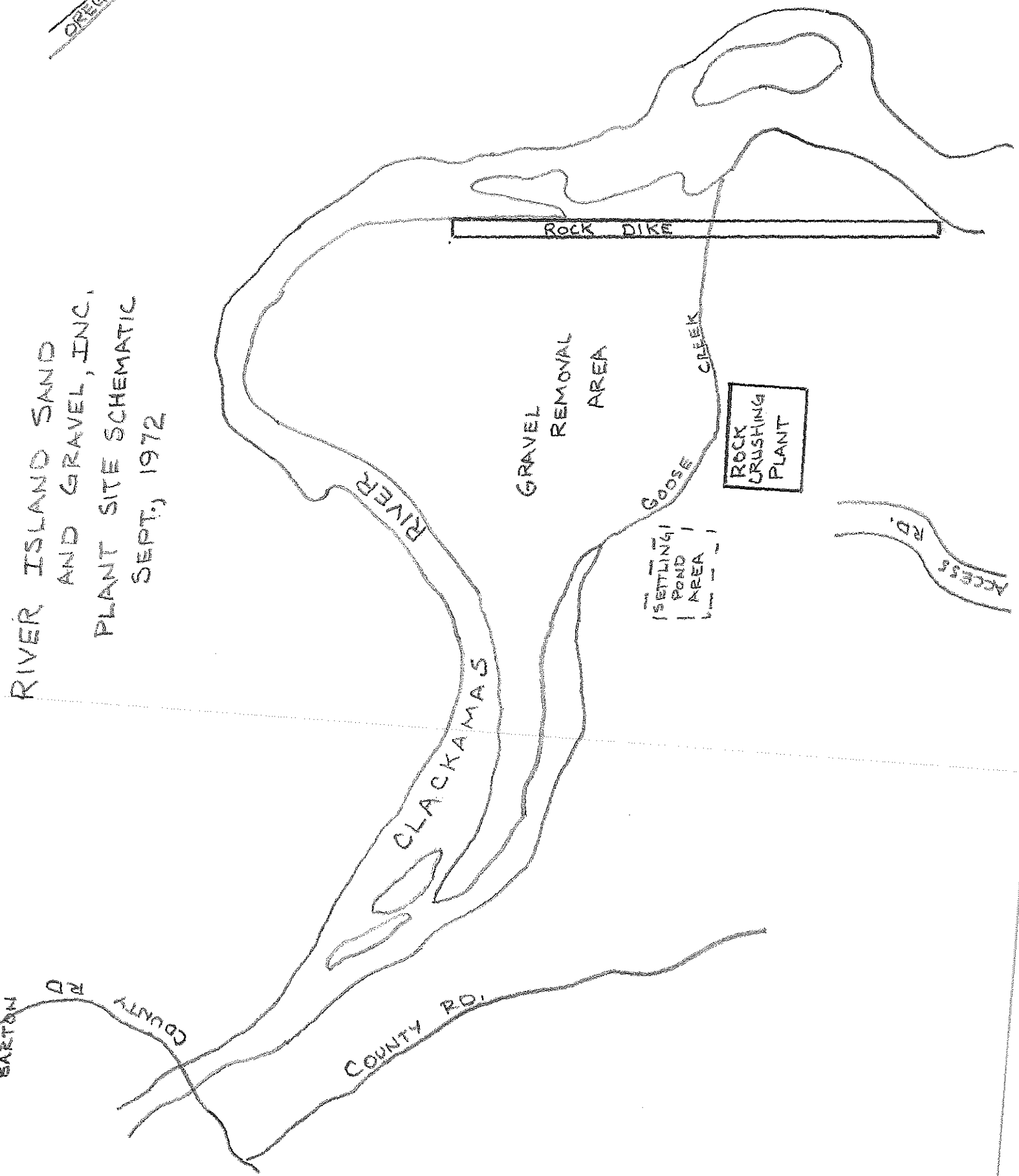
L. B. Day

REG/bw

September 26, 1972

RIVER ISLAND SAND  
AND GRAVEL, INC.  
PLANT SITE SCHEMATIC  
SEPT., 1972

OREGON HWY 211





## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: Director

SUBJECT: Agenda Item D a) for October 4, 1972 EQC Meeting

Kraft Mill Emission Regulation  
(OAR 340, Sections 25-155 through 25-195)

### Background:

The kraft mill emission regulation, adopted by the Sanitary Authority in April, 1969, set total reduced sulfur (TRS) emission limits from recovery furnaces at an immediate level of 70 parts per million (ppm), or 2 pounds of sulfur per ton of pulp (lb S/t), with a 1975 limit of 17.5 ppm or 0.5 lb S/t, or "such other limit of TRS that proves to be reasonably attainable utilizing the latest in design of recovery furnace equipment, controls, and procedures." A review and public hearing was provided for no later than July, 1973, to review technology and adequacy of the recovery furnace emission limits.

A second important provision of the 1969 regulation required mill operators to conduct special studies of other emission sources throughout the mill with the objective of establishing a basis for specifying more effective control of all kraft mill odor sources.

Discussion:

It has become desirable to set definite 1975 limits well in advance of the July, 1973 date in order to allow for the two years' construction time required for major installations where necessary. Also, the technology of controls for both conventional and low-odor furnaces has progressed to the point of allowing limits to be set with reasonable certainty, and the importance of "other sources", heretofore considered minor, has become more apparent. Accordingly, a proposed amended kraft mill regulation has been drafted which expresses these developments and also redirects the emphasis of the regulation towards total odor control at the mill site.

The timing and limits in the new proposed regulation are:

	<u>Recovery Furnaces (1), (2)</u>	<u>Lime Kilns (2)</u>	<u>All Other Sources</u>
Jan. 1, 1974			The sum of all TRS emissions not to exceed 0.1 lb S/t, and also no vent TRS to exceed 10 ppm
July 1, 1975	10 ppm or 0.3 lb S/t	20 ppm or 0.1 lb S/t	
July 1, 1978	5 ppm or 0.15 lb S/t	10 ppm or 0.05 lb S/t	

Notes:

- (1) New recovery furnaces would be required to comply with the 5 ppm TRS limit immediately (after an appropriate, short-term run-in period).
- (2) The limits are given in terms of a concentration and a mass emission rate. The proposed regulation adds, "whichever is the more restrictive."

Stepwise limits on lime kiln TRS have been added, with deadlines of July 1, 1975 and July 1, 1978. Three lime kilns in Oregon emit less than 10 ppm TRS gases with good reliability. However, the technology of lime kiln TRS control is not well known. Some studies have been made, and more are in progress, but since the reliability of even the best kilns for emitting less than 10 ppm is not absolute, and since there is still much that must be learned about why any given kiln emits the concentrations it does, the first step of control has been set at 20 ppm for 1975, with a subsequent limit of 10 ppm in 1978. The 10 ppm appears to be the best that technology can deliver, and also it appears to be a limit on the accuracy of TRS monitors. This accuracy limitation does not arise in the detection-analysis part of the monitoring systems but rather in interferences from other contaminants in the sample lines between stacks and detection units. Ten ppm from a lime kiln is approximately a mass-emission rate of 0.05 lb S/ton, or roughly equivalent to a recovery furnace emitting two ppm.

In addition, the particulate limit deadline for recovery furnaces and lime kilns is being moved up from July 1, 1975 to May 1, 1975, to conform to Oregon's State-wide Clean Air Act Implementation Plan. This is the only change in the particulate emission limits.

Under the proposed revised regulation, the mills would be allowed to retain conventional recovery furnaces provided they could operate within the 10 ppm TRS limit by not later than July 1, 1975, and within a 5 ppm TRS limit by not later than July 1, 1978. For the 1975 TRS limit, where there is more than one furnace stack (for example, a low-odor and a conventional

furnace on one plant site), averaging the stacks at 10 ppm would be allowed, provided that no furnace stack would exceed more than 15 ppm or 0.45 lb S/ton. The 5 ppm TRS limit would apply immediately to all new furnaces and after 1978 to all existing furnaces as well as to new furnaces.

These proposed limits are based on emissions averaged over each calendar day. Peaks from recovery furnace stacks would be limited to four times the average for no more than sixty cumulative minutes per day, that is, 40 ppm by July 1, 1975, and 20 ppm by July 1, 1978.

The proposed revised regulation represents, to a degree, a shift in emphasis in that the existing regulation concentrates essentially entirely on recovery furnaces, while the proposed regulation would bring other odor sources under highest and best practicable control. Continuing to restrict recovery furnace emissions to the point of requiring that all recovery capacity be converted to low-odor configurations by July 1, 1975 would not only require great expenditures of time and money, but would not in itself solve the kraft mill odor problem. The other sources, such as pulp-washing systems, lime-mud recovery ("recausticizing cycles") systems, and black liquor oxidation vents, account for as much as 0.5 lb S/ton, or equivalent to a recovery furnace at 20 ppm. It is believed that the time and money to control these sources would do more at this time to reduce the kraft odor problem than would the greater expenditure necessary to convert all existing recovery furnace capacity to low-odor configuration.

"Other Sources" are not uniform throughout the industry, in that the strengths and indeed the array of vents present at any mill will vary with different types of pulp produced, the wood species pulped, and differences in equipment and procedures. Therefore, developing a program for compliance

with this provision would follow staff inspections and detailing with the mill staffs of sources and controls. Some of the sources listed in the definition of "Other Sources" (Section A, Definition 7) would be included in the vents to be treated in the non-condensable systems or given equivalent treatment, namely the knotter and brown-stock washer vents, brown-stock-washer filtrate tank vents, and black-liquor-oxidation tower vents.

It is proposed that contaminated liquid streams be steam-stripped prior to re-use or treatment, and the stripped gases incinerated in the non-condensable system. Examples of these streams are condensate from multiple-effect evaporators and wash water from lime-mud washers. In the interest of water re-use programs, to reduce BOD loadings to treatment systems and to reduce the fresh water demand of the mills, these streams presently are commonly used for scrubbing media for particulate scrubbers or for wash water elsewhere. When used as a scrubbing medium, flue gases can strip out odorous gases, thus transferring a water quality problem to an air quality problem. Stripping the odorous gases in a steam stripper would make these liquid effluents suitable for re-use, and also remove a certain amount of BOD to aid the water treatment programs and help limit odorous emissions from aerated lagoons. It is intended in this way to keep air and water quality programs from defeating each other and indeed to provide some mutual benefit.

A requirement would be added to enclose sewers and drains which are presently open troughs. These drains serve as spill and leak collectors, and the liquid streams in them are often very potent.

The use of anaerobic lagoons, which have been used for primary treatment (settling ponds) in waste water treatment would be prohibited, because of observations and complaints of odors from this type of lagoon in the past.

A limit would be set on recovery furnace sulfur dioxide at 300 ppm. At present, under normal operating conditions, few furnaces emit as much as 100 ppm SO<sub>2</sub>. However, low-odor furnaces have emitted as much as 1000 ppm in their start-up phases. Imposing a limit would ensure that SO<sub>2</sub> control would not be neglected when the furnaces are designed and operated, as well as provide a basis for regulatory control should problems develop in the future.

New facilities would be required to be in compliance with applicable limits within 180 days of start-up. This requirement would apply to new mills or to an added or modified piece of equipment in an existing mill. The time limit is somewhat short for start-ups of major pieces of equipment, like recovery furnaces, but more than adequate for minor units like scrubbers. It is expected that if a mill were nearing the 180th day and still had not achieved compliance, that the problem and its reasons would be brought to the attention of the Department. A need for significant additional time could be presented as a request for a variance.

Compliance schedules would be reviewed from the point of view of achieving compliance in the shortest time practicable within the limits imposed by availability of materials and by construction schedules, rather than emphasizing the compliance deadlines.



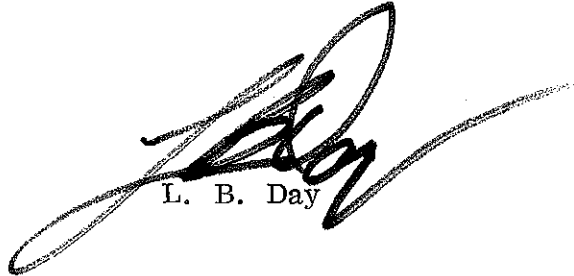
Some further "housekeeping" provisions would be included in the proposed regulation. A requirement would be provided for installing stand-by thermal oxidation capacity to function whenever lime kilns used for incinerating non-condensibles are removed from service or fail. This might not be necessary at plant sites using more than one kiln, in which case the mill could request a variance if it could be shown that at no time would both kilns be out of service at a time when the rest of the mill was operating (i. e., exclusive of total mill shutdowns). Special studies could be required by the mechanism of a permit requirement for special cases (such as bleach plant emissions at three kraft mills which bleach pulp). Continual monitoring of particulate emissions would be required by January 1, 1974. Weyerhaeuser at Springfield is doing so now, and Georgia-Pacific at Toledo has piloted a project with another non-papermaking, company to develop a continuous particulate monitor. A continual particulate monitoring system would be more representative than once-a-month grab sampling and would provide the mills with a rapid indication of malfunctions.

Criteria also are included for setting more restrictive emission limits if found to be necessary for especially critical situations.

Another review would be made prior to January, 1976. This would give an opportunity to review the total odor problem and progress in solving it, and to review the need or desirability of limiting all furnaces to 5 ppm TRS by July 1, 1978, as proposed.

Director's Recommendation:

It is recommended that the Director be authorized to schedule a Public Hearing before the Commission for the adoption of this regulation at the next appropriate Commission meeting, which will allow 30 days public notice and conferences with interested persons.



L. B. Day

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY CONTROL DIVISION

September 25, 1972

PROPOSED  
REVISED REGULATION FOR KRAFT PULP MILLS  
OAR Chapter 340, Sections 25-155 to 25-195 are Repealed and Sections  
A through K are adopted in lieu thereof.

A. DEFINITIONS:

As used in these regulations, unless otherwise required by context:

1. Continual Monitoring means sampling and analysis, in a continuous or timed sequence, using techniques which will adequately reflect actual emission levels or concentrations on a continuous basis.
2. Department means the Department of Environmental Quality.
3. Emission means a release into the atmosphere of air contaminants.
4. Kraft Mill or Mill means any industrial operation which uses for a cooking liquor an alkaline sulfide solution containing sodium hydroxide and sodium sulfide in its pulping process.
5. Lime Kiln means any production device in which calcium carbonate is thermally converted to calcium oxide.
6. Non-condensibles means gases and vapors from the digestion and evaporation processes of a mill that are not condensed with the equipment used in said processes.
7. Other Sources means sources of sulfur emissions in a kraft mill other than recovery furnaces and lime kilns, including but not limited to:
  - a. vents from knotters, brown stock washing systems, evaporators, blow tanks, smelt tanks, blow heat accumulators, black liquor storage tanks, black liquor oxidation systems, tall oil recovery operations,

steaming vessels and other equipment for pretreatment of chips and sawdust prior to their introduction into digestors,

- b. any operation connected with the treatment of condensate liquids within the mill, and
  - c. any vent which is shown to be a contribution of odorous gases over 10 ppm TRS.
8. Particulate Matter means a small, discrete mass of solid matter, including the solids dissolved or suspended in liquid droplets, but not including uncombined water.
  9. Parts Per Million (ppm) means parts of a contaminant per million parts of gas by volume on a dry-gas basis (1 ppm equals 0.001% by volume).
  10. Production means tons of air-dried, unbleached kraft pulp, or equivalent, produced.
  11. Recovery Furnace means the combustion device including any direct contact evaporator in which pulping chemicals are converted to a molten smelt and wood solids are incinerated.
  12. Total Reduced Sulfur (TRS) means the sulfur in hydrogen sulfide, mercaptans, dimethyl sulfide, dimethyl disulfide, and any other organic sulfides present in an oxidation state of minus two.

#### B. STATEMENT OF POLICY

Recent technological developments have enhanced the degree of malodorous emission control possible for the kraft pulping process. While recognizing that complete malodorous and particulate emission control is not presently

possible, consistent with the meteorological and geographical conditions in Oregon, it is hereby declared to be the policy of the Department to:

1. Require, in accordance with a specific program and time table for each operating mill, the highest and best practicable treatment and control of atmospheric emissions from kraft mills through the utilization of technically feasible equipment, devices and procedures.
2. Require degrees and methods of treatment that shall essentially eliminate discharge of odorous gases from kraft pulp mills.
3. Require effective monitoring and reporting of emissions and reporting of other data pertinent to air quality or emissions. The Department will use these data in conjunction with ambient air data and observation of conditions in the surrounding area to develop and revise emission and ambient air standards, and to determine compliance therewith.
4. Encourage and assist the kraft pulping industry to conduct a research and technological development program designed to progressively reduce kraft mill emissions, in accordance with a definite program, including specified objectives and time schedules.
5. Establish standards deemed to be technically feasible and reasonably attainable, with the intent of revising the standards as new information and better technology are developed.

C. HIGHEST AND BEST PRACTICABLE TREATMENT AND CONTROL REQUIRED:

Notwithstanding the specific emission limits set forth in Section D of these regulations, in order to maintain the lowest possible emission of air contaminants, the highest and best practicable treatment and control currently available shall in every case be provided.

D. EMISSION LIMITATIONS:

1. Emission of Total Reduced Sulfur (TRS)

a. Recovery Furnaces

1) As soon as practicable, but not later than July 1, 1975, the emission of TRS from each recovery furnace shall not exceed:

a) 10 ppm and 0.3 lb S/ton of production

b) 40 ppm for more than 60 cumulative minutes in any one day

c) At mill sites where a combination of more than one recovery furnace is used, the TRS emissions from all active recovery furnace capacity may be averaged to establish compliance with subsection D. 1. a. (1) a) above, provided, however, that the TRS emissions from each individual recovery furnace shall not exceed 15 ppm and 0.45 lb S/ton of production.

d) TRS emissions from recovery furnaces placed in operation after the effective date of these regulations shall be controlled to limit them such that emissions of TRS will immediately comply with the limits in subsection D. 1. a. (2) below.

2) As soon as practicable, but not later than July 1, 1978, the TRS emissions from recovery furnaces shall not exceed:

a) 5 ppm and 0.15 lb S/ton of production

b) 20 ppm for more than 60 cumulative minutes in any one day.

b. Lime Kilns

1) As soon as practicable, but not later than July 1, 1975, the emission of TRS from lime kilns shall not exceed:

a) 20 ppm and 0.1 lb S/ton of production

- b) Lime kilns placed in operation after the effective date of these regulations shall immediately comply with the limits in subsection D. 1. b. (2) below.
- 2) As soon as practicable, but not later than July 1, 1978, the emissions of TRS from lime kilns shall not exceed 10 ppm and 0.05 lb S/ton.
- c. For the purposes of subsections D. 1. a. and b. above, daily arithmetic average emissions will be used.
- d. Non-condensibles
- 1) Non-condensibles from digesters and multiple-effect evaporators shall be treated by thermal incineration in a lime kiln or the equivalent.
- 2) On mill sites where a lime kiln or combination of lime kilns is used for incinerating non-condensibles, as soon as practicable but not later than July 1, 1974, the means shall be provided to immediately and automatically treat the non-condensibles in a separate incineration device, capable of subjecting the non-condensibles to a temperature of not less than 1200° F for not less than 0.3 seconds whenever the kiln or combination of kilns is out of service or otherwise incapable of incinerating non-condensibles.
- 3) When steam- or air-stripping of condensates or other contaminated streams is practiced, the stripped gases shall be subjected to treatment in the non-condensable system or otherwise given equivalent treatment.

4) As soon as practicable, but not later than July 1, 1974, emissions from the following sources shall be treated in the non-condensable system or otherwise given equivalent treatment: knotter and brown stock washer vents, brown-stock washer filtrate tank vents, and black-liquor-oxidation tower vents.

e. Other Sources

As soon as practicable, but not later than July 1, 1974, the emissions from all other sources not specifically provided for in subsections D. 1. a., b., and d., above shall be controlled or limited in such manner that the emissions of TRS do not exceed either 10 ppm from each source, or a mill-site total from all such other sources of 0.1 lb S/ton of production.

f. Contaminated Condensate

As soon as practicable, but not later than January 1, 1974, each mill shall provide steam stripping of contaminated condensate streams prior to re-use of such streams within the mill and prior to their discharge to any liquid waste treatment system. The compliance proposal for this requirement submitted in accordance with subsection D.4. below shall be sufficiently detailed to demonstrate that each mill's system is highest and best practicable treatment within the limits of the current state of the art, and shall also detail the source, composition, and present disposition of each stream, the degree of treatment supplied in terms of removal of major contaminants and an estimate of the decrease in malodorous gas emissions and BOD



loadings to the liquid waste treatment system expected from implementing the proposed systems.

g. Sewers and Drains

As soon as practicable, but not later than January 1, 1974, all open-trough sewers and drains within the pulp digestion and chemical recovery areas of each mill site shall be replaced by piped systems and the vent-emissions therefrom treated equivalent to thermal oxidation at 1200° F for 0.3 seconds.

h. Anaerobic Lagoons and Ponds

As soon as practicable, but not later than May 1, 1974, the use of anaerobic lagoons or ponds for the treatment of liquid waste is prohibited.

2. Particulate Matter

a. Recovery Furnaces

As soon as practicable, but not later than May 1, 1974, the emissions of particulate matter from each recovery furnace or combination of recovery furnaces discharging through a common stack shall be controlled or limited such that emissions do not exceed four pounds per ton of production.

b. Lime Kilns

As soon as practicable, but not later than May 1, 1975, the emissions of particulate matter from each lime kiln or combination of lime kilns discharging through a common stack shall be controlled or limited such that emissions of particulate do not exceed one pound per ton of production.

c. Smelt Dissolving Tanks

The emission of particulate matter from each smelt dissolving tank or combination of smelt dissolving tanks discharging through a common stack shall be controlled or limited such that emissions of particulate matter do not exceed one-half pound per ton of production.

3. Sulfur Dioxide (SO<sub>2</sub>)

As soon as practicable, but not later than July 1, 1975, emissions of sulfur dioxide from each stack or vent in the pulp digestion or recovery processes shall be controlled or limited such that emissions of sulfur dioxide (SO<sub>2</sub>) do not exceed 300 ppm on a dry-gas basis.

4. New Facility Compliance

As soon as practicable, but not later than within 180 days of the start-up of a new kraft mill or of any new or modified facility having emissions limited by these regulations, that facility shall be operated, controlled or limited to comply with the applicable provisions of these regulations and the mill shall conduct source sampling or monitoring as appropriate to demonstrate compliance.

5. Compliance Schedules

As soon as practicable, but not later than February 1, 1973, each mill shall submit to the Department a proposed compliance program, including means, methods and a schedule for complying with the emission limits of these regulations. After receipt and review of said compliance program, the Department will establish in cooperation with mill representatives an approved compliance schedule for each mill within the time limitations established by these regulations.

E. MORE RESTRICTIVE EMISSION LIMITS:

The Department may establish more restrictive emission limits and compliance schedules after notice and hearing if applicable for different geographical areas of the state.

F. PLANS AND SPECIFICATIONS:

Prior to the construction of new kraft mills, or expansions of production or modification of facilities significantly affecting emissions at existing kraft mills, complete and detailed engineering plans and specifications for air pollution control devices and facilities and such other data as may be required to evaluate projected emissions and potential effects on air quality shall be submitted to and approved by the Department. All construction shall be in accordance with plans as approved in writing by the Department.

G. MONITORING

1. Total Reduced Sulfur (TRS)

Each mill shall provide continual monitoring of TRS in accordance with the following:

- a. The monitoring equipment shall be capable of determining compliance with the emission limits established by these regulations, and shall be capable of continual sampling and recording of concentrations of TRS contaminants during a time interval not greater than 30 minutes.
- b. The sources monitored shall include, but are not limited to, the recovery furnace stacks and the lime kiln stacks.
- c. At least once per year, vents from other sources (as defined in Section A, Definitions) shall be sampled to demonstrate representative

emissions of TRS and the results reported to the Department.

2. Particulate Matter

Each mill shall sample the recovery furnace(s), lime kiln(s) and smelt dissolving tank(s) for particulate emissions on a regularly scheduled basis.

As soon as practicable, but not later than July 1, 1974, each mill shall provide continual monitoring of particulate matter from recovery furnaces and lime kilns.

3. Sulfur Dioxide (SO<sub>2</sub>)

Representative sulfur dioxide emissions from the recovery furnace(s) shall be determined once each month.

H. REPORTING:

Unless otherwise authorized or required by permit, data shall be reported by each mill for each calendar month by the fifteenth day of the subsequent calendar month as follows:

1. Daily average emissions of TRS gases expressed in parts per million of H<sub>2</sub>S on a dry gas basis for each source included in the approved monitoring program.
2. The number of cumulative minutes each day the TRS gases from the recovery furnaces exceed 20 ppm and 40 ppm and the maximum concentration of TRS measured each day, expressed as H<sub>2</sub>S on a dry gas basis.
3. Emissions of TRS gases in pounds of sulfur per equivalent air-dried ton of pulp processed in the kraft cycle for each source included in the approved monitoring program.
4. Emission of SO<sub>2</sub> from the recovery furnace(s), expressed as ppm, dry basis.

5. Emission of particulates in pounds per equivalent air-dried ton of pulp produced in the kraft cycle based upon the sampling conducted in accordance with the approved monitoring program.
6. Cumulative hours of operation of the lime kiln(s) used for non-condensable incineration and the number of cumulative hours of stand-by afterburner operation.
7. Average daily equivalent kraft pulp production in air-dried tons.
8. Other emission data as required by the Air Contaminant Discharge Permit.
9. Each kraft mill shall furnish, upon request of the Department, such other pertinent data as the Department may require to evaluate the mill's emission control program. Each mill shall immediately report abnormal mill operations which result in increased emissions of air contaminants, in accordance with the provisions of the Oregon Administrative Rules, Chapter 340, "Upset Conditions".

I. SPECIAL STUDIES:

Where warranted by conditions at particular mills, special studies of specific vents or air contaminant emissions may be required as a condition of issuing an Air Contaminant Discharge Permit.

J. OTHER ESTABLISHED AIR QUALITY LIMITATIONS:

The emission limits established by these regulations are in addition to visible emissions and other ambient air standards, established or to be established by the Department, unless exempted therefrom by this regulation.

K. PUBLIC HEARING

A public hearing shall be held by the Department no later than January, 1976 to review current technology and the adequacy of these regulations and to adopt any revisions that are necessary.



# DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

## MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: Director

SUBJECT: Agenda Item D b) October 4, 1972, EQC Meeting

Proposed Amendment to OAR, Chapter 340, Division 2,  
Sections 25-105 through 25-130, Hot Mix Asphalt Plants

### Background:

The existing hot mix asphalt plant regulation was adopted by the State Sanitary Authority on August 2, 1968. Since this regulation was adopted, additional related regulations have been adopted and control technology has advanced. Thus a review and revision of the hot mix asphalt plant regulation is considered appropriate.

Overall the proposed new regulation maintains a high degree of control by requiring compliance for both stationary and portable plants located in special control areas with the current process weight table, expanding the boundaries of special control areas, adding new definitions and deleting sections which are now obsolete because of the adoption of new rules with the Implementation Plan.

Discussion:

An effort has been made in the proposed revision to maintain the general format of the original regulation. Deleted language has been enclosed in brackets, and new or relocated language has been underlined.

Review of Proposed Revisions:

25-105 DEFINITIONS- "Particulate Matter" has been added to this section to maintain consistency with other adopted regulations.

The relocation and revision of "Special Control Areas" updates the definition and expands the applicable area of the regulation. Extending the special control areas to one mile from a residence and to two miles straight line distance of paved public roads is a major revision making the regulation more restrictive. This will require high performance controls in locations subject to significant public exposure yet allow less efficient controls outside special control areas. The necessity for different standards for different areas of the state is still apparent but on a reduced basis since the adoption of the initial regulation.

Minor changes in the definitions are proposed for housekeeping reasons.

25-110 CONTROL FACILITIES REQUIRED - The definition of special control areas has been revised and relocated as previously explained to rid this section of everything except requirements for control facilities.

The proposed language changes in subsection (1) of this section are intended to more clearly indicate that all gases and dusts must

be collected and subjected to a particulate collection efficiency of at least 80% in all locations outside special control areas.

The revisions proposed in subsection (2) are intended to specifically indicate the emission limitations which must be complied with inside of special control areas by all plants. These limitations include the appropriate emission mass rate from Table 1, a maximum visible emission of 20% opacity and a maximum mass loading of 0.2 grains (1/35,000 pound) per standard cubic foot of exhaust for existing sources and 50% of these values for new sources.

25-115 OTHER ESTABLISHED AIR QUALITY LIMITATIONS - This section was updated, but remains essentially the same.

25-120 PORTABLE HOT MIX ASPHALT PLANTS - Portable hot mix plants, located outside of Special Control Areas, have been exempted from the opacity limits of Section 21-015, if particulate collection efficiency equals or exceeds 80%. It is proposed that when this condition is met that the grain loading limits of Section 21-030 also be exempted since neither 21-015 nor 21-030 can be met with an 80% collection efficiency.

A new proposed subsection would allow portable plants to apply for air contaminant discharge permits within the Department's jurisdiction without specifying exact site locations for periods not to exceed one calendar year. Since this source group often has to adjust site schedules on short notice during the construction season this would facilitate both the industry and Department in accomplishing the permit requirements in an orderly manner. Department approval



for the air pollution controls to be installed at each site location would insure an adequate control program.

25-125 INFORMATION REQUIRED AND MONITORING OF PLANT FACILITIES-

This section has been deleted because since the adoption of the existing regulation these requirements have been made general requirements elsewhere in Chapter 340, OAR.

25-130 ANCILLARY SOURCES OF EMISSION-HOUSEKEEPING OF PLANT

AND FACILITIES - A slight revision is proposed to clearly indicate the application of this renumbered section "at all times".

TABLE 1 - PROCESS WEIGHT TABLE - No changes are proposed.

Summary:

The proposed revisions of the Hot Mix Asphalt Plant Regulation will expand the area within Oregon where high efficiency controls are required thus making the regulation more restrictive. The regulation will also be updated to be more consistent with additions made to Chapter 340, OAR, since the existing hot mix asphalt plant was adopted.

Director's Recommendation:

It is the recommendation of the Director that the Environmental Quality Commission authorize the Director to schedule a Public Hearing, at a time and place to be determined, for the purpose of receiving testimony relevant to the amendment of OAR, Chapter 340, Division 2, Sections 21-015 through 25-130, Hot Mix Asphalt Plants.

  
L. B. Day

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY CONTROL DIVISION

September, 1972

Proposed  
Amendments of OAR, Chapter 340, Division 2,  
Section 25-105 through 25-130, Hot Mix Asphalt Plants.

---

OAR, Chapter 340, Division 2, Sections 25-105 through 25-130 are hereby amended to read as follows:

25-105 DEFINITIONS. As used in Sections 25-105 through [25-130] 25-125, unless otherwise required by context:

(1) "Hot mix asphalt plants" [are] means those firms conveying [proportion] proportioned quantities or batch loading of cold aggregate to a drier, and heating, drying, screening, classifying, measuring and mixing the aggregate [and] with asphalt for the purposes of paving, construction, industrial, residential or commercial use.

(2) "Collection efficiency" [is] means the overall performance of the air cleaning device in terms of ratio of material collected to total input to the collector unless specific size fractions of the contaminant are stated or required.

(3) "Process weight by hour" [is] means the total weight of all materials introduced into any specific process which process may cause any discharge into the atmosphere. Solid fuels charged will be considered as part of the process weight, but liquid and gaseous fuels and combustion air will not. "The Process Weight Per Hour" will be derived by dividing the total process weight by the number of hours in one complete operation from the beginning of any given process to the completion thereof, excluding any time during which the equipment is idle.

(4) "Dusts" [are] means minute solid particles released into the air by natural forces or by mechanical processes such as crushing, grinding, milling, drilling, demolishing, shoveling, conveying, covering, bagging or sweeping.

(5) "Portable hot mix asphalt plants" [are] means those facilities or equipment, which are designed to be dismantled and transported from one job site to another job site.

(6) "Particulate Matter" means any matter except uncombined water, which exists as a liquid or solid at standard conditions.

(7) "Special Control Areas" means for the purpose of this regulation any location within:

(a) Multnomah, Clackamas, Columbia, Washington, Yamhill, Polk, Benton, Marion, Linn and Lane Counties.

(b) The Umpqua Basin as defined in section 21-010,(2).

(c) The Rogue Basin as defined in section 21-010,(3).

(d) Any incorporated city or within six (6) miles of the city limits of said incorporated city.

(e) Any area of the state within [one-half (1/2)] one (1) mile of any structure or building used for a residence.

(f) Any area of the state within two (2) miles straight line distance or air miles of any paved public road, highway or free-way having a total of two (2) or more traffic lanes.

25-110 CONTROL FACILITIES REQUIRED [- GENERAL AND SPECIAL CONTROL AREAS]. (1) [A] No person shall [not] operate any hot mix asphalt plant, either portable or [permanent] stationary, [in] located within any area of the state outside special control areas unless all dusts and gaseous effluents [collected] generated [from] by the plant are subjected to air cleaning device or devices having a particulate collection efficiency of at least 80% by weight.

(2) [In addition to the provisions of (1) above, plants] No person shall operate any hot-mix asphalt plant, either portable or stationary located within [the following] any special control [areas] area of the state [shall] without installing and operating [install] systems or processes for the control of particulate emissions so as to comply with the emission limits established by the process weight table, Table I, attached herewith and by reference made a part of this rule and the emission limitations in section 21-015, subsections (2) and (3) and section 21-030 of Chapter 340, OAR. [The special control areas are as follows:]

[(a) Those portions of Multnomah, Clackamas, Washington, Yamhill, Polk, Benton, Marion, Linn and Lane Counties specifically described as follows:]

[(a) Those portions of Multnomah, Clackamas, Washington, Yamhill, Polk, Benton, Marion, Linn and Lane Counties specifically described as follows:]

[Beginning at the point where rangeline 5 E, W.M. intersects the Oregon-Washington boundary; thence S on rangeline 5E to the SE corner of T3S, R5E; thence W to the NW corner of T4S, R4E; thence S to the SE corner of T4S, R3E; thence W to the NW corner of T6S, R2E; thence S to the SE corner of T14S, R1E; thence W to the SW corner of T14S, R1E; thence S on the W.M. line to the SE corner of T19S, R1W; thence W to the SW corner of T19S, R1W; thence S to the SE corner of T21S, R2W; thence W to the SW corner of T21S, R3W; thence N to the NW corner of T21S, R3W; thence W to the SW corner of T20S, R6W; thence N to the NE corner of T12S, R7W; thence W to the NW corner of T12S, R7W; thence N to the NE corner of T7S, R8W; thence W to the NW corner of T7S, R8W; thence N to the NW corner of T5S, R8W; thence E to the NE corner of T5S, R6W; thence N to the NW corner of T2N, R5W; thence E along township line 2N to the Oregon-Washington boundary, then southeasterly along the Oregon-Washington boundary to the point of beginning.]

[(b) That portion of Columbia County specifically described as follows:]

[Beginning at the point of intersection of township line 2N, W.M., Multnomah County with the Oregon-Washington boundary; thence W to the NE corner of T2N, R3W; thence N to the NE corner of T6N, R3W; thence W to the NW corner of T6N, R6W; thence N along range line 6W to its point of intersection with the Oregon-Washington boundary; thence southeasterly along the Oregon-Washington boundary to the point of beginning.]

[(c) Incorporated cities or within six (6) miles of the city limits of said incorporated city.]

[(d) In areas of the state within one-half (1/2) mile of any structure or building used for a residence.]

25-115 OTHER ESTABLISHED AIR QUALITY LIMITATIONS: The emission limits established under these sections are in addition to visible emission and other ambient air standards, established or to be established by the [Sanitary Authority] Environmental Quality Commission unless otherwise provided by rule or regulation.

25-120 PORTABLE HOT MIX ASPHALT PLANTS: (1) Portable hot mix asphalt plants temporarily located outside of special control areas and complying with the emission limitation of 25-110 (1) need not comply with (Section) Sections 21-015 and 21-030 of Chapter 340, OAR provided however that the particulate matter emitted does not create or tend to create a hazard to human, animal or plant life, or unreasonably interfere with agricultural operations, recreation areas, or the enjoyment of life and property.

(2) Portable hot mix asphalt plants may apply for air contaminant discharge permits within the area of Department jurisdiction without indicating specific site locations. Said permits will be issued for periods not to exceed one (1) calendar year. As a condition of said permit, the permittee will be required to obtain approval from the Department for the air pollution controls to be installed at each site location or set-up at least ten (10) days prior to operating at each site location or set-up.

[25-125 INFORMATION REQUIRED AND MONITORING OF PLANT FACILITIES: When requested by the Sanitary Authority for the purpose of formulating plans in conjunction with industries who are or may be sources of air pollution, and to investigate sources of air pollution, a person operating or responsible for operating a hot mix asphalt plant shall submit information to include but not be limited to the following:]

- [(1) Ownership, address, location and name of manager.]
- [(2) Location of plant if different from (1) above.]
- [(3) Description of plant processes and quantities of raw materials used and products produced.]
- [(4) Description of the system, methods, and equipment used for controlling or preventing release of air contaminants together with all available data on efficiency of air contaminant removal.]
- [(5) Provide and maintain such sampling and testing facilities to permit collection of samples to determine collection efficiencies and particulate emissions into the atmosphere.]

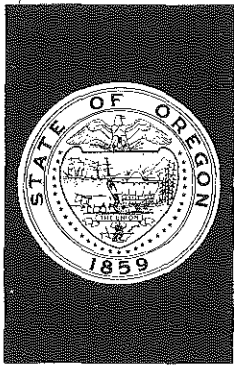
[25-130] ~~25-125~~ ANCILLARY SOURCES OF EMISSION - HOUSE-KEEPING OF PLANT AND FACILITIES: (1) Ancillary air contamination sources from the plant and its facilities which emit air contaminants into the atmosphere such as, but not limited to the drier openings, screening and classifying system, hot rock elevator, bins, hoppers and [pub] pug mill mixer, shall be controlled at all times so as to maintain the highest possible level of air quality and the lowest possible discharge of air contaminants.

(2) The handling of aggregate and traffic shall be conducted at all times so as to minimize emissions into the atmosphere.

TABLE I

PROCESS WEIGHT  
TABLE

<u>Process Wt/hr (lbs)</u>	<u>Maximum Weight Disch/hr (lbs)</u>	<u>Process Wt/hr (lbs)</u>	<u>Maximum Weight Disch/hr (lbs)</u>
50	.24	3400	5.44
100	.46	3500	5.52
150	.66	3600	5.61
200	.85	3700	5.69
250	1.03	3800	5.77
300	1.20	3900	5.85
350	1.35	4000	5.93
400	1.50	4100	6.01
450	1.63	4200	6.08
500	1.77	4300	6.15
550	1.89	4400	6.22
600	2.01	4500	6.30
650	2.12	4600	6.37
700	2.24	4700	6.45
750	2.34	4800	6.52
800	2.43	4900	6.60
850	2.53	5000	6.67
900	2.62	5500	7.03
950	2.72	6000	7.37
1000	2.80	6500	7.71
1100	2.97	7000	8.05
1200	3.12	7500	8.39
1300	3.26	8000	8.71
1400	3.40	8500	9.03
1500	3.54	9000	9.36
1600	3.66	9500	9.67
1700	3.79	10000	10.0
1800	3.91	11000	10.63
1900	4.03	12000	11.28
2000	4.14	13000	11.89
2100	4.24	14000	12.50
2200	4.34	15000	13.13
2300	4.44	16000	13.74
2400	4.55	17000	14.36
2500	4.64	18000	14.97
2600	4.74	19000	15.58
2700	4.84	20000	16.19
2800	4.92	30000	22.22
2900	5.02	40000	28.3
3000	5.10	50000	34.3
3100	5.18	60000	40.0
3200	5.27	or	
3300	5.36	more	



# DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

## MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: Director

SUBJECT: Agenda Item D c) , October 4, 1972 EQC Meeting

Proposed Amendment to OAR Chapter 340, Division 2,  
Section 25-315 (Board Products Industries) Establishing  
Particulate Emission Standards for Veneer Driers

### Background:

At the Environmental Quality Commission meeting held in Portland on March 5, 1971, the Commission adopted the Board Products Industries regulations as defined in Oregon Administrative Rules, Chapter 340, Division 2, Subdivision 5, Sections 25-305 through 25-325. At that time the technical staff proposed to restrict emissions from veneer driers under Section 25-315(1) (a) through (d) by applying only a visual standard since the work by Washington State University had not been completed and, as a consequence, no meaningful data was available.

In September 1971, the technical staff prepared a report on veneer driers which was presented to the Environmental Quality Commission embracing the data collected by Washington State University and presented by the American Plywood Association after an extensive research and testing program. This report attempted to accomplish the following objectives:

1. Summarize basic technical data on emissions and emission control methods for veneer driers.
2. Define the objectives to be met in adopting emission standards for veneer driers, and
3. Present alternative regulatory provisions that, singly or in combination, meet the stated objectives.

After conducting Public Hearings in Portland, Medford and Eugene on January 5th and 7th, 1972, on Oregon's Implementation Plan and regarding the adoption of the proposed standards contained in the above report, the Environmental Quality Commission and the Director, at the request of members of the plywood industry, granted an additional nine (9) months to complete investigations into control hardware. As a condition, the American Plywood Association was to submit quarterly reports in March, June and September of 1972 delineating industry efforts and progress in finding and installing various types of control equipment. After submission of the second report the Department appointed a study committee chaired by Mr. William Swindells of Willamette Industries. The committee was composed of individuals from various plywood manufacturing companies and equipment representatives who were involved in research and development programs on veneer driers. Three (3) meetings of this committee were held in the Department conference room.

Discussion:

The continued investigation by the Department has made clear the extreme difficulty of effectively controlling veneer driers with only a visible emission limitation. The multiplicity of emission points in close



proximity to one another frequently results in interference to the degree that no valid individual readings are possible. The short stacks, overcast skies and wet emissions also tend to interfere with accurate visible emission observations. Further the staff has concluded that the visible haze which hangs over plants and areas is related to the total mass emission of the particulates (hydrocarbons) from the plant and that limitations in terms of mass measurements must be established.

The Department has continued to investigate quantitative means of regulating veneer driers. As stated on March 5, 1971, when the current regulation was adopted, the Department and the industry have pursued a continued effort to achieve additional and more reliable data relating to veneer drier operation and emission control. A number of significant items have been developed. (1) There is little uniformity in the operation of veneer driers within the industry. (2) There is still a limited amount of hard data relating veneer drier emissions to various operating parameters. (3) There is not agreement within industry that a quantitative emission regulation is warranted.

During this investigation period several means of quantitatively relating veneer drier emissions have been investigated. These investigations included process weight limitation, either whole plant or veneer drier alone, emission grain loading, emission mass limitation related to veneer production, emission mass limitation related to veneer fed to the drier and means of arriving at a quantitative measure related to the visible emissions from the driers. Each of the reviewed systems of control have advantages and disadvantages.

#### Process Weight

The system of process weight regulation is considered the simplest method to propose. The basis is currently included in the Board Product Regulation 25-315. The weight restriction could be included in the present total emission allowed, as is being done by MWVAPA or the limitation on total allowance could be adjusted. The process weight is used by any number of regulatory agencies such as Los Angeles. The limitation to this approach is considered the combining of two problems, sanderdust emissions and

condensable hydrocarbons. Were these combined, the potential of achieving compliance and continuing to have an emission problem with sanderdust or a visibility problem with condensable hydrocarbons is concluded to be significant. The problem of using process weight for the veneer drier alone does not address the variations in veneer drier operation and both have the inherent problems of establishing the weight of process material to be used.

#### Grain Loading

The use of emission grain loading was proposed in the original regulation and at the request of industry withdrawn for further study. The continued investigation indicates that grain loading is a greater function of veneer drier operating practices than of total particulate emissions. The potential of penalizing the veneer drier with the smaller total particulate emissions and more efficient operations is considered significant.

#### Mass Emission vs. Production

The various methods of emission mass control reviewed included total feed to the drier, net production of the plant, green veneer feed to each drier, and theoretical drier capacity. When the net production of the plant was used, some driers had no feed, hence no allowed emissions, and theoretical drier feed did not appear to have any basis. The use of total measured feed to the veneer drier did appear as a base on which to establish control.

The bulk of the data available during this investigation period has been the amended results of the Washington State University Study, jointly funded by the American Plywood Association and the Environmental Protection Agency. It has been apparent that these data are most limited.

Conclusions:

It is the conclusion of the Department that a quantitative mass emission limitation should be considered at this time. This conclusion is not shared by the industry.

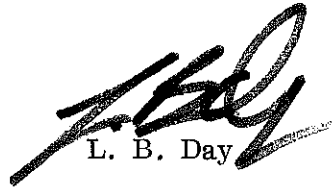
The presently recommended emission limitation of 0.5#/1000 ft<sup>2</sup> total veneer (3/8" basis) is the level which, on the basis of limited data, will assure the relief of the current visible emission problem, and is achievable with currently available control equipment.

The limitations imposed by insufficient data makes it desirable that a definite date for further review should be included in this regulation. There are several members of the industry currently embarked on emission control programs. The review date is to coincide with these control programs and further amendment of the regulation will be predicated on the results of these installations. Should these control installations demonstrate an adequate control of visible emissions and indicate a higher or lower mass emission limitation, the presently recommended 0.5 pounds per 1000 square feet (3/8 inch basis) would be adjusted. All adjustments will be made on the basis of operating test data.

Recommendation:

It is the recommendation of the Director that the Environmental Quality Commission authorize the Director to schedule a public hearing, at a time and place to be determined, for the purpose of receiving testimony relevant to the amendment of OAR, Chapter 340, Division 2, Section

25-315 Subsection (1) establishing particulate emission standards for veneer driers.



L. B. Day

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY CONTROL DIVISION

September 1972

## PROPOSED

Amendments to OAR, Chapter 340, Division 2, Section 25-315 (Board Products Industries) Establishing Emission Standards for Veneer Driers.

OAR, Chapter 340, Division 2, Section 25-315 Subsection (1) is hereby amended to read as follows:

## (1) Veneer Driers

- (existing) (a) No person shall cause to be emitted from any veneer drier, visible air contaminants of an opacity equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one hour. Where the presence of uncombined water is the only reason for failure of an emission to meet this requirement, said requirement shall not apply.
- (new) (b) No person shall cause to be emitted from any veneer drier, particulate matter exceeding 0.5 pound per 1000 square feet (3/8" basis) processed through the veneer drier.
- (existing) (c) No person shall cause to be emitted from any veneer drier, constructed or installed after March 1, 1972, visible air contaminants of an opacity exceeding 10% for a period or periods aggregating more than three (3) minutes in any one hour. Where the presence of uncombined water is the only reason for failure of an emission to meet this requirement, said requirement shall not apply.

- (d) Veneer driers complying with all sections of this regulation shall be  
(new) exempted from compliance with OAR Chapter 340, Section 21-030  
Particulate Emission Limitations.
- (e) No person shall attempt to comply with the requirements of (1)(a)  
(existing) or (1)(c) of the subsection by diluting the exhaust gas volume above  
that generally occurring under normal operating conditions.
- (f) Where air contaminant emissions escape from a veneer drier from  
(new) other than the exhaust stacks, the veneer drier shall be repaired  
in such a manner that significant air contaminant emissions do not  
escape from locations other than the exit stacks.
- (g) No later than September 30, 1972, every person operating a veneer  
(existing) drier shall submit to the Department of Environmental Quality, a  
specific proposal for complying with this subsection, and by no  
later than December 31, 1972, a specific detailed schedule of  
compliance. The schedule shall provide for compliance with the  
applicable provisions at the earliest practicable date, consistent with  
local air quality conditions and the difficulty and complexity of  
compliance, and shall employ the highest and best practical  
treatment and control. In no case shall final compliance be achieved  
by later than December 31, 1974.
- (h) By no later than December 31, 1973, the Department will conduct  
(new) a public hearing for the purpose of reviewing the limitations as  
set forth in this section.

(Existing language of 25-315(1) is deleted.)

Note: OAR 340, Section 25-315(2) Other Emission Sources remains as  
initially adopted.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

### MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: Director

SUBJECT: Agenda Item No. D d), October 4, 1972, EQC Meeting

Proposed Amendment to OAR, Chapter 340, Sections 20-050  
through 20-070, Parking Facilities and Highways in Urban Areas

#### Background:

The existing parking facilities and highways regulation was adopted by the Environmental Quality Commission on January 24, 1972 as a part of the Clean Air Act Implementation Plan for Oregon. The regulation requires Commission approval prior to commencing construction of parking facilities, freeways, and expressways in the Portland, Salem and Eugene metropolitan areas and delegates the primary responsibility for review of proposed facilities to the regional authorities.

The primary purpose of the regulation is to ensure that construction of parking facilities and highways will be consistent with environmentally sound transportation and land use plans and will not interfere with attaining and maintaining acceptable air quality, noise levels and quality of life in urban areas. As a means of determining the probable impact of a parking facility or highway on the environment, an environmental impact study may be required.

Since the existing regulation was adopted, the Department in cooperation with the regional authorities has reviewed 23 applications for construction of parking facilities and presently is reviewing proposals for construction of 5 major freeways in the Portland, Salem and Eugene metropolitan areas.

The experience gained to date from the review of individual parking facilities and highways has revealed that; (1) the intent of the existing regulation should be clarified, (2) the major environmental impact of parking facilities and highways is not from individual facilities, but results from the total system of existing and planned parking facilities and highways in metropolitan areas, (3) in order for the review and analysis of individual parking facilities and highways to be realistic and meaningful, the relationship of the proposed facility to a planned system of parking facilities and highways, designed to minimize adverse environmental impact, should be considered, (4) at the present time, we are unaware of any parking or transportation plans which have been implemented or adopted by local governmental agencies in the Portland, Salem, or Eugene metropolitan areas, which were designed to minimize environmental impact such that acceptable air quality, noise levels and quality of life will be achieved and maintained.

With these things in mind, the existing parking facilities and highways regulation has been rewritten.

Discussion:

The purpose of the new parking facilities and highways regulation is two-fold; (1) to clarify the intent of the original regulation, and (2) to require



environmentally sound parking plans and transportation plans prepared for metropolitan areas in order that the decision for approval or disapproval of proposed facilities may be based upon the consistency of the proposed facility with the adopted plans rather than attempting to evaluate the effect of individual facilities on the urban environment.

Clarifications in the new regulation include the following:

1. Definitions of terms such as: parking facility, freeway, expressway, environmental impact statement, metropolitan area, urban area, urban core area, modification of parking facility, etc.
2. Classification of parking facilities as short-term, long-term, and residential.
3. Designation of parking facilities and highways as air contaminant sources and declaring the Commission's retention of exclusive jurisdiction thereover.
4. Notice of construction required for all proposed parking facilities and highways which fall under jurisdiction of the regulation and minimum Notice of Construction information requirements established for parking facilities.
5. Guidelines for preparation of environmental impact statements for parking facilities included in the rule.
6. Areas of special concern defined for which environmental impact statements are required for all proposed parking facility construction.

7. New section added which specifically gives the Department authority to request additional information from the applicant if the Department determines that insufficient information has been provided.
8. Identification of cities by name which are within the jurisdiction of the regulation and expanded to include the cities of Corvallis and Springfield.
9. Revision of the Environmental Quality Commission statement of policy.

The remainder of the new regulation is a new section requiring the appropriate local governmental agencies to develop, adopt and submit parking plans and transportation plans for their respective metropolitan areas to the Department.

Parking plans are required for the Portland, Salem and Eugene urban core areas (essentially the central business district) no later than December 1, 1973, except that Portland is required to have its plan filed with the Department by February 1, 1973. The Portland date was moved ahead because the City is currently developing a parking plan for the CBD as an integral part of their transportation control strategy.

In addition, parking plans are required for the cities of Corvallis and Springfield and the remainder of the metropolitan areas of Portland, Salem and Eugene not covered in the urban core plans, no later than December 1, 1974.

Until the required plans are adopted by the appropriate local governmental agencies and filed with the Department, the review and approval

of individual parking facilities will be undertaken, basically as they are now, under the general provisions of the regulation. After the required plans have been filed with the Department, review of individual parking facilities will be based upon the consistency of the proposed facility with the adopted plans. Environmental impact statements for individual parking facilities will not be required and it is expected that the time and cost involved in the review process for the applicant, regional authorities and the Department will be greatly diminished. However, if the required parking plans are not filed by the required date, then no parking facility proposed for construction in the affected area will be approved until acceptable plans are submitted to the Department.

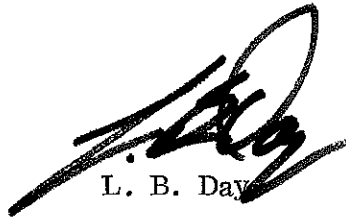
Transportation plans are required for the Corvallis, Eugene, Portland, Salem, and Springfield metropolitan areas no later than December 1, 1974. The procedures to be followed until the plans are filed and after filing are, in general, the same as those for parking facilities. Again, if the required transportation plans are not filed by the required date, then no freeway or expressway will be approved for construction in the affected metropolitan area until acceptable plans are forthcoming.

Summary:

The proposed revisions to the parking facilities and highways regulation will clarify the intent of the original regulation and will provide a more meaningful basis for review of individual parking facilities and highways in metropolitan areas with the additional side benefit of significantly reducing the time and cost of the review process for all the parties involved.

Director's Recommendation:

It is the recommendation of the Director that the Environmental Quality Commission authorize the Director to schedule a Public Hearing, at a time and place to be determined, for the purpose of receiving testimony relevant to the amendment of OAR, Chapter 340, Sections 20-050 through 20-070, Parking Facilities and Highways in Urban Areas.



L. B. Day

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY CONTROL DIVISION  
September 26, 1972

PROPOSED REGULATION FOR  
PARKING FACILITIES AND MAJOR HIGHWAYS IN METROPOLITAN AREAS

OAR, Chapter 340, Sections 20-050 through 20-070 are repealed and Sections I through IX are adopted in lieu thereof.

I. Definitions

1. "Commission" means the Environmental Quality Commission.
2. "Department" means the Department of Environmental Quality.
3. "Impact statement" means an objective evaluation and discussion, in quantitative as well as qualitative terms, of beneficial and detrimental environmental consequences of a proposed major highway or parking facility with alternatives.
4. "Major highway" means:
  - a. Expressway defined as: a divided highway primarily for through traffic with full or partial control of access and generally with grade separation at intersections;
  - b. Freeway defined as: an expressway with full control of access and with grade separation at all intersections.
5. "Parking facility" means:
  - a. Any lot, structure, building or portion thereof; intended, modified, designed, or used for the temporary storage of, or renting of space for 50 or more motor vehicles.

- b. Any lot, structure, building or portion thereof, which is provided as ancillary or incidental to some other major purpose and intended, modified, designed, or used for the temporary storage of, or renting of space for 50 or more motor vehicles. Illustrative are shopping centers, hotels and motels, financial institutions, entertainment houses and restaurants.
  - c. Any existing lot, structure, building or portion thereof; intended, modified, designed, or used for the temporary storage of, or renting of space for 50 or more motor vehicles, which is or is proposed to be expanded or modified to add space for 20 or more motor vehicles.
6. "Regional" means Columbia-Willamette Air Pollution Authority, Mid-Willamette Valley Air Pollution Authority or Lane Regional Air Pollution Authority.
7. "Metropolitan area" means the area within the municipal limits of the cities of Corvallis, Eugene, Portland, Salem, Springfield and any other city having a population of 50,000 or greater, and the area within five (5) miles of the municipal limits of these cities.
8. "Urban area" means the remainder of a metropolitan area not included within the urban core area.

9. "Urban core area" means:
  - a. The Portland central business district defined as: the area within a freeway loop formed by the Marquam Bridge-Eastbank Freeway (I-5) and the Fremont Bridge-Stadium Freeway (I-405), and the area within 1/2 mile of the freeway loop.
  - b. The Salem central business district defined as: the area bounded by Market Street to the North, the Willamette River to the West, Mission Street to the South, and 12th Street to the East.
  - c. The Eugene central business district defined as: the area bounded by Third Avenue to the North, Jefferson Street to the West, Thirteenth Street to the South, and Mill Street to the East.

## II. Environmental Quality Commission Statement of Policy

The Commission finds that existing and developing land use patterns and their associated highway systems and parking facilities may contribute to existing air pollution and environmental problems or may create air pollution and environmental problems in metropolitan areas. The Commission further finds that the general responsibility for developing metropolitan area plans, including land use plans, transportation plans and parking facilities plans resides with local governmental agencies; and the Commission declares its intention to

encourage and cooperate with these local governmental agencies in the development of land use, transportation and parking facilities plans consistent with the public policy expressed in ORS 449.765 and ORS 449.951.

The Commission further finds that individual parking facilities and major highways proposed for construction in metropolitan areas, due to their inherent nature of attracting and inducing motor vehicle trips and dependency, may contribute to existing air pollution and environmental problems or may create air pollution and environmental problems in metropolitan areas, and therefore, prior to the construction of parking facilities and major highways in metropolitan areas, full recognition should be given to the environmental impact of such facilities including the degree to which they may affect (1) the ability of the State to achieve and maintain air quality and noise standards and limits, (2) the development of low-polluting and balanced transportation systems by local and regional governmental agencies, and (3) the general quality of life in metropolitan areas including, but not limited to, social and economic dislocations, traffic congestion, maintenance of open space, pedestrian-vehicular conflicts and traffic safety.

It is therefore the policy of the Commission:



1. To ensure that the construction of parking facilities and major highways will not interfere with attaining and maintaining acceptable air quality and noise levels and quality of life in metropolitan areas.
2. To promote the development of environmentally sound comprehensive transportation and land use plans in metropolitan areas, and specifically to promote the development of mass transit systems wherever feasible.
3. To ensure that the construction of parking facilities and major highways in metropolitan areas will not hinder development of environmentally sound transportation or land use plans, and to ensure that parking facilities and major highways constructed in metropolitan areas will not be inconsistent with environmentally sound transportation or land use plans that are developed.

### III. Classes of Parking Facilities

The following are designated as classes of parking facilities which may have different requirements depending upon type and location.

1. Class I - Short Term: Used primarily by patrons of retail and wholesale stores, motels, hotels, medical-dental clinics, churches, entertainment houses, restaurants, financial establishments and buildings whose tenants provide service to the public, including government buildings.

The foregoing list is not intended to be exhaustive, but only illustrative.

2. Class II - Long Term: Used primarily by individuals who commute to places of employment.
3. Class III - Residential: Used primarily by apartment and condominium residents and guests.

#### IV. Parking Facilities and Major Highways as Air Contaminant Sources

The Commission designates parking facilities and major highways as air contamination sources pursuant to ORS 449.712, and confirms its retention and assumption of exclusive jurisdiction there of subject to the provisions of these rules.

#### V. Comprehensive Plans Required

1. Parking Plans for Urban Core Areas:

No later than December 1, 1973, the cities of Portland, Salem, and Eugene shall have parking plans developed, adopted, and

filed with the Department for the urban core areas delineated in Section I., 9, except that the City of Portland shall have its plans adopted and filed with the Department no later than February 1, 1973.

2. Parking Plans for Urban Areas:

No later than December 1, 1974, the cities of Corvallis, Eugene, Portland, Salem, and Springfield, in conjunction with other applicable local governmental agencies, shall have parking plans developed, adopted, and filed with the Department for the urban areas defined in Section I., 8.

3. Transportation Plans for Metropolitan Areas:

No later than December 1, 1974, the cities of Corvallis, Eugene, Portland, Salem, and Springfield, in conjunction with other applicable local governmental agencies, shall have transportation plans developed, adopted, and filed with the Department for the metropolitan areas defined in Section I., 7.

4. Submission of Plans Required:

a. Parking Plans

After such time as the date for the submittal of the parking plans has expired, only those parking facilities, proposed

for construction or establishment in metropolitan areas shall be approved which are consistent with the plans filed with the Department. Persons proposing to construct or establish parking facilities in urban core areas or urban areas, for which parking plans have been filed with the Department, shall not be subject to the provisions of Section VI., subsections 2., 3., and 4. and Section IX. of these rules.

If no plans are filed by the required date or if the Department determines that the parking plans submitted are incomplete or inconsistent with these rules and policy criteria, then no parking facility shall be approved for construction or establishment in the affected urban core areas or urban areas until the required plans are filed with the Department.

b. Transportation Plans

After such time as the date for the submittal of the transportation plans has expired, only those major highways, proposed for construction or establishment in metropolitan areas, shall be approved which are consistent with the plans filed with the Department. Persons proposing to construct or establish major highways in metropolitan areas, for which transportation plans have been filed with the Department, shall not be subject to the provisions of Section VI., subsection 5. of these rules.

If no plans are filed by the required date or if the Department determines that the transportation plans submitted are incomplete or inconsistent with these rules and policy criteria, then no major highway shall be approved for construction or establishment in the affected metropolitan areas until the required plans are filed with the Department.

5. Interim Procedures:

Until such time as the appropriate date for the submittal of of the required parking plans and transportation plans has passed, persons proposing construction or establishment of parking facilities or major highways in metropolitan areas shall be subject to all applicable provisions of these rules. If the plans required by these rules are filed with the Department prior to the required date for submittal, then persons proposing construction or establishment of parking facilities or major highways in metropolitan areas shall be subject to the provisions of these rules as if the required date for submittal of plans had passed.

6. Review of Plans:

The transportation and parking plans filed with the Department shall be reviewed and updated biennially, as a minimum, by the submitting cities in conjunction with the applicable local governmental agencies to ensure the plans continue to be consistent

with these rules and policy criteria. The updated plans shall be adopted by the appropriate local governmental agencies and filed with the Department. Failure to submit updated plans biennially to the Department shall deem the plans on file with the Department to be incomplete.

7. Minimum Contents of Parking Plans:

Parking plans filed with the Department, as required by these rules, shall include as part of the plan's contents the following information as a minimum:

- a. A land use plan for the land area encompassed by the parking plan which shall illustrate development and proposed implementation of land use patterns contemplated by local governmental agencies including associated minimum or maximum off-street parking requirements, if any, by land use type.
- b. A grid system covering the land area encompassed by the parking plan which shall illustrate development and proposed implementation of on-street and off-street parking space density contemplated by local governmental agencies. The grid system shall consist of equal size grid squares, no one of which shall exceed 0.2 mile on a side and shall indicate by appropriate means the approximate number of on-street and off-street parking spaces in each grid square.

- c. An evaluation and analysis of the effects of the proposed on-street and off-street parking space density delineated in the parking plans on (1) the ability of the State to achieve and maintain applicable air quality and noise standards and limitations in the area encompassed by the parking plan, (2) the development of low-polluting and balanced transportation systems by local and regional governmental agencies in the applicable metropolitan area and (3) the general quality of life in the applicable metropolitan area including, but not limited to, social and economic dislocations, traffic congestion, maintenance of open space, pedestrian-vehicular conflicts and traffic safety.

8. Minimum Contents of Transportation Plans:

Transportation plans filed with the Department, as required by these rules, shall include as part of the plan's contents the following information as a minimum:

- a. A land use plan for the land area encompassed by the transportation plan which shall illustrate development and proposed implementation of land use patterns contemplated by local governmental agencies.
- b. A compilation of highway improvement projects, including but not limited to freeways and expressways, and mass transit improvements contemplated by the local governmental agencies.

The compilation of highway and mass transit improvements shall identify individual improvements by geographic limits, purpose, traffic assignments and capacity projections for design life of projects, person trips by transportation mode, estimated cost of construction and proposed schedule of implementation. The compilation shall also indicate the relationship of the proposed highway and mass transit improvements to the development and implementation schedule for the land use patterns contemplated by the local governmental agencies in the vicinity of the proposed improvements or affected by the proposed improvements.

- c. An evaluation and analysis of the effects of the proposed highway and mass transit improvements delineated in the transportation plans on (1) the ability of the State to achieve and maintain applicable air quality and noise standards and limitations in the applicable metropolitan area, and (2) the general quality of life in the applicable metropolitan area including, but not limited to, social and economic dislocations, traffic congestion, maintenance of open space, pedestrian-vehicular conflicts and traffic safety.



VI. General Requirements

1. No person shall construct or establish any Class I, II, or III parking facility or major highway within a metropolitan area without first furnishing a notice of said construction or establishment to the regional authority in whose territory the proposed class of parking facility or major highway is to be located. For the purposes of these rules, an addition to or enlargement or replacement of a parking facility or major highway or any major alteration or modification thereof is considered as construction or establishment of such parking facility or major highway. Forms for notices of construction may be requested of the applicable regional authority at its agency offices.
2. A person who wishes to construct or establish a Class I, II, or III parking facility in an urban core area shall, in addition to furnishing the notice required by subsection (1), also submit an impact statement to the regional authority prepared by an architect, planner or professional engineer.
3. A person who wishes to construct or establish a Class I, II, or III parking facility for 500 or more motor vehicles in an urban area shall, in addition to furnishing the notice required by subsection (1), also submit an impact statement to the regional authority prepared by an architect, planner or professional engineer.

4. A person who wishes to construct or establish a Class I, II or III parking facility for less than 500 motor vehicles in an urban area is not required to have an impact statement prepared and submitted unless it is determined by the applicable regional authority that such construction or establishment will have a significant environmental impact. However, a notice of construction is still required to be furnished to the regional authority.
5. A person who wishes to construct or establish a major highway in a metropolitan area shall, in addition to furnishing the notice required by subsection (1), also submit an impact statement to the regional authority prepared by a professional engineer.
6. No construction or establishment of a parking facility or major highway shall be commenced until the person receives a notice approving such construction or establishment from the Department.

VII. Regional - Department of Environmental Quality Determination

1. The regional authority shall within 21 days of receiving all information, impact statements and notices required under section VI forward them, together with a recommendation for approval or disapproval, and the reasons therefore, of the proposed parking facility or major highway to the Department.

2. Nothing in this regulation shall preclude the Department from requesting additional information from the person proposing construction or establishment of a parking facility or major highway if the Department determines, within 60 days of receipt of the information, impact statements, notices and recommendations from the regional, that insufficient information has been provided.
3. The Department, within 60 days of receipt of the information, impact statements, notices and recommendations from the regional, and upon determining the proposed construction or establishment of the parking facility or major highway is in accordance with the Statement of Policy set forth in section II and with ORS 449.702 to 449.717, 449.727 to 449.741, 449.760 to 449.830 and 449.949 to 449.965, or applicable rules and standards, shall notify the person who gave notice that construction may proceed. If, however, the Department determines the proposed construction or establishment of the parking facility or major highway is to be denied, it shall issue an order prohibiting said construction or establishment.
4. Any person against whom an order is directed may, within 20 days from the date of mailing of the order, request a hearing. The hearing will be conducted pursuant to the applicable provisions of ORS, Chapter 183.

VIII. Notices of Construction for Parking Facilities

Applications for notice of proposed construction of parking facilities in a metropolitan area shall be made upon forms prescribed by the Department.

As a minimum, the following information shall be required of any person desiring to construct or establish a Class I, II or III parking facility in a metropolitan area:

1. Name, address, phone and nature of business.
2. Name of local person responsible for compliance with these rules.
3. Name of person authorized to receive requests for data and information.
4. Type of facility; Class I, II or III or combination thereof.
5. Major design features; length, width, height, number of levels, access control, number of vehicles to be stored, etc.
6. A vicinity map(s) shall be furnished which will show the proposed parking facility and its relationship to the surrounding area.

7. A schedule or an estimate of when the proposed facility will be constructed.

IX. Requirements for and Content of Impact Statements for Proposed Parking Facilities: Air Quality; Noise; Water Quality; Solid Waste; Quality of Life

The following sections outline subject matter and content of submission which shall, as a minimum, be covered in environmental impact statements required under section V for proposed parking facilities in metropolitan areas:

1. Description of the Proposed Facility and Its Surroundings.

The description should include the following type of information:

- a. A vicinity map(s) shall be furnished which will show the proposed parking facility and its relationship to surrounding natural and cultural features such as hills, parks, historic sites, landmarks, institutions, developed areas, surrounding streets, principal highways and similar features that are pertinent to a parking study.

- b. General description of surrounding terrain, existing land use and proposed land use (map preferable), other existing environmental features.
- c. A schedule or an estimate of when the proposed facility will be constructed; the current status of the proposal, with a brief historical resume.
- d. Existing parking facilities in vicinity including their deficiencies, the need for the proposal, the benefits to the region and community.
- e. An inventory of economic factors such as employment, taxes, property values, etc., should be included as appropriate.
- f. Traffic data within 0.2 mile-square grid; vehicle trips on access streets during design year and anticipated new trips generated two years after completion and through 1990.

2. Probable Impact of the Proposed Facility or Improvement Upon

the Environment: The evaluation and discussion should specifically emphasize significant beneficial and detrimental environmental consequences upon the State, metropolitan area, urban core area and vicinity in objective quantitative terms with specific discussion of the following points:

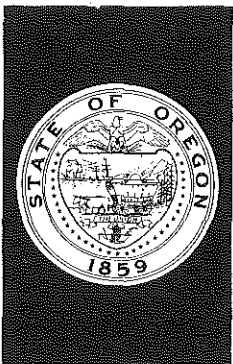
- a. Effect of the proposed facility upon the dependence of the urban dweller upon motor vehicles.
- b. Consistency of the proposed facility with local and regional mass transit planning and objectives.
- c. Consistency of the proposed facility with environmentally sound local and regional land use planning.
- d. Effect the proposed facility will have upon air quality in the vicinity, the urban core area, and the metropolitan area during and after construction and biannually thereafter over a 15 to 20 year period. This section should include sufficient data for ambient air carbon monoxide concentrations to allow an objective estimate to be made of present and future levels.

- e. Effect the proposed facility will have upon noise levels in the vicinity and urban core area during and after construction and biannually thereafter over a 15 to 20 year period. This section should include sufficient data for ambient noise levels to allow an objective estimate to be made of present and future levels.
- f. Probable adverse effects on water quality or solid waste management during and after construction.
- g. Visual impact of the proposed facility upon the surroundings including residents, motorists, historical or other sites designated to have special merit; effect upon local or regional beautification and restoration plans or objectives; interference with views or vistas.
- h. Effect upon traffic congestion, pedestrian-vehicle conflicts, automobile-bus conflicts and maintenance of open space in the vicinity and urban core area.

- 3. Alternatives: The exploration of alternatives should include an objective evaluation and analysis of feasible alternatives with detailed discussion of the following specific areas:
  - a. Design alternatives that would minimize environmental impact of project.



- b. Existing alternative modes of transportation, including mass transit systems, and their effect upon the parking requirements of the development and vicinity.
- c. Future alternative modes of transportation presently being planned, developed or implemented and their effect upon the parking requirements of the development and vicinity within five, ten and fifteen year periods of the expected date of construction of the proposed parking facility.
- d. Effect of the proposed facility upon use or patronage of existing and future alternative modes of transportation.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

### MEMORANDUM

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. Ea, October 4, 1972, EQC Meeting

Proposed Habitat Too Apartments 397-Space Parking  
Facility, Portland

### Background:

On August 16, 1972, the Department received a letter from the Columbia-Willamette Air Pollution Authority delineating their analysis of and recommendation for the proposed Habitat Too Apartments 397-space surface parking facility.

The proposed facility is to be located at the new Habitat Too Apartment complex at the corner of S. E. Colt Drive and S. E. 28th Avenue near Reed College in Portland, Oregon. It is intended to provide parking primarily for residents of the apartments.

The proposed facility will provide 397 parking spaces for 291 apartment units; 100 of which will be two-bedroom apartments. The developers expect that many of the two-bedroom units

will be shared by students, thus requiring more than one parking space per unit in many cases. The Portland Planning Commission requires a minimum of one off-street parking space per apartment unit in this area.

Analysis:

The parking facility is not located in an area of special concern as defined in the DEQ Guidelines for review of parking facilities.

The Columbia-Willamette Air Pollution Authority has concluded that the proposed facility is compatible with the DEQ parking facilities rules and recommends that construction be allowed to proceed.

Director's Recommendation:

In view of the fact that Columbia-Willamette Air Pollution Authority's review of the proposed facility indicates that it is compatible with the Department of Environmental Quality parking facility rules, I recommend that the Commission approve construction of the facility.

  
L. B. Day

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

1 August 1972

H. M. Patterson, Chief  
Air Quality Control Division  
Department of Environmental Quality  
1234 S.W. Morrison Street  
Portland, Oregon 97205



## BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

Dear Mr. Patterson:

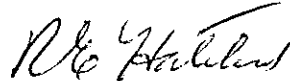
On 6 July 1972, Paul S. Forchuk filed a notice to construct a 397-space parking facility consisting of two major surface facilities at the corner of S.E. Colt Drive and S.E. 28th Avenue. The facility is to be used for tenant parking at the Habitat Too apartment complex.

The proposed facility is not in a special concern area and an environmental impact statement was not requested due to the intended use of the facility (Class III residential parking).

The City of Portland Planning Commission requires one parking space per unit. There are 291 units and 106 extra parking spaces. The entrances and exits to the facility are designed for minimum traffic congestion.

It would appear that the proposed facility is compatible with the D.E.Q. parking facility regulation; therefore, it is recommended that D.E.Q. allow the construction to proceed.

Very truly yours,

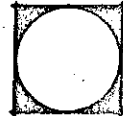
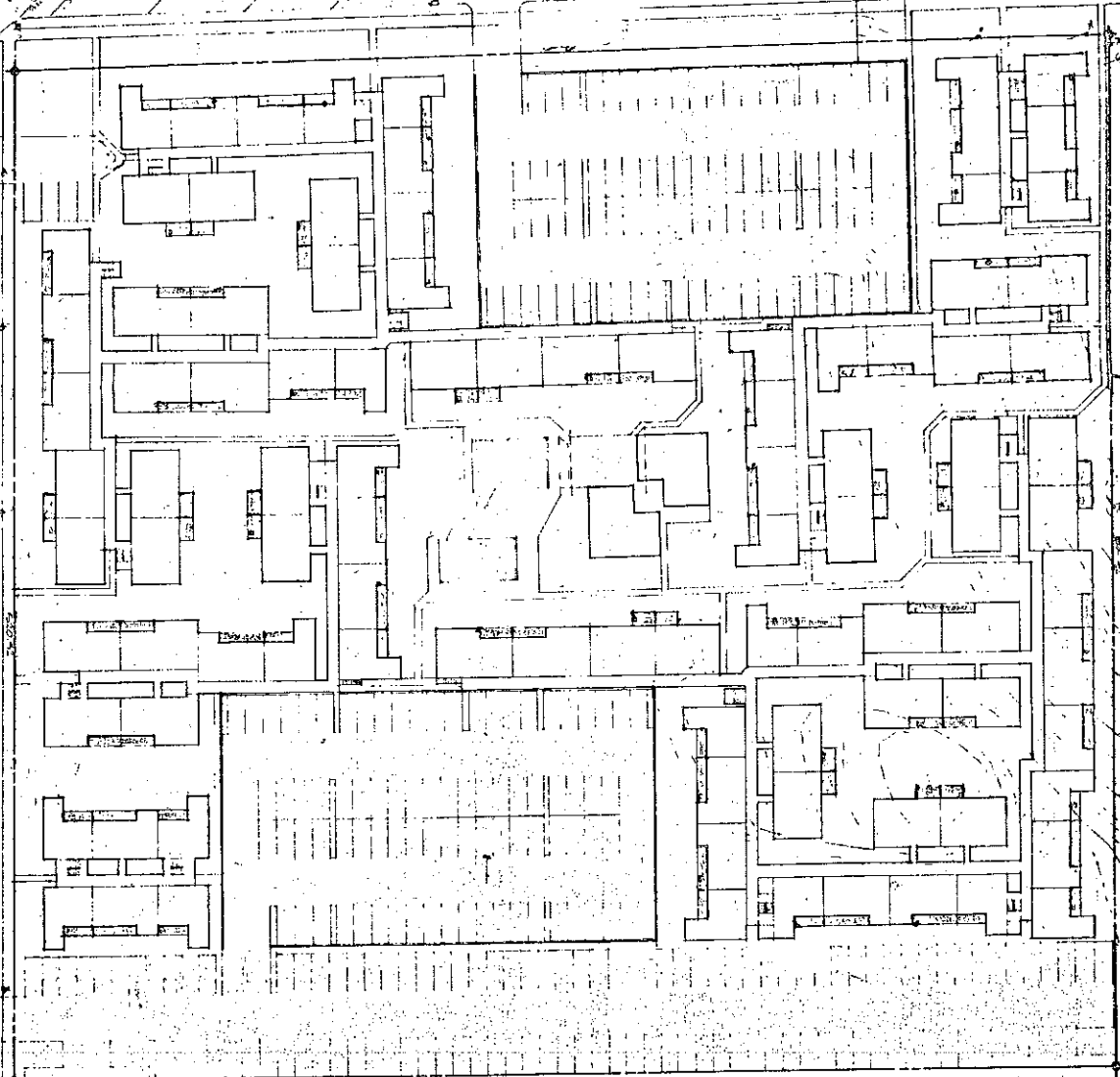


R. E. Hatchard  
Program Director

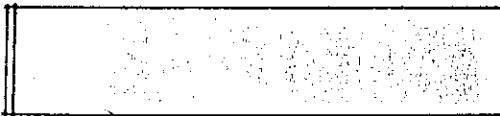
REH:dgs

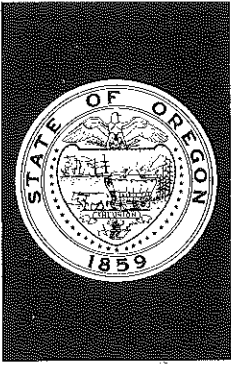


8



**THOMAS S. VARNAM - ARCHITECT**  
2241 SW 10TH AVENUE PORTLAND, OREGON 97201





## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

MEMORANDUM

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item No. Eb, October 4, 1972, EQC Meeting  
Proposed Port of Portland Terminal #1 59-space Sur-  
face Lot, Portland

Background:

On August 29, 1972, the Department received a letter from the Columbia-Willamette Air Pollution Authority delineating their analysis of and recommendation for the proposed Port of Portland 59-space surface parking facility.

The proposed facility is to be located at Terminal #1, 2150 N. W. Front Avenue, Portland, Oregon, and is intended primarily to provide parking for longshoremen working at the terminal.

The proposed facility is being constructed to concentrate parking in a localized, easily identifiable area away from the terminal operating area. There are presently approximately 150 parking spaces located randomly around the terminal operating

area. Upon completion of this 59-space facility, 59 of the random spaces will be eliminated. Eventually, the Port of Portland plans to eliminate all of the random spaces in the terminal operating area by constructing parking facilities on the periphery.

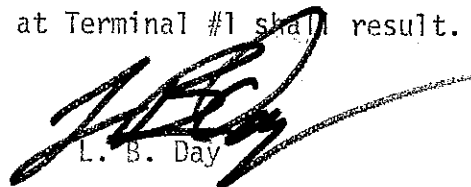
Analysis:

The parking facility is located in an area of special concern as defined in the DEQ Guidelines for review of parking facilities. However, CWAPA did not request an environmental impact statement due to the fact that the construction of this parking facility will not result in a net increase in parking spaces available at Terminal #1.

CWAPA has concluded that the proposed facility is compatible with the DEQ parking facility rules and recommends that construction be allowed to proceed.

Director's Recommendation:

In view of the fact that Columbia-Willamette Air Pollution Authority's review of the proposed facility indicates that it is compatible with the Department of Environmental Quality parking facility rules provided no increase in available parking spaces results, I recommend that the Commission approve construction of the facility with the condition that no net increase in available parking spaces at Terminal #1 shall result.

  
L. B. Day



# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

25 August 1972

Mr. H. M. Patterson, Director  
Air Quality Control Division  
Department of Environmental Quality  
1234 S.W. Morrison Street  
Portland, Oregon 97204

## BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

Dear Mr. Patterson:

On 1 August 1972, the Port of Portland filed a notice to construct a 59 space paved parking facility on Front Avenue at Terminal #1 (2150 N.W. Front Avenue). This facility is to provide parking for longshoremen working at the terminal.

It is realized that this facility is located in an area of concern but it is not an increase of parking in the area. It will localize the parking where before it was random parking around the dock area.

It has been concluded that the proposed facility is compatible with the D.E.Q. parking facility rules and it is recommended that D.E.Q. allow construction to proceed.

Very truly yours,



R. E. Hatchard  
Program Director

REH:sm  
Enclosures



August 2, 1972



**Port of Portland**

Box 3529 Portland, Oregon 97208  
503 233-8391  
TWX: 910-464-8141 FAX: EDN

Mr. John Kowalczyk  
Technical Director  
Columbia Willamette Air Pollution Authority  
1010 N.E. Couch Street  
Portland, Oregon 97232

LONGSHORE PARKING LOT, TERMINAL #1

The objective of the new paved longshore parking lot, to be constructed at Terminal 1 in conjunction with the container storage yard, is to consolidate all existing random parking associated with the day-to-day operation of this portion of the terminal.

With the completion of this parking lot there will be no further parking of private automobiles within this working area of the terminal.

If there is any further information required on this project, please let us know.

B. W. Taylor  
Assistant Manager, Marine Projects

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

*Process 29*

PARKING FACILITY  
NOTICE OF CONSTRUCTION AND APPLICATION FOR APPROVAL

To Construct or Modify an Air Contaminant Source

NOTE: An Approval to Construct must be obtained prior to construction. The Columbia-Willamette Air Pollution Authority will review the application and will send its recommendations to the D.E.Q. for their final action to approve or deny the project. An environmental impact statement or other information may be requested within 30 days of receipt of this N-C.

Business Name: PORT OF PORTLAND Phone: 233-8331

Address of Premises: 2150 NW Front Ave Terminal #1 City: Portland, Ore Zip: 97210

Nature of Business: Dock facilities operation

Responsible Person to Contact: R. H. Janes Title: Sr. Design Engineer

Other Person Who May Be Contacted: E. E. Isaacson Title: " "

Corporation  Partnership  Individual  Government Agency

Legal Owner's Address: P.O. Box 3529 City: Portland, Oregon Zip: 97208

Description of Parking Facility and its Intended Use. (Please Include Plot Plan Showing Parking Space Location and Access to Streets or Roadways): A 54 foot x 420 foot

more or less, A.C. paved parking area, adjacent to the easterly side of N.W. Front Ave., with curbs, fencing & lighting. This will provide parking for dock personnel, longshoremen  
Estimated Cost: Parking Facility Only: \$ 17,130 etc.

Estimated Construction Date: August, 1 1972 Estimated Operation Date Nov. 1, 1972

Name of Applicant or Owner of Business: PORT OF PORTLAND, Portland, Oregon

Title: DIRECTOR, DEVELOPMENT SERVICES Phone: 233-8331, Ext. 202

Signature: *A. M. Eschbach* Date: August 2, 1972

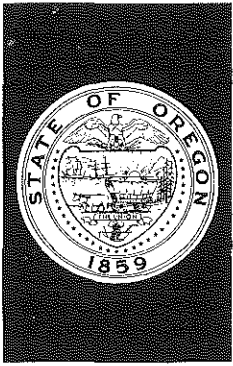
A. M. Eschbach

Applicability: This Notice of Construction Requirement Pertains

1. To areas within five miles of the municiple boundary of any city having a population of 50,000 or greater.
2. Any parking facility used for temporary storage of 50 or more motor vehicles or having two or more levels of parking for motor vehicles.

Date Received \_\_\_\_\_ Grid \_\_\_\_\_ N/C P-16

*Plans in file by...*



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

### MEMORANDUM

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item No. Ec, October 4, 1972, EQC Meeting

Proposed City of Portland Park Block #1 95-space  
Underground Parking Facility, Portland

### Background:

On August 24, 1972, the Department received a letter from the Columbia-Willamette Air Pollution Authority delineating their analysis of and recommendation for the proposed 95-space underground parking facility on Park Block #1.

The proposed facility is to be located on the block bounded by S. W. Ninth, Park, Washington and Stark Streets in downtown Portland. The site is presently occupied by a 61-space surface parking facility which will be eliminated during construction. Thus, an increase of 34 available parking spaces would be expected on the site.

The proposed facility will be on one level, located below street elevation, to be covered by a park covering the

entire block. The development of the surface level as a park will restore Park Block #1 to its intended purpose delineated in the original park blocks concept. The City intends to use the revenue derived from the proposed parking facility to retire bonds needed to finance the street level park construction.

The Architect and Financial Analyst retained by the City for this project have recommended removal of all on-street parking on the Ninth and Park Street sides of the site. If parking were removed on these two streets, sixteen on-street parking spaces would be eliminated and the increase in available parking spaces would be reduced to 18 spaces.

Analysis:

The proposed facility would lie in CWAPA air quality grid number 40. According to preliminary calculations performed by the City, for the transportation control strategy, grid 40 will be in compliance by 1975 if the DEQ Motor Vehicle Inspection Program is implemented and is as effective as predicted. However, automobiles that park in this facility will be passing through other grids in downtown Portland which will not be in compliance by 1975 unless the City develops an aggressive and effective plan for controlling air pollution in downtown Portland.

The Columbia-Willamette Air Pollution Authority has concluded that the proposed facility is compatible with the DEQ parking facilities rules for the following reasons:

1. Air quality impact will be minimal on the immediate vicinity.

2. Removing the existing unsightly surface parking and replacing this with an underground facility will have a positive impact on visual and noise pollution.

3. Restoration of Park Block #1 into an open space-park setting will fulfill an objective of the Downtown Plan which calls for Park Block #1 to be an open space.

4. There is presently a deficit of long-term and short-term parking in the vicinity, so incentives to utilize mass transit will still remain.

CWAPA also recommends that the DEQ endorse the removal of the 16 on-street spaces on the Ninth and Park Street sides of the project.

Conclusions:

1. The construction of the proposed parking facility with the associated street level park will probably have a positive environmental impact upon the vicinity and downtown Portland if the parking facility is consistent with the City's transportation control strategy.

2. The air quality impact of the proposed parking facility cannot be properly evaluated until the required transportation control strategy is submitted October 10, 1972.

Director's Recommendation:

In view of the fact that the City has received an extension of the deadline for submission of the transportation control strategy to October 10, 1972;

I recommend that the Commission approve construction of the 95-space parking facility with the condition that the City remove all curb parking on S. W. Park and Ninth Streets between S. W. Washington and Stark Streets immediately upon completion of construction of the parking facility and upon the condition that the Director determines that the proposed parking facility is consistent with the City's transportation control strategy and associated comprehensive parking plan as submitted October 10, 1972.

  
L. B. Day

MJD B

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

## BOARD OF DIRECTORS

- Francis J. Ivancie, Chairman  
City of Portland
- Fred Stefani, Vice-Chairman  
Clackamas County
- Burton C. Wilson, Jr.  
Washington County
- Ben Padrow  
Multnomah County
- A.J. Ahlborn  
Columbia County
- Richard E. Hatchard  
Program Director

21 August 1972

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
AUG 24 1972  
**AIR QUALITY CONTROL**

Mr. H. M. Patterson, Director  
Air Quality Control Division  
Department of Environmental Quality  
1234 Southwest Morrison Street  
Portland, Oregon 97205

Dear Mr. Patterson:

On 18 July 1972 the City of Portland filed a notice to construct a 95 space underground parking facility on Park Block #1 near SW 9th Avenue and Washington. On 14 August 1972 CWAPA received all requested information concerning this project.

Although this facility is in an area of special concern, a complete environmental statement was not requested due to one, the content of the information sent with the application, and two, the relative insignificant increase in existing parking space, and three, the fact that the project appears to present a positive environmental impact in the area.

After review of information pertinent to this project, it has been concluded that the proposed facility is compatible with the DEQ parking facility regulation, and it is therefore recommended that DEQ notify the City of Portland that construction may proceed. It is also recommended the DEQ consider endorsing the removal of 16 on-street parking spaces on 9th Avenue and Park surrounding the project. This parking removal, which is recommended by the project architect and financial analyst, would present a positive visual air quality and noise impact on the proposed park, especially with 9th and Park considered in long-range plans for pedestrian ways.

Major technical reasons for allowing the facility to be constructed are:

1. Air quality impact would be minimal. There will be a net increase of 19-24 vehicles on the project ground (presently 61 spaces exist with occupancy as high as 76) and potentially a net reduction in vehicle emissions due to a shift from short term to long term spaces. CO emissions in CWAPA grid 40 (Technical Report 71-9A-B) in 1975 are estimated by the City Bureau of Traffic Engineering to be 265 tons/year assuming the present city transportation control strategy is implemented. This would indicate that Federal ambient air standards would be achieved. The modified parking facility would add at most a negligible amount of CO to projected levels.



H. M. Patterson

Page 2

21 August 1972

2. Removing the existing unsightly surface parking and replacing this with an underground facility will have a positive impact on visual and noise pollution.

3. Restoration of Park Block #1 into an open space-park setting will fulfill an objective of the Downtown Plan which calls for Park Block #1 to be an open space.

4. There is presently a deficit of long term and short term parking in the vicinity, so incentives to utilize mass transit will still remain.

Very truly yours,

*R. E. Hatchard*

R. E. Hatchard

REH:jl

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

PARKING FACILITY  
NOTICE OF CONSTRUCTION AND APPLICATION FOR APPROVAL

To Construct or Modify an Air Contaminant Source

NOTE: An Approval to Construct must be obtained prior to construction. The Columbia-Willamette Air Pollution Authority will review the application and will send its recommendations to the D.E.Q. for their final action to approve or deny the project. An environmental impact statement or other information may be requested within 30 days of receipt of this N-C.

Business Name: CITY OF PORTLAND Phone: 228-6141

Address of Premises: 1220 S.W. 5th Ave. City: Portland Zip: 97201

Nature of Business: Municipality

Responsible Person to Contact: Donald C. Jeffery Title: Sr. Dep. City Atty.

Other Person Who May Be Contacted: Michael A. Lehner Title: Law Clerk

Corporation  Partnership  Individual  Government Agency   
(W.E. Roberts)

Legal Owner's Address: 01649 S.W. Greenwood Rd. City: Portland Zip: \_\_\_\_\_

Description of Parking Facility and its Intended Use. (Please Include Plot Plan Showing Parking Space Location and Access to Streets or Roadways): A one level

underground parking facility for <sup>95</sup> automobiles covered by a one block recreational park.

Estimated Cost: Parking Facility Only: \$ 50,000.00

Estimated Construction Date: 9-1-72 Estimated Operation Date 3-1-73

Name of Applicant or Owner of Business: City of Portland

Title: Commissioner of Public Affairs Phone: 228-6141

Signature:  Date: \_\_\_\_\_

Applicability: This Notice of Construction Requirement Pertains

1. To areas within five miles of the municipal boundary of any city having a population of 50,000 or greater.
2. Any parking facility used for temporary storage of 50 or more motor vehicles or having two or more levels of parking for motor vehicles.

Date Received July 18, 1972 Grid \_\_\_\_\_ N/C P-16

OFFICE OF CITY ATTORNEY

CITY HALL

PORTLAND, OREGON 97204

MARIAN C. RUSHING

CITY ATTORNEY

August 8, 1972

ROUTING	
To	Noted by
JK	JK
From:	
Action:	

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

Attention: Mr. John Kowalczyk, Technical Director

Re: Proposed Park & Parking Facility  
at SW 9th and Washington

Gentlemen:

Enclosed you will find the properly signed Notice of Construction form for the Park Block #1 Project. Please accept our apologies for this previous oversight.

It is difficult for us to answer, at this date, your question regarding the number of on-street parking spaces to be affected by this project. Our Architect and our Financial Analyst have recommended removal of on-street parking on the 9th Street and Park Street sides. However, this decision must be made by the City Council, and any prediction I could make of their action would be speculation. If parking is removed on these two streets, sixteen on-street parking spaces would be eliminated.

Without the elimination of any on-street spaces there would be a net increase of five parking spaces on the entire block. It has also been pointed out by our Architect that the design of the new facility is more conducive to long term parking use than is the present facility located on the block. Therefore, even though there may be a slight increase in the overall number of spaces, the short-term usage will be decreased and the total number of cars using the garage in any given day will decrease.

I hope this additional information will simplify your analysis and lead to a quick determination of CWAPA approval. I will be glad to provide any further assistance you desire.

Yours truly,  
*Michael A. Leiner*  
MICHAEL A. LEINER  
Law Clerk

MAL:dle

*Handwritten notes:*  
See CWAPA file  
8/17/72  
76 18-34

2 August 1972

Don C. Jeffery  
Senior Deputy City Attorney  
1220 S.W. 5th Avenue  
Portland, Oregon 97204

Dear Mr. Jeffery:

Attached please find the Notice of Construction form for the proposed parking facility at S.W. 9th and Washington which was inadvertently sent to us unsigned. Please resubmit this to CWAPA as soon as possible.

Also, could you indicate if any or how many on-street parking spaces will be eliminated by the proposed facility.     

Very truly yours,



John F. Kowalczyk  
Technical Director

JFK:sm  
Attachment

ROUTING	
To	Noted by
From:	
Action:	

OFFICE OF CITY ATTORNEY  
CITY HALL  
PORTLAND, OREGON 97204

MARIAN C. RUSHING  
CITY ATTORNEY

July 14, 1972

ROUTING	
To	Noted by
JK	
From:	
Action:	

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

Attention: Mr. John Kowalczyk

Re: Parking Facility Approval For Park  
Block #1, City of Portland

Gentlemen:

This letter is in answer to your suggestion that we forward additional background information with the enclosed application for C.W.A.P.A. approval of the captioned project.

The City of Portland is presently in the process of acquiring this property from the legal owner, Mr. William E. Roberts, with the help of the Department of Housing and Urban Development; Open Space Program, and gifts from Mr. Roberts.

The parking facility itself will be on one level, located below street elevation, to be covered by a park covering the entire block. The revenue to be derived from the underground parking will be used to retire bonds needed to finance the street level park construction.

The over-all environmental impact of this project upon the immediate vicinity is expected to be very favorable. The particular portion of the downtown core area to be served by the park is badly in need of such visibly pleasing park improvements in order to counter the shift in economic growth toward the South Auditorium area. It is hoped that the restoration of Park Block 1 to its intended purpose as a park will be the first step in the over-all plan to recreate the entire chain of park blocks as a green belt through the center of the core area.

Since three of the four lots of the subject block

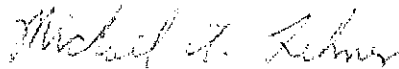
Columbia Willamette Air Pollution Authority  
July 14, 1972  
Page 2

presently contain street level parking, the prospect of increased emission by this project is slight. The benefits gained by the addition of a pleasing open space will far outweigh the minimal detrimental effects of exhaust emissions from the parking facility.

A report of the City Planning Commission is attached for your perusal. We would appreciate expeditious handling of this application so that work may be begun before winter weather returns.

If any additional information is needed by your office, please call me.

Yours truly,



MICHAEL A. LEHNER  
Law Clerk

MAL:dle  
Enc.

CITY OF PORTLAND  
INTER-OFFICE CORRESPONDENCE

(NOT FOR MAILING)

July 12, 1972

From Dept. of Public Affairs, City Planning Commission  
To Dept. of Public Works, Bureau of Buildings  
Addressed to C. N. Christiansen, Building Inspections Director  
Subject Downtown Plan Review File No: DPR #8

Dear Mr. Christiansen:

As required by subsection (2) of Section 35.44.135 of the Zoning Code, plans have been reviewed and are transmitted herewith for the following:

Proposed Use and Structure: To construct below grade parking for 80 to 85 cars with a park above.

Applicant: City of Portland

On property legally described as: Lots 1, 2, 3, 4, Park Block 1, Portland

In Zone: C1

Located at: SW 9th, Park, Washington & Stark

Action is as follows: Approval with the following conditions:

- 1) That the entrance on SW Park shall be permitted for a period not to exceed 5 years and may be extended for another period if at that time the City has not gone forward with additional Park Blocks.
- 2) That the design of the Park Street entrance shall be designed so it can be covered over or landscaped at the end of the time specified.
- 3) Preliminary and final landscaping plans for the Park Plaza be approved by the Planning Commission Staff.

Waive the 14-day waiting period.

Sincerely,

Lloyd T. Keefe  
Planning Director

LTK/st

CITY OF PORTLAND  
INTER-OFFICE CORRESPONDENCE  
(NOT FOR MAILING)

From Dept. of Public Affairs, City Planning Commission  
To Dept. of Public Affairs, Bureau of Buildings  
Addressed to C. N. Christiansen, Building Inspections Director  
Subject Conditional Use Request No. 55-72

Dear Mr. Christiansen:

On July 5, 1972 the Zoning Committee of the City Planning Commission met and considered the following Conditional Use request:

Applicant: City of Portland

Conditional Use Requested: Parking underground with surface level park plaza

On property legally described as: Lots 1, 2, 3, 4, Park Block 1, Portland


In zone: C1

Located at: SW 9th, Park, Washington & Stark

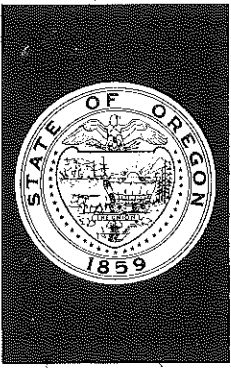
The Committee action was as follows: Approval with the following conditions: 1) that the entrance on SW Park shall be permitted for a period not to exceed 5 years and may be extended for another period if at that time the City has not gone forward with additional Park Blocks; 2) that the design of the Park Street entrance shall be designed so it can be covered over or landscaped at the end of the time specified; and 3) preliminary and final landscaping plans for the Park Plaza be approved by the Planning Commission Staff.

Waive the 14-day waiting period.

Sincerely,

  
Lloyd T. Keefe  
Planning Director





## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

### MEMORANDUM

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item No. Ed, October 4, 1972, EQC Meeting  
Proposed Portland Osteopathic Hospital 94-Space Sur-  
face Lot, Portland

### Background:

On August 29, 1972, the Department received a letter from the Columbia-Willamette Air Pollution Authority delineating their analysis of and recommendation for the proposed Portland Osteopathic Hospital 94-space surface parking facility.

The proposed facility is to be located at the Portland Osteopathic Hospital, 2900 S. E. Steele Street, Portland, Oregon, and is intended primarily to provide parking for patients and medical personnel of the hospital.

The proposed facility is being constructed to take the place of an old parking lot with 68 spaces which is being removed for construction of a new addition to the hospital. The new lot will increase the total number of hospital parking spaces from 78 spaces to 112 spaces.

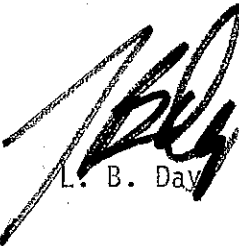
Analysis:

The parking facility is not located in an area of special concern as defined in the DEQ Guidelines for review of parking facilities.

The Columbia-Willamette Air Pollution Authority has concluded that the facility is compatible with the DEQ parking facility rules and recommends that the Commission approve construction of the facility.

Director's Recommendation:

In view of the fact that Columbia-Willamette Air Pollution Authority's review of the proposed facility indicates that it is compatible with the Department of Environmental Quality parking facilities rules, I recommend that the Commission approve construction of the facility.

  
L. B. Day

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

24 August 1972

Mr. H. M. Patterson, Director  
Air Quality Control Division  
Department of Environmental Quality  
1234 S.W. Morrison Street  
Portland, Oregon 972015

BOARD OF DIRECTORS  
Francis J. Ivancie, Chairman  
City of Portland  
Fred Stefani, Vice-Chairman  
Clackamas County  
Burton C. Wilson, Jr.  
Washington County  
Ben Padrow  
Multnomah County  
A.J. Ahlborn  
Columbia County  
Richard E. Hatchard  
Program Director

Dear Mr. Patterson:

On 16 August 1972, Schmeer, Harrington & Bana, Architects, filed a notice to construct a 94 space surface blacktop parking facility for Portland Osteopathic Hospital, 2900 S.E. Steele Street, Portland, Oregon. This facility is to provide necessary parking for patients and medical personnel resulting from both the original hospital and an addition to be built on the site of the old parking lot. The new lot will increase the total hospital parking facilities by 40 spaces.

It has been concluded that the proposed facility is compatible with the D.E.Q. parking facility rules and it is recommended that D.E.Q. allow construction to proceed.

Very truly yours,

  
R. E. Hatchard  
Program Director

REH:sm  
Enclosures

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
AUG 23 1972  
AIR QUALITY CONTROL



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

PARKING FACILITY  
NOTICE OF CONSTRUCTION AND APPLICATION FOR APPROVAL

To Construct or Modify an Air Contaminant Source

NOTE: An Approval to Construct must be obtained prior to construction. The Columbia-Willamette Air Pollution Authority will review the application and will send its recommendations to the D.E.Q. for their final action to approve or deny the project. An environmental impact statement or other information may be requested within 30 days of receipt of this N-C.

Business Name: PORTLAND OSTEOPATHIC HOSPITAL Phone: 234-0411  
Address of Premises: 2900 S. E. STEELE STREET City: PORTLAND, Zip: 97202  
Nature of Business: HOSPITAL  
Responsible Person to Contact: MR. C. CASTLE Title: ADMINISTRATOR  
Other Person Who May Be Contacted: \_\_\_\_\_ Title: \_\_\_\_\_

N.P Corporation  N. Partnership  Individual  Government Agency

Legal Owner's Address: 2900 S.E. STEELE ST. City: PORTLAND, Zip: 97202

Description of Parking Facility and its Intended Use. (Please Include Plot Plan Showing Parking Space Location and Access to Streets or Roadways): ASPHALT

PARKING LOT, TO REPLACE EXISTING PARKING AREA, MOVED FOR NEW BUILDING.

Estimated Cost: Parking Facility Only: \$ 15,500.00

Estimated Construction Date: 8/14/72 Estimated Operation Date 8/28/72

Name of Applicant or Owner of Business: SCHMEER, HARRINGTON & BANA ; ARCHITECTS

Title: ARCHITECTS Phone: 228-4881

Signature: *C. G. Harrington* Date: AUG. 15, 1972

Applicability: This Notice of Construction Requirement Pertains

1. To areas within five miles of the municipal boundary of any city having a population of 50,000 or greater.
2. Any parking facility used for temporary storage of 50 or more motor vehicles or having two or more levels of parking for motor vehicles.

Date Received \_\_\_\_\_ Grid \_\_\_\_\_ N/C P-22

6 June 1972

Portland Planning Commission  
424 S.W. Main Street  
Portland, Oregon 97204

Attention: Lloyd T. Keefe

Gentlemen:

This is in reply to your request for comments on the proposed parking facility for Portland Osteopathic Hospital.

Our preliminary review of the facility indicates it is not, from an air quality standpoint, in an area of special concern. Since this is a small facility and is serving the needs of a medical institution, upon receipt of a formal notice of construction from the responsible party, we will recommend the Department of Environmental Quality allow construction to proceed.

Very truly yours,

*REH*

R. E. Hatchard  
Program Director

REH:sm

ROUTING	
To	Noted by
From:	
Action:	

# PORTLAND CITY PLANNING COMMISSION

424 S.W. MAIN STREET  
PORTLAND, OREGON 97204  
228-6141 EXT. 296

FRANCIS J. IVANCIE, Commissioner, Department of Public Affairs

C. RALPH WALSTROM, Chairman  
MILDRED A. SCHWAB, Vice Chairman  
ELLIS H. CASSON  
HERBERT M. CLARK, JR.  
DALE R. COWEN  
HAROLD M. GOWING  
HERBERT C. HARDY  
ROWLAND S. ROSE  
MARVIN WITT, JR.

LLOYD T. KEEFE, Planning Director  
DALE D. CANNADY, Assistant Director

10661  
Mr. Richard E. Hachard  
Columbia-Willamette Air Pollution  
Authority  
1010 N.E. Couch Street  
Portland, Oregon 97232

CO 46-72

Dear Mr. Hachard:

On JUNE 27, 1972, the Planning Commission will consider the following request.

Applicant: PORTLAND ORTHOPATHIC HOSPITAL

Request: PARKING

Location: SE 28<sup>th</sup> & STEELE STREETS

Legal Description: TL '24', '114', '37' ; SEC 13, T1S, R1E

Quarter Section: 3533

Applicant's Proposal: 94 ADDITIONAL PARKING SPACES

We would appreciate your review and opinions of this request before JUNE 20, 1972. We are especially interested in the effect approval would have on air quality.

If you desire more information on this matter, we will be glad to assist you.

Sincerely,

*Lloyd T. Keefe*  
Lloyd T. Keefe  
Planning Director

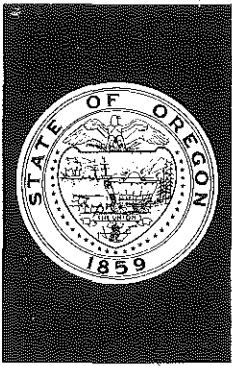
eg

USE REVERSE FOR COMMENTS

RECEIVED  
JUN 1 1972

COLUMBIA-WILLAMETTE  
AIR POLLUTION AUTHORITY

ROUTING	
To	Noted by
WH	WH
JK	JK
From:	
Action:	



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

### MEMORANDUM

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item No. Ee, October 4, 1972, EQC Meeting  
Proposed White Stag Manufacturing Company 80-space  
Surface Lot, Multnomah County

### Background:

On August 30, 1972, the Department received a letter from the Columbia-Willamette Air Pollution Authority delineating their analysis of and recommendation for the proposed White Stag Manufacturing Company 80-space surface parking facility.

The proposed facility is to be located at the White Stag Manufacturing Company, 5100 S. E. Harney Drive, Multnomah County and is intended primarily to provide parking for employees of the company and visitors.

The proposed facility is being constructed to relieve congested on-street and off-street employee parking. White Stag



Manufacturing Company has approximately 600 employees at the Harney Drive plant with presently only 200 off-street spaces available.

Analysis:

The parking facility is not located in an area of special concern as defined in the DEQ Guidelines for review of parking facilities.

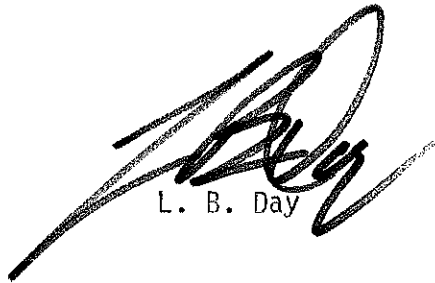
The Columbia-Willamette Air Pollution Authority has concluded that the proposed facility is compatible with the DEQ parking facilities rules for the following reasons:

1. The facility will be located in an area of low traffic density.
2. The facility should not attract any significant amount of additional vehicles to the area.
3. The facility should reduce on-street parking and associated low-speed search in the area.

CWAPA has recommended that DEQ allow construction to proceed upon this parking facility.

Director's Recommendation:

In view of the fact that Columbia-Willamette Air Pollution Authority's review of the proposed facility indicates that it is compatible with the Department of Environmental Quality parking facilities rules, I recommend that the Commission approve construction of the facility.



L. B. Day

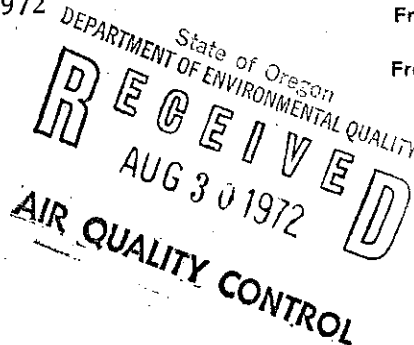
MJD

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

28 August 1972

Mr. H. M. Patterson, Director  
Air Quality Control Division  
Department of Environmental Quality  
1234 S.W. Morrison Street  
Portland, Oregon 97205



## BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland  
Fred Stefani, Vice-Chairman  
Clackamas County  
Burton C. Wilson, Jr.  
Washington County  
Ben Padrow  
Multnomah County  
A.J. Ahlborn  
Columbia County  
Richard E. Hatchard  
Program Director

Dear Mr. Patterson:

On 24 August 1972, White Stag Manufacturing Company filed a notice to construct an 80 space surface parking facility at their manufacturing facility at 5100 S.E. Harney Drive. This facility is to provide parking to relieve congested employee parking and provide spaces for visitors.

It has been concluded that the proposed facility is compatible with the D.E.Q. parking facility rules and it is recommended that D.E.Q. allow construction to proceed for the following reasons:

1. This is an area of low traffic density;
2. This facility should not attract any significant amount of additional vehicles to the area;
3. This facility should reduce on-street parking and associated low speed search in the area.

Very truly yours,

R. E. Hatchard  
Program Director

REH:dzs  
Enclosures

Our 88th Year  
August 23, 1972

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

03  
25 Aug 72  
80 spaces

Gentlemen:

Enclosed herewith is application for approval of parking facility adjacent to the White Stag factory as well as two copies of the Plot Plan.

Please let us hear from you as soon as possible so we can proceed with work.

Sincerely,

WHITE STAG MFG. CO.

  
B. F. White  
Personnel Director

DFW:sp  
Encls.

ING
Noted by
9/1

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

PARKING FACILITY  
NOTICE OF CONSTRUCTION AND APPLICATION FOR APPROVAL

To Construct or Modify an Air Contaminant Source

NOTE: An Approval to Construct must be obtained prior to construction. The Columbia-Willamette Air Pollution Authority will review the application and will send its recommendations to the D.E.Q. for their final action to approve or deny the project. An environmental impact statement or other information may be requested within 30 days of receipt of this N-C.

Business Name: White Stag Manufacturing Company Phone: (503) 777-1711

Address of Premises: 5100 S. E. Harney Drive City: Portland Zip: 97206

Nature of Business: Sportswear Manufacturing

Responsible Person to Contact: D. F. White Title: Personnel Director

Other Person Who May Be Contacted: Frank Traeger Title: Controller

Corporation  Partnership  Individual  Government Agency

Legal Owner's Address: 5100 S. E. Harney Drive City: Portland Zip: 97206

Description of Parking Facility and its Intended Use. (Please include 2 copies of Plot Plan showing parking space location and access to streets or roadways): \_\_\_\_\_

Estimated Cost: Parking Facility Only: \$ 25,000.00

Estimated Construction Date: As soon as possible Estimated Operation Date \_\_\_\_\_

Name of Applicant or Owner of Business: White Stag Manufacturing Company

Title: John Detjens, President Phone: 777-1711

Signature: *John Detjens* Date: August 22, 1972

Applicability: This Notice of Construction Requirement Pertains

1. To areas within five miles of the municipal boundary of any city having a population of 50,000 or greater.
2. Any parking facility used for temporary storage of 50 or more motor vehicles or having two or more levels of parking for motor vehicles.

Date Received \_\_\_\_\_ Grid \_\_\_\_\_ N/C P-23

Our 88th Year  
August 15, 1972

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

Gentlemen:

White Stag Manufacturing Company is in the process of applying for a permit for a parking lot on tax Lot No. 190, Carlsruhe Addition in Multnomah County.

This work will be done by the Henry M. Mason Company and the architect is Bernard A. Heims with Robert Koch and Associates, Architects.

This parking lot will facilitate approximately 80 cars and we trust will eliminate on-street congestion. We respectfully request your approval for this.

Sincerely,

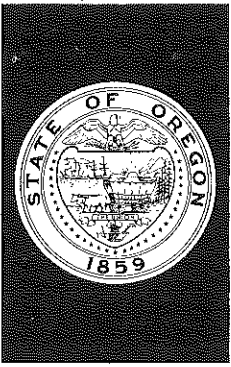
WHITE STAG MFG. CO.

*D. F. White*

D. F. White  
Personnel Director

DFW:sp

RECEIVED  
AUG 15 1972  
COLUMBIA WILLAMETTE  
AIR POLLUTION AUTHORITY



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

MEMORANDUM

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item No. Ef, October 4, 1972, EQC Meeting

Proposed Portland Commons Office Building with 360  
Ancillary Parking Spaces, Portland

Background:

On August 2, 1972, the Department received the report, Technical Review No. P-9 from the Columbia-Willamette Air Pollution Authority, which delineates their analysis of and recommendation for the proposed Portland Commons parking facility.

Portland Commons, Inc. proposes to construct an office/hotel complex with 706 ancillary parking spaces in the South Auditorium Urban Renewal Area on the two blocks bounded by S. W. Clay Street, S. W. Front Avenue, S. W. Jefferson Street, and S. W. First Avenue near the west approaches to the Hawthorne Bridge.

The Portland Commons office building is to be located on the north block (#114) of the two block site. Consideration of the

office building and its associated parking is the subject of this staff report. Consideration of the hotel and its associated parking structure will be undertaken at a later date.

The project site is presently unoccupied except for a surface parking lot with a rated capacity of 60 motor vehicles. This lot would be removed during construction.

The office building development will be the world headquarters for Evan Products Company and will be occupied by approximately 1,000 employees by 1975. Evans Products expects to have 400 of their own employees in the building by 1975 with the remaining floor space leased to tenants.

Two underground levels of the office building will be devoted to parking with 214 spaces provided. The remaining 146 parking spaces ( $360-214 = 146$  spaces) will be provided by a 492-space parking structure to be constructed as an integral part of the hotel development planned for the block (#115) immediately south of the proposed office building site. Construction of the hotel development is planned for 1973.

In a letter dated August 23, 1972, the Department requested the Portland Planning Commission to determine whether the height, bulk and employee density of the proposed Portland Commons



development is consistent with the planning guidelines for the Downtown Plan. The letter was considered by the City Planning Commission at a meeting on August 29, 1972, and a reply by letter was received by the Department August 30, 1972. The City Planning Commission has determined that the Portland Commons building is consistent with the proposed uses in the District Guideline Plan and the amount of floor space proposed is within the interim density regulations approved.

Analysis:

A. Effect on air quality

The proposed Portland Commons office building would lie in CWAPA air quality grid number 68. According to preliminary calculations performed by the City, for the transportation control strategy, grid 68 will require an additional 24% reduction in carbon monoxide emissions to achieve compliance by 1975.

The environmental impact statement submitted for the proposed parking facility indicates that if the project were not constructed, a 1% reduction in CO emissions would be realized in grid 68, leaving a 23% reduction to be achieved by other means.

It should be noted that even if all existing and projected parking spaces (approximately 1,800 spaces) in grid 68 were

eliminated in 1975, a net reduction in CO emissions of only 4.2% would be attained, leaving a 20% reduction to be achieved by other means. This is a result of the fact that approximately 83% of the traffic in grid 68 is destined for the remaining 36,000 parking spaces existing in other areas of downtown Portland.

It is not possible at this time to predict the effectiveness of the City transportation control strategy in reducing CO emissions by 24% in the vicinity of the Portland Commons project due to the lack of information about what specific control measures will be implemented.

B. Effect on commuter transportation modes

The Portland Commons office building will provide 360 parking spaces for approximately 1,000 employees. Under these conditions approximately 40% of the 1,000 employees will be induced to ride transit, join car pools or seek other parking spaces.

At the present time approximately 30% of the commuter trips made to downtown Portland are by transit. Thus, the amount of parking proposed for the Portland Commons office building is consistent with the objective of inducing increased transit patronage to reduce air pollution. However, the goal of the proposed 1990 Mass Transit Master Plan is 56% of the commuter trips to downtown Portland by transit by 1990.

C. CWAPA Recommendation

The Columbia-Willamette Air Pollution Authority recommends that construction of the Portland Commons parking facilities be approved and that Portland Commons, Inc. conduct a survey prior to May, 1975, which:

- a. Will determine the actual supply and demand for office parking in the immediate vicinity of the project;
- b. Will determine the actual effectiveness of the City transportation control strategy in meeting 1975 air quality requirements in the project vicinity;
- c. Will assess the availability of transit service to the Portland Commons office building.

Should the study show that convenient transportation alternatives to the motor vehicle are available to office patrons of Portland Commons, Portland Commons could consider restricting some of their parking from use by commuters.

Conclusions:

1. The Portland Commons office building is a new development and will require commuter parking. The 360 parking spaces proposed seem consistent with the objective of inducing commuter transit patronage by limiting available parking spaces.

2. The impact upon air quality of the parking facility cannot be properly evaluated until the transportation control strategy is submitted by the City on October 10, 1972.

3. The Portland Commons office building is consistent with the Planning Guidelines for the Downtown Plan.

Director's Recommendation:

In view of the fact that the City has received an extension of the deadline for submission of the transportation control strategy to October 10, 1972;

I recommend that the Commission approve construction of the 214-space parking facility within the Portland Commons office building on block #114 and 146-space parking facility on block #115 upon the condition that the Director determines the parking facilities are consistent with the City's transportation control strategy as submitted October 10, 1972.

  
L. B. Day

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY  
1010 N.E. Couch Street, Portland, Oregon 97232

Technical Review - Parking Facility No. P-9

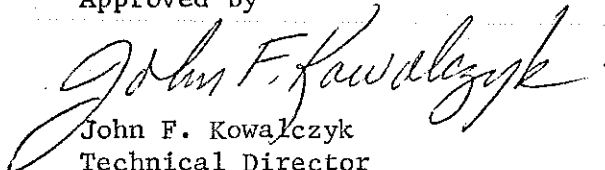
706 Space Parking Facility  
Proposed by  
Portland Commons Inc.

Prepared For  
Department of Environmental Quality

Prepared by

Technical Division  
Columbia-Willamette Air  
Pollution Authority  
31 July 1972

Approved by

  
John F. Kowalczyk  
Technical Director

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY  
1010 N.E. Couch Street, Portland, Oregon 97232

Technical Review - Parking Facilities  
for Portland Commons

Background

On June 21, 1972, Mitchell G. Drake, on behalf of Portland Commons, Inc., filed a Notice to Construct a parking facility totalling 706 spaces for use by the proposed new Portland Commons office, hotel, retail complex to be located in the south auditorium urban renewal area. An environmental impact statement has been prepared by DeLew, Cather & Company following D.E.Q. Guidelines for Review of Parking Facilities in Urban Areas. On July 11, 1972, CWAPA received all requested information concerning this parking facility.

Technical Review

The proposed Portland Commons parking structures represent one of the largest facilities in the downtown area. These new facilities will result in attraction of new motor vehicles to the south auditorium urban renewal area. Estimates in the impact statement are that carbon monoxide emissions will be increased by some 1.8 to 4.5 percent in the immediate vicinity of the project. Portland Commons will be located in an area of high motor vehicle emission density with surrounding Front and 1st street traffic projected to double with the closure of Harbor Drive and subsequent re-routing of traffic.

A review of the impact statement and associated information has been made. It is concluded that the facility is for the most part, compatible with the statement of policy in the D.E.Q. parking facility rule. Although the parking facility's size has been designed to meet the off-street parking requirements of the Portland Development Commission and although the facility has been in the planning stages for a number of years with full project committal being given in January of 1969, there are some reservations about fully approving this parking facility which has been designed to completely satisfy projected parking demands through 1990 especially when approximately one half of the parking spaces will be devoted to a new office facility. Clearly supplying parking to fully meet a demand, which apparently is the rationale behind parking requirements and codes, increases the dependency of the urban dweller upon motor vehicles and does not provide a direct incentive for development or utilization of alternative low polluting transportation systems. The added vehicle emissions due to the Portland Commons parking facility will be an added burden to the City of Portland in their development of an effective transportation control strategy to meet the 1975 Oregon Clean Air Implementation Plan requirements.

It is recommended that D.E.Q. notify Portland Commons, Inc. that construction may proceed on their parking facility. It is further recommended that Portland Commons, Inc. support D.E.Q.'s policy of providing incentives to development of low polluting transportation systems by conducting a survey prior to May 1975 which:

- a. will determine the actual supply and demand for office parking in the immediate vicinity of the project;
- b. will determine the actual effectiveness of the City of Portland's transportation control strategy in meeting 1975 air quality requirements in the project vicinity; and,
- c. will assess the availability of mass transit service to Portland Commons' office facility, specifically planned improvements for service on nearby 5th and 6th Avenues and Clay and Market Streets.

Should the study show that convenient transportation alternatives to the motor vehicle are available to office patrons of Portland Commons, Portland Commons could consider restricting some of their parking for office use making such excess space available for the hotel-retail complex. Superficially providing one parking space for each four units in the hotel complex appears very conservative.

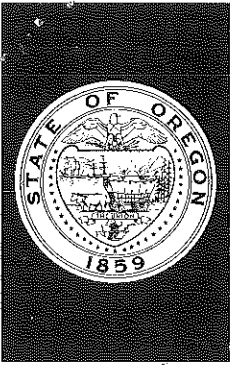
Major technical facts upon which recommendations to allow construction have been based are as follows:

1. The Portland Commons project is an integral part of long range land use plans. The facility is incorporated in the Downtown Plan - in fact, it is indicated as an activity node for the south waterfront planning district. Portland Commons is to be located in the south auditorium urban renewal area and building codes and requirements imposed by the Portland Development Commission and the Portland Planning Commission have apparently been fully met.

2. The Environmental Impact Statement indicates air quality requirements in a 2/10ths mile square grid centered on the Portland Commons project will be achieved by 1975. Grid 68 of figure 15 in the Impact Statement which includes the office facility of Portland Commons appears not to meet acceptable carbon monoxide air quality standards. Subsequent discussions with the City of Portland Bureau of Traffic Engineering indicates that the proposed transportation control strategy which includes closure of ramps on the Steel Bridge, Morrison Bridge and Stadium Freeway will reduce projected carbon monoxide emission in this grid from the projected 397 tons per year to 321 tons per year. The DeLeuw Cather estimate of carbon monoxide emissions in grid 68 from the Portland Commons facility was approximately 8 tons per year which would bring emissions of carbon monoxide above acceptable levels in 1975. The City of Portland has indicated however that planned meter rate increases and new park and ride and shop and ride service by Tri-Met have the potential of further reducing carbon monoxide emissions in the entire downtown area from between 1 and 4%. Should this be reality, grid 68 encompassing part of the Portland Commons would meet the 1975 carbon monoxide emission density requirement.

3. Other environmental aspects of noise and visual appearance appear to have been fully considered in their environmental impact would seem minimal.





## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. Eg, October 4, 1972, EQC Meeting  
Proposed Port of Portland/U. S. Navy 100-space Surface  
Lot, Portland

Background:

On September 5, 1972, the Department received a letter from the Columbia-Willamette Air Pollution Authority delineating their analysis of and recommendation for the proposed U. S. Navy 100-space gravel parking facility.

The proposed facility is to be located at 6735 N. Basin Avenue on Swan Island, Portland, Oregon, and is intended primarily to provide parking for Navy station personnel during the week and reserve personnel on weekends.

The proposed facility is being constructed to replace an existing gravel lot of the same size. The Navy has indicated that they will pave the new lot when they have expanded the parking capacity to 246 spaces in mid-1973.

Analysis:

The parking facility is located in an area of special concern as defined in the DEQ Guidelines for review of parking facilities. However, CWAPA did not request an environmental impact statement due to the fact that construction of the facility will not result in a net increase in available parking spaces in the vicinity.

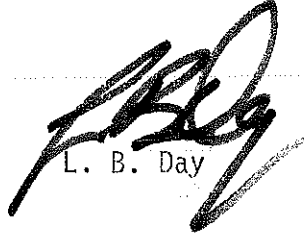
CWAPA has indicated considerable concern over particulate emissions from the gravel lot since the area is presently in violation of national air quality particulate standards.

CWAPA has concluded that the proposed facility is compatible with the DEQ parking facility rules and recommends that construction be allowed to proceed provided the facility is paved in 1973, regardless of whether it is expanded to 246 spaces in 1973.

Director's Recommendation:

In view of the fact that Columbia-Willamette Air Pollution Authority's review of the proposed facility indicates that it is compatible with the Department of Environmental Quality parking facility rules provided it is paved and provided the existing gravel lot is phased out, I recommend that the Commission approve construction of the 100-space parking facility with

the conditions that it be paved no later than June, 1973, and that the existing gravel lot not be used for parking after construction of the new lot is completed.



L. B. Day

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

29 August 1972

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

RECEIVED  
SEP 5 1972

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

H. M. Patterson, Director  
Air Quality Control Division  
1234 S.W. Morrison Avenue  
Portland, Oregon 97205

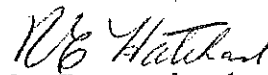
AIR QUALITY CONTROL

Dear Mr. Patterson:

On 26 June 1972, the Port of Portland (U.S. Navy) filed a notice to construct a 100-car space gravel parking lot on Swan Island at 6735 N. Basin Avenue. This facility is to provide parking for Navy station personnel during the week and reserve personnel on weekends. The Navy has also indicated that they will pave this lot when they have expanded their parking capacity to 246 spaces in mid-1973.

It is realized that this facility is located in an area of concern but it will replace an existing gravel lot of the same size. Therefore, the facility is not adding to the vehicle concentration in the Swan Island area. It has been concluded that the proposed facility is compatible with the D.E.Q. parking facility rules and it is recommended that D.E.Q. allow construction to proceed provided this facility is paved in 1973, even if the additional spaces are not added to this facility in 1973.

Very truly yours,

  
R. E. Hatchard  
Program Director

REH:sm  
Enclosures



2 August 1972

Carl V. Jonasson  
Port of Portland  
P.O. Box 3529  
Portland, Oregon 97208

Reference: Swan Island - U.S. Navy Parking Facility

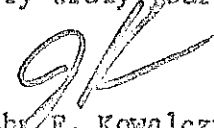
Dear Mr. Jonasson:

On 26 June 1972 you filed a notice to construct a 100 space gravel parking facility on Swan Island. We have expressed our concern over particulate emissions from this facility with you and your staff and have received a verbal commitment from Mr. Siggelkow and Mr. McClellan that the lot would be paved during 1973. We also received a letter from Commander Montoya, U.S.N., dated 19 July which transmitted a plot plan of a 246 space parking facility with A.C. pavement (presumably meaning asphaltic concrete). Since your notice of construction indicates a 100 space facility this is legally the only facility we could make our recommendation to D.E.Q.

Would you please have the enclosed N/C parking facility form filled out for the 246 space facility if this is what you intend to construct on the premise.

We will be in a position to act on this project once we receive the proper application to construct.

Very truly yours,

  
John F. Kowalczyk  
Technical Director

JFK:sm  
Enclosure

ROUTING	
To	Noted by
<i>Carl V. Jonasson</i>	
From:	
Action:	



DEPARTMENT OF THE NAVY  
 WESTERN DIVISION  
 NAVAL FACILITIES ENGINEERING COMMAND  
 P.O. BOX 727  
 SAN BRUNO, CALIFORNIA 94066

IN REPLY REFER TO:  
 Code 405 GRC/dn  
 19 July 1972

Mr. Don Gruber  
 Columbia-Williamette  
 Air Pollution Authority  
 1010 NE Couch  
 Portland, Oregon 97232

Dear Mr. Gruber,

Per your telephone conversation with Mr. Gary Cook of our Civil Design Branch, on 19 July 1972, the following information is provided concerning our plans at Swan Island Industrial Park, Portland, Oregon.

At this time, the training center for the U.S. Navy and Marine Corps, is scheduled for construction in Spring or Summer of 1973. This new facility will be approximately as shown on the enclosed drawing, which is a reproduction of the 15% design submittal from Campbell & Yost, Architects & Engineers, Portland, Oregon.

If more information is required other than what is enclosed, please contact Mr. Cook (415) 871-6600 ext. 3086.

Sincerely,

*B. F. Montoya*  
 B. F. MONTOYA  
 Commander, CEC, USN  
 Ecology Officer

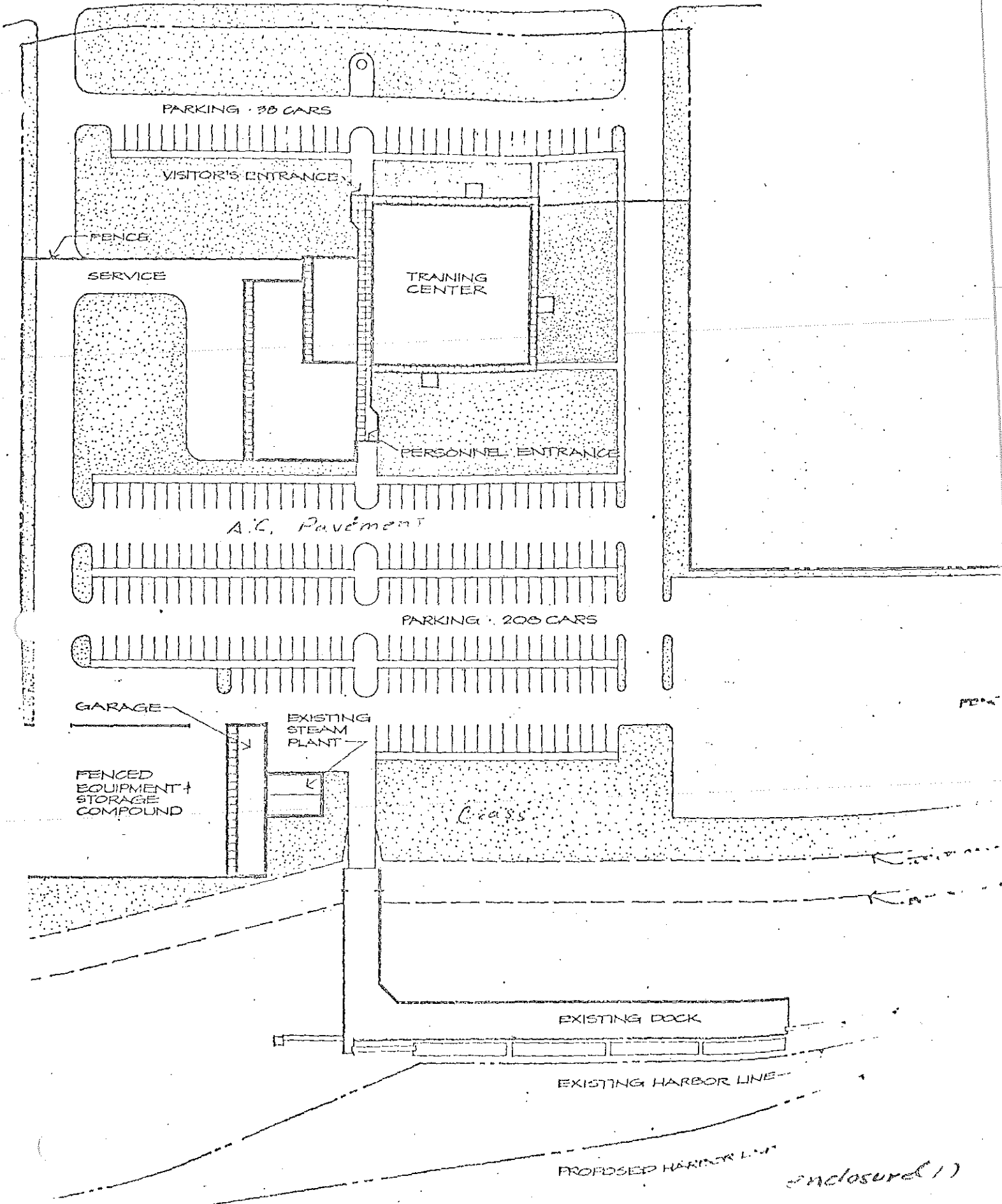
enclosure

Copy to Bill Siggelkow Port of Portland  
 Copy to Gary McClellan EPI

*Lpk 224-3607*

ROUTING	
To	Noted by
<i>JL</i>	<i>[Signature]</i>
From:	
Action:	

NORTH BASIN - VE.



enclosure (1)



COLUMBIA WILLAMETTE AIR POLLUTION AUTHORITY  
1010 NE Couch St., Portland, Oregon 97232  
Telephone: 233-7176

Date

21 Oct 72

From

DE

To

JK

US Navy Parking Lot

They are sending a letter to confirm the lot will be paved.

The letter should arrive before we approve the facility.

11 July 1972

Mr. Carl Jonasson  
Port of Portland  
P. O. Box 3529  
Portland, Oregon 97208

Dear Mr. Jonasson:

With regard to the Port of Portland/U.S. Navy parking lot Notice of Construction #P-10, this proposed facility is in a critical area with respect to air pollution. As proposed, the gravel parking lot Notice of Construction and application for approval would have to be denied since this area is above the 1975 (particulates) Federal ambient air standards at this time. We feel since this area is in a critical zone, a paved parking lot would be the only acceptable way this lot could be approved.

A reply on this matter is needed by 26 July 1972 or a denial will have to be issued on this application.

If there are any questions, please contact us.

Very truly yours,

  
Don Gerber  
Assistant Engineer

DG:jl

ROUTING	
To	Noted by
From:	
Action:	

COLUMBIA-WILLAMETTE AIR POLLUTION AGENCY  
10. 185 Couch Street, Portland, Ore. 97232  
Telephone: 233-7176

NOTICE OF CONSTRUCTION AND APPLICATION FOR APPROVAL

To Construct, Install, Establish or Alter an Air Contaminant Source and/or Control Facility  
(As Required by Rule 5, Section 5.1)

Business Name: PORT OF PORTLAND / US NAVY Phone: 233-8331  
Address of Premises: 6735 N Basin Ave City: Portland Zip: 97208  
Nature of Business: PORT AUTHORITY  
Responsible Person to Contact: Carl Jonasson Title: Mgr Industrial Projects  
Other Person Who May be Contacted: Bill Siggelkow Title: DESIGN ENGR.  
Corporation  Partnership  Individual  Government Agency   
Present Legal Owner: Port of Portland  
Legal Owner's Address: P.O. Box 3529 City: Portland Zip: 97208

Description of Proposed Construction (Air Contamination Source):  
NATURAL GAS FIRED STEAM BOILER; 100 CAR GRAVEL PARKING LOT

Description of Air Pollution Control Equipment: Boiler is Natural Gas Fired

List Air Contaminant(s) which will be produced and/or controlled: EXHAUST

Estimated Cost: Basic Air Contaminant Source Equipment: \$ 26,500 Cost of Boiler?  
Air Pollution Control Equipment: \$ 14,000 ± Cost of mods to Gas Fired

Estimated Installation Date: July, 1972 Estimated Operation Date: Sept, '72

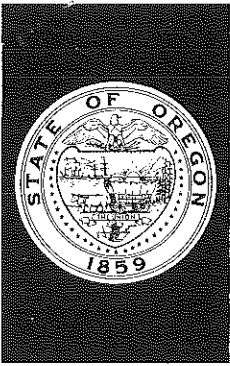
Name: Carl V. Jonasson  
Signature: [Signature] Date: 6/16/72  
Title: Manager Industrial Projects Phone: 233-8331 X294

Owner or responsible party who will operate the equipment.

NOTE: A Notice of Approval must be received from this Authority prior to commencing construction. Further technical information may be requested within 30 days of Notice of Construction receipt in order to evaluate whether the proposed construction is capable of complying with Authority Rules.

(Authority Use Below This Line)

Date Rec'd \_\_\_\_\_ SIC \_\_\_\_\_ REC \_\_\_\_\_ Grid \_\_\_\_\_ N/C \_\_\_\_\_



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

### MEMORANDUM

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. Eh, October 4, 1972, EQC Meeting

Proposed Valley River Inn 481-space Surface Parking  
Facilities, Eugene

### Background:

On September 4, 1972, the Department received a letter from Lane Regional Air Pollution Authority together with an environmental impact statement regarding the proposed Valley River Inn motor hotel and ancillary 481-space surface parking facilities.

Valley River Center of Eugene, Oregon, has proposed construction of the Valley River Inn motor hotel adjacent to the Valley River Center shopping mall located just north of Eugene near the intersection of the Delta Freeway and Goodpasture Island Road.

The Inn will be constructed in two phases, the first one including the central complex, 163 guest rooms, and 275 parking

spaces. Phase II, to be constructed within 2 to 5 years after Phase I, will add 132 guest rooms and 206 parking spaces.

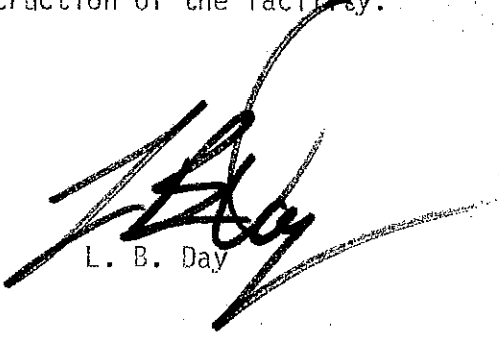
Analysis:

The proposed parking facility is not located in an area of special concern as defined in the DEQ Guidelines for review of parking facilities.

The Lane Regional Air Pollution Authority has concluded that the proposed facility is compatible with the DEQ parking facilities rules and recommends that construction be allowed to proceed.

Director's Recommendation:

In view of the fact that Lane Regional Air Pollution Authority's review of the proposed Valley River Inn and ancillary parking facilities is compatible with the Department of Environmental Quality parking facility rules, I recommend that the Commission approve construction of the facility.



L. B. Day

Lane  
Regional  
AIR  
POLLUTION  
AUTHORITY

V.J. ADKISON  
Program Director

AIRPORT ROAD - ROUTE 1, BOX 739  
EUGENE, OREGON 97402  
PHONE: (503) 689-3221

BOARD OF DIRECTORS

WICKES BEAL  
Eugene

NANCY HAYWARD  
Lane County

CHARLES TEAGUE  
Eugene

DARWIN COURTRIGHT  
Springfield

VERN STOKESBERRY  
Cottage Grove

August 31, 1972

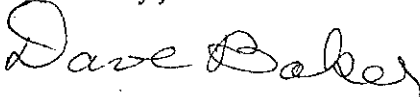
Mr. Mike Downs  
Department of Environmental Quality  
1234 S.W. Morrison  
Portland, Oregon

Dear Mike,

Enclosed are the environmental impact statement and the site plan for the proposed parking facility at the Valley River Inn. We have reviewed the statement and recommend that the facility be approved.

If you need any more information, please don't hesitate to call us.

Sincerely,



Dave Baker  
Assistant Engineer



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

### MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: Director

SUBJECT: Agenda Item No. E i , October 4, 1972, EQC Meeting

Proposed Pringle Creek 480-Space Parking Structure, Salem

#### Background:

On May 26, 1972, the Department received a letter from the Mid-Willamette Valley Air Pollution Authority together with an environmental impact statement and an analysis of and recommendation for the proposed Pringle Creek Parking structure.

In a letter dated June 9, 1972, the Department requested additional information from MWVAPA regarding the Pringle Creek Parking Structure and associated developments. On August 29, 1972, the Department received a reply to its letter of June 9 including most of the requested information.

The City of Salem proposes to construct a 480-space parking structure in the Pringle Creek Urban Renewal Area near the Salem central business district. The construction site is bounded by Liberty Street

on the west, High Street on the east, Trade Street on the north, and Pringle Creek on the south and is located between the new Salem Civic Center complex and the proposed State Accident Insurance Fund building.

The site of the proposed parking structure is presently occupied by 195 off-street parking spaces and 91 on-street spaces which will be eliminated during construction. Thus an increase of 194 parking spaces (480 - 286 = 194 spaces) on the project site will result from the construction of the proposed parking structure.

According to MWVAPA, the proposed SAIF building will have 905 occupants and the City of Salem zoning code requires one off-street parking space per 600 square feet of building area plus one space per two employees. Based upon these criteria, the SAIF building would require 910 off-street parking spaces.

Analysis:

The proposed parking structure is in an area of special concern as delineated in the DEQ Guidelines for Review of Parking Facilities.

MWVAPA has concluded that the proposed facility is compatible with the DEQ parking facilities rules and recommends that construction be allowed to proceed for the following reasons:

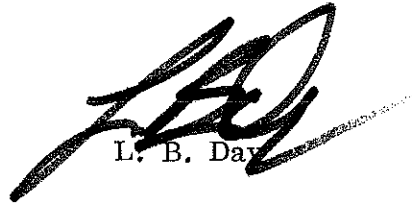
"The total effect on the downtown environment is expected to be enhanced rather than degraded because of improved appearance and usage. Ambient levels of measured CO in the downtown Salem area are nearly undetectable. The small number of additional automobiles brought



into the area, plus the fact that auto emissions in future years are expected to decline, indicates that ambient levels will not increase as a result of this project."

Director's Recommendation:

In view of the fact that the Mid-Willamette Valley Air Pollution Authority has analyzed the proposed parking structure and recommended that construction be allowed to proceed, I recommend that the Commission approve construction of the 480-car Pringle Creek Parking Structure.



L. B. Day

MICHAEL D. ROACH  
Director

MID WILLAMETTE VALLEY  
AIR POLLUTION AUTHORITY

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

August 22, 1972

Department of Environmental Quality  
1234 S.W. Morrison  
Portland, Oregon 97205

Attn: Mr. L.B. Day

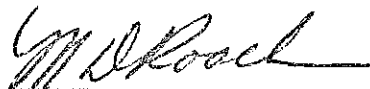
Gentlemen:

SUBJ: PRINGLE CREEK PARKING AREA

The attached staff report was written in response to the Department of Environmental Quality's questions concerning the subject facility. As you will note, the original study only considered the 480-car parking structure. This report considers the net increase in the area of 258 vehicles.

If the Department needs additional information on this facility, please notify this office.

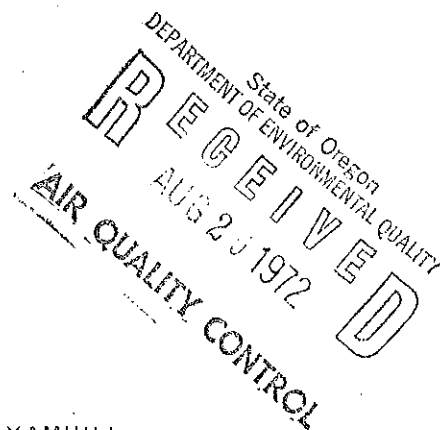
Sincerely,



Michael D. Roach  
Director

MDR/st

encl.



MID-WILLAMETTE VALLEY AIR POLLUTION AUTHORITY  
2585 State Street - Salem, Oregon

MEMORANDUM

TO : DEPARTMENT OF ENVIRONMENTAL QUALITY  
FROM : MWVAPA Staff  
DATE : August 22, 1972

SUBJ : PRINGLE CREEK PARKING AREA

The MWVAPA reviewed and recommended approval of the Pringle Creek Parking structure. The DEQ requested additional information which the Authority requested from the City of Salem. The answers to the questions are in the same order as requested by DEQ.

1. Although the original review by the Authority considered only the 480 car parking structure, parking in this area is so interrelated that the entire project must be considered. This report addresses itself to include all 1002 spaces. They are as follows:

Civic Center - existing	334
SAIF - proposed	120
Medical Bldg. - proposed	18
Two small lots - proposed	50
Pringle Creek Garage - proposed	480
TOTAL	<u>1002</u>

2. The parking area in question is part of the overall downtown parking and transportation plan. The Authority has not reviewed the entire plan.

3. The City of Salem zoning code requires a number of parking spaces based upon square footage of the building and the number of occupants. Specifically, one space is required for each 600 feet, plus one space per two

employees. Floor area is 274,000 square feet and the number of occupants is 905. Based upon this criteria, 910 spaces would be required. Since short term parking will be required for retail shops designed for the lower area of the structure, an additional 92 spaces is not unreasonable.

4. The lot designated 110 in the original statement is actually the 97 car SAIF lot.

5. The proposed additional 668 spaces represent a net increase in the area of 258. The attached map titled "Exhibit A" shows where the spaces are eliminated.

6. Noise studies have not been undertaken in this area. Comparison of noise data furnished for other projects would indicate that increases in noise levels would be undetectable.

7. Attached are sketches of the proposed structures as requested.

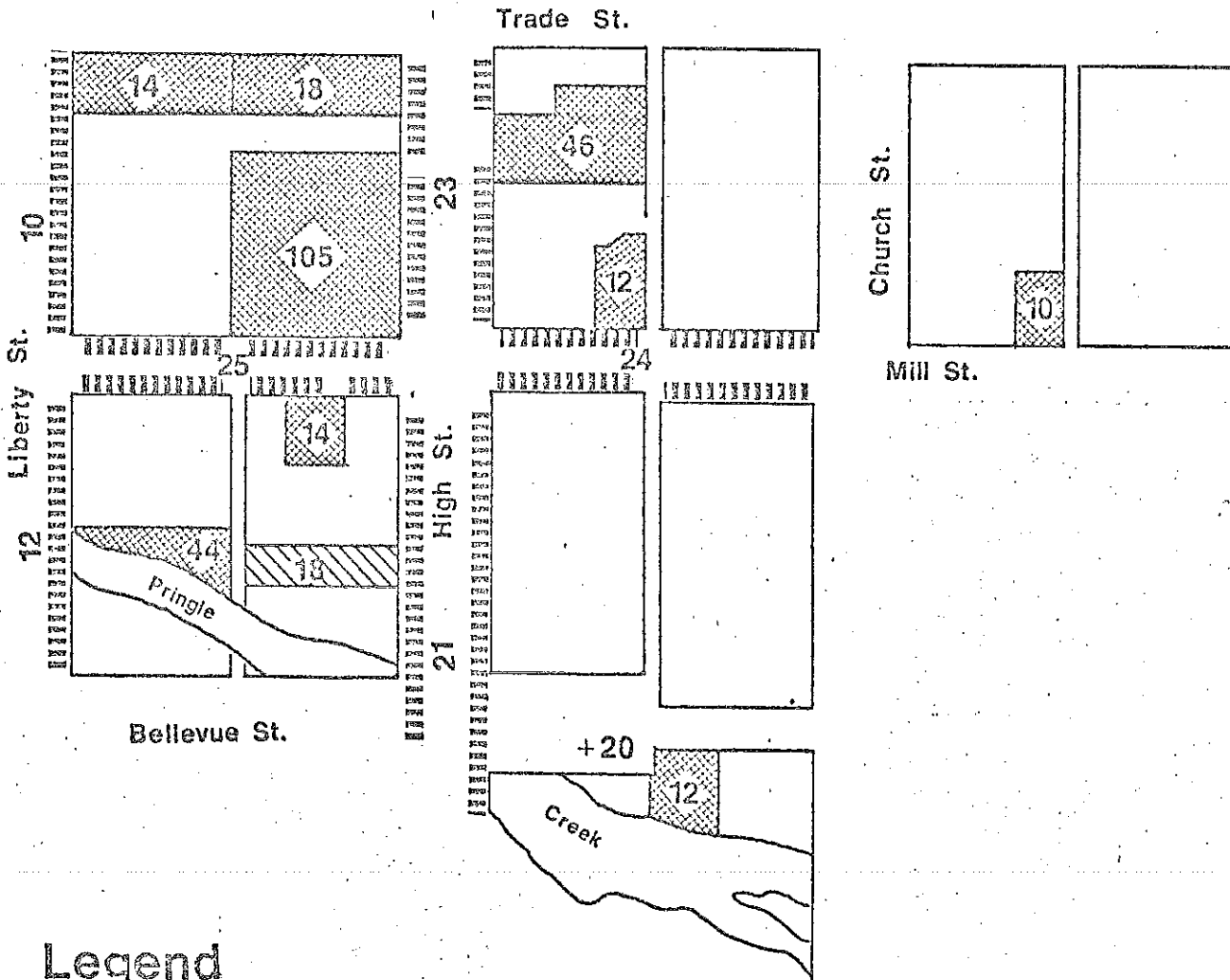
In recent years business establishments in Salem have followed the pattern of most communities by locating on lower-cost, out-lying land. The establishment of the new Civic Center, SAIF building, and Pringle Creek Parking structure in an area that was deteriorating has reversed this trend on a limited scale. Retail establishments will be located in the structure. This, accompanied with the attractiveness of the area is expected to bring people into the area not only for work, but for shopping and recreation. Concentration of shopping, work, and recreation is necessary for economical public transportation. Even though public transportation is not directly improved as a result of

Page 3  
August 22, 1972  
Pringle Creek Parking Area

these projects, the possibility of it being improved becomes more real as the central core area obtains greater usage.

The total effect on the downtown environment is expected to be enhanced rather than degraded because of improved appearance and usage. Ambient levels of measured CO in the downtown Salem area are nearly undetectable. The small number of additional automobiles brought into the area, plus the fact that auto emissions in future years are expected to decline, indicates that ambient levels will not increase as a result of this project.

# EXHIBIT "A"



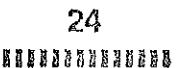
## Legend



Number of off-street parking spaces to be vacated



Number of off-street parking spaces to remain



Number of on-street parking spaces to be vacated



TO: MID WILLAMETTE  
VALLEY AIR POLLUTION  
AUTHORITY

ENVIRONMENTAL IMPACT STATEMENT

PRINGLE CREEK PARKING STRUCTURE  
AND  
PARKING LOT FOR THE  
STATE ACCIDENT INSURANCE FUND  
A STATE AGENCY

Builder: City of Salem, Oregon

Architect: Broome, Selig & Oringdulph  
Portland, Oregon

Mention, Hanns & Lindburg  
Salem, Oregon

Date of Construction  
October 1972

Prepared by:

Office of Community Development  
Broome, Selig & Oringdulph

April 20, 1972



## IMPACT STATEMENT

### PRINGLE CREEK PARKING STRUCTURE, SALEM

#### INTRODUCTION:

The Pringle Creek Parking Structure is a multi-level parking ramp designed to accommodate approximately 480 vehicles. It is to be located on a site near the Central Downtown Business Area of Salem. The site is bounded by Liberty Street on the west, High Street on the east, Trade Street on the north, and Pringle Creek on the south.

The site is located within the Pringle Creek Urban Renewal Area and is located between the new Salem Civic Center complex and the soon-to-be constructed State Accident Insurance Fund building. A basic design requirement is that this structure and other on-site developments allow for a free and easy pedestrian flow between these facilities. Every effort has been made to subordinate the car to the pedestrian rather than subordinating the pedestrian to the car.

The design provides for the elevation of all cars within the structure to the upper levels, leaving the ground level free for the development of pedestrian flow through open malls between shops and office space.

The height of the structure has been carefully considered. Along it's principal face (High Street), it's height is only 42.5 feet, while the maximum height of 48 feet occurs at the interior of the site. The sloping ramps are not apparent in the major elevations. In order to reduce the apparent mass of the structure and to allow natural light to penetrate further beneath it, the first floor above grade has been recessed along the east and

west sides.

The site is of greater size than is required for the parking structure. The development of the excess property has been encouraged. Over-development or improper development should be avoided. In order to insure that the development of this property is coordinated both functionally and aesthetically with the surrounding area, the City has commissioned the architects for the parking structure (Broome, Selig, Oringdolph & Partners, Portland; and Mention, Hanns, & Lindburg, Salem) to develop concurrently with the parking structure design, guidelines for future commercial developments on the site.

Water forms the north and south boundaries of the site. Pringle Creek on the south and the Millrace on the north. The design of the water-related features is being executed by Mitchell, McArthur, Gardner & O'Kane Associates, Landscape Architects, commissioned by the Urban Renewal Agency. The parking structure design is being closely coordinated with that effort.

1. The nature and magnitude of existing motor vehicle movement and anticipated change due to the proposed structure or construction.

At present the parking structure and SAIF sites, including street parking, are accommodating approximately 521 automobiles. The majority of these spaces are for long term (more than four hours) parkers. All of these spaces are on-grade.

The majority of the parking in the future in this immediate area is expected to be for the long term parker. From plans developed to date, projected parking spaces in this area would include: SAIF site - 125 spaces on-grade; parking structure site - 62 spaces on-grade, 480 spaces within the structure. This projection indicates a total of 667 spaces, or an increase

of 146 spaces. This increase reflects the increased demand caused by SAIF, the Civic Center, and other future development within this area. The construction of the parking structure allows this increase and at the same time allows for the decrease of 334 on-grade spaces in this four block area. This property relieved from it's role as storage area for automobiles, is to be put to a more efficient use.

Motor vehicle movement into the garage will occur on a gradual basis between 7:00 a.m. and 8:30 a.m. on weekdays. This is the time most employees within the four block area must be at work. Although entrance into the garage will peak at 7:45 a.m., the facility is designed to allow maximum space selection on entry, thereby minimizing the operative time for motor vehicles within the garage.

The late afternoon hours between 4:00 p.m. and 6:00 p.m. will again be a peak period for motor vehicle operation within the garage. To minimize the impact of vehicle use within the 4:00 to 6:00 p.m. time frame, it is expected that the major employers in the area will stagger their hours of employment.

The construction period for the structure will begin in the month of October and November. Because this is the local rainy season, it is not expected that dust will be a critical factor. In the event dry spells do occur, the contractor will be expected to control the situation by sprinkling or spraying with water.

2. The anticipated change in air quality levels for hydrocarbons, carbon monoxide, oxides of nitrogen, and photochemical oxidants, associated with the proposed construction.

The air quality levels in the vicinity of the structure will be slightly

modified between 4:30 and 5:30 p.m. This is the period when the maximum number of automobiles will be operating at one time.

The design of the facility will allow for rapid exiting from the garage. Street entry controls will also facilitate existing conditions. A maximum number of operating vehicles standing within the garage at any time is not expected to exceed 20 vehicles.

The open air design of the facility will allow for adequate air exchange to ventilate the garage. No mechanical ventilation system will be required to accommodate automotive exhausts.

Gasoline, inflamables and other noxious chemicals will not be stored within the facility. Air intakes for the retail activities on the ground level will be located away from major entry points in areas where automotive fumes will not concentrate or collect.

3. How the project complies with local or regional landuse planning; and
4. How the project complies with local or regional public transportation systems.

The proposed facility is in conformance with the Pringle Creek Urban Renewal Plan and the Central Salem Development Plan both have been adopted by the local governing body, and is in accordance with state and Federal regulations. These plans are also in conformance with the community's general plan and the region's transportation plan.

5. The appearance of the project in relationship to the surroundings; i.e., landscaping, interference with views or vistas from surrounding areas.

As stated earlier, the successful, harmonious relationship to the neighborhood is a basic design requirement. During the development of this design,

a constant review by Urban Renewal Agency and City staff members has occurred. In addition to that review, periodic reviews have taken place with a design team consisting of the architects of the SAIF building, landscape architects commissioned by the Urban Renewal Agency for overall site coordination, and the architects for the parking structure.

Federal guidelines also require a design review by and approval from the Project Area Committee (PAC). This is a multi-disciplined group of interested and dedicated citizens aided by the Urban Renewal Agency and the City staff members.

Final review by and approval from the Common Council of the City of Salem is required.

It is hardly conceivable that any feature of a design, much less an entire design that was improperly related to the neighborhood could survive these reviews.

6. The precautions that will be taken to protect air quality and water quality during and after construction.

Air quality will not be adversely affected during construction for the reasons cited in paragraph three above. A certain amount of siltation could occur in the adjacent stream. However, this will occur during the rainy season when stream flows are moderate enough to allow for sufficient carry-off.

Further control of siltation will be instituted by grass planting to occur during the site preparation phase of the agency's demolition program.

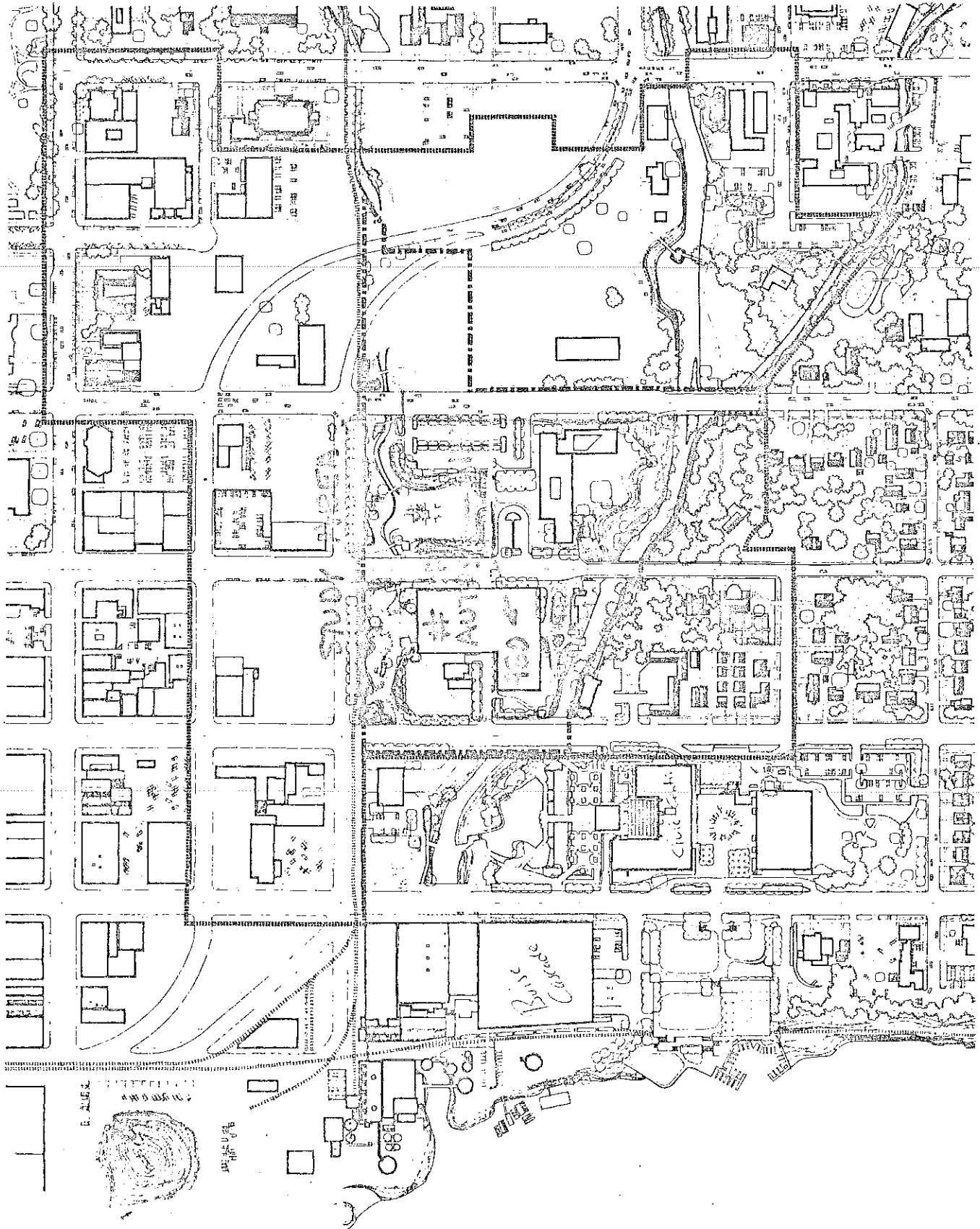
7. How solid waste will be handled during construction.

Solid waste will be the responsibility of the contractor. Materials not salvaged will be disposed of at local landfill sites. The nature of construction

(mostly concrete and a minimum of wood and sheathing material will be used) should limit the solid waste problem considerably.

8. The anticipated change in background noise levels as the result of the structure or construction.

No appreciable changes expected. Future use reflect existing uses.



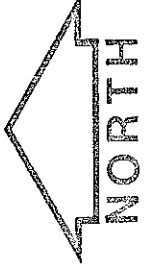
**PRELIMINARY URBAN DESIGN PLAN**

— ACTIVITY AREA (NDP)

--- PROJECT AREA (ORE. R-27)

R-224 EXHIBIT 'R'

DATE: 1-72



June 9, 1972

Mid-Willamette Valley Air  
Pollution Authority  
2585 State Street  
Salem, Oregon 97301

Attn: Michael D. Roach,  
Director

Re: Pringle Creek Parking Structure

Gentlemen:

The Department has reviewed the proposed Pringle Creek Parking Structure environmental impact statement, and the Mid-Willamette Valley Air Pollution Authority recommendation for approval, which was received at the DEQ offices on May 26, 1972. It is the determination of the Department that insufficient information has been presented for us to recommend approval for the City of Salem to commence construction.

A timely response by the appropriate agencies or individuals to the following questions will allow the Department to make a final determination of appropriate action in this matter.

1. Does the MWVAPA recommendation for approval of the proposed Pringle Creek Parking Structure also include approval of the proposed 125-car SAI surface lot and the proposed 62-car surface lot to be located at or near the site of the parking garage? As you are aware, under OAR Chapter 340, Section 20-050 through 20-070 each of these proposed parking facilities will require EQC approval before construction may commence.
2. The environmental impact statement prepared for the proposed parking facilities states that the proposed facilities are consistent with the Central Salem Development Plan and the Salem Area Transportation Study. According to information available to DEQ, the Central Salem Development Plan includes development of approximately 11,000 parking spaces in the Salem C. B. D. Does the MWVAPA recommendation for approval of the Pringle Creek



Parking Structure also imply approval of these comprehensive plans as environmentally sound transportation planning?

3. The environmental impact statement states that the 667 parking spaces to be provided are justified by the parking demands created by SAIF, the Civic Center, and other local developments. What is the basis for predicting these parking demands? For example, if the new SAIF building were to be occupied by 300 employees and if a survey of SAIF employees showed that 20% presently ride mass transit to work and the average car occupancy of commuters were 1.5 persons per car, then a demand for approximately 160 parking spaces could be expected.
4. The map that is attached to the environmental impact statement shows what appears to be a proposed surface parking lot for 110 vehicles. How does this parking facility relate to the other parking facilities mentioned in the environmental impact statement?
5. The environmental impact statement states that present parking in the area accommodates approximately 521 vehicles and that 334 of these spaces will be abolished after construction of the proposed parking facilities.
  - a. Where are the 521 spaces presently located?
  - b. Which of the 521 spaces will be eliminated?
  - c. Where will the 400-car parking structure, 125-car and 62-car surface lots and the proposed SAIF headquarters be located?

A series of maps should suffice to show present and future parking locations.

6. The environmental impact statement states that no appreciable changes in noise levels are expected to occur in the vicinity of the proposed parking structure. What is the basis for this statement? Have relative noise levels for surface parking versus structure parking been monitored or has some appropriate basis for estimation been employed? Have present background noise levels in the vicinity been monitored?

Mid-Willamette Valley Air  
Pollution Authority

June 9, 1972

Page 3

7. The environmental impact statement states that the proposed parking structure will be constructed in such a manner that its appearance, landscaping, and bulk will be harmonious in its relationship to the surrounding neighborhood. Are architectural sketches and drawings, or the equivalent, available showing the proposed structure and its relationship to the surrounding area?

There are two other areas of concern that we would like to resolve with MWVAPA at a later date. The MWVAPA air quality study and analysis treats the proposed parking structure as a point source of CO emissions due to vehicles operating within the structure. It does not address the question of the contribution to area CO concentrations resulting from the operation of vehicles that will be drawn to the vicinity of the parking structure.

Also, the MWVAPA predictions of present ambient CO concentration at the site of the proposed parking structure is based upon 1½ days of continuous monitoring. Elementary statistical analysis of the DEQ Continuous Air Monitoring Station carbon monoxide data indicates that much larger intervals of continuous sampling are required to predict ambient CO concentrations.

We would appreciate your early reply to the questions delineated above so that the Department may make a final recommendation for action as soon as possible.

Very truly yours,

Respectfully Signed By

L. B. Day

JUN 13 1972

L. B. Day

Director

*R MJD HWP*  
LBD:MJD:h

cc: Robert S. Moore  
City Manager, Salem

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

TO : Board of Directors  
FROM: William R. Spurgeon  
DATE: May 12, 1972  
SUBJ: EVALUATION OF PRINGLE CREEK PARKING STRUCTURE

Introduction

An Environmental Impact Statement has been received from the City of Salem for the subject structure as requested by the Authority. An evaluation of this information has been made.

Quantitative information on increased air pollution resulting from the structure was not provided by this document because such information was not available to the Urban Renewal personnel. The Authority has made a limited evaluation of air quality as described in this report.

*2.11.11.11.11*  
Ambient air sampling for CO was accomplished by the Authority on May 2 and 3, 1972, in the vicinity of the proposed Pringle Creek structure. CO was the only pollutant sampled since test equipment was readily available. DEQ sampled for CO in the vicinity of Center Street, January 26, 27 and 28, 1972. In both tests background ambient CO concentrations were at low levels. (Average concentrations 1 to 1.7 with 4 ppm as a peak). A test was also conducted in the Meier and Frank garage, May 3 through 5, 1972, to obtain an indication of CO concentrations in a busy parking structure. The average concentration during operation of the garage was 24 ppm.

The proposed parking structure is of a four level design. The lower floor has been designed for shopping and pedestrian traffic. All four sides as well as the top level are open, allowing good ventilation.

Parking will be for employees, or relatively long-term (DEQ's Class II). A total of 480 spaces will be available within the structure. An additional 177 spaces will be available in the general area. This results in an increase of 146 spaces in this general area. Primary motor vehicle movement will be between the hours of 7 a.m. and 8:30 A.M., and 4 p.m. and 6 p.m. on week days. According to the attached Impact Statement, the maximum number of vehicles operating within the garage at one time will be twenty.

Calculations were made to estimate maximum concentrations, assuming low wind, no turbulence, laminar wind pattern and all 480 autos idling at the same time for one hour per day.

The emission rate from the structure was calculated to be 185 kg/hr. Using a nomograph, based upon Basanquet and Pearson equation, the maximum downwind concentration would be 31 ppm and would occur at a distance of 800 feet. Rule 14-030 lists 35 ppm as a maximum one hour average.

### Conclusions

1. Because of the traffic flow design, it is not likely that an auto would need to operate within the garage for more than ten minutes per day, nor is it likely that all autos will be operated at one time. If we assume that all autos enter and exit at an even flow over a period of time and that each will operate for a five minute period within the garage when entering or leaving, the emission rate would be 15 kg/hr. The maximum determined ground level concentration would be 3.5 mg/cu.m. (2.6 ppm).
2. The background concentrations were measured to be less than 2 ppm with a peak of 4 ppm. This is well below the allowable 8 hours ambient standard of 8.7 ppm.
3. Peak background CO and average maximum 8 hour concentrations from the garage with all autos operating at one time would not exceed the ambient standard.
4. Studies made in the Meier and Frank garage near the exit revealed that concentrations of CO averaged 24 ppm during operating hours and peaked at 72 ppm. Traffic flow in this garage is relatively constant and congested whereas traffic flow in the proposed structure will be basically short term at the beginning and end of the work day. This should result in lower emissions than measured at Meier and Frank.
5. It is expected that the highest levels of CO will occur at the exit and entry rather than at some point downwind as from a stack. This will be the area of greatest vehicle concentration.
6. The Ambient and source test data and calculations indicate that this parking structure will not cause a noticeable increase in CO and other air pollutants.
7. Statistical analysis of CO ambient air quality measurements made by the DEQ and by recent studies of CWAPA in Portland, indicates a downward trend in CO. This is primarily due to increased efficiency in automobile engine controls. Carbon Monoxide emission curves developed by the EPA indicate that 1985 CO concentrations will be 15% of 1967's. Based upon this downward trend, emissions from the parking structure will be reduced in the following years since it will accomodate newer, better controlled automobiles.<sup>1</sup>

### Recommendations

The staff recommends that approval be granted for the structure.

<sup>1</sup> John E. Core, John E. Kowalczyk, 1971-1985 A Report on Air Quality, CWAPA Tech. Report 71-9A, Oct. 19, 1971, pp 14,23,24.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

### MEMORANDUM

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: Director

SUBJECT: Agenda Item No. E k, October 4, 1972 EQC Meeting

Proposed Pioneer Industries Apartments 95-Space  
Surface Parking Facility, Portland

Background:

On October 2, 1972, the Department received a letter from the Columbia-Willamette Air Pollution Authority delineating their analysis of and recommendation for the proposed Pioneer Industries Apartments 95-space surface parking facility.

The proposed facility is to be located on S. W. 35th Drive near the Baldock Freeway (I-5), and is intended primarily to provide parking for residents and guests of a new 63 unit apartment complex.

The city code requires one off-street parking space for each apartment unit. Thus 63 off-street parking spaces are required for this apartment complex. The applicant proposes to provide approximately  $1\frac{1}{2}$  off-street spaces per unit ( $63 \times 1\frac{1}{2} = 95$  spaces).

Analysis:

The proposed parking facility is located in an area of special

concern as defined in the DEQ Guidelines for review of parking facilities. However, the Columbia-Willamette Air Pollution Authority did not request an environmental impact statement. CWAPA recognizes that the proposed facility is located near a major highway, but they conclude that it is compatible with the DEQ parking facility rules because of the necessity of providing parking for the tenants of the apartments.

It seems that a more important question than the number of off-street spaces provided should be raised regarding the compatibility of constructing an apartment complex on the edge of a major freeway (the Baldock) and near a major arterial (Barbour Blvd.) with the associated noise, carbon monoxide levels and road dust that will face the tenants of these apartments in their day-to-day lives.

It is obvious that incompatible land uses are being allowed to exist side by side and until an effective land use plan is developed and implemented to deal with this type of problem, this trend will continue.

The recommendation of CWAPA is that the Department allow construction to proceed. However, since the apartment complex will be constructed adjacent to the Baldock Freeway, the design of the units should be controlled such that adverse environmental impact upon the tenants will be minimized.

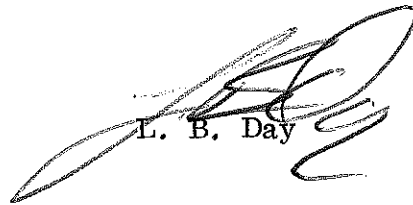
Director's Recommendation:

In view of the fact that the local governmental agencies responsible for land use planning have seen fit to allow residential development in this area;

And in view of the fact that Columbia-Willamette Air Pollution

Authority has concluded that the number of off-street parking facilities provided is compatible with the Department's parking facilities rules;

I recommend that the Commission approve construction of the 95-space surface parking facility. I further recommend that the Commission direct me to inform the appropriate local governmental agencies of the Department's concerns about the location and design of this apartment complex.



L. B. Day

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

2 October 1972

Mr. H. M. Patterson, Director  
Air Quality Control Division  
Department of Environmental Quality  
1234 Southwest Morrison Street  
Portland, Oregon 97201



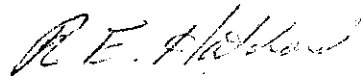
BOARD OF DIRECTORS  
Francis J. Ivancie, Chairman  
City of Portland  
Fred Stefani, Vice-Chairman  
Clackamas County  
Burton C. Wilson, Jr.  
Washington County  
Ben Padrow  
Multnomah County  
A.J. Ahlborn  
Columbia County  
Richard E. Hatchard  
Program Director

Dear Mr. Patterson:

On 27 September 1972 Pioneer Industries filed a notice to construct a 95-space surface parking facility on SW 35th Drive near I-5. This facility is to provide parking for a 63 unit apartment complex.

It is realized that this facility is located near a major highway. However, because of the necessity of providing parking for the tenants of this facility and the fact that parking appears to be adequately dispersed in the development, it has been concluded that the proposed facility is compatible with the DEQ parking facility rules. It is recommended that DEQ allow construction to proceed.

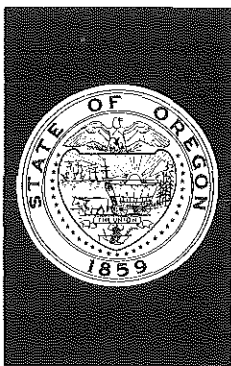
Very truly yours,



R. E. Hatchard  
Program Director

REH:jl  
Enclosures





# DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

## MEMORANDUM

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

To: ENVIRONMENTAL QUALITY COMMISSION

From: Director

Subject: Agenda Item No. F, October 4, 1972, EQC Meeting

Allocation of State Funds to Regional Air Pollution Authorities

Background:

Under ORS 449.920(2) "Any air quality control program exercising functions" .... "and operated by more than one unit of local government shall be eligible for state aid in an amount not to exceed 50 per cent of the locally funded annual operating cost thereof, not including any federal funds to which the program may be entitled."

An initial biennial legislative appropriation of \$216,167 was reduced by the special legislative session to \$212,924.

At the September 17, 1971 EQC meeting, the Commission approved state fund allocations for fiscal year July 1, 1971 through June 30, 1972, to Regional Air Pollution Control Authorities as follows:

Columbia-Willamette Air Pollution Authority	\$53,769
Lane Regional Air Pollution Authority	28,832
Mid-Willamette Valley Air Pollution Authority	<u>22,516</u>
Total	\$105,117

Summary: Allocation by Legislature	\$212,924
Allocation for fiscal 71-72	<u>105,117</u>
Balance (7-1-72)	\$107,807

Analysis:

Each Regional Authority has submitted a request for allocation of State funds for fiscal year July 1, 1972 through June 30, 1973, as follows (letters are attached):

CWAPA	\$53,771
LRAPA	30,269
MWVAPA	<u>22,809</u>
Total	106,849

The CWAPA has reported the fourth-quarter expenditures of state funds for fiscal 1971-72 at \$4,299.89 less than that allocated for that fiscal year. Each of the other regions has stated by conference that expenditures will be slightly less than the state funds allocated so that a surplus in fiscal 1971-72 allocations is available.

Each Region has submitted a Federal grant application for federal funds and has been awarded a federal grant by an award statement. Copies of the award statements are attached. The federal grant award to the CWAPA was reduced from that applied for (\$500,016 vs. \$490,016); however, it is anticipated that CWAPA will apply for a supplemental grant for this amount as soon as local funds are assured.

Conclusions:

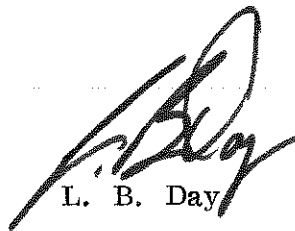
Each regional authority has applied for an allocation of state funds for fiscal year 1972-73 and sufficient state funds are available to meet the regional requests.

Director's Recommendation:

The Director recommends that the Environmental Quality Commission approve state money allocations to each Regional Air Pollution Authority for the fiscal year July 1, 1972 through June 30, 1973 as follows:

CWAPA	\$53,771
LRAPA	\$30,269
MWVAPA	\$22,809

The funds are to be apportioned to regional authorities in conformance with ORS 449.920(2).



L. B. Day

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

10 August 1972

Department of Environmental Quality  
1234 S.W. Morrison  
Portland, Oregon 97205

Attention: H. M. Patterson, Director  
Air Quality Control Division

Subject: Request for State Grant Funds

## BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

Gentlemen:

Request is hereby made for State grant funds in the amount of \$53,771.00 for support of the program of this Authority for the period 1 July 1972 through 30 June 1973.

The amount requested is as shown as a revenue resource in the 1972-73 budget included as Appendix 1-12 in the application for Federal Grant No. A000021. This budget was subsequently adopted by the Board of Directors, 16 June 1972.

The amount requested is 50% of the estimated and authorized total combined expenditures of the participating counties.

It is expected that additional local funds will become available and will be utilized in an amended budget better to meet the requirements placed upon this agency by the Oregon Implementation Plan. In such an event, both additional Federal funds and State funds will be requested.

For the Board of Directors.

Very truly yours,



R. E. Hatchard  
Program Director

REH:jls

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED  
AUG 14 1972

AIR QUALITY CONTROL

ENVIRONMENTAL PROTECTION AGENCY

Air Pollution Control Office

DURHAM, NORTH CAROLINA 27701

NOTICE OF AIR POLLUTION CONTROL PROGRAM

GRANT AWARDED  ORIGINAL  AMENDED

IMPORTANT - Refer to this No. in all correspondence

GRANT NO.

A000021

DATE

JUN 28 1972

A GRANT in support of your Air Pollution Control Program, in the amount indicated below, has been approved, as authorized by section 105 of the Clean Air Act, as amended (P.L. 90-145). This award is subject to the Regulations governing grants to air pollution control programs (42 C.F.R. Part 56, as revised), to the Terms and Conditions on the reverse of this Notice, and to other terms and conditions, if any, noted under Remarks of this Notice.

TYPE OF GRANT <input type="checkbox"/> INITIAL <input type="checkbox"/> SUPPLEMENTAL <input checked="" type="checkbox"/> CONTINUATION <input type="checkbox"/> RETENTION		TYPE OF SUPPORT <input type="checkbox"/> DEVELOPMENT <input type="checkbox"/> IMPROVEMENT <input checked="" type="checkbox"/> ESTABLISHMENT	
BUDGET PERIOD COVERED BY THIS AWARD FROM July 1, 1972 THROUGH June 30, 1973		FUTURE SUPPORT (Subject to the availability of funds, and satisfactory program development, Federal funds have been committed, in the amounts shown below, for future support of the program.) SECOND YEAR \$ _____ THIRD YEAR \$ _____	
TOTAL SUPPORT PERIOD FROM July 1, 1969 THROUGH June 30, 1973			
GRANTEE AGENCY Columbia-Willamette Air Pollution Authority 1010 N.E. Couch Street Portland, Oregon 97232		PAYEE (Check will be drawn as follows) Multnomah County Accounting Division Columbia-Willamette Air Pollution Authority 1010 N.E. Couch St., Portland, Oregon 97232	

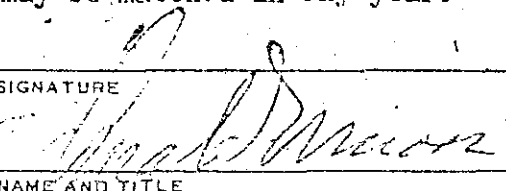
BUDGET SUMMARY FOR BUDGET PERIOD COVERED BY THIS AWARD

PROGRAM BUDGET	NON-FEDERAL PROGRAM FUNDS			FEDERAL PROGRAM FUNDS	TOTAL PROGRAM FUNDS
	BUDGET CATEGORY	ELIGIBLE NON-RECURRENT	OTHER THAN NON-RECURRENT		
PERSONNEL	\$		\$ 139,867	\$ 139,867	\$ 264,366
EQUIPMENT			797	797	2,391
SUPPLIES			2,975	2,975	8,925
TRAVEL			2,950	2,950	8,850
CONSULTATION AND SERVICE			2,850	2,850	8,550
ALTERATIONS AND RENOVATIONS					
UTILITIES			300	300	900
PUBLICATION COSTS					
OTHER			11,574	11,574	34,721
TOTAL	\$		\$ 161,313	\$ 161,313	\$ 328,703

IMPORTANT!

\$ 48,412

of the total non-Federal program budget as shown above have been designated non-matchable costs. Pursuant to grant regulations (42 C.F.R. Part 456, 56.5(g)), non-matchable costs of the program may not be less in any year than the total non-Federal recurrent expenditures were for the applicant's air pollution control program in the applicant's fiscal year immediately preceding the beginning of the support period. Only non-Federal funds in excess of the non-matchable costs may be matched in any year.

Total Amount Approved	328,703	SIGNATURE 
Less Prior Years' Unobligated Balances	61,084	
Less Amount Deferred	5,000	
Total This Award	262,619	
APPROPRIATION NO. 68X0100	ALLOWANCE NO. 29991056	NAME AND TITLE Donald W. Moos Deputy Regional Administrator
PHS PAY LIST NO. Region X APC-S-72	OBJECT CLASSIFICATION 4713	
APPLICATION NO.	LOCATION CODE	

(See other side)

NAPCA(ENR) 152

NIH Transaction No. 04-089026

NIH Vendor Code 786961

## TERMS AND CONDITIONS

This award is subject to the Terms and Conditions hereon as well as to the Regulations governing grants for air pollution control programs (42 C.F.R. Part 56, as revised) and policies and procedures of the Department of Health, Education, and Welfare in the Air Pollution Control Program Grants Manual and amendments thereto.

### A. Use of Program Funds

Program funds, which include the non-Federal as well as the Federal program funds shown on the Notice, may be used for those costs specifically incurred for the approved program. These funds are to be expended for the purpose stated in the approved grant application and for those items enumerated in the approved budget. The program funds may be expended and/or obligated only during the grant period covered by this award.

### B. Prior Approval Items

#### 1. Budget transfers

To facilitate program operation, transfers may be made among budget categories without prior approval, except that, prior approval of the Public Health Service is required where:

a. Expenditures would result in a cumulative increase in the grand total of any budget category of more than 25 percent or \$1,000, whichever is greater.

b. An expenditure would be made in a budget category for which no funds were approved.

The grantee shall submit with justification any request for approval of a budget change as outlined above. Where any transfer or substantial budget change would result in and reflect a significant change in the scope or nature of the approved program, the grantee is required to submit an application for a program revision.

#### 2. Other items

In addition, prior approval is required where:

a. Any item of equipment costing in excess of \$1,000 which was not specifically enumerated in the approved grant application, is to be purchased.

H. Support beyond this award period will be considered in light of the agency's responsibilities under the applicable State Implementation Plan including, but not limited to, timely submission of data required for quarterly and semiannual reports and timely submission of negotiated legally enforceable compliance schedules, and all other matters required by Section 110 of the Clean Air Act, as amended, and regulations adopted pursuant thereto.

b. Services are to be performed as a part of the program by contract. Any such proposed contract must be submitted for review prior to its execution. The grantee is required to obtain and keep available assurance from the contractor of compliance with Title VI of the Civil Rights Act of 1964 and regulations of the Department of Health, Education, and Welfare (45 C.F.R. Part 80), when services are provided as a part of the program through an approved contract.

### C. Matching Requirements

The grantee is required to obtain the necessary non-Federal program funds for the entire grant period and to expend such funds so that appropriate non-Federal/Federal matching ratio requirements are assured.

### D. Submission of Reports

The grantee is required to submit an annual expenditure report (NAPCA Form Hq. 37) within 90 days after the end of the grant period, unless otherwise instructed.

### E. Fiscal Audit

The grantee will keep such records so as to facilitate an effective audit. All program expenditures, Federal as well as non-Federal, are subject to review and audit by the Department of Health, Education, and Welfare and the Comptroller General of the United States, or any of their duly authorized representatives, for the purpose of verifying the accuracy and propriety of charges.

### F. Balance of Grant Funds

Any unencumbered balance of Federal grant funds of one dollar (\$1.00) or more at the end of the grant period, as reflected in the annual expenditure report, constitutes a debt to the Federal government. Any unobligated balance will normally be applied as an offset to future payments for succeeding grants to the agency, unless otherwise instructed.

### G. Adjustment of Award

The Public Health Service may amend this award at any time with proper notification to the grantee.

I. Equipment purchased for use in satisfying ambient air quality monitoring requirements as shown in the applicable Implementation Plan must utilize the measurement methods, or their EPA approved equivalent, as described in 40 CFR 50.

Lane  
Regional  
AIR  
POLLUTION  
AUTHORITY

V.J. ADKISON  
Program Director

AIRPORT ROAD - ROUTE 1, BOX 739  
EUGENE, OREGON 97402  
PHONE: (503) 689-3221

August 16, 1972.

BOARD OF DIRECTORS

WICKES BEAL  
Eugene

NANCY HAYWARD  
Lane County

CHARLES TEAGUE  
Eugene

DARWIN COURTRIGHT  
Springfield

VERN STOKESBERRY  
Cottage Grove

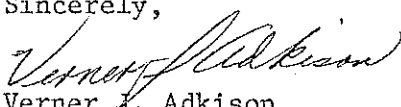
Mr. H. M. Patterson  
Department of Environmental Quality  
1234 S. W. Morrison Street  
Portland, Oregon 97205

Dear Mr. Patterson:

The Lane Regional Air Pollution Authority's budget for the fiscal year 1972-73 has been approved by the Budget Committee, at a public hearing and by our Board of Directors.

We are requesting funds in the amount of \$30,269 from the State of Oregon for this period. Funds have been requested from the local agencies and the full amount is anticipated.

Sincerely,

  
Verner A. Adkison  
Director

VJA/mw

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
AUG 16 1972  
AIR QUALITY CONTROL

ENVIRONMENTAL PROTECTION AGENCY

Air Pollution Control Office

DURHAM, NORTH CAROLINA 27701

NOTICE OF AIR POLLUTION CONTROL PROGRAM

GRANT AWARDED  ORIGINAL  AMENDED

IMPORTANT - Refer to this No. in all correspondence

GRANT NO.

A-000010

DATE

JUN 28 1972

A GRANT in support of your Air Pollution Control Program, in the amount indicated below, has been approved, as authorized by section 105 of the Clean Air Act, as amended (P.L. 90-148). This award is subject to the Regulations governing grants to air pollution control programs (42 C.F.R. Part 56, as revised), to the Terms and Conditions on the reverse of this Notice, and to other terms and conditions, if any, noted under Remarks of this Notice.

TYPE OF GRANT <input type="checkbox"/> INITIAL <input type="checkbox"/> SUPPLEMENTAL <input checked="" type="checkbox"/> CONTINUATION <input type="checkbox"/> RETENTION		TYPE OF SUPPORT <input type="checkbox"/> DEVELOPMENT <input checked="" type="checkbox"/> IMPROVEMENT <input type="checkbox"/> ESTABLISHMENT	
BUDGET PERIOD COVERED BY THIS AWARD FROM <u>July 1, 1972</u> THROUGH <u>June 20, 1973</u>		FUTURE SUPPORT (Subject to the availability of funds and satisfactory program development, Federal funds have been committed, in the amounts shown below, for future support of the program.) SECOND YEAR \$ _____ THIRD YEAR \$ _____	
TOTAL SUPPORT PERIOD FROM <u>July 1, 1970</u> THROUGH <u>June 30, 1973</u>		PAYEE (Check will be drawn as follows:) Lane Regional Air Pollution Authority Route 1 Box 739 Eugene, Oregon 97402	
GRANTEE AGENCY Lane Regional Air Pollution Authority Route 1 Box 739 Eugene, Oregon 97402		PAYEE (Check will be drawn as follows:) Lane Regional Air Pollution Authority Route 1 Box 739 Eugene, Oregon 97402	

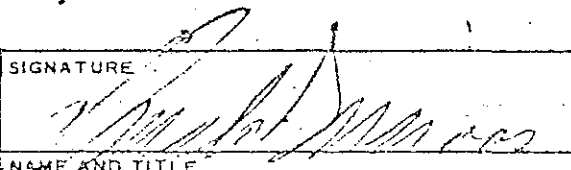
BUDGET SUMMARY FOR BUDGET PERIOD COVERED BY THIS AWARD					
PROGRAM BUDGET	NON-FEDERAL PROGRAM FUNDS			FEDERAL PROGRAM FUNDS	TOTAL PROGRAM FUNDS
	BUDGET CATEGORY	ELIGIBLE NON-RECURRENT	OTHER THAN NON-RECURRENT		
PERSONNEL	\$	\$51,043	\$51,043	\$68,488	\$119,531
EQUIPMENT		7,775	7,775	5,325	13,100
SUPPLIES		3,175	3,175	925	4,100
TRAVEL		3,925	3,925	850	4,775
CONSULTATION AND SERVICES		2,700	2,700	5,100	7,800
ALTERATIONS AND RENOVATIONS		0	0	0	0
UTILITIES		175	175	75	250
PUBLICATION COSTS		800	800	200	1,000
OTHER		17,107	17,107	7,530	24,637
<b>TOTAL</b>	<b>\$</b>	<b>\$86,700</b>	<b>\$86,700</b>	<b>\$88,493</b>	<b>\$175,193</b>

IMPORTANT!

\$ 57,202

of the total non-Federal program budget as shown above have been designated non-matchable costs. Pursuant to grant regulations (42 C.F.R. Part 456, 56.5(g)), non-matchable costs of the program may not be less in any year than the total non-Federal recurrent expenditures were for the applicant's air pollution control program in the applicant's fiscal year immediately preceding the beginning of the support period. Only non-Federal funds in excess of the non-matchable costs may be matched in any year.

Total Amount Approved \$88,493  
 Less Prior Years Unobligated Balances 12,164  
 Less Amount Deferred 5,000  
 Total This Award \$71,329

APPROPRIATION NO. 68X0100	ALLOWANCE NO. 29991056	SIGNATURE  NAME AND TITLE Donald W. Moos Deputy Regional Administrator
PROGRAM LIST NO. XAPC-8-72	OBJECT CLASSIFICATION 4113	
LOCATION NO. A-0010	LOCATION CODE	

(See other side)

HAPCA(DU) 155  
1-76

NIH TRANSACTION NUMBER 010X0009  
 NIH VENDOR CODE 783724



## TERMS AND CONDITIONS

This award is subject to the Terms and Conditions hereon as well as to the regulations governing grants for air pollution control programs (42 C.F.R. Part 56, as revised) and policies and procedures of the Department of Health, Education, and Welfare in the Air Pollution Control Program Grants Manual and amendments thereto.

### A. Use of Program Funds

Program funds, which include the non-Federal as well as the Federal program funds shown on the Notice, may be used for those costs specifically incurred for the approved program. These funds are to be expended for the purpose stated in the approved grant application and for those items enumerated in the approved budget. The program funds may be expended and/or obligated only during the grant period covered by this award.

### B. Prior Approval Items

#### 1. Budget transfers

To facilitate program operation, transfers may be made among budget categories without prior approval, except that, prior approval of the Public Health Service is required where:

a. Expenditures would result in a cumulative increase in the grand total of any budget category of more than 25 percent or \$1,000, whichever is greater.

b. An expenditure would be made in a budget category for which no funds were approved.

The grantee shall submit with justification any request for approval of a budget change as outlined above. Where any transfer or substantial budget change would result in and reflect a significant change in the scope or nature of the approved program, the grantee is required to submit an application for a program revision.

#### 2. Other items

In addition, prior approval is required where:

a. Any item of equipment costing in excess of \$1,000 which was not specifically enumerated in the approved grant application, is to be purchased.

H. Support beyond this award period will be considered in light of the agency's responsibilities under the applicable State Implementation Plan including, but not limited to, timely submission of data required for quarterly and semi-annual reports and timely submission of negotiated legally enforceable compliance schedules, and all other matters required by Section 110 of the Clean Air Act, as amended, and regulations adopted pursuant thereto.

I. Equipment purchased for use in satisfying ambient air quality monitoring requirements as shown in the applicable Implementation Plan must utilize the measurement methods, or their EPA approved equivalent, as described in 40 CFR 50.

b. Services are to be performed as a part of the program by contract. Any such proposed contract must be submitted for review prior to its execution. The grantee is required to obtain and keep available assurance from the contractor of compliance with Title VI of the Civil Rights Act of 1964 and regulations of the Department of Health, Education, and Welfare (45 C.F.R. Part 80), when services are provided as a part of the program through an approved contract.

### C. Matching Requirements

The grantee is required to obtain the necessary non-Federal program funds for the entire grant period and to expend such funds so that appropriate non-Federal/Federal matching ratio requirements are assured.

### D. Submission of Reports

The grantee is required to submit an annual expenditure report (NAPCA Form Hq. 37) within 90 days after the end of the grant period, unless otherwise instructed.

### E. Fiscal Audit

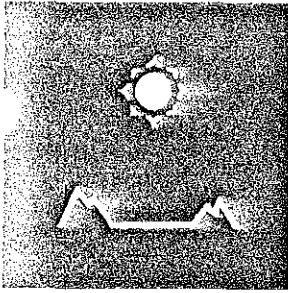
The grantee will keep such records so as to facilitate an effective audit. All program expenditures, Federal as well as non-Federal, are subject to review and audit by the Department of Health, Education, and Welfare and the Comptroller General of the United States, or any of their duly authorized representatives, for the purpose of verifying the accuracy and propriety of charges.

### F. Balance of Grant Funds

Any unencumbered balance of Federal grant funds of one dollar (\$1.00) or more at the end of the grant period, as reflected in the annual expenditure report, constitutes a debt to the Federal government. Any unobligated balance will normally be applied as an offset to future payments for succeeding grants to the agency, unless otherwise instructed.

### G. Adjustment of Award

The Public Health Service may amend this award at any time with proper notification to the grantee.



MICHAEL D. ROACH  
Director

# MID WILLAMETTE VALLEY AIR POLLUTION AUTHORITY

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

March 7, 1972

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED  
MAR 10 1972

Harold M. Patterson, Director  
Air Quality Control Division  
Dept. of Environmental Quality  
1234 SW Morrison Street  
Portland, Oregon 97205

AIR QUALITY CONTROL

Dear Mr. Patterson:

The Mid-Willamette Valley Air Pollution Authority requests the Environmental Quality Control Commission to reserve state matching funds in the amount of \$22,809 for the fiscal year 1972-73.

Enclosed is a Budget Resource Summary approved by the Budget Committee on February 29, 1972. This budget still requires final adoption by the governing body on March 21, 1972. It is not anticipated at this time that the budgeted amounts will change.

We would appreciate your consideration of this request.

Sincerely yours,

Michael D. Roach  
Director

MDR:dm  
Enclosure

FOR THE FISCAL YEAR 1972-1973.

BEGINNING JULY 1, 1972

Mid-Willamette Valley Air Pollution Authority

(MUNICIPAL CORPORATION)

Benton, Linn, Marion, Polk, Yamhill

(COUNTY)

HISTORICAL DATA				BUDGET FOR ENSUING YEAR		
ACTUAL		BUDGET		PROPOSED	APPROVED	ADOPTED
SECOND PRECEDING YEAR	FIRST PRECEDING YEAR	CURRENT YEAR		Do Not Publish This Col.	1972-73	Do Not Publish This Col.
1	1969-70	1970-71	1971-72	Beginning Fund Balances:	1972-73	1972-73
2	-----	-----	2750	*Available Cash on Hand (Cash Basis), or	2200	
3				*Net Working Capital (Accrual Basis)		
4				Previously Levied Taxes Estimated		
5				To Be Received During Ensuing Year		
6				OTHER RESOURCES		
6	3240	6026	6469	Benton County	6644	
7	4871	9061	8626	Linn County	8859	
8	9995	18,592	18,139	Marion County	18,630	
9	2183	4061	4228	Polk County	4343	
10	2688	5001	4821	Yamhill County	4950	
11						
12	11,488	21,371	22,516	State of Oregon	22,809	
13						
14	102,404	90,000	90,000	Federal Grants	102,652	
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31	136,869	154,112	157,549	Total Resources, Except Taxes to Be Levied	171,087	
32				Taxes Necessary to Balance Budget		
33				Taxes Collected in Year Levied		
34	136,869	154,112	157,549	Total Resources	171,087	

\*Includes Unassociated Balance budgeted last year.

NOTICE OF MAINTENANCE GRANT AWARDED


GRANT NO. A-000009
DATE JUN 28 1972

A MAINTENANCE GRANT in support of your Air Pollution Control Program, in the amount indicated below, has been approved, as authorized by Section 105 of the Clean Air Act, as amended (P.L. 90-148). This award is subject to the Regulations governing grants for air pollution control programs (42 C.F.R. Part 56, as revised), to the Terms and Conditions on the reverse of this Notice, and to other terms and conditions, if any, noted under Remarks of this Notice.

TYPE OF GRANT <input checked="" type="checkbox"/> INITIAL <input type="checkbox"/> CONTINUATION <input type="checkbox"/> SUPPLEMENTAL	GRANT PERIOD COVERED BY THIS AWARD FROM July 1, 1972 THROUGH June 30, 1973
GRANTEE AGENCY Mid-Willamette Valley Air Pollution Authority 2585 State Street Salem, Oregon 97301	PAYEE (Check will be drawn as follows): Michael D. Roach, Director Mid-Willamette Valley Air Pollution Authority 2585 State Street Salem, Oregon 97301

BUDGET SUMMARY FOR GRANT PERIOD COVERED BY THIS AWARD

BUDGET CATEGORY	NON-FEDERAL FUNDS			FEDERAL MAINTENANCE FUNDS	GRAND TOTAL
	ELIGIBLE NON-RECURRENT	OTHER THAN NON-RECURRENT	TOTAL		
PERSONNEL	\$	\$ 50,045	\$ 50,045	\$ 65,068	\$ 115,113
EQUIPMENT		2,530	2,530	3,143	5,673
UTILITIES		1,970	1,970	2,955	4,925
TRAVEL		2,300	2,300	3,450	5,750
CONSULTATION & SERVICES		3,320	3,320	4,980	8,300
ALTERATIONS & RENOVATIONS		80	80	120	200
TUITION		160	160	240	400
PUBLICATION COSTS		240	240	360	600
OTHER		7,790	7,790	9,684	17,474
TOTAL	\$	\$ 68,435	\$ 68,435	\$ 90,000	\$ 158,435

TOTAL GRANT AWARD	\$ 90,000	SIGNATURE	
-------------------	-----------	-----------	--

APPROPRIATION NO. 68X0100	ALLOWANCE NO. 29991056	NAME AND TITLE  Donald W. Meos Deputy Regional Administrator
PHS PAY LIST NO. Region X-APC-7-72	OBJECT CLASSIFICATION 4113	
AGENCY CODE	LOCATION CODE	

REMARKS	NIH VENDOR CODE 784955
	NIH TRANSACTION 01X0908

## TERMS AND CONDITIONS

This award is subject to the Terms and Conditions hereon as well as to the Regulations governing grants for air pollution control programs (42 C.F.R. 56, as revised) and policies and procedures of the Department of Health, Education, and Welfare in the Air Pollution Control Program Grants Manual and amendments thereto.

### A. Use of Program Funds

Program funds, which include the non-Federal as well as the Federal program funds shown on the Notice, may be used for those costs specifically incurred for the approved program. These funds are to be expended for the purpose stated in the approved grant application and for those items enumerated in the approved budget. The program funds may be expended and/or obligated only during the grant period covered by this award.

### B. Prior Approval Items

#### 1. Budget transfers

To facilitate program operation, transfers may be made among budget categories without prior approval, except that, prior approval of the Public Health Service is required where:

a. Expenditures would result in a cumulative increase in the grand total of any budget category of more than 25 percent or \$1,000, whichever is greater.

b. An expenditure would be made in a budget category for which no funds were approved.

The grantee shall submit with justification any request for approval of a budget change as outlined above. Where any transfer or substantial budget change would result in and reflect a significant change in the scope of the approved program, the grantee is required to submit an application for a program revision.

#### Other items

In addition, prior approval is required where:

a. Any item of equipment costing in excess of \$1,000 which was not specifically enumerated in the approved grant application, is to be purchased.

b. Services are to be performed as a part of the program by contract. Any such proposed contract must be submitted for review prior to its execution. The grantee is required to obtain and keep available assurance from the contractor of compliance with Title VI of the Civil Rights Act of 1964 and regulations of the Department of Health, Education, and Welfare (45 C.F.R. Part 80), when services are provided as a part of the program through an approved contract.

### C. Matching Requirements

The grantee is required to obtain the necessary non-Federal program funds for the entire grant period and to expend such funds so that appropriate non-Federal/Federal matching ratio requirements are assured.

### D. Submission of Reports

The grantee is required to submit an annual expenditure report (NAPCA Form Hq-37) within 90 days after the end of the grant period, unless otherwise instructed.

### E. Fiscal Audit

The grantee will keep such records so as to facilitate an effective audit. All program expenditures, Federal as well as non-Federal, are subject to review and audit by the Department of Health, Education, and Welfare and the Comptroller General of the United States, or any of their duly authorized representatives, for the purpose of verifying the accuracy and propriety of charges.

### F. Balance of Grant Funds

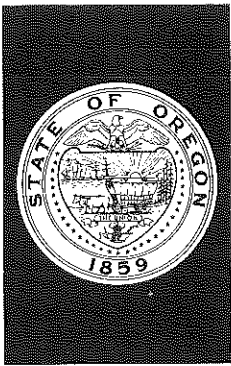
Any unencumbered balance of Federal grant funds of one dollar (\$1.00) or more at the end of the grant period, as reflected in the annual expenditure report, constitutes a debt to the Federal government. Any unobligated balance will normally be applied as an offset to future payments for succeeding grants to the agency, unless otherwise instructed.

### G. Adjustment of Award

The Public Health Service may amend this award at any time with proper notification to the grantee.

H. Support beyond this award period will be considered in light of the agency's responsibilities under the applicable State Implementation Plan including, but not limited to, timely submission of data required for quarterly and semi-annual reports and timely submission of negotiated legally enforceable compliance schedules, and all other matters required by Section 110 of the Clean Air Act, as amended, and regulations adopted pursuant thereto.

I. Equipment purchased for use in satisfying ambient air quality monitoring requirements as shown in the applicable Implementation Plan must utilize the measurement methods, or their EPA approved equivalent, as described in 40 CFR 50.



# DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

## MEMORANDUM

L. B. DAY  
Director

To: Environmental Quality Commission

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville  
EDWARD C. HARMS, JR.  
Springfield  
STORRS S. WATERMAN  
Portland  
GEORGE A. McMATH  
Portland  
ARNOLD M. COGAN  
Portland

From: Director

Subject: Agenda Item G, October 4, 1972, EQC Meeting

Columbia-Willamette Variance No. 72-4 Granted to  
Wasteco, Inc.

### BACKGROUND:

Wasteco, Inc. designs, develops and manufactures commercial and industrial low-emission incinerators at its facility in Tualatin. Operation and testing of experimental units, an integral part of the company's program of developing more efficient incinerator-control system combinations, may result in emissions in excess of CWAPA's standards. Consequently Wasteco has petitioned CWAPA for a renewal of the variance granted them for these purposes in March, 1971. The Authority granted an extension through July 20, 1973, and modified the variance with certain additional conditions. The variance as granted has been forwarded for Department review and Commission action.

### ANALYSIS:

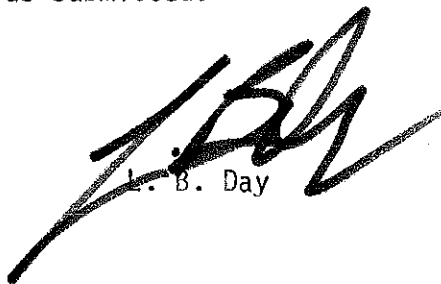
A variance is required if the company is to continue its incinerator development and testing program, since such testing

may result in emissions outside CWAPA standards. The potential long-term benefits to air quality resulting from allowing such testing far outweigh any short-term disadvantages.

The variance has been adequately conditioned to insure that areas bordering the plant site are protected from any possible nuisance resulting from the testing program.

DIRECTOR'S RECOMMENDATION:

The Director recommends that CWAPA variance 72-4 to Wasteco, Inc. be approved as submitted.



L. B. Day

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

28 July 1972

Department of Environmental Quality  
1234 S.W. Morrison Street  
Portland, Oregon 97205

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
JUL 1 1972  
AIR QUALITY COMMISSION

BOARD OF DIRECTORS  
Francis J. Ivancie, Chairman  
City of Portland  
Fred Stefani, Vice-Chairman  
Clackamas County  
Burton C. Wilson, Jr.  
Washington County  
Ben Padrow  
Multnomah County  
A.J. Ahlborn  
Columbia County  
Richard E. Hatchard  
Program Director

Attention: L. B. Day, Director

Subject: CWAPA Variance No. 72-4, Wasteco, Inc.

Gentlemen:

Please find enclosed, CWAPA Variance No. 72-4 which we request be reviewed by your department and presented to the Environmental Quality Commission for their approval.

Also enclosed, to assist in your review, are the following documents:

- a. CWAPA staff report, 27 June 1972
- b. Minutes of Advisory Committee Meeting, 6 July 1972
- c. Minutes of the Board of Directors, 21 July 1972

For the Program Director.

Very truly yours,



Jack Lowe  
Administrative Director

JL:sm  
Enclosures - 4





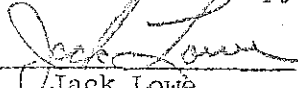
ORDER

NOW THEREFORE IT IS HEREBY ORDERED that a VARIANCE from the provisions of Title 32, Emission Standards, Columbia-Willamette Air Pollution Authority Rules, be granted to Wasteco, Inc. to test-fire certain new or experimental incineration units for short periods of time on their property situated at 20675 S.W. 105th, Tualatin, Oregon, subject to the following conditions:

1. The test units will be utilized for Types 1, 2, 3 and 4 wastes only; operations shall be limited to daylight hours and this agency shall be notified prior to any test utilizing Type 4 wastes;
2. The test unit shall be utilized for experimentation and shall not at any time be operated on a commercial basis;
3. Precautions shall be taken to minimize smoke emissions at all times;
4. Any significant changes in design or operation of this unit which would affect atmospheric emissions shall be submitted to the Authority for approval prior to the installation;
5. The variance shall be in effect for a period of one year from the date hereof;
6. If, at any time during the operation of this unit, significant air pollution problems or nuisance results, Wasteco, Inc. will, at the request of Columbia-Willamette Air Pollution Authority, install adequate control equipment or cease the operation of said unit.
7. Operation and testing of said units shall not be conducted during any period of an air pollution alert, warning or emergency.

Entered at Portland, Oregon the 21st day of July 1972.

Certified a True Copy

  
Jack Lowe  
Administrative Director

  
Vice Chairman

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

23 June 1972

## BOARD OF DIRECTORS

Francis J. Ivancic, Chairman  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

TO: Board of Directors  
FROM: R. E. Hatchard, Program Director  
SUBJECT: Variance Request - Wasteco, Inc.

Gentlemen:

Wasteco, Inc., a national manufacturer of pollution control equipment located in Tualatin, has requested from the Authority, a renewal of their original variance granted on 19 March 1971. This variance would allow the Company to continue to operate and test experimental control atmosphere furnaces on their company property. These test operations will aid the Company in developing new and better equipment for processing solid wastes. Such equipment promises to have less atmospheric emissions than the presently available equipment. In the process of experimental testing of these furnaces to determine maximum operating perimeters and atmospheric emissions, it would be expected that emissions in excess of those allowed by this Authority's Rules may occur.

Your staff recommends that a variance be granted from the Authority Rules to Wasteco, Inc., to allow such excess emissions as part of their developmental testing program, as the ultimate benefit from such practice can significantly contribute to an overall reduction in the present solid waste and air pollution problems. To protect the public health and welfare in the immediate vicinity of the plant site from any unforeseen air pollution problems, it is further recommended that the variance be granted subject to the following conditions:

1. The test units will be utilized only for Types 1, 2, 3 and 4 wastes; operations shall be limited to daylight hours and this agency shall be notified prior to any test utilizing Type 4 wastes;
2. The test unit shall be utilized for experimentation and shall not be at any time operated on a commercial basis;
3. Adequate precautions shall be taken to minimize smoke emissions at all time;
4. Any significant changes in design or operation of this unit which would affect atmospheric emissions shall be submitted to the Authority for approval prior to their installation;

Wasteco, Inc.  
23 June 1972  
Page 2

5. The variance shall be in effect for a one year period for the date hereof at which time renewal shall be required;
6. If, at any time, during the operation of this unit significant air pollution problem or nuisance results, Wasteco, Inc. will, at the request of CWAPA, install adequate control equipment or cease its operations.
7. Operation and testing of said units will not be conducted whenever an air pollution alert level is reached.

Respectfully submitted,

  
R. E. Hatchard

REH:sm

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY  
1010 NE Couch Street, Portland, Oregon 97232

ADVISORY COMMITTEE MEETING  
3:00 p.m., Thursday, 6 July 1972  
Auditorium, Portland Water Service Bldg.

Present:

Advisory Committee: Darrel Johnson, Chairman  
Walter Nutting, Vice-Chairman  
John Donnelly, M. D.  
Anthony Federici  
Fritz Fleischer  
Walter Goss, M. D.

*Walter, Inc.*  
*Pages 3-4*

Thomas L. Meador, M. D.  
Nancy Rushmer  
Hollister M. Stolte, M. D.  
Carleton Whitehead

Staff: Wayne Hanson, Deputy Program Director

Others: Harold Ruecker, Mayor of Hillsboro  
Joel Rubey, Environmental Studies Manager, Port of Portland  
Roy Ruel, Chief Engineer, Publishers Paper Company

Minutes

The meeting was called to order and the minutes of the 4 May 1972 meeting approved as recorded.

Open Burning in Washington County

Harold Ruecker, Mayor of Hillsboro, stated he had asked to appear before the Advisory Committee to speak about the burning periods now allowed. He pointed out that the citizens of Hillsboro feel they have a different problem in the more rural atmosphere; for example, agricultural burning is allowed and can be occurring beside a piece of property which is not an agricultural operation and burning is not allowed. He stated he was also concerned about roadside dumping which goes on because open burning is not allowed, and that the Washington County Commissioners have failed to act on finding a solid waste disposal site in Washington County. Mayor Ruecker suggested an interim solution to this problem might be more frequent periods for burning throughout the year.

Charles Haney, Chairman of the Sub-committee on Open Burning and Solid Waste Disposal, stated his group had met and considered the staff report, dated 15 June 1972, which reviewed the spring burning period. After discussion the sub-committee concluded that there was no need for additional public hearings. Mr. Haney stated his sub-committee would be happy to meet with Mayor Ruecker to study the facts and determine if problems exist in Hillsboro which are different from those brought out at the public hearing held last year.

Mr. Nutting pointed out that Clackamas County had the same sort of problems as enumerated by Mayor Ruecker concerning Hillsboro. He added that his county has several privately operated landfill sites receiving other than garbage which operate well and are approved by the state agency.

Mr. Haney added that until the citizens of Washington County bring enough pressure on the Washington County Board of Commissioners, a dump site in Washington County will not be established.

Mr. Nutting added that he did not feel the Advisory Committee should consider any relaxation of the burning restrictions for the City of Hillsboro. This would not be fair unless it were done for the entire four-county area and this would be a large step backwards.

After considerable further discussion, it was agreed that Mayor Ruecker would arrange a meeting with the Washington County Board of Commissioners to urge that action be taken to develop solid waste disposal sites in Washington County. The sub-committee members would attend this meeting, and also Mr. Haney suggested Commissioners Ivancie and Stefani may be interested in meeting with the Washington County Commissioners.

#### Port of Portland - Airport Expansion Environmental Impact

Mr. Joel Rubey, Environmental Studies Manager of the Port of Portland, presented a preview of the progress made by the Port of Portland towards completing an environmental impact statement concerning the airport expansion.

He stated the reason for the environmental impact statement was to assure the public that all aspects of environmental impact caused by the airport expansion project have received complete and impartial analysis. He commented briefly on the purpose of the Citizens Steering Committee, the Citizens Resources Panel and the three university teams set up to aid the investigation and oversee the airport expansion project. The natural resources impact, the pollution impact and the socio-economic impact have been thoroughly investigated. He stated the major impacts caused by the airport expansion will be the hydrology of the Columbia River because of the quite large dredge and fill operation, reduction in noise exposure to a great number of people and an enlargement of the recreational capability of the river. Mr. Rubey commented on the arguments concerning what the effect of removing Sand Island will have on the erosion of the north shore of the river.

Concerning air pollution, Mr. Rubey reported that Dr. R. W. Boubel of Oregon State University, in his study, considered emission sources, types and quantities from the various types of aircraft, land vehicles, construction equipment and surface facilities such as heating and air conditioning systems. He investigated primary and secondary effects, cumulative and long range effects and possible adverse effects of emissions. He concluded the level of airport emissions will not exceed established standards with one possible exception; this exception could occur north of the airport entrance where a combination of high ground vehicular emissions, and high aircraft emissions could exceed established standards if strong inversion conditions prevail. Dr. Boubel suggested the chances of these events occurring simultaneously are very remote.

Mr. Rubey commented that the impact which he feels is most disturbing is that it has been estimated that in 1990 the vehicle ground transportation demand will exceed the capacity of the present and proposed roadway network by 7 times. That's just airport traffic. Some form of mass transportation to and from the airport will have to be developed. He commented briefly on some of the studies done concerning mass transportation systems for the airport traffic.

Mr. Rubey stated it is estimated the airport will last well into the next century and its ultimate capacity will be  $15\frac{1}{2}$  million passengers annually. Currently, the airport serves about  $2\frac{1}{2}$  million passengers annually.

In answer to Mr. Hanson's inquiry, Mr. Rubey stated that very little of the 13,000 acres either owned by the Port or affected by the airport expansion will be used for industrial development.

Mr. Rubey answered further questions and Chairman Johnson thanked him for his interesting presentation.

#### Publishers Paper Company

Wayne Hanson reviewed the staff report dated 26 June 1972, copies of which had been distributed to the Committee, concerning the request by Publishers Paper Company for an extension of their existing variance. He pointed out that the wigwam waste burner in Molalla does meet the DEQ standards, and the staff is recommending that the variance extension be granted under specific conditions. Mr. Hanson reviewed these specific conditions as listed in the 26 June 1972 staff report.

Carleton Whitehead stated that the variance sub-committee had met and considered a number of items, one of which was the Oregon Department of Environmental Quality's desire to have a special regulation for wigwam waste burners, and CWAPA's continuing policy that wigwam waste burners should be regulated along with other sources of particulate emission. After discussion, Mr. Whitehead moved, Mr. Nutting seconded and the motion carried to recommend to the Board of Directors that they reaffirm the existing policy on particulate emissions, applying the same standards to all sources of pollution, with the option of providing a variance for a specific period of time and subject to specific conditions, when a special circumstance warrants this action.

After discussion of the Publishers Paper variance extension request, Mr. Federici moved, Dr. Donnelly seconded and the motion carried to recommend to the Board of Directors they adopt the staff recommendation and grant this variance extension, with two exceptions; one, that the variance extension time be until 30 June 1973 and two, that Publishers Paper submit a report concerning the alternate disposal methods which are being investigated to the Authority by 31 December 1972.

Mr. Roy Ruel, Chief Engineer, Publishers Paper, stated he felt his company would have no objections to the conditions of the variance and the submission of a progress report by 31 December 1972.

#### Wasteco, Inc.

Mr. Hanson reported that Wasteco, Inc., a national manufacturer of pollution control equipment in Tualatin, has asked for a renewal of their variance to allow them to continue to operate and test experimental control atmosphere incinerators on their company property. Subject to certain conditions as outlined in the staff report of 23 June 1972, it is the staff recommendation the variance request be granted.

After discussion, Mr. Nutting moved, Mr. Federici seconded and the motion carried to recommend to the Board that the staff recommendation be adopted and the variance granted to Wasteco for a period ending 1 July 1973.

#### Beaver Lumber Company

Mr. Whitehead stated that the Department of Environmental Quality has reduced the period of the Beaver Lumber Company variance to 31 December 1972, the date that their improvements in burner operation are to be completed. The variance sub-committee considers this an unjustifiably short period of time for this variance and is prepared to recommend approval of another variance after progress has been made on the installation of their burner equipment. No action is required now, but an application is anticipated this fall.

Mr. Hanson reported that Beaver Lumber Company is not happy with the DEQ action. He added that he visited Beaver Lumber Company and assured them the Advisory Committee and staff would look upon a request for a variance extension favorably. Mr. Hanson stated the staff feels that a variance in this special condition is a much better route to take in our region than changing the rules on wigwam waste burners as the state agency has done.

#### Cedarwood Timber Company

Mr. Whitehead reported that the subcommittee recommends the Advisory Committee recommend to the Board of Directors that the matter of Cedarwood Timber Company be taken off the table and action be taken adopting the stipulation signed by Mr. Eddie Miller of Cedarwood Timber. After discussion, Mr. Federici moved, Mr. Nutting seconded and the motion carried to reaffirm the Advisory Committee recommendation of 4 May to the Board of Directors which recommends the Board adopt the stipulated order signed by Mr. Eddie Miller.

#### Other Matters

Mr. Fritz Fleischer stated that due to the closing of the Shell Chemical Plant in St. Helens and his relocation in California, it is necessary for him to resign from the Advisory Committee. Dr. Goss moved, Mr. Federici seconded and a resolution was passed extending appreciation to Mr. Fleischer for his years of dedicated service on the Committee and wishing him well on his new venture.

Mr. Federici suggested that Mr. Charles Haney, Chairman of the Sub-committee on Open Burning and Solid Waste be suggested by the Board of Directors for membership on the Department of Environmental Quality's Advisory Committee on Solid Waste Disposal. Mr. Federici moved, Mr. Nutting seconded and the motion passed to recommend to the Board that they urge the Director of DEQ to appoint Mr. Haney to his committee.

The meeting was adjourned at 5:00 p.m.



COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY  
1010 N.E. Couch Street, Portland, Oregon 97232

BOARD OF DIRECTORS MEETING  
9:30 a.m., Friday, 21 July 1972  
Auditorium, Portland Water Service Bldg.

Present:

Board of Directors: Fred Stefani, Vice-Chairman  
A. J. Ahlborn  
Ben Padrow

*Wasteco, Inc.*  
*p. 2.*

Staff: R. E. Hatchard, Program Director  
Wayne Hanson, Deputy Program Director  
Jack Lowe, Administrative Director  
Emory Crofoot, General Counsel

Others: Walter Nutting, Vice Chairman, Advisory Committee  
Peter Schnell, Publishers Paper Company  
Nancy Stevens, Coalition for Clean Air  
Rick Reid, CH<sub>2</sub>M/Hill

Minutes

The meeting was called to order by Vice-Chairman Stefani and the minutes of the 16 June 1972 meeting were approved as recorded.

Advisory Committee Report

Mr. Nutting reported on the Advisory Committee meeting held 6 July; copies of the minutes of this meeting had been distributed to the Board members. He stated that the Advisory Committee adopted a statement recommended by the Subcommittee on Variances. The statement is as follows: "The Advisory Board notes with concern what appears to be an attempt to persuade CWAPA to change the particulate emission standards to provide a special less rigorous standard for wigwam burners. Any such policy change is considered both unnecessary and destructive of the air quality in this region. Therefore, the Advisory Board recommends to the Board of Directors of CWAPA that they reaffirm the existing policy on particulate emissions, applying the same standards to all sources of pollution, with the option of providing a variance for a specific period of time and subject to specific conditions, when a special circumstance warrants this action."

Mr. Nutting stated the Advisory Committee considered the variance requests of Publishers Paper Company and Wasteco, and the Beaver Lumber Company's variance which the Department of Environmental Quality had reduced in time to terminate 31 December 1972. Concerning Beaver Lumber Company, Mr. Nutting reported that the Advisory Committee decided, after discussion, they would look upon a variance extension request from Beaver Lumber Company favorably after 31 December 1972.

Mr. Nutting also reported that the Advisory Committee recommends to the Board that the Board of Directors adopt the stipulation signed by Mr. Eddie Miller, owner of Cedarwood Timber Company, concerning the operation of his wigwam waste burner. This matter had been tabled at a previous meeting by the Board of Directors.

Mr. Nutting reported that the Advisory Committee recommended the following persons to fill the three General Public vacancies on the Advisory Committee: Mrs. Betty Merten, Mr. A. McKay Rich and Mr. Kenneth Klarquist, Mrs. Melissa Shuping, with a fourth person recommended in the event one of the first three cannot serve. The Advisory Committee also recommended that Mr. Charles Haney be appointed to the Department of Environmental Quality's Advisory Committee on Solid Waste Disposal.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to accept the Advisory Committee's recommendations concerning the appointment of the new Advisory Committee members and recommend to D.E.Q. that Mr. Haney be appointed to the Advisory Committee on Solid Waste Disposal.

#### Variance Requests

##### Wasteco-Tualatin

The staff recommended in a report dated 23 June 1972 that a variance extension be granted to Wasteco, Inc., a national manufacturer of pollution control equipment, to allow the Company to test experimental control atmosphere incinerators on their company property in Tualatin. Mr. Nutting reported that the Advisory Committee concurs with the staff recommendation.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to grant the variance to Wasteco, Inc. until 1 July 1973, subject to the conditions as outlined in the staff report of 23 June 1972.

##### Publishers Paper Company - Molalla

This company has asked for an extension of the variance granted to them to operate a wigwam waste burner at their Molalla Division mill. In a staff report, dated 26 June 1972, it is recommended that this variance request be granted subject to certain conditions. Mr. Nutting stated the Advisory Committee concurs with the staff recommendation with two exceptions; one, that Publishers Paper should be asked to submit a progress report concerning the alternate disposal methods which are being investigated by the company by 31 December 1972; and two, that the variance period be only until 30 June 1973.

Mr. Pete Schnell, Publishers Paper, stated his company would be glad to submit a report by 31 December 1972; however, they would prefer to answer specific questions put to them by staff rather than simply submitting an open-ended report. Mr. Hanson stated the staff would have no objection to this.

Mr. Schnell commented on the state standard on wigwam waste burners. He stated that the state regulation allows a wigwam to be used for disposal only when no other method is available. He commented on the large volume of material being generated by mills throughout the state for which there are no means of disposal other than by burning. He stated that CWAPA should not ignore the request

of the Department of Environmental Quality to adopt the state regulations for wigwam waste burners. He stated that by not adopting the state regulations, CWAPA will deny the operators of modified wigwam burners access to the state's tax credit program.

Mr. Nutting pointed out that the CWAPA region was a very populated area compared to other areas of the state and the CWAPA region would be adversely affected with the particulate emissions if wigwam burners were allowed to operate in this region. He stressed the importance of meeting the federal ambient air standards by 1975. He added that the Advisory Committee feels granting a variance, when it is necessary, is a better route to take than adopting the state's special regulation for wigwam waste burners. Mr. Hatchard commented that he felt if CWAPA certified that a wigwam waste burner in our region was meeting the D.E.Q. waste burner regulations that they could be considered for tax credit consideration if the state is now approving waste burner modifications for tax benefits.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to accept the staff report and grant the variance request from Publishers Paper Company. Commissioner Stefani requested the staff to aid Publishers Paper Company in obtaining tax credit for the work done in modifying their wigwam waste burner in Molalla.

#### Oregon Portland Cement Company - Lake Oswego

Mr. Crofoot reported that a stipulation has been signed by Erik Voldback, 1st Vice President, Oregon Portland Cement Company which sets forth the additional air pollution control systems to be installed, certain practices to be discontinued and certain affirmative acts to improve dust control to obtain compliance with ambient air and emission standards. He reviewed briefly the actions to be taken by the Company as outlined in items I-IX of the proposed Order to be completed by 1 December 1973. It is the staff recommendation that the stipulation and Order be adopted by the Board of Directors.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to adopt the stipulation and enter the Order in the matter of the Oregon Portland Cement Company.

#### Barker Manufacturing Company - Portland

Mr. Hanson reported that Bruce W. Roemer, Vice President, Barker Manufacturing Company, 1100 N.E. 28th Avenue, Portland, has signed a stipulation to complete extensive changes in their operations to bring them into compliance with Authority rules. The stipulation is in two phases, the first to be completed by 1 January 1973 which will relocate and eliminate several cyclones and correct the paint overspray problems. Phase two is more complex and extensive and will involve a new collection system and is scheduled to be completed by 1 July 1974. He added the staff feels this is a fine program for control of a very difficult source.

Mr. Rick Reid of Cornell, Howland, Hayes, Merryfield and Hill, the engineering firm retained by Barker Manufacturing Company, stated the company was in full agreement with the stipulated dates.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion passed to approve the stipulation and enter the order in the matter of Barker Manufacturing Company.

#### Union Carbide Company - Portland

Mr. Hanson reported that Union Carbide has applied for approval to produce a different type of product in furnace #4. It is not possible at this time to ascertain whether the furnace will be able to meet emission standards using the new materials. They are asking to be allowed to try the new material. Mr. Hanson stated a consent and order have been prepared which basically says Union Carbide can start the furnace with the new material, and if an air pollution problem is created, they will reduce production and if additional control equipment does not correct the pollution problem, the operation will be shut down. This will allow the company to find out if this material can be used in this type of furnace or if another furnace must be designed.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to approve the Union Carbide Consent and Order.

#### Civil Penalties

Mr. Lowe presented a status report of civil penalties, stating that for the period 16 June through 20 July 1972, 7 civil penalties were imposed, totaling \$1450. A total of \$910 has been collected this year thus far. He stated there is only one delinquent penalty at this date.

In answer to Commissioner Padrow's inquiry, Mr. Hanson stated that Fred Meyer, Hollywood store has paid the first two civil penalties issued, but a third penalty has been issued in the amount of \$400 and Fred Meyer has now retained a consulting engineer to develop plans and specifications to bring this incinerator into compliance with authority rules. Mr. Hatchard reported that there have been many complaints from citizens concerning emissions from this store, and although Fred Meyer has been cooperative, and made many new installations and changes in their other installations, this store has presented specific problems. Commissioner Padrow asked that a status report on Fred Meyers, Hollywood store, be presented at the next meeting.

Mr. Crofoot stated that Leon A. Martin was issued a civil penalty for open burning. Mr. Martin has not filed a notice of appeal nor has he paid the penalty. He recommended that the Board authorize entry of a final order which in ten days will be put of record in the judgment docket as provided in statute.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion passed to authorize entry of a final order of the civil penalty against Leon A. Martin.

### Oregon Implementation Plan - Permit System

Mr. Hatchard briefly reviewed the development of the permit system by the three regional authorities and the Department of Environmental Quality. A hearing was held July 1972 on the permit system, at which time CWAPA recommended several changes. One change which CWAPA felt important was to reduce the fees in three categories which are felt to be too high. The second change concerns part of the permit fee regulation which moves jurisdiction from CWAPA to the state agency. Mr. Hatchard stated that unless this jurisdiction change was deleted, CWAPA would be unable to operate and enforce the permit fee system. He added that CWAPA feels this change is contrary to the intent of the Oregon Legislature when they passed legislation authorizing the permit system.

Commissioners Padrow, Stefani and Ahlborn each stated that their Boards of County Commissioners, when reviewing their financial contributions to CWAPA, felt that if the state agency was taking over the control of the regional agency, then their counties should no longer contribute to the regional authority. Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to direct a letter to the Department of Environmental Quality recommending strongly that jurisdiction within the CWAPA region for administration of the permit fee system be given to CWAPA, not retained by the state agency.

### Motor Vehicle Emission Reduction Plan

Mr. Hatchard presented a progress report on the development of the motor vehicle emission reduction plan. By 1 September 1972 the City of Portland must have approved by D.E.Q. a program to comply with the Federal ambient air standards by 1975. This work is underway with the City of Portland Traffic Engineer and Transportation Coordinator. He stated that the plan is developing and has real promise of meeting the requirements.

### Particulate Monitoring System

Mr. Hatchard reported that responsibilities are assigned CWAPA in the state's implementation plan which require approximately \$19,000 of new sampling and data equipment. Because of budget problems, this money is not available now in the regular CWAPA budget. Mr. Hatchard pointed out that if the permit system is put into operation, it may be possible for the Board to consider a supplemental budget and CWAPA will be able to meet these responsibilities.

Mr. Hatchard stated one of the pieces of equipment is a continuous recording device which is proposed to be located in the Lake Oswego area. He called the Board's attention to a letter from the West Clackamas County League of Women Voters urging that this equipment be purchased to aid the Authority in meeting the ambient air standards in the Lake Oswego area.

### Other Matters

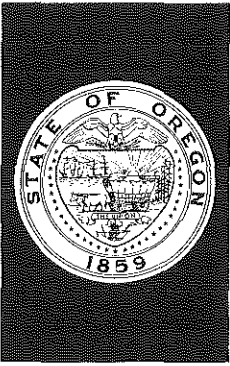
Washington County - In answer to Commissioner Padrow's inquiry, Mr. Crofoot gave a status report of the litigation with Washington County concerning their financial contribution to CWAPA. He stated that the litigation may continue for some time.

EPA Grant Award - Mr. Hatchard reported that the Environmental Protection Agency cut the grant to CWAPA by \$10,000 on the basis that CWAPA has overbudgeted in previous years. Mr. Hatchard stated CWAPA has written to EPA explaining why it appeared CWAPA over-budgeted in previous years and stressing the urgency of restoring the full grant funds to CWAPA, in order that the CWAPA program can be maintained.

CWAPA Rules - Mr. Hatchard called the Board's attention to copies of the new rules of the authority, effective 1 July 1972, which are in a new format, corresponding with the formats of the state agency's rules and rules of the other two regional authorities in the state.

---

The meeting was adjourned at 11:10 a.m.



# DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

## MEMORANDUM

### ENVIRONMENTAL QUALITY COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville  
EDWARD C. HARMS, JR.  
Springfield  
STORRS S. WATERMAN  
Portland  
GEORGE A. McMATH  
Portland  
ARNOLD M. COGAN  
Portland

TO : ENVIRONMENTAL QUALITY COMMISSION

FROM : Director

SUBJECT : Agenda Item No. G , October 4, 1972 EQC Meeting

Columbia-Willamette Air Pollution Authority Variance No. 72-5  
Publisher's Paper Co., Molalla Division

### Background:

Publisher's Paper Co., Molalla Division, operates a modified wigwam wood waste burner at its Molalla sawmill. The burner has been operating under an existing variance from Columbia-Willamette Air Pollution Authority emission standards. That variance expired June 30, 1972. The company petitioned CWAPA for an unlimited extension of the variance and was granted an extension through July 30, 1973 by CWAPA, subject to certain conditions. Pursuant to statute, the variance has been forwarded for Department review and Commission action. All materials and information necessary for Department review of the variance has been supplied.

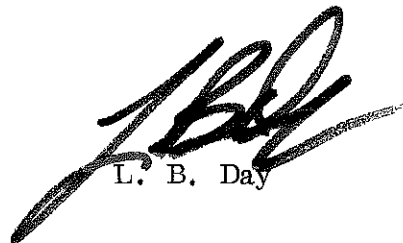
### Analysis:

Apparently there is no feasible present alternative to

incineration of the waste wood, bark and fine kerf sawdust from the Publisher's Molalla sawmill. The wigwam wood waste burner presently used for incineration of these materials meets the standards set forth in OAR, Chapter 340, Section 25-020. The variance as granted to Publisher's Molalla by CWAPA meets all Department criteria for determining necessity and adequacy of variances. However, condition number 5 of the variance may not assure studies specific to solving the waste disposal problems at Molalla will be completed during the variance period.

Director's Recommendation:

The Director recommends CWAPA variance No. 72-5, granted to Publisher's Paper Co., Molalla Division, be approved with the following modification: Condition 5 of the variance shall be modified to read "After 15 May 1973 and prior to 15 June 1973, Publisher's Paper Co., a Corporation, Molalla Division, shall submit to the Authority a written statement describing research and development completed on utilization, disposal or other methods specifically for handling present and expected wood waste from the Molalla mill in a manner which complies with Authority emission standards, including estimated implementation costs and time schedules for each method explored."

  
L. B. Day



# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

28 July 1972

Department of Environmental Quality  
1234 S.W. Morrison Street  
Portland, Oregon 97205

Attention: L. B. Day, Director

Subject: CWAPA Variance 72-5, Publishers  
Paper Company, Molalla Division

Gentlemen:

Please find enclosed, CWAPA Variance No. 72-5 which we request be reviewed by your department and presented to the Environmental Quality Commission for their approval.

Also enclosed, to assist in your review, are the following documents:

- a. CWAPA staff report, 26 June 1972
- b. Minutes of Advisory Committee Meeting, 6 July 1972
- c. Minutes of the Board of Directors, 21 July 1972

Please be informed that if your agency is giving consideration to wigwam waste burner modifications for tax credit benefits, that it is the desire of the CWAPA Board of Directors that full consideration for such tax benefits be given to Publishers Paper Co., Molalla, Division.

For the Program Director.

Very truly yours,



Jack Lowe  
Administrative Director

JL:sm  
Enclosures - 4

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
AUG 1 1972  
AIR QUALITY CONTROL

## BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY  
1010 N.E. Couch Street, Portland, Oregon 97232

In the matter of:	)	No. 72-5
VARIANCE TO PUBLISHERS PAPER CO.,	)	VARIANCE INCLUDING
a Corporation, MOLALLA DIVISION	)	FINDINGS AND CONCLUSIONS

FINDINGS

I

Publishers Paper Co., a Corporation, Molalla Division, operates a sawmill near Molalla, Oregon. The said Publishers Paper Co. operates a modified wigwam waste burner in connection with the sawmill operation for the disposal of wood waste material which cannot be disposed of in any manner except by burning.

II

The said wigwam waste burner has been modified in such a manner as to obtain maximum combustion efficiency in the burning process. Notwithstanding the modification, the wigwam waste burner cannot be operated in compliance with all the emission standards contained in Columbia-Willamette Air Pollution Authority Rules; however, the said wigwam waste burner can be operated in compliance with the provisions of Oregon Administrative Rules, Chapter 340, Section 25-020.

CONCLUSIONS

The requested variance should be granted pursuant to provisions of Columbia-Willamette Air Pollution Authority Rules, Title 23.

ORDER

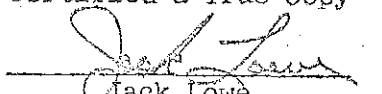
NOW THEREFORE IT IS HEREBY ORDERED that a VARIANCE be granted to Publishers Paper Co., a Corporation, Molalla Division, to operate a wigwam waste burner near Molalla, Oregon in violation of emission standards contained in Rules of Columbia-Willamette Air Pollution Authority for a period of time not beyond 30 July 1973 subject to the following conditions:

1. The operation of the wigwam waste burner shall comply with the provisions of Oregon Administrative Rules, Chapter 340, Section 25-020;
2. There shall be maintained in said burner, a temperature probe connected to a strip chart recorder which will continuously monitor and record the exit gas temperatures. The strip charts from said recorder shall clearly define times and dates of operation and be forwarded to Columbia-Willamette Air Pollution Authority each calendar month before the 10th day of the following month.
3. If the operation of the burner causes a significant air pollution problem or causes a nuisance either public or private, Publishers Paper Co., Molalla Division, will at the request of the Columbia-Willamette Air Pollution Authority, install adequate air pollution control equipment on the burner or cease its operation.
4. Publishers Paper Co., a Corporation, Molalla Division, will upon request from the Authority, comply with Columbia-Willamette Air Pollution Authority Rules, Chapter 5, Title 51, regulating air pollution emergencies.
5. After 15 May 1973 and prior to 15 June 1973, Publishers Paper Co., a Corporation, Molalla Division shall submit to the Authority, a written statement describing research and development completed on utilization, disposal or other methods for handling wood waste from the Molalla mill in a manner which complies with Authority emission standards including an estimation of implementation costs for each method explored.
6. After 1 July 1973, the Authority will review the operation of the wigwam waste burner as related to air pollution. Based upon the findings of said review, and the report provided for in Paragraph 5 hereof, this variance may be modified, revoked or extended for a specific period of time.

Entered at Portland, Oregon the 21st day of July 1972.

  
Vice-Chairman

Certified a True Copy

  
Jack Lowe  
Administrative Director

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

26 June 1972

## MEMORANDUM

TO: Board of Directors

FROM: R. E. Hatchard

SUBJECT: Variance Request - Publishers Paper, Molalla Division

BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

Gentlemen:

On 16 July 1971 the Board of Directors granted Publishers Paper, Molalla Division, a variance for their wigwam waste burner, until 30 June 1972, subject to certain conditions.

On 9 June 1972 Publishers Paper requested an indefinite extension of their variance on the condition it meets the Department of Environmental Quality rules on wigwam waste burners.

In a report to the Authority dated 13 April 1972, Publishers Paper stated that all but a portion of the fine kerf sawdust, bark and miscellaneous wood waste is now being utilized and efforts to dispose of the remaining residues either as agricultural products, fuel for heat recovery and disposal in a landfill have not proven feasible or acceptable. According to the report, engineering studies are still in progress to eliminate the necessity for burning.

With respect to Publishers' efforts to comply with the conditions set forth in the existing variance, according to staff reports, conditions No. 1, 2, 3, 6 and 7 have been met; it has not been necessary to invoke condition No. 4; and condition No. 5 was rescinded in April 1972.

### Staff Recommendation

It is the staff recommendation a variance from the Authority Rules be granted to Publishers Paper, Molalla Division, for this wigwam waste burner, with the following conditions:

1. The operation of the wigwam waste burner shall comply with provisions of Oregon Administrative rules, Chapter 340, Section 25-020.

Memorandum  
Publishers Paper  
Page 2  
26 June 1972

2. There shall be maintained in said burner a temperature probe connected to a strip chart recorder which will continuously monitor and record the exit gas temperatures. The strip charts from said recorder shall clearly define times and dates of operation and be forwarded to the Columbia-Willamette Air Pollution Authority each calendar month before the 10th of the following month.

3. If the operation of the burner causes a significant air pollution problem or causes a nuisance either public or private, Publishers Paper Company, Molalla Division, will at the request of the Columbia-Willamette Air Pollution Authority, install adequate air pollution control equipment on the burner or cease its operation.

4. Publishers Paper upon request from the Authority will comply with the Authority Rules pertaining to Air Pollution Emergencies.

5. After 15 May 1973 and prior to 15 June 1973, Publishers Paper Company, Molalla Division shall submit to the Authority a written statement describing research and development completed on utilization, disposal or other methods for handling wood waste from the Molalla mill in a manner which complies with Authority emission standards including an estimation of implementation costs for each method explored.

6. After 1 July 1973, the Authority will review the operation of the wigwam waste burner as related to air pollution. Based upon the findings of said review, the variance may be modified, revoked or extended for a specific period.

Respectfully submitted,

  
R. E. Hatchard

REH:jl

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY  
1010 NE Couch Street, Portland, Oregon 97232

ADVISORY COMMITTEE MEETING  
3:00 p.m., Thursday, 6 July 1972  
Auditorium, Portland Water Service Bldg.

Present:

Advisory Committee: Darrel Johnson, Chairman  
Walter Nutting, Vice-Chairman  
John Donnelly, M. D.  
Anthony Federici  
Fritz Fleischer  
Walter Goss, M. D.  
Thomas L. Meador, M. D.  
Nancy Rushmer  
Hollister M. Stolte, M. D.  
Carleton Whitehead

*Publishers Paper  
Page 3*

Staff: Wayne Hanson, Deputy Program Director

Others: Harold Ruecker, Mayor of Hillsboro  
Joel Rubey, Environmental Studies Manager, Port of Portland  
Roy Ruel, Chief Engineer, Publishers Paper Company

Minutes

The meeting was called to order and the minutes of the 4 May 1972 meeting approved as recorded.

Open Burning in Washington County

Harold Ruecker, Mayor of Hillsboro, stated he had asked to appear before the Advisory Committee to speak about the burning periods now allowed. He pointed out that the citizens of Hillsboro feel they have a different problem in the more rural atmosphere; for example, agricultural burning is allowed and can be occurring beside a piece of property which is not an agricultural operation and burning is not allowed. He stated he was also concerned about roadside dumping which goes on because open burning is not allowed, and that the Washington County Commissioners have failed to act on finding a solid waste disposal site in Washington County. Mayor Ruecker suggested an interim solution to this problem might be more frequent periods for burning throughout the year.

Charles Haney, Chairman of the Sub-committee on Open Burning and Solid Waste Disposal, stated his group had met and considered the staff report, dated 15 June 1972, which reviewed the spring burning period. After discussion the sub-committee concluded that there was no need for additional public hearings. Mr. Haney stated his sub-committee would be happy to meet with Mayor Ruecker to study the facts and determine if problems exist in Hillsboro which are different from those brought out at the public hearing held last year.

Mr. Nutting pointed out that Clackamas County had the same sort of problems as enumerated by Mayor Ruecker concerning Hillsboro. He added that his county has several privately operated landfill sites receiving other than garbage which operate well and are approved by the state agency.

Mr. Haney added that until the citizens of Washington County bring enough pressure on the Washington County Board of Commissioners, a dump site in Washington County will not be established.

Mr. Nutting added that he did not feel the Advisory Committee should consider any relaxation of the burning restrictions for the City of Hillsboro. This would not be fair unless it were done for the entire four-county area and this would be a large step backwards.

After considerable further discussion, it was agreed that Mayor Ruecker would arrange a meeting with the Washington County Board of Commissioners to urge that action be taken to develop solid waste disposal sites in Washington County. The sub-committee members would attend this meeting, and also Mr. Haney suggested Commissioners Ivancie and Stefani may be interested in meeting with the Washington County Commissioners.

#### Port of Portland - Airport Expansion Environmental Impact

Mr. Joel Rubey, Environmental Studies Manager of the Port of Portland, presented a preview of the progress made by the Port of Portland towards completing an environmental impact statement concerning the airport expansion.

He stated the reason for the environmental impact statement was to assure the public that all aspects of environmental impact caused by the airport expansion project have received complete and impartial analysis. He commented briefly on the purpose of the Citizens Steering Committee, the Citizens Resources Panel and the three university teams set up to aid the investigation and oversee the airport expansion project. The natural resources impact, the pollution impact and the socio-economic impact have been thoroughly investigated. He stated the major impacts caused by the airport expansion will be the hydrology of the Columbia River because of the quite large dredge and fill operation, reduction in noise exposure to a great number of people and an enlargement of the recreational capability of the river. Mr. Rubey commented on the arguments concerning what the effect of removing Sand Island will have on the erosion of the north shore of the river.

Concerning air pollution, Mr. Rubey reported that Dr. R. W. Boubel of Oregon State University, in his study, considered emission sources, types and quantities from the various types of aircraft, land vehicles, construction equipment and surface facilities such as heating and air conditioning systems. He investigated primary and secondary effects, cumulative and long range effects and possible adverse effects of emissions. He concluded the level of airport emissions will not exceed established standards with one possible exception; this exception could occur north of the airport entrance where a combination of high ground vehicular emissions, and high aircraft emissions could exceed established standards if strong inversion conditions prevail. Dr. Boubel suggested the chances of these events occurring simultaneously are very remote.

Mr. Rubey commented that the impact which he feels is most disturbing is that it has been estimated that in 1990 the vehicle ground transportation demand will exceed the capacity of the present and proposed roadway network by 7 times. That's just airport traffic. Some form of mass transportation to and from the airport will have to be developed. He commented briefly on some of the studies done concerning mass transportation systems for the airport traffic.

Mr. Rubey stated it is estimated the airport will last well into the next century and its ultimate capacity will be 15½ million passengers annually. Currently, the airport serves about 2½ million passengers annually.

In answer to Mr. Hanson's inquiry, Mr. Rubey stated that very little of the 13,000 acres either owned by the Port or affected by the airport expansion will be used for industrial development.

Mr. Rubey answered further questions and Chairman Johnson thanked him for his interesting presentation.

#### Publishers Paper Company

Wayne Hanson reviewed the staff report dated 26 June 1972, copies of which had been distributed to the Committee, concerning the request by Publishers Paper Company for an extension of their existing variance. He pointed out that the wigwam waste burner in Molalla does meet the DEQ standards, and the staff is recommending that the variance extension be granted under specific conditions. Mr. Hanson reviewed these specific conditions as listed in the 26 June 1972 staff report.

Carleton Whitehead stated that the variance sub-committee had met and considered a number of items, one of which was the Oregon Department of Environmental Quality's desire to have a special regulation for wigwam waste burners, and CWAPA's continuing policy that wigwam waste burners should be regulated along with other sources of particulate emission. After discussion, Mr. Whitehead moved, Mr. Nutting seconded and the motion carried to recommend to the Board of Directors that they reaffirm the existing policy on particulate emissions, applying the same standards to all sources of pollution, with the option of providing a variance for a specific period of time and subject to specific conditions, when a special circumstance warrants this action.

After discussion of the Publishers Paper variance extension request, Mr. Federici moved, Dr. Donnelly seconded and the motion carried to recommend to the Board of Directors they adopt the staff recommendation and grant this variance extension, with two exceptions; one, that the variance extension time be until 30 June 1973 and two, that Publishers Paper submit a report concerning the alternate disposal methods which are being investigated to the Authority by 31 December 1972.

Mr. Roy Ruel, Chief Engineer, Publishers Paper, stated he felt his company would have no objections to the conditions of the variance and the submission of a progress report by 31 December 1972.

#### Wasteco, Inc.

Mr. Hanson reported that Wasteco, Inc., a national manufacturer of pollution control equipment in Tualatin, has asked for a renewal of their variance to allow them to continue to operate and test experimental control atmosphere incinerators on their company property. Subject to certain conditions as outlined in the staff report of 23 June 1972, it is the staff recommendation the variance request be granted.



After discussion, Mr. Nutting moved, Mr. Federici seconded and the motion carried to recommend to the Board that the staff recommendation be adopted and the variance granted to Wasteco for a period ending 1 July 1973.

#### Beaver Lumber Company

Mr. Whitehead stated that the Department of Environmental Quality has reduced the period of the Beaver Lumber Company variance to 31 December 1972, the date that their improvements in burner operation are to be completed. The variance sub-committee considers this an unjustifiably short period of time for this variance and is prepared to recommend approval of another variance after progress has been made on the installation of their burner equipment. No action is required now, but an application is anticipated this fall.

Mr. Hanson reported that Beaver Lumber Company is not happy with the DEQ action. He added that he visited Beaver Lumber Company and assured them the Advisory Committee and staff would look upon a request for a variance extension favorably. Mr. Hanson stated the staff feels that a variance in this special condition is a much better route to take in our region than changing the rules on wigwam waste burners as the state agency has done.

#### Cedarwood Timber Company

Mr. Whitehead reported that the subcommittee recommends the Advisory Committee recommend to the Board of Directors that the matter of Cedarwood Timber Company be taken off the table and action be taken adopting the stipulation signed by Mr. Eddie Miller of Cedarwood Timber. After discussion, Mr. Federici moved, Mr. Nutting seconded and the motion carried to reaffirm the Advisory Committee recommendation of 4 May to the Board of Directors which recommends the Board adopt the stipulated order signed by Mr. Eddie Miller.

#### Other Matters

Mr. Fritz Fleischer stated that due to the closing of the Shell Chemical Plant in St. Helens and his relocation in California, it is necessary for him to resign from the Advisory Committee. Dr. Goss moved, Mr. Federici seconded and a resolution was passed extending appreciation to Mr. Fleischer for his years of dedicated service on the Committee and wishing him well on his new venture.

Mr. Federici suggested that Mr. Charles Haney, Chairman of the Sub-committee on Open Burning and Solid Waste be suggested by the Board of Directors for membership on the Department of Environmental Quality's Advisory Committee on Solid Waste Disposal. Mr. Federici moved, Mr. Nutting seconded and the motion passed to recommend to the Board that they urge the Director of DEQ to appoint Mr. Haney to his committee.

The meeting was adjourned at 5:00 p.m.

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY  
1010 N.E. Couch Street, Portland, Oregon 97232

BOARD OF DIRECTORS MEETING  
9:30 a.m., Friday, 21 July 1972  
Auditorium, Portland Water Service Bldg.

Present:

Board of Directors: Fred Stefani, Vice-Chairman  
A. J. Ahlborn  
Ben Padrow

*Publishers Paper*  
*pages 2-3*

Staff:

R. E. Hatchard, Program Director  
Wayne Hanson, Deputy Program Director  
Jack Lowe, Administrative Director  
Emory Crofoot, General Counsel

Others:

Walter Nutting, Vice Chairman, Advisory Committee  
Peter Schnell, Publishers Paper Company  
Nancy Stevens, Coalition for Clean Air  
Rick Reid, CH<sub>2</sub>M/Hill

Minutes

The meeting was called to order by Vice-Chairman Stefani and the minutes of the 16 June 1972 meeting were approved as recorded.

Advisory Committee Report

Mr. Nutting reported on the Advisory Committee meeting held 6 July; copies of the minutes of this meeting had been distributed to the Board members. He stated that the Advisory Committee adopted a statement recommended by the Subcommittee on Variances. The statement is as follows: "The Advisory Board notes with concern what appears to be an attempt to persuade CWAPA to change the particulate emission standards to provide a special less rigorous standard for wigwam burners. Any such policy change is considered both unnecessary and destructive of the air quality in this region. Therefore, the Advisory Board recommends to the Board of Directors of CWAPA that they reaffirm the existing policy on particulate emissions, applying the same standards to all sources of pollution, with the option of providing a variance for a specific period of time and subject to specific conditions, when a special circumstance warrants this action."

Mr. Nutting stated the Advisory Committee considered the variance requests of Publishers Paper Company and Wasteco, and the Beaver Lumber Company's variance which the Department of Environmental Quality had reduced in time to terminate 31 December 1972. Concerning Beaver Lumber Company, Mr. Nutting reported that the Advisory Committee decided, after discussion, they would look upon a variance extension request from Beaver Lumber Company favorably after 31 December 1972.

Mr. Nutting also reported that the Advisory Committee recommends to the Board that the Board of Directors adopt the stipulation signed by Mr. Eddie Miller, owner of Cedarwood Timber Company, concerning the operation of his wigwam waste burner. This matter had been tabled at a previous meeting by the Board of Directors.

Mr. Nutting reported that the Advisory Committee recommended the following persons to fill the three General Public vacancies on the Advisory Committee: Mrs. Betty Merten, Mr. A. McKay Rich and Mr. Kenneth Klarquist, Mrs. Melissa Shuping, with a fourth person recommended in the event one of the first three cannot serve. The Advisory Committee also recommended that Mr. Charles Haney be appointed to the Department of Environmental Quality's Advisory Committee on Solid Waste Disposal.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to accept the Advisory Committee's recommendations concerning the appointment of the new Advisory Committee members and recommend to D.E.Q. that Mr. Haney be appointed to the Advisory Committee on Solid Waste Disposal.

#### Variance Requests

##### Wasteco-Tualatin

The staff recommended in a report dated 23 June 1972 that a variance extension be granted to Wasteco, Inc., a national manufacturer of pollution control equipment, to allow the Company to test experimental control atmosphere incinerators on their company property in Tualatin. Mr. Nutting reported that the Advisory Committee concurs with the staff recommendation.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to grant the variance to Wasteco, Inc. until 1 July 1973, subject to the conditions as outlined in the staff report of 23 June 1972.

##### Publishers Paper Company - Molalla

This company has asked for an extension of the variance granted to them to operate a wigwam waste burner at their Molalla Division mill. In a staff report, dated 26 June 1972, it is recommended that this variance request be granted subject to certain conditions. Mr. Nutting stated the Advisory Committee concurs with the staff recommendation with two exceptions; one, that Publishers Paper should be asked to submit a progress report concerning the alternate disposal methods which are being investigated by the company by 31 December 1972; and two, that the variance period be only until 30 June 1973.

Mr. Pete Schnell, Publishers Paper, stated his company would be glad to submit a report by 31 December 1972; however, they would prefer to answer specific questions put to them by staff rather than simply submitting an open-ended report. Mr. Hanson stated the staff would have no objection to this.

Mr. Schnell commented on the state standard on wigwam waste burners. He stated that the state regulation allows a wigwam to be used for disposal only when no other method is available. He commented on the large volume of material being generated by mills throughout the state for which there are no means of disposal other than by burning. He stated that CWAPA should not ignore the request

of the Department of Environmental Quality to adopt the state regulations for wigwam waste burners. He stated that by not adopting the state regulations, CWAPA will deny the operators of modified wigwam burners access to the state's tax credit program.

Mr. Nutting pointed out that the CWAPA region was a very populated area compared to other areas of the state and the CWAPA region would be adversely affected with the particulate emissions if wigwam burners were allowed to operate in this region. He stressed the importance of meeting the federal ambient air standards by 1975. He added that the Advisory Committee feels granting a variance, when it is necessary, is a better route to take than adopting the state's special regulation for wigwam waste burners. Mr. Hatchard commented that he felt if CWAPA certified that a wigwam waste burner in our region was meeting the D.E.Q. waste burner regulations that they could be considered for tax credit consideration if the state is now approving waste burner modifications for tax benefits.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to accept the staff report and grant the variance request from Publishers Paper Company. Commissioner Stefani requested the staff to aid Publishers Paper Company in obtaining tax credit for the work done in modifying their wigwam waste burner in Molalla.

#### Oregon Portland Cement Company - Lake Oswego

Mr. Crofoot reported that a stipulation has been signed by Erik Voldback, 1st Vice President, Oregon Portland Cement Company which sets forth the additional air pollution control systems to be installed, certain practices to be discontinued and certain affirmative acts to improve dust control to obtain compliance with ambient air and emission standards. He reviewed briefly the actions to be taken by the Company as outlined in items I-IX of the proposed Order to be completed by 1 December 1973. It is the staff recommendation that the stipulation and Order be adopted by the Board of Directors.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to adopt the stipulation and enter the Order in the matter of the Oregon Portland Cement Company.

#### Barker Manufacturing Company - Portland

Mr. Hanson reported that Bruce W. Roemer, Vice President, Barker Manufacturing Company, 1100 N.E. 28th Avenue, Portland, has signed a stipulation to complete extensive changes in their operations to bring them into compliance with Authority rules. The stipulation is in two phases, the first to be completed by 1 January 1973 which will relocate and eliminate several cyclones and correct the paint overspray problems. Phase two is more complex and extensive and will involve a new collection system and is scheduled to be completed by 1 July 1974. He added the staff feels this is a fine program for control of a very difficult source.

Mr. Rick Reid of Cornell, Howland, Hayes, Merryfield and Hill, the engineering firm retained by Barker Manufacturing Company, stated the company was in full agreement with the stipulated dates.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion passed to approve the stipulation and enter the order in the matter of Barker Manufacturing Company.

#### Union Carbide Company - Portland

Mr. Hanson reported that Union Carbide has applied for approval to produce a different type of product in furnace #4. It is not possible at this time to ascertain whether the furnace will be able to meet emission standards using the new materials. They are asking to be allowed to try the new material. Mr. Hanson stated a consent and order have been prepared which basically says Union Carbide can start the furnace with the new material, and if an air pollution problem is created, they will reduce production and if additional control equipment does not correct the pollution problem, the operation will be shut down. This will allow the company to find out if this material can be used in this type of furnace or if another furnace must be designed.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to approve the Union Carbide Consent and Order.

#### Civil Penalties

Mr. Lowe presented a status report of civil penalties, stating that for the period 16 June through 20 July 1972, 7 civil penalties were imposed, totaling \$1450. A total of \$910 has been collected this year thus far. He stated there is only one delinquent penalty at this date.

In answer to Commissioner Padrow's inquiry, Mr. Hanson stated that Fred Meyer, Hollywood store has paid the first two civil penalties issued, but a third penalty has been issued in the amount of \$400 and Fred Meyer has now retained a consulting engineer to develop plans and specifications to bring this incinerator into compliance with authority rules. Mr. Hatchard reported that there have been many complaints from citizens concerning emissions from this store, and although Fred Meyer has been cooperative, and made many new installations and changes in their other installations, this store has presented specific problems. Commissioner Padrow asked that a status report on Fred Meyers, Hollywood store, be presented at the next meeting.

Mr. Crofoot stated that Leon A. Martin was issued a civil penalty for open burning. Mr. Martin has not filed a notice of appeal nor has he paid the penalty. He recommended that the Board authorize entry of a final order which in ten days will be put of record in the judgment docket as provided in statute.

Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion passed to authorize entry of a final order of the civil penalty against Leon A. Martin.

## Oregon Implementation Plan - Permit System

Mr. Hatchard briefly reviewed the development of the permit system by the three regional authorities and the Department of Environmental Quality. A hearing was held July 1972 on the permit system, at which time CWAPA recommended several changes. One change which CWAPA felt important was to reduce the fees in three categories which are felt to be too high. The second change concerns part of the permit fee regulation which moves jurisdiction from CWAPA to the state agency. Mr. Hatchard stated that unless this jurisdiction change was deleted, CWAPA would be unable to operate and enforce the permit fee system. He added that CWAPA feels this change is contrary to the intent of the Oregon Legislature when they passed legislation authorizing the permit system.

Commissioners Padrow, Stefani and Ahlborn each stated that their Boards of County Commissioners, when reviewing their financial contributions to CWAPA, felt that if the state agency was taking over the control of the regional agency, then their counties should no longer contribute to the regional authority. Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to direct a letter to the Department of Environmental Quality recommending strongly that jurisdiction within the CWAPA region for administration of the permit fee system be given to CWAPA, not retained by the state agency.

## Motor Vehicle Emission Reduction Plan

Mr. Hatchard presented a progress report on the development of the motor vehicle emission reduction plan. By 1 September 1972 the City of Portland must have approved by D.E.Q. a program to comply with the Federal ambient air standards by 1975. This work is underway with the City of Portland Traffic Engineer and Transportation Coordinator. He stated that the plan is developing and has real promise of meeting the requirements.

## Particulate Monitoring System

Mr. Hatchard reported that responsibilities are assigned CWAPA in the state's implementation plan which require approximately \$19,000 of new sampling and data equipment. Because of budget problems, this money is not available now in the regular CWAPA budget. Mr. Hatchard pointed out that if the permit system is put into operation, it may be possible for the Board to consider a supplemental budget and CWAPA will be able to meet these responsibilities.

Mr. Hatchard stated one of the pieces of equipment is a continuous recording device which is proposed to be located in the Lake Oswego area. He called the Board's attention to a letter from the West Clackamas County League of Women Voters urging that this equipment be purchased to aid the Authority in meeting the ambient air standards in the Lake Oswego area.

## Other Matters

Washington County - In answer to Commissioner Padrow's inquiry, Mr. Crofoot gave a status report of the litigation with Washington County concerning their financial contribution to CWAPA. He stated that the litigation may continue for some time.

EPA Grant Award - Mr. Hatchard reported that the Environmental Protection Agency cut the grant to CWAPA by \$10,000 on the basis that CWAPA has overbudgeted in previous years. Mr. Hatchard stated CWAPA has written to EPA explaining why it appeared CWAPA over-budgeted in previous years and stressing the urgency of restoring the full grant funds to CWAPA, in order that the CWAPA program can be maintained.

CWAPA Rules - Mr. Hatchard called the Board's attention to copies of the new rules of the authority, effective 1 July 1972, which are in a new format, corresponding with the formats of the state agency's rules and rules of the other two regional authorities in the state.

The meeting was adjourned at 11:10 a.m.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

### MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: Director

SUBJECT: Agenda Item G c, October 4, 1972, EQC Meeting

Columbia-Willamette Variance to J. C. Compton Paving Co.  
at Alder Creek

#### Background:

On September 20, 1972, J. C. Compton Co. requested a variance through October 20 from Columbia-Willamette Air Pollution Authority from emission standards and notice of construction requirements, in order to allow the addition of a dry drum at the company's Alder Creek site. The request was made in order to increase the capacity of the portable asphaltic paving plant at the site to complete work on the Alder Creek-Wildwood section of the Mt. Hood Highway before winter weather sets in. The construction zone frequently crosses the existing roadway, and the disruption of traffic and consequent hazard during poor weather are of concern to both Compton Co. and CWAPA. Compton Co. stated in the variance request their willingness to cease operation of the drum if CWAPA so requests.

A telephone vote on the matter was conducted on September 21 by the CWAPA Board of Directors, and the request was approved, with formal action to take place at the Directors' regular meeting on October 20.



The variance as approved has been forwarded for Department review and Commission action.

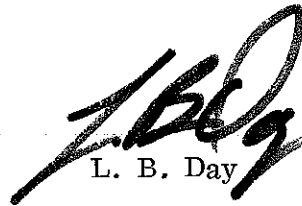
Analysis:

Operation of the dry drum and associated conveyers may exceed CWAPA emission standards, and CWAPA requirements for Notices of Construction and concomitant plan review cannot be met in such a short time. The relatively remote site of the plant minimizes the possibility its emissions would cause a nuisance.

The variance as approved is adequately conditioned to protect the public health and welfare.

Director's Recommendation:

The Director recommends the CWAPA variance to J. C. Compton Co. paving plant at Alder Creek be approved as submitted.

  
L. B. Day

# J. C. COMPTON COMPANY

Highway Construction



General Contractor's

P. O. BOX 86

McMINNVILLE, OREGON 97128

September 20, 1972

Mr. Wayne Hansen  
Columbia-Willamette Air-Pollution Authority  
1010 NE Couch Street  
Portland, Oregon 97232

Dear Mr. Hansen:

We would like to request a variance of notice of construction and emission standards at our paving site on the Alder Creek to Wildwood section of the Mt. Hood highway.

Our request is to be allowed to set up the dry drum that goes with our Standard plant and use the burner only on this drum. This would allow us to pre-heat the rock so that we can increase our production in the Pioneer paving plant. It is of the utmost importance that we complete this job before the weather gets too bad so that the road will be open for the winter traffic.

It is our request that this variance be granted until the 20th of October; and if for any reason that our emissions from this pre-drying drum are greater than your expectations and you wish to cease operation of the drum, we will at your request.

Your understanding and cooperation on this project has been much appreciated.

Sincerely,

J. C. COMPTON CO.

*John C. Compton*  
John C. Compton  
President

ROUTING	
To	Noted by
	<i>WCH</i>
From:	
Action:	

JCC:sb

SEP 21 1972  
PORTLAND, OREGON

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

25 September 1972

J. C. Compton Company  
P.O. Box 86  
McMinnville, Oregon 97128

Attention: John C. Compton, President

## BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

Gentlemen:

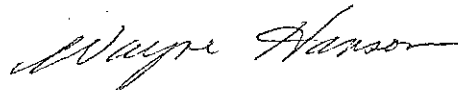
This is to confirm receipt of your variance request dated 20 September 1972 concerning the installation of a dry drum at your asphalt plant at Alder Creek and to confirm our telephone conversation of 21 September 1972.

Your variance request was reviewed and approved by telephone with our Board of Directors on 21 September 1972 with the following conditions:

1. The variance is to terminate 20 October 1972;
2. The J. C. Compton Co. will cease or limit operation of the pre-drying drum and associated conveyor belt system upon notification from the Authority staff such action is necessary for the protection of public health or welfare.

Your variance request and our Authority staff report has been forwarded to the Department of Environmental Quality for their consideration and will be presented to our Advisory Committee for informational purposes on 5 October 1972 and for formal adoption to our Board of Directors on 20 October 1972.

Very truly yours,



Wayne Hanson  
Deputy Program Director

WH:sm

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

22 September 1972

Department of Environmental Quality  
1234 S.W. Morrison  
Portland, Oregon 97232

Attention: ~~Harold Patterson, Director~~  
Air Quality Control Division

## BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

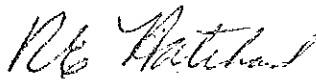
Richard E. Hatchard  
Program Director

Gentlemen:

As discussed with your staff enclosed is the variance request and staff report for the J. C. Compton Co.

On the 21 September 1972 approval was granted by our Board of Directors (telephone vote) for the variance request as per the staff recommendations. The variance request and staff report will be presented to our Advisory Committee for informational purposes on 5 October 1972 and to our Board of Directors on 20 October 1972 for formal adoption.

Very truly yours,



R. E. Hatchard  
Program Director

REH:whj

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

1010 N.E. COUCH STREET PORTLAND, OREGON 97232 PHONE (503) 233-7176

20 September 1972

## BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

## MEMORANDUM

TO: Board of Directors

FROM: E. B. Hinchard, Program Director

SUBJECT: Variance request, J. C. Compton

Gentlemen:

On 20 September 1972 the J. C. Compton Co. requested a variance from Title 21 (Notice of Construction) and Title 22 (Emission Standards) of the Columbia-Willamette Air Pollution Authority Rules.

As described in the attached variance request the J. C. Compton Co. wishes to install a dry drum at their asphalt plant near Alder Creek for the purpose of pre-heating rock to increase production at their existing plant.

Essentially the process or it pertains to the variance request consists of a drum where rock is heated with butane so moisture can be removed. The partially dried rock is then transferred via conveyor belt to the existing plant to be used in asphalt production. Although it is our understanding this process has been used in the State of Washington, our staff is not aware of any similar operations within our region.

### Staff Evaluation

1. Dust emissions from the dry drum and transfer points on the conveyor could exceed that allowed by the Authority Rules.

2. The remote location of the plant is such that the staff would not anticipate the construction and operation of the facilities to create a public nuisance or generate public complaint.

3. Weather conditions at this time of the year may be such that without the additional drying equipment the paving of the Mt. Hood Highway could be delayed resulting in a substantial curtailment of the J. C. Compton Co. operation and adversely affecting public safety and welfare.

4. The operation of the proposed equipment will provide air quality information not presently available that may be utilized for future proposed installations.

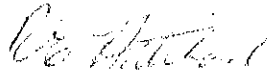
MEMORANDUM  
Page 2  
Board of Directors

Staff Recommendation

It is the Authority staff recommendation a variance be granted to the J. C. Compton Co. as requested with the following conditions:

1. The variance terminate 20 October 1972.
2. The J. C. Compton Co. will cease or limit operation of the pre-drying drum and associated conveyor belt system upon notification from the Authority staff such action is necessary for the protection of public health or welfare.

Respectively submitted,

  
R. E. Hatchard

REH:js



# DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

## MEMORANDUM

TO: Environmental Quality Commission

FROM: Director

SUBJECT: Agenda Item H, October 4, 1972, EQC Meeting

Statewide Solid Waste Management Action Plan: Status Report

### BACKGROUND

On April 21, 1972, the EQC approved a proposal to develop a statewide solid waste management implementation plan based on individual regional plans to be prepared for each of the 14 State Administrative Districts. The actual planning is to be done by the local government units best prepared to carry forth the planning at this time and DEQ will provide planning grants from the Pollution Control Bond Fund to finance each regional effort.

In May the proposed planning concept was presented to representatives of state administrative district Councils of Governments and to the State Solid Waste Management Citizens' Advisory Committee (CAC). The CAC officially endorsed the planning concept and staffing budget on May 16, 1972 and recommended that the Director present it to the Emergency Board for approval.

At its regular meeting on May 26, 1972 the Emergency Board approved the proposed planning concept and a \$58,942 budget to add three DEQ staff positions and support services, including approved expenses of the CAC.

### PRESENT STATUS

The Department has developed a proposed detailed planning task program for each of thirteen Solid Waste Management Regions of the state and presented it to those regions in a series of individual county

and regional meetings. County and regional representatives were asked to use the proposed task programs as a basis for developing their own request for planning funds to enable interim and long range planning for implementation of improved solid waste management systems which maximize recycling, resource recovery and reutilization.

These requests were due to be submitted to the Department by October 1, 1972 and to contain the following:

1. Determination of whether the actual plan development will be done by:
  - (a) County Planning staff, assisted by sanitarian and public works staff,
  - (b) Regional planning staff (COG),
  - (c) DEQ Solid Waste Management planning staff, including consultants from other appropriate state agencies,
  - (d) Private consultant, or
  - (e) A combination of the above.
2. Determination of who will implement the plan and the relationship between planning and implementing authorities.
3. Determination of an adequate, itemized amount of funds to finance this planning, including consideration for available county and federal funds, and request financing from the state (DEQ) of the balance needed for this planning program.
4. Written concurrence with the task program and agreement to pursue it, including designation of items 1, 2, and 3 above to DEQ.

The CAC has appointed five subcommittees assigned to study particular aspects of the solid waste management problem. These include Short Range Needs, Long Range Needs, Public Relations and Acceptance, Special Wastes, and Research and Development. On September 28 and 29, 1972 the Short and Long Range Needs Subcommittees of the Citizens' Advisory Committee began a joint review of the individual planning proposals and funding requests by local government, with DEQ staff assistance. For those few counties not heard from by October 1, 1972, the Department is estimating the planning requirements and costs. At this time the estimated statewide interim planning fund request from state bonds is expected to be about \$1,000,000.



SCHEDULE

The following work schedule and target dates for the Department and CAC has been established to secure funding of the statewide planning program before the 1973 Legislative session:

By October 9, 1972

The CAC Subcommittees, assisted by Department staff, should complete review, modification and approval of all local planning fund requests and assemble them as 13 regional proposals within a statewide action plan proposal.

By October 23, 1972

The full CAC should complete the review and approval of the Subcommittees recommended draft of the statewide action plan proposal.

By November 3, 1972

The Executive Committee of the CAC should present the final draft of the statewide action plan proposal to the Department Director.

By November 17, 1972

The final CAC draft of the plan proposal with the Director's recommendation should be forwarded to the State Emergency Board.

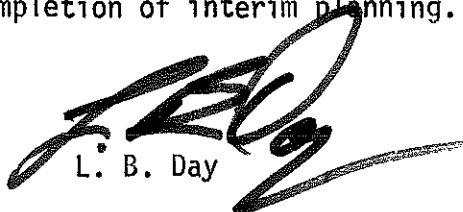
On December 7 and 8, 1972

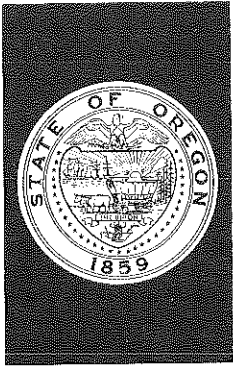
The request for funding of statewide solid waste planning should appear on the agenda of the State Emergency Board.

By January 1, 1973

Assuming E Board approval of funds, the Department should give final review to applications for planning funds, make final agreements with local governments and allocate funds to local government for completion of interim planning by July 1, 1973.

During the planning period, solid waste disposal permits will be written for all existing disposal sites to support the consolidation and upgrading of each region's disposal system within the context of the developing regional plan. All disposal sites must be in compliance with Department rules and regulations or on a compliance schedule by July 1, 1973, coincident with the completion of interim planning.

  
L. B. Day



## DEPARTMENT OF ENVIRONMENTAL QUALITY

TERMINAL SALES BLDG. • 1234 S.W. MORRISON ST. • PORTLAND, OREGON 97205

TOM McCALL  
GOVERNOR

September 26, 1972

L. B. DAY  
Director

ENVIRONMENTAL QUALITY  
COMMISSION

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

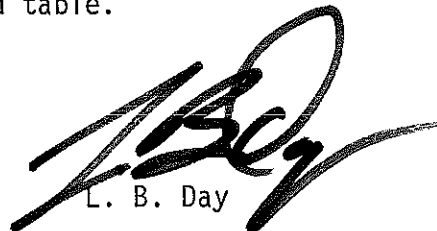
GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item No. I, October 4, 1972 EQC Meeting

Tax Credit Applications

Attached are review reports on 7 Tax Credit Applications.  
These applications and the recommendations of the Director are  
summarized on the attached table.



L. B. Day

HLS:ak

TAX CREDIT APPLICATIONS

<u>Applicant</u>	<u>Appl. No.</u>	<u>Facility</u>	<u>Claimed Cost</u>	<u>% Allocable to Poll. Control</u>	<u>Director's Recommendation</u>
Little River Box Co.,Glide Willamette Industries, Inc. - (Duraflake), Albany	T-243	Wigwam burner modification	\$ 11,825.00	80% or more	Issue
Weyerhaeuser Co. - Wood Products Manuf.,N.Bend	T-360	Dust Collectors	138,975.69	80% or more	Issue
Weyerhaeuser Co. - Wood Products Manuf.,N.Bend	T-362	Wood Dust Radar Filter Unit	24,006.00	80% or more	Issue
Weyerhaeuser Co. - Wood Products Manuf.,N.Bend	T-363	Piping to the sanderdust collector	3,204.00	80% or more	Issue
Weyerhaeuser Co. - Wood Products Manuf.,N.Bend	T-364	Wood Hog System	167,042.00	80% or more	Issue
3-G Lumber Co. - Wren Division, Philomath	T-367	Wood trim & sawdust processing & handling system to eliminate wigwam burner	110,640.04	80% or more	Issue
Herbert Malarkey Roofing Co., Portland	T-375	Asphalt fume collection & incinerating system	114,880.60	80% or more	Issue

HLS:ak

September 26, 1972

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
TAX RELIEF APPLICATION REVIEW REPORT

Applicant

Little River Box Company  
P. O. Box 88  
Glide, OR 97433

The applicant operates a sawmill at Glide, Oregon.

This application was received August 27, 1971.

Description of Claimed Facility

The facility claimed in this application is described as a modification of a wigwam waste burner and consists of the following:

1. Top Damper
2. Under-fire and Over-fire air systems
3. Ignition system
4. Temperature recording system
5. Automatic control system

The claimed facility was completed and put into service in July, 1971.

Certification must be made under the 1969 act because construction was not started until June 1, 1971, and the percentage claimed for pollution control is 100%.

Facility Costs \$11,825.00 (Cost verification was provided.)

Evaluation of Application

This facility was installed in accordance with an approved compliance program and approved plans and specifications.

The completed modified wigwam waste burner was demonstrated to the Department as being capable of continuous operation in compliance with OAR, Chapter 340, Section 25-020.

This modification to the wigwam waste burner has reduced emissions of particulate matter by an estimated 78 tons/year and CO emissions by 187 tons/year.

Conclusions

This facility does operate satisfactorily and did reduce emissions of particulate matter and CO by an estimated 265 tons/year.

Directors Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$11,825.00 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-243.

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
TAX RELIEF APPLICATION REVIEW REPORT

---

Applicant

Willamette Industries, Inc.  
Duraflake Company  
1002 Executive Building  
Portland, OR 97204

The applicant operates facilities at Albany for the production of particleboard.

This application was received May 15, 1972. The report from the Mid-Willamette Valley Air Pollution Authority was received August 7, 1972.

Description of Claimed Facility

The facility in this application is used to control particulate emissions from four Heil particle dryers and is described as consisting of the following:

Four (4) Type R American Air Filter wet centrifugal dust collectors.

The facility was completed and put into service in January, 1972.

Certification is claimed under the 1969 act and percentage claimed for pollution control is 100%.

Facility Costs: \$138,975.69 (Accountants' certification was provided).

Evaluation of Application

The facility was required by the Mid-Willamette Valley Air Pollution Authority as stated in their letter dated August 7, 1972. The Authority did review and approve the plans and specifications and has inspected the completed installation.

The facility enabled the company to control the particulate matter previously discharged into the atmosphere from the cyclones mounted on the Heil dryers. If operations of the new wet centrifugal dust collectors is assumed to be at least 90% efficient, the reduction of particulate emissions would be at least 342 tons/year since particulate emissions from the previously uncontrolled cyclones was 380 tons/year.

The company will not be able to earn any return on this investment.

It is concluded that this facility does operate satisfactorily and did reduce particulate emissions to the atmosphere by at least 342 tons/year.

Directors' Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$138,975.69 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-360.

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
TAX RELIEF APPLICATION REVIEW REPORT

Applicant

Weyerhaeuser Company  
Wood Products Manufacturing  
P. O. Box 389  
North Bend, OR 97459

The applicant operates facilities at North Bend that produce plywood, particle-board and wood products.

This application was received May 16, 1972.

Description of Claimed Facility

The facility claimed in this application for control of wood dust is described to consist of a Radar WR-144-LPC filter unit.

The facility was completed and put into service in March, 1971.

Certification is claimed for pollution control is 100%.

Facility cost: \$24,006.00 (accountants' certification was provided).

Evaluation of Application

This facility was installed as part of the company's approved compliance program to reduce particulate emissions to the atmosphere.

The Radar WR-144LPC filter unit was mounted on an existing 13 ft. diameter cyclone on the sanderdust system. This installation has reduced particulate emissions by approximately 252 lbs/hour or approximately 400 tons/year.

It is concluded that this installation operates as planned and does reduce particulate emissions to the atmosphere by approximately 400 tons/year.

Directors Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$24,006 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-362.

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
TAX RELIEF APPLICATION REVIEW REPORT

---

Applicant

Weyerhaeuser Company  
Wood Products Manufacturing  
P. O. Box 389  
North Bend, OR 97459

The applicant operates facilities at North Bend that produce plywood, particle-board and other wood products.

This application was received May 16, 1972.

Description of Claimed Facility

The claimed facility which was installed to control dust emissions from use bins, is described to consist of piping from the use bin to the sanderdust collector. (The sanderdust collector is not claimed in this application.)

The facility was completed and put into use in December, 1970.

Certification is claimed under the 1969 act and percentage claimed for pollution control is 100%.

Facility Costs: \$3,204.00 (Accountants' certification was provided).

Evaluation of Application

This facility was installed as a part of the company's approved compliance program to reduce emissions to the atmosphere.

This facility enabled the company to seal the existing vents on the use bin at the versaboard plant and feed the wood dust into the sanderdust collecting system.

The company will not be able to earn any significant return on this investment.

It is concluded that this facility does work as planned and has eliminated the discharge of particulate matter from the use bins to the atmosphere.

Directors Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$3,204 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-363.

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
TAX RELIEF APPLICATION REVIEW REPORT

---

Applicant

Weyerhaeuser Company  
P. O. Box 389  
North Bend, OR 97459

The applicant operates a wood products manufacturing plant at North Bend, Oregon.

This application was received May 16, 1972.

Description of Claimed Facility

The claimed facility is described to be a wood hog system to enable the phase-out of the wigwam waste burner and consists of the following:

1. Jeffery 42 x 48, Type B, Serial #11025 Wood Hog
2. Feed Conveyor
3. Discharge Conveyor
4. Electrical power center.

The facility was completed and put into operation in November, 1970.

Certification is claimed under the 1969 act and the percentage claimed for pollution control is 100%.

Facility Costs: \$167,042 (Accountants' certification was provided).

Evaluation of Application

This facility was installed in accordance with an approved compliance program and plans and specifications were approved by the Department.

The completed facility has been inspected by the Department and has enabled the company to phase-out all operation of their wigwam waste burner.

This facility, through the phase-out of the wigwam waste burner, has resulted in a reduction of emissions of particulate matter by an estimated 183 tons/year. Reduction of CO emissions are estimated to be 383 tons/year.

Conclusions

This facility does operate satisfactorily and did accomplish the phase-out of the wigwam waste burner. This reduced emissions of particulate matter and CO by an estimated 566 tons/year.

Directors Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$167,042 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-364.



State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
TAX RELIEF APPLICATION REVIEW REPORT

---

Applicant

3-G Lumber Company  
Wren Division  
Route 1, Box 23-G  
Philomath, OR 97370

The applicant operates a sawmill for the manufacture of lumber at Philomath, Oregon.

This application was received June 15, 1972. The report from Mid-Willamette Air Pollution Authority was received August 1, 1972.

Description of Claimed Facility

The claimed facility is a wood trim and sawdust processing and handling system which eliminated a wigwam waste burner. The facility is described to consist of the following:

1. C. M. & E. Morman 48 Chipper complete with electric motors and controls.
2. Two (2) Peerless 30 unit storage bins
3. Conveyors to feed chipper, from chipper to screens and from screens to storage bins including electric drive system and controls.
4. Buildings to house chipper and screens.

The facility was completed and put into service in October, 1971.

Certification is claimed under the 1969 act and percentage claimed for pollution control is 100%.

Facility Costs: \$110,640.04 (Accountants' certification was provided).

Evaluation of Application

The facility was installed in accordance with an approved compliance program required by the Mid-Willamette Valley Air Pollution Authority. In the letter dated August 1, 1972, the Authority stated that a modified wigwam waste burner was not considered a feasible alternative for the company and that the agency did not review plans and specifications for the claimed facility because the installation would not be a significant air pollution source.

The facility did enable the company to phase-out the wigwam waste burner by converting pieces of wood waste into chips and by separating the sawdust from the other wood waste residues. After chipping and sorting, the wood waste residues can be stored in bins until such time as they are shipped.

The company will not be able to earn a return on their investment according to information supplied with this application.

It is concluded that the facility does operate in a satisfactory manner and did enable the company to phase-out the wigwam waste burner and thereby make an approximate reduction in the emissions of particulate matter of 27.2 tons/year and a reduction of CO emissions of 91.2 tons/year.

Directors Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$110,640.04 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-367.

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
TAX RELIEF APPLICATION REVIEW REPORT

---

Applicant

Herbert Malarkey Roofing Company  
3131 North Columbia Boulevard  
P. O. Box 17217  
Portland, OR 97217

The applicant operates a tar paper and composition shingle manufacturing plant in Portland.

This application was received June 20, 1972. The report from the Columbia-Willamette Air Pollution Authority was received August 18, 1972.

Description of Claimed Facility

The claimed facility is an asphalt fume collection and incinerating system to control visible emissions and fumes and consists of the following:

1. Rommco 100-29, Fume Incinerator of 10 million BTU capacity using either natural gas or oil fuel.
2. Fume collecting ductwork and fan.
3. Saturator Hood enclosure.

The facility was completed and placed in service in May, 1971.

Certification is claimed under the 1969 act and the percentage claimed for pollution control is 100%.

Facility Costs: \$114,880.60 (Accountant's Certification was provided).

Evaluation of Application

The Columbia-Willamette Air Pollution Authority report states that the company had voluntarily initiated action to control visible emissions and fumes being discharged to the atmosphere when the authority met with the company in September, 1969. The Authority reviewed and approved the installation and made a final inspection of the completed project in May and August, 1971. At that time the Authority determined that the facility did operate as planned and that the company was operating in compliance with the Authority's rules and regulations.

The facility did enable the company to control visible emissions and fumes from the asphalt coating and dipping operations. Previous uncontrolled emissions were registered as 67.6 Tons/year. With a reasonable assumed efficiency of 98% for the afterburner, emissions would be reduced to 6.63 Tons/year for a total reduction of particulate emissions of more than 60 Tons/year.

The company will not be able to earn any return on this investment.

Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$114,880.60 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-375.