

6/8/1972

**OREGON
ENVIRONMENTAL QUALITY
COMMISSION MEETING
MATERIALS**



State of Oregon
**Department of
Environmental
Quality**

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AGENDA

Environmental Quality Commission Meetings

June 8, 1972

Bend High School Auditorium

230 East 6th Street, Bend, Oregon

2:00 p.m.

- A. Minutes of April 21, 1972 Meeting
- B. Project Plans for April 1972
- C. City of Wasco Sewage Treatment
- D. Weyerhaeuser Company (Air Quality Compliance Schedules)
- E. Winchester Bay Sanitary District (Staff Report)
- F. Oil Spill Regulations (Final Adoption)
- G. Civil Penalties
- H. Revisions to Oregon's Clean Air Act Implementation Plan
- I. Tax Credit Applications
- J. Ponderosa Mouldings, Redmond (Request for Variance)
- K. Coin Millwork, Prineville (Request for Variance)
- L. Beaver Lumber Co., Clatskanie (Request for Variance)
- M. U.S. National Bank Building, Portland (Request for approval of parking facilities)

7:00 p.m.

- N. Hearing re: Amendment of regulations pertaining to Section 41-022
IMPLEMENTATION OF TREATMENT REQUIREMENTS AND WATER QUALITY STANDARDS
and REGULATIONS PERTAINING TO WASTE DISCHARGE PERMITS
- O. Bend-Redmond-Madras Sewerage Programs
- P. Bend-Prineville-Redmond Area Air Quality Control (Status Report)
- Q. Brooks-Scanlon, Bend, Boiler Stack Emission Control Program
- R. Brooks-Scanlon, Bend, Log Debris Control Program

June 9, 1972

Memorial Hall, Courthouse

513 Center Street, Lakeview, Oregon

2:30 p.m.

- S. Alkali Lake Waste Disposal Site (Status Report)
- T. Air Quality Control - Lakeview & Klamath Falls Areas (Status Report)
- U. Lake Ewauna and Klamath River - Log Debris Control Program (Status Report)
- V. Columbia Plywood Corporation, Klamath Division - Log Debris Control

MINUTES OF THE THIRTY-FIFTH MEETING
of the
Oregon Environmental Quality Commission
June 8-9, 1972

The thirty-fifth regular meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 2:00 p.m., Thursday, June 8, 1972, in the Auditorium, Bend High School, 230 E. 6th Street, Bend, Oregon. All members were present including 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, Deputy Director; Harold M. Patterson, Air Quality Control Division Director; Harold L. Sawyer, Water Quality Control Division Director; Fred M. Bolton, Field Services Division Director; C. Kent Ashbaker, Bend District Engineer; Patrick Wicks, Supervising Engineer, Environmentally Hazardous Wastes Program; H.H. Burkitt, Associate Engineer; Glen D. Carter, Water Quality Analyst; Barbara J. Seymour, Information Director; and Rob Haskins, Legal Counsel.

Forty government officials and staff members, representatives of industry and the general public were in attendance and signed the meeting register.

MINUTES OF APRIL 21, 1972

It was MOVED by Mr. Harms, seconded by Mr. McMath and carried that the minutes of the thirty-fourth regular meeting of the Commission held in Portland on April 21, 1972 be approved as prepared.

PROJECT PLANS FOR APRIL 1972

It was MOVED by Mr. McMath, seconded by Mr. Waterman and carried that the actions taken by the Department during the month of April 1972 as reported by Mr. Weathersbee regarding the following 36 domestic sewerage, 4 industrial waste, 39 air quality control and 0 solid waste disposal projects be approved:

Water Quality Control

| <u>Date</u> | <u>Location</u> | <u>Project</u> | <u>Action</u> |
|--------------------------------|-------------------------------------|-------------------------------|---------------|
| <u>Municipal Projects (36)</u> | | | |
| 4/3/72 | East Salem Sewer & Drainage Dist. I | Lancaster Drive sewer | Prov. app. |
| 4/5/72 | Keizer Sewer Dist. | Northwood Park #4 | Prov. app. |
| 4/5/72 | Lake Oswego | Mt. Park Phase 5A - pump sta. | Prov. app. |
| 4/5/72 | Mt. Angel | North Pershing St. sewer | Prov. app. |
| 4/5/72 | Troutdale | Lady Ann Addn. Subd. sewers | Prov. app. |

Water Quality Control - continued

| <u>Date</u> | <u>Location</u> | <u>Project</u> | <u>Action</u> |
|-------------|-------------------------------------|---|---------------|
| 4/6/72 | Wilsonville | Willamette River Crossing and Addendum No. 1 | Prov. app. |
| 4/10/72 | Columbia County | Dikeside Moorage sewage treatment plant | Prov. app. |
| 4/10/72 | Wilsonville | Charbonneau pump station | Prov. app. |
| 4/10/72 | Wilsonville | Willamette River Bridge Crossing, Addenda 2 and 3 | Approved |
| 4/10/72 | Gresham | Change Orders #4 and 5 | Approved |
| 4/10/72 | Portland | Linnton Interceptor Addenda 4 and 5 | Approved |
| 4/10/72 | Portland | Linnton Interceptor revisions | Approved |
| 4/10/72 | USA (Beaverton) | Greenway Subdivision sewers | Prov. app. |
| 4/10/72 | USA (Aloha) | Augusta Meadows sewers | Prov. app. |
| 4/10/72 | Multnomah County | Inverness system - Airport pump station | Prov. app. |
| 4/10/72 | Garibaldi | Sewage treatment plant and outfall (0.5 MGD activated sludge) | Prov. app. |
| 4/11/72 | Sunriver | Mt. Village East Phase 3 & Mt. Village West Phase I sewers | Prov. app. |
| 4/12/72 | Salem | Twelfth Street sewer | Prov. app. |
| 4/12/72 | USA (Metzger) | Greenburg Road sewer | Prov. app. |
| 4/12/72 | Sunriver | Meadow Houses North Phase I through IV sewers | Prov. app. |
| 4/13/72 | Gresham | Sludge conditioning at sewage treatment plant | Prov. app. |
| 4/13/72 | Astoria | Addendum No. 1 (sewage treatment plant) | Approved |
| 4/13/72 | Wilsonville | Charbonneau pump station Addenda 1 and 2 | Approved |
| 4/18/72 | Oak Lodge San. Dist. | Mark Terrace Subd. sewers | Prov. app. |
| 4/18/72 | Gresham | Halsey Street sewer | Prov. app. |
| 4/19/72 | Seaside | Sewage treat. plant upgrading | Prov. app. |
| 4/19/72 | Bunker Hill San. D. | Flanagan sewer | Prov. app. |
| 4/25/72 | Salem | Mulligan Court sewer | Prov. app. |
| 4/25/72 | Astoria | Addendum No. 3 | Approved |
| 4/25/72 | USA (Metzger) | Greenway Subdivision, Phase III sewers | Prov. app. |
| 4/25/72 | Tualatin | 65th Avenue sewer | Prov. app. |
| 4/25/72 | USA (Sunset) | Bluffs Subdivision sewers | Prov. app. |
| 4/25/72 | East Salem Sewer & Drainage Dist. I | Oak Park, Phase II sewers and Walker Road sewer | Prov. app. |
| 4/27/72 | Troutdale | Beaver Creek Interceptor, Change Order No. 2 | Approved |
| 4/28/72 | North Roseburg Sanitary District | Newton Creek interceptor extension No. 2 | Prov. app. |
| 4/28/72 | Woodburn | Landau Estates sewers | Prov. app. |

Water Quality Control - continued Industrial Projects (4)

| <u>Date</u> | <u>Location</u> | <u>Project</u> | <u>Action</u> |
|-------------|-----------------|---|---------------|
| 4/11/72 | Oakridge | Pope and Talbot effluent and drainage control system | Prov. app. |
| 4/13/72 | Springfield | Weyerhaeuser Company hydraulic barker effluent piping | Prov. app. |
| 4/26/72 | Tualatin | Hervin Company cooling water diffuser | Prov. app. |
| 4/26/72 | North Portland | Crown Zellerbach Flexible Packaging pretreatment and future city sewer connection | Prov. app. |

Air Quality Control

| <u>Date</u> | <u>Location</u> | <u>Project</u> | <u>Action</u> |
|-------------|-----------------|--|--|
| 4/3/72 | Douglas Co. | Highway Project: Mystic Creek-Camas Valley Section, Coos Bay-Roseburg Highway; Notice of intent to apply for Federal aid | No comment |
| 4/3/72 | Deschutes Co. | Highway Project: Canal Blvd.-South, Railroad Blvd. FAS 926 Redmond; Notice of intent to apply for Federal aid | No comment |
| 4/3/72 | Malheur Co. | Highway Project: Ontario-Carro Jct. Olds Ferry - Ontario Highway; Notice of intent to apply for Federal aid | No comment |
| 4/3/72 | Multnomah Co. | Highway Project: S.W. Capitol Highway-N. Tigard Interchange, Pacific Highway (I-5); Notice of intent to apply for Federal aid | Requested OSHD to have CWAPA make review of proposal |
| 4/3/72 | Lincoln Co. | Highway Project: Oregon Coast Highway, Waterline Dr., Review of draft Environmental Impact Statement | No comment |
| 4/3/72 | Lane Co. | Highway Project: Santa Clara Eugene Section, Eugene-Junction City Highway; Notice of intent to apply for Federal aid, review of draft Environmental Impact Statement | Requested OSHD to have LRAPA make review of proposal |
| 4/3/72 | Multnomah Co. | Airport Expansion: Acquisition of land for airport expansion of Portland International Airport | No comment |

Air Quality Control - continued

| <u>Date</u> | <u>Location</u> | <u>Project</u> | <u>Action</u> |
|-------------|-----------------|---|---|
| 4/3/72 | Washington Co. | Airport Master Planning Grant, Hillsboro Airport | No comment |
| 4/3/72 | Clackamas Co. | Water & Sewer Facilities, Clackamas County Service District #1 | No comment |
| 4/4/72 | Douglas Co. | Green Valley Lbr. Co. Plans and specifications for modification of WWB | Approved |
| 4/4/72 | Lake Co. | Lakeview Lumber Co. Compliance program and schedule for either phase out or modification of WWB | Approved |
| 4/4/72 | Lake Co. | Oregon Windor Co., Inc. Compliance program and schedule for phase out of WWB | Approved |
| 4/7/72 | Marion Co. | Boise Cascade Corp. Proposal to amend special studies program | Approved |
| 4/7/72 | Clackamas Co. | Publishers Paper Co. Proposal to amend emission control program | Approved |
| 4/7/72 | Yamhill Co. | Publishers Paper Co. Proposal to amend emission limit compliance program | Approved |
| 4/10/72 | Washington Co. | Highway Project: Austin Rd. Interchange Section, Sunset Highway; Notice of intent to apply for Federal aid | Requested OSHD to prepare Environmental Impact Statement and review by CWAPA |
| 4/10/72 | Marion Co. | Highway Project: Mission Street, S.E. Bellevue St., S.E. 13th St., Salem; Notice of intent to apply for Federal aid | Requested OSHD to prepare Environmental Impact Statement and review by MWVAPA |
| 4/10/72 | Deschutes Co. | Bridge Project: Squaw Creek Canal Bridge, FAS 853, Dist. 12; Notice of intent to apply for Federal aid | No comment |
| 4/10/72 | Lane & Linn Co. | Road Construction Project U.S. Forest Service, Region 6, Willamette National Forest | Additional information requested |
| 4/10/72 | Klamath Co. | Weyerhaeuser Company Plans and specifications for enclosure for particle-board truck dump | Approved |

Air Quality Control - continued

| <u>Date</u> | <u>Location</u> | <u>Project</u> | <u>Action</u> |
|-------------|-----------------|---|---------------|
| 4/10/72 | Tillamook Co. | Midway Shake Company Plans and specifications for modification of WWB | Approved |
| 4/10/72 | Marion Co. | Boise Cascade Corp. Proposal to amend emission limit compliance program | Approved |
| 4/10/72 | Lane Co. | Lane County Mass Transit District, Review of coach specifications | Approved |
| 4/12/72 | Tillamook Co. | Diamond Lumber Co. Plans and specifications for modification of WWB | Approved |
| 4/13/72 | Jackson Co. | Timber Products Co. Plans and specifications for two (2) wet scrubbers on drying ovens | Approved |
| 4/14/72 | Curry Co. | Western States Plywood Compliance program and schedule for modification or phase out of two (2) WWB | Approved |
| 4/14/72 | Douglas Co. | Roseburg Shingle Co. Phase out of one (1) WWB | Approved |
| 4/21/72 | Crook Co. | Consolidated Pine Co. Compliance program and schedule for hog fuel boiler | Approved |
| 4/26/72 | Klamath Co. | Weyerhaeuser Company Compliance program and schedule for Klamath Falls hog fuel boilers | Approved |
| 4/26/72 | Klamath Co. | Weyerhaeuser Company Compliance program and schedule for Klamath Falls plywood plant | Approved |
| 4/26/72 | Klamath Co. | Weyerhaeuser Company Compliance program and schedule for Klamath Falls hardboard plant | Approved |
| 4/26/72 | Klamath Co. | Weyerhaeuser Company Compliance program and schedule for Klamath Falls particleboard plant | Approved |

Air Quality Control - continued

| <u>Date</u> | <u>Location</u> | <u>Project</u> | <u>Action</u> |
|-------------|-----------------|--|---|
| 4/26/72 | Sherman Co. | Highway Project: Liberty Rd.-Ruggles Rd., FAS 669; Notice of intent to apply for Federal aid | No comment |
| 4/26/72 | Marion Co. | Highway Division: Highway Planning and Research Work program | No comment |
| 4/26/72 | Marion Co. | MWVAPA: Review of air pollution control program | Additional information requested |
| 4/26/72 | Yamhill Co. | City of McMinnville: Municipal Airport Master Plan | Additional information requested |
| 4/28/72 | Hood River Co. | J. Arlie Bryant, Inc. Plans and specifications for installation of hot mix asphalt plant | Approved subject to conditions in Stipulation and Order |
| 4/28/72 | Hood River Co. | J. Arlie Bryant, Inc. Plans and specifications for installation of portable rock crusher | Approved subject to conditions in Stipulation and Order |
| 4/28/72 | Klamath Co. | George R. Stacy Company Plans and specifications for installation of hot mix asphalt plant | Approved subject to conditions in Stipulation and Order |

CITY OF WASCO SEWAGE TREATMENT

Mr. Ashbaker presented the staff report, dated June 8, 1972, in which it was concluded that the city of Wasco continues to cause a public health hazard by discharging inadequately treated effluent from a community septic tank to Spanish Hollow without disinfection; that the city has failed to present a positive program for providing adequate sewage treatment facilities and that the city has had ample time and opportunity, since first requested to do so by the Sanitary Authority in 1949, to correct its sewage treatment deficiencies.

Mr. Dave Richelderfer, Mayor of the city of Wasco, appeared and stated that although he did not believe the city was causing a health problem, the city has set aside some \$30,000 from its water fund and has had its preliminary

engineering report completed, but is being prevented from going further until the State Highway Department makes up its mind where the highway would be relocated.

After further general discussion, it was MOVED by Mr. Harms, seconded by Mr. Cogan and carried that the Director's recommendation be adopted; that a hearing be scheduled at the earliest possible date and the city of Wasco be requested to appear and show cause why an order should not be issued requiring them to complete adequate sewage treatment facilities in accordance with a schedule developed by the Department to be incorporated in the city's waste discharge permit.

Mr. Day assured Mr. Richelderfer that the Department of Environmental Quality staff would be in close contact with the city to assist them in every way possible.

WEYERHAEUSER COMPANY (Air Quality Compliance Schedules)

Mr. Burkitt presented the staff report dated June 8, 1972 in which it is pointed out that the Department had attempted to formalize in the form of "Stipulations and Orders" the compliance schedules submitted by the Weyerhaeuser Company for the Klamath Falls hardboard, particleboard and plywood operations and for the hog-fuel burners in Klamath Falls and Bly as well as a phase-out schedule for the Bly wigwam waste burner.

On May 22, 1972 the Department was informed by telephone that the Weyerhaeuser Company objected to the "Stipulation and Order" procedure and format being used by the Department, that the company could not execute the Stipulation and Order forms submitted by the Department with reference to the above installations and may request the alternative procedure of a public hearing in order to fulfill the requirements of an enforceable compliance schedule as provided under OAR, 340, Section 20-032(2) and ORS 449.815.

Mr. Burkitt met with Weyerhaeuser representatives just prior to considering this agenda item and reported back to the Commission that they had been unable to reach agreement on revised language to be included in a Stipulation and Order form that would be mutually acceptable.

Mr. Jack Larson appearing on behalf of the Weyerhaeuser Company, stated that Weyerhaeuser's legal department has concerns about the Stipulation and Order procedure and the language used in the DEQ form. Also that the company would prefer to follow the normal procedure of submitting a compliance schedule with full commitment to carry out the program as agreed.

In response to a question by Mr. McMath, Mr. Day explained that the Stipulation and Order procedure was adopted as a more rapid enforcement tool and that other companies were proceeding to execute the forms without problems.

Mr. Cogan asked if Weyerhaeuser would object to hearings. Mr. Larson replied that the company had no objections to hearings.

It was MOVED by Mr. Harms, seconded by Mr. Waterman and carried that the recommendation of the Director be adopted and a public hearing be authorized for the purpose of entering an order for compliance including the conditions contained in the Stipulations and Orders previously tendered to the Weyerhaeuser Company.

WINCHESTER BAY SANITARY DISTRICT

Mr. Bolton presented the staff report dated June 8, 1972. In response to the EQC action at its meeting on March 24, 1972, the Sanitary District had passed a \$138,000 bond issue and Douglas County was cooperating to prohibit development that would further aggravate the waste disposal problem.

It was concluded that reasonable progress was being made toward providing the necessary sewerage facilities for the area and a hearing was not warranted at this time. No Commission action was taken.

OIL SPILL REGULATIONS (Final Adoption)

Mr. Carter presented the staff report dated June 8, 1972 which pointed out that a public hearing was held March 24, 1972, to receive testimony on proposed regulations and at the next meeting of the Commission on April 21, 1972, at the request of Mr. Harms, the Commission delayed adoption of the amended regulations until the June meeting to allow time to consider possible conflicts with federal laws and regulations.

It was reported that legal counsel for the Department had determined that ORS 449.175(2) assures that there will be no conflict with federal laws or regulations.

It was MOVED by Mr. Harms, seconded by Mr. Waterman and carried that the Oil Spill Regulations be adopted as amended at the April 21, 1972 EQC meeting and as attached to the June 8, 1972 staff report.

CIVIL PENALTIES

Mr. Patterson presented the staff report dated June 8, 1972, which cited the circumstances leading up to the imposing of Civil Penalties by the Director on three Oregon industries as follows:

| <u>Company</u> | <u>Violation</u> | <u>Imposed Penalty</u> |
|--------------------------------|---|------------------------|
| Rogge Lumber Sales, Bandon | Operating wigwam waste burner in violation of final order | \$500 per day |
| Pennington Mfg. Co., Kl. Falls | Open burning after warning | \$500 per day |
| Jeld-Wen, Inc., Kl. Falls | Open burning after warning | \$200 per day |

Since the Rogge Lumber Sales and Pennington Mfg. Company had corrected the violations and had given assurances that violations would not recur, the Director recommended mitigation by the Commission of the imposed Civil Penalties to zero in the cases of Rogge Lumber Sales and to \$50 in the case of Pennington Mfg. Company. The open burning charged to Jeld-Wen, Inc. was found to actually have occurred on property not under their control at the time of violation and it was therefore recommended that the Civil Penalties be removed.

It was MOVED by Mr. Cogan, seconded by Mr. McMath and carried that the Director's recommendation be adopted and the Civil Penalties for Rogge Lumber Sales and Jeld-Wen, Inc. be reduced to zero and the Civil Penalties for Pennington Mfg. Company be reduced to \$50.00.

REVISIONS TO OREGON'S CLEAN AIR ACT IMPLEMENTATION PLAN

Mr. Patterson presented the staff report dated June 8, 1972, which gives the details of additions, corrections and amendments, including two temporary rules, which were submitted to the EPA by letter dated May 3, 1972 and signed by Governor McCall, in order to clarify portions of Oregon's Clean Air Act Implementation Plan. One temporary rule requires the retention of

written records upon notification from the Director of DEQ, the other temporary rule amended Section 25-135, OAR Chapter 340 to require submission of specific proposals to control veneer dryer emissions by December 31, 1972 instead of by March 30, 1973, three months earlier than previously required.

The staff report, dated June 8, 1972, and identified as Agenda Item No. H, Governor McCall's letter to Mr. William D. Ruckelshaus, Administrator, EPA, dated May 3, 1972 and the Addendum to Oregon's Clean Air Implementation Plan dated May 3, 1972 are by reference made a part of these minutes.

Mr. Day explained that the above referenced changes and additions to the Clean Air Plan were necessary to meet EPA requirements and that it is now necessary to authorize a public hearing for the purpose of formal consideration for adoption by the Commission of the two temporary rules as permanent regulations.

It was MOVED by Mr. Waterman, seconded by Mr. McMath and carried that the Director be authorized to hold a public hearing on the proposed regulations on a date and at a location to be determined by him.

TAX CREDIT APPLICATIONS

Mr. Sawyer presented the staff's evaluations and Director's recommendations regarding the 5 tax credit applications covered by the following motion:

It was MOVED by Mr. Harms, seconded by Mr. McMath and carried that the recommendation of the Director be adopted and that Pollution Control Facility Tax Credit Certificates be issued to the following applicants for facilities claimed in tax applications Nos. T-227, T-317, T-324, T-320 & T-255 and for the claimed costs as follows:

| <u>Appl. No.</u> | <u>Applicant</u> | <u>Facility</u> | <u>Claimed Cost</u> |
|------------------|---------------------------------|-----------------|---------------------|
| T-227 | Crown Zellerbach West Linn | Saveall | \$207,620.00 |
| T-317 | John H. Dirksen Forest Grove | Manure Tank | 4,900.00 |
| T-324 | Elwyn L. Putnam Bend | Manure Tank | 6,959.78 |

| <u>Appl. No.</u> | <u>Applicant</u> | <u>Facility</u> | <u>Claimed Cost</u> |
|------------------|------------------------------------|--|---------------------|
| T-320 | Hull Oakes Lumber Monroe | Wood Waste Processing Facilities | \$ 61,489.67 |
| T-255 | Olson-Lawyer Timber Co. Medford | Wood Waste Furnace and Accessories | 1,307,513.00 |

with the certificates for all five applicants showing 80% or more of the costs as claimed allocated to pollution control.

PONDEROSA MOULDINGS, INC., Redmond (Variance Request)

Mr. Burkitt presented the staff report which pointed out that Ponderosa Mouldings, Inc. had phased out use of its wigwam waste burner by shipping its residues to the particle board plant in Bend. Because of vacation shut-down of the particle board plant for a 2-week period, wood residues could not be shipped or accepted for a 4-day period (July 3 to July 7).

By letter dated 5/8/72 the company requested a variance to permit operation of its wigwam waste burner for the 4-day period that wood residues could not be shipped for utilization. The alternative would be to shut down the Ponderosa Moulding, Inc. plant for this period unless other acceptable methods of residue disposal could be found.

In response to a question from Mr. Waterman, Mr. Burkitt stated that it would be the staff's intention to work out procedures with the company such that similar variances would not be necessary in future years.

It was MOVED by Mr. Harms, seconded by Mr. Waterman and carried that, in accordance with the Director's recommendation, Ponderosa Mouldings, Inc. request for variance for the operation of its wigwam waste burner from July 3 to July 7, 1972, at its plant site in Redmond be approved subject to the following conditions:

1. That the company notify the Department by telephone with confirmation in writing of the dates and times the wigwam waste burner would be placed in service during the 4-day period.
2. That the company agrees to make every attempt to utilize the residues thereby minimizing the use of the wigwam waste burner.

COIN MILLWORK COMPANY, Prineville (Request for Variance)

Mr. Burkitt presented the staff report regarding this variance request which is similar to the situation facing Ponderosa Mouldings. Coin Millwork's wigwam waste burner had been phased out through sale of sawdust and wood shavings to Brooks-Willamette particleboard plant in Bend and board ends to Clear Pine Moulding, Inc. for remanufacture as laminates.

Annual plant-wide shutdown by both Brooks-Willamette and Clear Pine Moulding during the first two weeks in July prevented acceptance of residues from Coin Millwork during this period. Coin Millwork utilizes a staggered vacation schedule during the year and operates its plant on a continuous production basis year round. Wood residues are unsuitable to their regular customers if stockpiled and no landfill or other disposal methods are available.

Coin Millwork Company, by its letter of May 24, 1972, requested a variance to permit reactivation of its wigwam waste burner for the period June 30 - July 14, 1972.

Mr. Leonard Wilkinson, President of Coin Millwork, read a letter from Clear Pine Mouldings Company and an attached letter from International Paper Company putting the company on notice that because of the Japanese ship strike and a general depression in the chip and pulp markets, they must reduce their chip shipments to half of former quantities. Mr. Ashbaker announced that Consolidated Pine had received a similar notice.

Mr. Harms stated that a variance appeared to be indicated now, but that he would like the staff to investigate the feasibility of a single, combined burner for disposal of all wood waste in the area.

It was MOVED by Mr. Cogan, seconded by Mr. McMath and carried that the Director be authorized to issue variances as indicated with a complete report for the best overall solution to be prepared by the staff and presented at the next EQC meeting.

BEAVER LUMBER COMPANY, Clatskanie (Request for Variance)

Mr. Patterson presented the staff report which is summarized as follows:

Beaver Lumber Company has been operating its wigwam burner under variance from CWAPA rules since January 1971 to dispose of unmarketable cedar residues. No progress has been made on developing alternative disposal methods so the company is now starting to modify its wigwam burner to bring it into compliance with visible emission limits; however, there is no known way that the burner

can be modified to meet CWAPA's very stringent particulate standard of 0.05 gr/SCF.

By letters of January 15 and March 29, 1972, the company petitioned CWAPA for a one-year variance from its grain-loading requirement with the understanding that such variance would be renewable each year as long as the modified burner met CWAPA's visible emission standard.

In essence, although the company requested a one-year variance from the grain loading standard only, CWAPA on April 24, 1972 granted a variance from both its grain loading and visible emission standards through December 31, 1973.

Since the company can meet the visible emission standard by December 31, 1972 and can never hope to meet the grain loading standard with a modified burner, it seems more appropriate to grant a variance until December 31, 1972 and to modify CWAPA's grain loading standard to be compatible with the accepted solution, namely, use of the modified burner.

Mr. Harms stated that such a direct solution would appear to be more sound rather than continuing to operate under a succession of one-year variances because of the administrative necessity of the DEQ having to approve each variance.

It was MOVED by Mr. McMath, seconded by Mr. Cogan and carried that in accordance with the Director's recommendation, CWAPA's variance No. 44 to Beaver Lumber Company be approved subject to the following conditions and modifications:

1. On or before August 1, 1972, Beaver Lumber Company will submit for Columbia-Willamette Air Pollution Authority review and approval, detailed plans and specifications for modifications to their wigwam wood waste burner which will allow it to achieve and maintain visible emissions in compliance with OAR Chapter 340, Subdivision 5, Section 25-020, Emission and Operation Standards for Wigwam Waste Burners.
2. On or before December 31, 1972, Beaver Lumber Company will complete modifications to its wigwam burner as required in 1. above.
3. The variance termination date shall be December 31, 1972.

U.S. NATIONAL BANK BUILDING, Portland (Request for approval of parking facilities)

Mr. Patterson presented the staff report and explained that, under OAR Chapter 340, Sections 20-050 through 20-070, the EQC must approve parking structures prior to their construction in the Portland, Salem and Eugene metropolitan areas.

The regulation delegates primary responsibility for review of proposals to the regional authorities. Accordingly, the CWAPA has reviewed the U.S. Bank Building proposal for a parking facility and has recommended that the EQC approve the proposed facility for construction. Strong elements in their decision were that the proposed facility would result in a net reduction of parking spaces at the site, was a minimum facility to sustain operation of the bank development and that the proposed facility conforms with the Downtown Plan and city of Portland planning requirements.

After detailed review of the proposal the DEQ staff basically agrees with CWAPA's reasoning and recommendation; however, some uncertainties remain because the city has not yet completed the Parking Plan, Vehicle Circulation Plan and Mass Transit Plan portions of the overall Downtown Plan. It was also pointed out that the influx of the 5,000 people that will occupy the bank building will not make attainment of Federal ambient air standards for carbon monoxide any easier.

It was MOVED by Mr. Cogan, seconded by Mr. McMath and carried that the Director's recommendation be adopted and that approval be granted for the U.S. National Bank of Oregon to commence construction of the parking facility; however, this approval should in no way be considered to imply DEQ approval of the bank headquarters and high-rise office tower of which the proposed parking structure is an ancillary part.

Having completed the agenda for the afternoon session, the Chairman recessed the meeting at 5:00 p.m. until 7:00 p.m.

Hearing re: Amendment of Regulations Pertaining to Section 41-022 IMPLEMENTATION OF TREATMENT REQUIREMENTS AND WATER QUALITY STANDARDS AND REGULATIONS PERTAINING TO WASTE DISCHARGE PERMITS

The hearing concerning the subject regulations was called to order by the Chairman at 7:00 p.m. with all members of the Commission and the Director present.

Mr. Sawyer presented the staff report and explained that on March 24, 1972, a hearing was held regarding adoption of a revised Plan for Implementation and Enforcement of Water Quality and Waste Treatment Standards. The revised plan included an amendment of OAR Chapter 340, Section 41-022 to provide that facilities needed to insure compliance with Waste Treatment and Water Quality Standards shall be provided in accordance with specific permit conditions. The Commission adopted the revised implementation plan at the March 24, 1972 meeting. Subsequent to adoption, it became apparent that the legal notice for the hearing may not have adequately covered the proposed amendments to Section 41-022. Therefore, a new notice was prepared and a new hearing scheduled at this time and place to insure proper legal adoption of the proposed rule amendment. The proposed amended rule is included in the attached notice of hearing.

On February 25, 1972, a hearing was held on "Regulations Pertaining to Waste Discharge Permits." These rules were adopted on March 24, 1972. Recent actions relative to activities which adversely affect water quality have demonstrated a need to amend the language of sections of these rules to strengthen the Department's control of such activities in addition to controlling the actual discharges of waste. The proposed amended language is included in the attached hearing notice.

The Chairman noted that no one had signed up to testify regarding the proposed regulations and asked if anyone in the audience would like to speak for or against the matter. No one responded.

Thereupon, it was MOVED by Mr. Waterman, seconded by Mr. Cogan and carried that the recommendation of the Director be adopted and the proposed amendments to rules as set forth in the notice be adopted as rules of the Department.

BEND - REDMOND - MADRAS - CULVER SEWERAGE PROGRAMS

Mr. Ashbaker presented the staff report and reviewed the requirements of regulations adopted by the Oregon State Sanitary Authority (predecessor to the Environmental Quality Commission) May 13, 1969 which provide for phasing out sewage disposal wells in rural areas by 1975 and in urban areas where sewer construction is scheduled by 1980.

It was pointed out that sewer construction had not proceeded as rapidly as desired in the area because of the delay in establishing an effective Council of Governments and because of the very high cost of sewer construction in the lava terrain common to Bend and Redmond.

Mr. Ashbaker also reported that the city of Culver had requested that it be classified as a waste disposal well permit area. The city has retained a consulting engineer and has submitted a program and timetable for providing sewerage facilities by October 1973. Drainholes within the city limits of Culver are failing and a health hazard will result if repair or replacement is not permitted.

It was MOVED by Mr. Waterman, seconded by Mr. Cogan and carried that in accordance with the Director's recommendations, the city of Culver be classified as a waste disposal well permit area and that the classification be continued as long as the city implements the schedule which was submitted February 10, 1972. It was noted that in accordance with the regulations the city must submit a written report each January until the project is completed.

Mr. Dick Gervais, Mayor of Bend read a prepared statement and showed slides of typical rock excavation conditions throughout the city of Bend which causes installation costs of sewers to be three times normal sewer construction costs. He reported that 92% of the city remained to be sewered at an estimated cost (in April 1972) of \$11-1/4 million. It is absolutely necessary that the city receive substantial Federal and State grants in order for it to meet the 1980 deadline for replacing waste disposal wells with sewers. He urged the DEQ to take a more active role in assisting the Central Oregon communities with their extraordinarily difficult sewerage problems and specifically to support their requested research and development grant applications for funds to demonstrate a non-gravity sewerage project and to develop effective and affordable methods of lava rock excavation.

State Representative Sam Johnson stated that he had been meeting with the cities of Bend and Redmond to help them with their problems. The cost of sewerage Redmond had been estimated from \$5 to \$8 million for a city of 3,800 people and in excess of \$11 million for the city of Bend.

He also pointed out that growth in Crook and Deschutes counties were among the fastest in the State and they needed all the help they could get.

Mr. McMath raised the question as to the advisability of allowing rapid development in an area where sewerage costs are so high and where other people in the State would be requested to subsidize the high cost of development.

Mr. Gerald Barrett, Mayor of Redmond, read a statement estimating the cost of sewers for Redmond to be approximately \$9 million. He echoed Bend's statement regarding high costs of construction and need for maximum Federal and State grant assistance to ease burden of excessive costs. He also presented a resolution by the executive committee of the League of Oregon Cities dated June 2, 1972, urging the state of Oregon and the DEQ to assist in seeking Federal and State funds to develop economically feasible methods of excavation and construction for the installation of sewage collection systems in this unique area of the State.

Considerable discussion ensued concerning the rapid growth in the area and whether or not it was reasonable or desirable to allow the rapid growth to continue to compound the sewerage problem. It was felt that withholding of building permits would unduly stifle growth and development but that it might be logical and feasible to require new development to install conventional sewers as the growth occurred.

Mr. Lloyd Clark, Consulting Engineer for the city of Bend felt that if sewers were required for new development this would encourage innovation and perhaps result in progress toward sewers. On the other hand such requirement for sewers might push development out of town where irrigation of effluents would be possible. He favored DEQ support of grants to the cities and to consider allowing such cost reducing factors as increased capacity coefficients for sewer pipes, reduced infiltration allowances to allow use of smaller sewers, etc.

Mayor Don Hatfield of Madras read a letter report prepared by CH₂M consulting engineers and dated June 6, 1972. He stated that they had started 8 years ago to build sewers and they now propose to do it in accordance with the schedule contained in the CH₂M letter, said sewers and sewage treatment facilities to be completed and in operation by May 1, 1974.

The Assistant Director for the Central Oregon Council of Governments reported that the Council of Governments now has been designated as the Regional Clearinghouse, hoped to be certified soon and is trying to compose a coordinated tri-county plan out of three separate county plans.

It was MOVED by Mr. Cogan, seconded by Mr. Waterman and carried that the Director's recommendation be adopted with amendments as follows:

1. The Department of Environmental Quality should actively seek and support a Research and Development project for non-gravity sewer construction in the area.
2. The Department should actively seek and support the investigation and demonstration of alternative methods of rock excavation.
3. The Department should actively seek and support special federal and/or state funding and to develop criteria for additional state funding where there are special geographic, geological and economic factors to pose really undue and unreal burdens on communities to assist Redmond and Bend in financing extraordinary sewer construction costs.
4. That the Department should encourage the certification and successful operations of the Council of Governments.

STATUS REPORT ON AIR QUALITY IN BEND-REDMOND AND PRINEVILLE AREAS

Mr. Burkitt presented the staff report on the status of atmospheric emission sources as follows:

| | | | |
|------------------|--|--|--|
| <u>Bend Area</u> | 1. Brooks-Willamette Corporation | 6. Kerns Furniture Div. of Desota, Inc. | |
| | 2. Brooks-Scanlon, Inc. | 7. Oregon Woodwork Limited (Brooks-Scanlon, Inc.) | |
| | 3. Bend Millwork | 8. Cascade Pumice Co. | |
| | 4. Graves Mfg. Company | 9. The Central Oregon Pumice Co. | |
| | 5. Cascade Forest Products (Jeld-Wen) | 10. Deschutes Ready-Mix (R.L. Coats) | |
| | | 11. Mid-Oregon Iron Works, Inc. | |
| | | 12. Bend Aggregate & Paving Co. | |
| | <u>Redmond Area</u> | 1. Brooks-Willamette Corp. | 4. Ponderosa Mouldings, Inc. |
| | | 2. F & F Products | 5. Whittier Moulding Co. (Brooks-Scanlon, Inc.) |
| | | 3. Central Oregon Wood Products, Inc. | 6. K.L. Boyle Mfg. Co. |
| | | | |
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|----------------------------|------------------------|---------------------------|
| <u>Prineville Area</u> | 1. Coin Millwork | 5. Ochoco Lumber Co. |
| | 2. Clear Pine Moulding | 6. Hudspeth Pine |
| | 3. Consolidated Pine | 7. Ochoco Feed & Seed Co. |
| | 4. Pine Products | |

It was concluded that air quality in the Bend, Redmond and Prineville areas has improved significantly due to the substantial efforts of those industrial sources with control programs approved by the Department. As noted above there are some smaller sources which will need to complete the development of their respective emission control programs. It is anticipated by the technical staff that acceptable compliance programs will develop as a result of the on-coming Permit Program for which Public Hearings will be scheduled in July 1972.

It was recommended by the Director that the Department continue to work toward the development of compliance schedules from those remaining sources as soon as practicable and in accordance with the State Clean Air Act Implementation Plan.

No action was taken by the Commission relative to this matter.

BROOKS-SCANLON, INC., BEND (Hog Fuel Boiler Compliance Program)

Mr. Burkitt presented the staff report and by way of review pointed out that at the September 17, 1971 EQC meeting a compliance program was adopted which called for completion by March 31, 1972 of the following.

1. Discontinue use of the old hog-fuel boilers and reduce steam demand from the new hog-fuel boilers to under 100,000 lb/hr and supply remaining energy requirements by purchase of electrical power.
2. Level steam demand by installing modulating valves on the dry kilns.
3. Improving the hog-fuel feed system.

The above compliance program was completed and a marked improvement resulted; however, steam requirements were found to be 120,000 lbs/hr and the new boilers could not meet particulate emission standards when operating in excess of 100,000 lbs/hr.

The company has proposed a program for modifying steam lines and boiler controls and collection equipment in an attempt to enable the new boilers to operate at the increased steaming rate and still meet particulate emission standards. Their proposal included a request for permission to fire

four of the old hog-fuel boilers for a period of 4 to 6 days to complete the drying of production in the dry-kilns at the time of shutdown of the new boilers for modifications.

Mr. Leo Hopper, Production Manager, appeared on behalf of the company and confirmed the staff report and indicated that the company was satisfied with the recommendations of the Director.

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

That the above modification and maintenance program be conducted during the mid-year shut-down provided that the company furnish supporting data in writing that it will accomplish the above program and demonstrate that as a result of the program compliance with applicable regulations will be achieved.

In addition to the above it is requested that the company again source sample the boiler stacks after completing all of the above maintenance program to demonstrate compliance with OAR, Chapter 340, Section 21-020. At the time these stacks are sampled it is requested that the company remove the screen from one of the flyash classifiers in order to determine the amount of cinders actually being reinjected into the boilers as well as the effects, if any, on particulate emissions. If the steam reinjection system could be eliminated, the result would be an additional 5,200 lb/hour reduction in required steaming capacity. This would then require disposal of the cinders at some nearby location.

It is recommended that if the above noted emission source tests do not confirm compliance with OAR, Chapter 340, Section 21-020, the steaming rates will have to be reduced to a level where emission source tests do confirm compliance. The company has previously demonstrated compliance at a steaming rate of 50,000 pounds/hour on each boiler. The company will then be required to operate the individual boilers at steaming rates no greater than those used to demonstrate compliance during the emission source tests.

It is also recommended that the company be allowed the use of four (4) of the old boilers to generate steam only for the dry kilns in order to complete the drying schedule of the production in the kilns. It is understood that this will result in from four (4) to six (6) days usage and that the company will plan their production schedule within the sawmill so as not to cut species which would require longer drying schedules.

BROOKS-SCANLON, INC., BEND (Log Debris Control Program)

Mr. Ashbaker gave the staff report and presented slides which showed the extensive loss of debris into the Deschutes River by the use of a one-half mile long section of the river as a log pond by Brooks-Scanlon, Inc.

It was made clear that the company had been given approximately three and one-half years to solve its log debris problem and that very little, if any progress had been made in this direction.

Mr. M.P. Hollern, President of Brooks-Scanlon, Inc. read a letter dated June 5, 1972 addressed to Mr. E.J. Weathersbee, Deputy Director of DEQ in which he requested that a waste discharge permit be issued to Brooks-Scanlon similar to their previous permit with the following additional provisions:

1. By October 1, 1972 all the company's log decks by the Deschutes River will be far enough from the river so that none of the log debris or log deck sprinkling water will enter the Deschutes River.
2. The company will abandon use of its upper log dump by June 23, 1972, the beginning of the vacation period. This will have the effect of reducing the portion of the Deschutes River used for log handling by 40% and will reduce the volume of logs which can be in the river at any one time by at least 40%.
3. The permit will expire October 1, 1974, by which time the company will conduct its log handling operations out of the Deschutes River or will have an alternative method of handling logs in operation which the Department of Environmental Quality has approved as being equally effective.

Mr. Day stated that with respect to proposed condition No. 3 that the Department presently did not know of any alternative method that would be considered equivalent to getting the logs out of the river and that it should be understood by all that acceptance of this condition would mean that the logs would have to be out of the river by October 1974. In response to a question by Mr. Cogan, Mr. Day stated that the October 1974 date was established in order to allow time to achieve the desired result of getting the logs out of the river and in recognition of the substantial magnitude and cost of the proposed changes.

It was MOVED by Mr. Harms, seconded by Mr. Waterman and carried that a waste discharge permit be prepared for Brooks-Scanlon with terms and conditions similar to those in their previous permit with the three additional conditions as specified in the June 5 letter from Mr. Hollern.

Having completed the agenda for the 7:00 p.m. session, the Chairman recessed the meeting at 9:30 p.m. to be resumed at 2:30 p.m., June 9, 1972 at Memorial Hall, Courthouse, 513 Center Street, Lakeview, Oregon.

The hearing was reconvened by the Chairman at 2:30 p.m., June 9, 1972 in Memorial Hall, Lake County Courthouse, Lakeview, Oregon, with all members and the Director present.

ALKALI LAKE WASTE DISPOSAL SITE (Status Report)

Mr. Wicks presented the staff report which summarized the establishment and operation of this disposal site and the responsibility of the EQC and DEQ relative to either bringing the site under permit or properly closing the site.

The site was established in 1968 by Chemical Waste Storage and Disposition, Inc. under permit issued by the Oregon State Department of Agriculture. Dr. Robert Goulding, OSU, has conducted studies for approximately three years under a research and development grant from EPA to determine the feasibility of disposing of the approximately 21,000 barrels of 2,4-D, 2,4,5-T and MCPA pesticide manufacturing wastes stored at the site.

In addition to the pesticide wastes, Chem-Waste disposed of approximately 100 tons of metallic chloride wastes from the Ore-Met titanium plant at Albany under a temporary permit from the DEQ during the period December 1970 through August 1971. In addition, an unknown quantity of miscellaneous

materials including paint pigment and solvent wastes have been brought to the site by Chem-Waste without a permit.

H.B. 1931 passed by the Oregon Legislature assigned regulatory authority over the disposal of pesticide wastes and other environmentally hazardous wastes (EHW) to the DEQ. Existing sites would be subject to the new legislation upon adoption by the EQC of regulations outlining procedures for making application to the DEQ for a permit to establish or operate an EHW disposal site.

In late 1971 the Oregon State Department of Agriculture and the DEQ jointly evaluated Chem-Wastes' Alkali Lake operations, found deficiencies and issued two joint directives dated December 8, 1971 and January 24, 1972, aimed at maintaining appropriate regulatory control during the period of transfer of authority from the Department of Agriculture to the DEQ.

On March 24, 1972, the EQC adopted Procedures for Issuance, Denial, Modification and Revocation of Licenses for the Disposal of Environmentally Hazardous Wastes. These rules became effective April 15, 1972. As required by H.B. 1931 (ORS 459.520) Chem-Waste must apply to DEQ within 60 days (by June 14, 1972), if they wish to continue to store or dispose of pesticide wastes at the Alkali Lake site. Chem-Waste was informed of these requirements by letter dated April 18, 1972.

Mr. Marcus Ward, Lake County District Attorney, stated that his office and the Lake County Commission wanted to see the operations at Alkali Lake brought under a properly conditioned permit which would ensure proper control of storage and disposal of pesticide wastes and other wastes presently stored there and that might henceforth be brought there.

Mr. Jim Schneider, former Chairman of the Lake County Planning Commission, requested that the County Commissioners be consulted prior to issuing any permit for the Alkali Lake site and that chemicals other than pesticides also be controlled. He also stated that it was the county's position that any disposal activity outside the original 10-acre site would be in violation of local zoning since the area was zoned for agriculture.

Mr. Forrest Cooper, Lakeview Attorney, expressed the hope that something could be done at the Alkali Lake site so that pesticide residues and containers could be received and processed or disposed of.

Mr. Arleigh Isley, Lake County Agent, stated that his tests indicated that some of the material stored at Alkali Lake could be beneficially used for sagebrush control.

Mr. Lloyd Gift, Klamath County Commissioner, testified that pesticide containers were a big problem in Klamath County. He stated that further research was needed to resolve this problem, but that applicators should be required to clean containers as much as possible.

No action was taken regarding this matter by the Commission since it was not known whether or not Chem-Waste would file an application for a permit by the statutory deadline.

AIR QUALITY IN LAKEVIEW AND KLAMATH FALLS AREAS (Status Report)

Mr. Burkitt presented the staff report on the status of air quality control for the following sources:

Lakeview: 1. Freemont Sawmill
2. Eastern Oregon Pine Co.
3. Mazama Timber Products, Inc.
4. Dame Lumber Company
5. Lakeview Lumber Products Co.
6. Oregon Windor Company, Inc.
7. Asphalt Paving Company
8. Lakeview Ag Center, Inc.

Klamath Falls

1. Weyerhaeuser Company
2. Metler Brothers, Inc.
3. Jeld-Wen, Inc.
4. Kingsley Field
5. Columbia Plywood Corp.
6. Klamath Iron Works
7. Klamath Lumber Company
8. Klamath Tallow Company
9. Modoc Lumber Company
10. Modoc Veneer
11. Lakeside Corporation

In response to a question from Mr. Harms, Mr. Ward replied that he has not received any complaints about air quality in the Lakeview area, but that he had received a few comments.

The Commission took no action on the Director's recommendation that the Department continue to work with the respective industries to insure compliance on a timely schedule in accordance with the State Clean Air Implementation Plan.

LOG DEBRIS CONTROL IN LAKE EWAUNA AND THE KLAMATH RIVER (Status Report)

Mr. Carter presented the staff report on the status of log debris control for the four companies that use the river as integral parts of their wood products manufacturing plants.

Modoc Lumber Company has met the terms of its waste discharge permit by removing 90% of its logs from the river and effecting debris control measures. This has significantly reduced, but not eliminated, the debris entering the river. Complete elimination of log handling would be necessary to completely eliminate debris.

Klamath Plywood has moved its entire log storage and handling out of the river and onto dry land. This company no longer contributes to the debris problem in the Klamath River.

Columbia Plywood, Klamath Division, has no land available for dry handling; therefore logs are delivered to the mill by truck and placed in the river with an easy let-down sling device. Large diameter logs are rafted and small logs are handled in bundles. Bark and debris generation has been reduced but not eliminated.

Weyerhaeuser Company. The company has moved its long storage and sorting operations out of the river and onto dry land. They still use a corridor of river to deliver logs into the mill. The logs are placed into the river with a front end loader and the large quantities of logs handled and the rate of delivery are such that large quantities of debris are still generated and escape to the river. Weyerhaeuser's debris control program is inadequate and considered not in compliance with its waste discharge permit. Based on the very large volume of logs handled it appears necessary to require total elimination of the wet feed system to the mill.

It was concluded that further efforts are needed to adequately control debris from log-handling in the Klamath River.

It was further concluded that the shifting of massive log storage and handling from the water to land has resulted in the accumulation of bark and wood residues at a staggering rate. Most of this material is presently going to landfills, but available disposal sites will soon be exhausted. Planning for permanent disposal or utilization should begin immediately.

Mr. Tom Shaw representing Modoc Lumber Company inquired if it was the Department's policy to get all logs out of the river by 1975. Mr. McPhillips and Mr. Harms in responding, stated that this might be considered a goal that might not be achieved in all cases, but the Department's policy was to have the individual companies control the problem to the best that each could practicably achieve as soon as possible.

Mr. Rod Jones, Corporate Service Manager of Weyerhaeuser Company, introduced Mr. Bernard Agrons who reported on what has been done so far and requested additional time to develop and demonstrate better control of debris but still utilizing the river to feed logs into the mill.

In response to a question from Mr. Harms, Mr. Agrons admitted that their present approach would not control submerged or sinking bark and debris.

It was MOVED by Mr. McMath, seconded by Mr. Cogan and carried that the recommendation of the Director be adopted as follows:

1. Weyerhaeuser Company should be required to submit a program by October 1, 1972, for providing such facilities as are necessary to eliminate the use of the Klamath River as a wet feed channel for the mill and clean up residual debris in the river by not later than October 1, 1974. The company should also be required to immediately improve its present debris control for the interim.
2. Modoc Lumber should be required to submit prior to expiration of its present permit on 3/31/74, a report and program for eliminating remaining log storage and handling in the Klamath River by not later than 3/31/75.

COLUMBIA PLYWOOD CORPORATION - Klamath Plywood Division

Mr. Ashbaker presented a separate report concerning the Columbia Plywood Corporation, Klamath Falls mill because the company had failed to submit a detailed program for providing dry handling of logs or equivalent debris control as required by its waste discharge permit.

Mr. Aaron Abts, Resident Mill Manager, appeared and read a written report which he submitted for the Department's files. Mr. Abts cited actions taken by the company to control debris as follows:

1. Reduced log storage in the river by 40%.
2. Installed a tilting "A" frame easy let-down device to replace brow-log dumping of logs.

3. Installed a system to handle small logs before placing them in the river.
4. Installed extensive facilities to control and remove bark and debris.

Mr. Abts stated that the company had not been able to obtain sufficient land to allow it to handle its logs on land. He listed the apparent alternatives available to the company as follows:

1. Acquire additional land of sufficient area to convert to dry land storage and remove log handling from the river. It appears that all potential sites have been investigated. It is our plan to continue to re-evaluate the above listed properties and search for new approaches. Any help or suggestions in this area would be appreciated.
2. Continue to handle logs in the river and instigate whatever measures are necessary to assure that the compliance standards are met and maintained.
3. If adjacent land is unavailable and river storage cannot be continued, there appears to be no other alternative but to close the plant. Our investigations showed that a remote log storage area would come under this category because such a plan would not allow us to remain competitive but force us out of business.

Mr. Day suggested that the matter be continued for 90 days so that the staff could continue to work with Mr. Abts to try to find additional land and report back to the Commission in 90 days.

No action was taken by the Commission regarding this matter.

Having completed the agenda, the meeting was adjourned by the Chairman at 5:00 p.m.

BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

| | | |
|--------------------------------|---|---------------------|
| In the Matter of the Amendment |) | |
| of Regulations Pertaining to |) | |
| Implementation of Treatment |) | NOTICE OF HEARING |
| Requirements and Water Quality |) | AND INTENDED ACTION |
| Standards and Pertaining to |) | |
| Waste Discharge Permits |) | |

1. A. On June 8, 1972, beginning at 7:00 p.m., a public hearing will be held in the auditorium, Bend Senior High School, 230 East Sixth, Bend, Oregon, to consider the amendment by the Environmental Quality Commission of section 41-022 of Oregon Administrative Rules, chapter 340, pertaining to the implementation of treatment requirements and water quality standards.

B. It is proposed that section 41-022 be amended to read as follows:

"41-022 IMPLEMENTATION OF TREATMENT REQUIREMENTS AND WATER QUALITY STANDARDS. Waste treatment and control requirements prescribed under 41-010, 41-015 and 41-020 and such other waste treatment and controls as may be necessary to insure compliance with the standards contained in this subdivision shall be provided in accordance with specific permit conditions for those sources or activities for which permits are required and the following implementation program:

(1) For new or expanded waste loads or activities, fully approved treatment or control facilities or both shall be provided prior to discharge of any wastes from the new or expanded facility or conduct of the new or expanded activity.

(2) For existing waste loads or activities necessary treatment or control facilities or both shall be provided in accordance with a specific program and timetable incorporated into the waste discharge permit for the individual discharger or activity. In developing treatment requirements and implementation schedules for existing installations or activities, consideration shall be given to the impact upon the overall environmental quality including air, water, land use and aesthetics."

2. A. On June 8, 1972, beginning at 7:00 p.m., a public hearing will be held in the auditorium, Bend Senior High School, 230 East Sixth, Bend, Oregon, to consider the amendment by the Department of Environmental Quality of subsection 4) of Section B

and of subsections 1)a) and 1)f) of Section C of the "Regulations Pertaining to Waste Discharge Permits" adopted by the Department of Environmental Quality on March 24, 1972.

B. (i) It is proposed that subsection 4) of Section B be amended to read as follows:

"B. DEFINITIONS

As used in these regulations unless otherwise required by context:

* * * *

4) 'Wastes' means sewage, industrial wastes, and all other liquid, gaseous, solid, radioactive, or other substances which will or may cause pollution or tend to cause pollution of any waters of the state."

(ii) It is proposed that subsections 1)a) and 1)f) of Section C be amended to read as follows:

"C. PERMIT REQUIRED

1) Without first obtaining a permit from the Department, no person shall:

a) Construct, install, expand or significantly modify any industrial, commercial, agricultural or other establishment or activity, the operation or conduct of which would result in a new or enlarged waste discharge into public waters, or which would otherwise alter the physical, chemical or biological properties of any waters of this state in any manner not already lawfully authorized.

* * * *

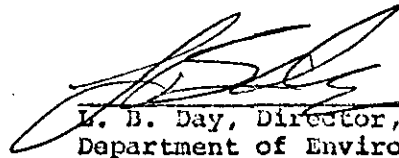
f) Operate or conduct any industrial, commercial, agricultural or other establishment or activity, the operation or conduct of which will or may cause or tend to cause pollution of any public waters or which would alter the physical, chemical or biological properties of any waters of this state in any manner not already lawfully authorized."

3. Interested persons may present their data, views or arguments, either orally or in writing, at the hearing or may submit them to the Director, Department of Environmental Quality, Terminal Sales Building, 1234 S.W. Morrison Street, Portland, Oregon, 97205, in writing prior to the hearing for inclusion

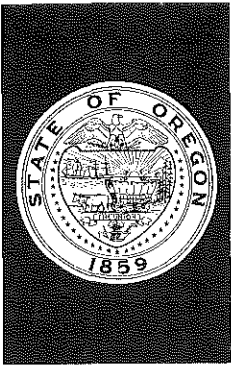
in the hearing records.

4. The Environmental Quality Commission will preside over and conduct the hearing.

Dated this 9th day of May, 1972.



W. B. Day, Director,
Department of Environmental Quality



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

From: Director

B. A. McPHILLIPS
Chairman, McMinnville
EDWARD C. HARMS, JR.
Springfield

Subject: Agenda Item No. B, June 8, 1972, EQC Meeting

STORRS S. WATERMAN
Portland

Project Plans for April 1972

GEORGE A. McMATH
Portland

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

Water Quality Control

1. Thirty-six (36) domestic sewage projects were reviewed:
 - a) Provisional approval was given to:
 - 21 plans for sewer extensions
 - 4 plans for sewage treatment works improvements
 - 3 plans for sewage lift stations
 - 1 contract modification
 - b) 7 contract modifications were approved without conditions.
2. Four (4) project plans for industrial waste facilities were given provisional approval.

Air Quality Control

1. Thirty-nine (39) project plans, reports or proposals were received and reviewed:
 - a) 17 Highway, airport and other miscellaneous projects were reviewed for environmental impact:
 - 4 Referred to Regional Air Quality Authorities for comment.
 - 10 No comment because of insignificant environmental impact or outside jurisdiction of regulation.
 - 2 Additional information requested.
 - 1 Approved

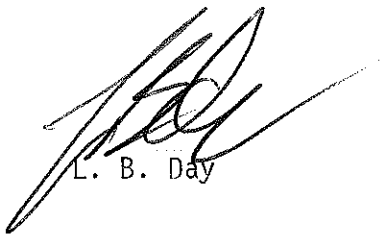
- b) 7 Wigwam burner proposals were approved for modification or phase out compliance
- c) 14 Additional industrial AQC proposals were reviewed:
 - 11 Approved
 - 3 Provisionally approved
- d) The MWVAPA Air Pollution Control Program was reviewed and additional information was requested.

Solid Waste Control

No plans or reports were reviewed.

Director's Recommendation

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



L. B. Day

PROJECT PLANS

Water Quality Division

During the month of April, 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 (36)</u> | | | |
| 4/3/72 | East Salem Sewer & Drainage Dist. I | Lancaster Drive sewer | Prov. approval |
| 4/5/72 | Keizer Sewer Dist. | Northwood Park #4 | Prov. approval |
| 4/5/72 | Lake Oswego | Mt. Park Phase 5A - pump sta. | Prov. approval |
| 4/5/72 | Mt. Angel | North Pershing St. sewer | Prov. approval |
| 4/5/72 | Troutdale | Lady Ann Addn. Subd. sewers | Prov. approval |
| 4/6/72 | Wilsonville | Willamette River Crossing and Addendum No. 1 | Prov. approval |
| 4/10/72 | Columbia County | Dikeside Moorage sewage treatment plant | Prov. approval |
| 4/10/72 | Wilsonville | Charbonneau pump station | Prov. approval |
| 4/10/72 | Wilsonville | Willamette River Bridge Crossing, Addenda 2 and 3 | Approved |
| 4/10/72 | Gresham | Change Orders #4 and 5 | Approved |
| 4/10/72 | Portland | Linnton Interceptor Addenda 4 and 5 | Approved |
| 4/10/72 | Portland | Linnton Interceptor revisions | Approved |
| 4/10/72 | USA (Beaverton) | Greenway Subdivision sewers | Prov. approval |
| 4/10/72 | USA (Aloha) | Augusta Meadows sewers | Prov. approval |
| 4/10/72 | Multnomah County | Inverness system - Airport pump station | Prov. approval |
| 4/10/72 | Garibaldi | Sewage treatment plant and outfall (0.5 MGD activated sludge) | Prov. approval |

| <u>Date</u> | <u>Location</u> | <u>Project</u> | <u>Action</u> |
|-------------|--|---|----------------|
| 4/11/72 | Sunriver | Mt. Village East Phase 3 & Mt. Village West Phase 1 sewers | Prov. approval |
| 4/12/72 | Salem | Twelfth Street sewer | Prov. approval |
| 4/12/72 | USA (Metzger) | Greenburg Road sewer | Prov. approval |
| 4/12/72 | Sunriver | Meadow Houses North Phase I through IV sewers | Prov. approval |
| 4/13/72 | Gresham | Sludge conditioning at sewage treatment plant | Prov. approval |
| 4/13/72 | Astoria | Addendum No. 1 (sewage treat- ment plant) | Approved |
| 4/13/72 | Wilsonville | Charbonneau pump station Addenda 1 and 2 | Approved |
| 4/18/72 | Oak Lodge San. Dist. | Mark Terrace Subd. sewers | Prov. approval |
| 4/18/72 | Gresham | Halsey Street sewer | Prov. approval |
| 4/19/72 | Seaside | Sewage treat. plant upgrading | Prov. approval |
| 4/19/72 | Bunker Hill San. D. | Flanagan sewer | Prov. approval |
| 4/25/72 | Salem | Mulligan Court sewer | Prov. approval |
| 4/25/72 | Astoria | Addendum No. 3 | Approved |
| 4/25/72 | USA (Metzger) | Greenway Subdivision, Phase III sewers | Prov. approval |
| 4/25/72 | Tualatin | 65th Avenue sewer | Prov. approval |
| 4/25/72 | USA (Sunset) | Bluffs Subdivision sewers | Prov. approval |
| 4/25/72 | East Salem Sewer & Drainage Dist. I | Oak Park, Phase II sewers and Walker Road sewer | Prov. approval |
| 4/27/72 | Troutdale | Beaver Creek Interceptor, Change Order No. 2 | Approved |
| 4/28/72 | North Roseburg Sanitary District | Newton Creek interceptor extension No. 2 | Prov. approval |
| 4/28/72 | Woodburn | Landau Estates sewers | Prov. approval |

| <u>Date</u> | <u>Location</u> | <u>Project</u> | <u>Action</u> |
|--------------------------------|-----------------|---|----------------|
| <u>Industrial Projects (4)</u> | | | |
| 4/11/72 | Oakridge | Pope and Talbot effluent and drainage control system | Prov. approval |
| 4/13/72 | Springfield | Weyerhaeuser Company hydraulic barker effluent piping | Prov. approval |
| 4/26/72 | Tualatin | Hervin Company cooling water diffuser | Prov. approval |
| 4/26/72 | North Portland | Crown Zellerbach Flexible Packaging pretreatment and future city sewer connection | Prov. approval |

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

| <u>DATE</u> | <u>LOCATION</u> | <u>PROJECT</u> | <u>ACTION</u> |
|-------------|-----------------|---|--|
| 3 | Douglas Co. | <u>Highway Project:</u> Mystic Creek-Camas Valley Section, Coos Bay-Roseburg Highway; Notice of intent to apply for Federal aid | No comment |
| 3 | Deschutes Co. | <u>Highway Project:</u> Canal Blvd-South, Railroad Blvd. FAS 926 Redmond; Notice of intent to apply for Federal aid | No comment |
| 3 | Malheur Co. | <u>Highway Project:</u> Ontario-Carro Jct. Olds Ferry - Ontario Highway; Notice of intent to apply for Federal aid | No comment |
| 3 | Multnomah Co. | <u>Highway Project:</u> S.W. Capitol Highway-N. Tigard Interchange, Pacific Highway (I-5); Notice of intent to apply for Federal aid | Requested OSHD to have CWAPA make review of proposal |
| 3 | Lincoln Co. | <u>Highway Project:</u> Oregon Coast Highway, Waterline Dr., Review of draft Environmental Impact Statement | No comment |
| 3 | Lane Co. | <u>Highway Project:</u> Santa Clara Eugene Section, Eugene-Junction City Highway; Notice of intent to apply for Federal aid, review of draft Environmental Impact Statement | Requested OSHD to have LRAPA make review of proposal |
| 3 | Multnomah Co. | <u>Airport Expansion:</u> Acquisition of land for airport expansion of Portland International Airport | No comment |
| 3 | Washington Co. | <u>Airport Master Planning Grant,</u> Hillsboro Airport | No comment |
| 3 | Clackamas Co. | <u>Water & Sewer Facilities,</u> Clackamas County Service District #1 | No comment |

AP - 9 PROJECT PLANS, REPORTS, PROPOSALS FOR AIR QUALITY CONTROL DIVISION
FOR APRIL, 1972 (Cont.)

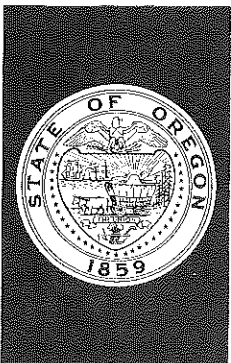
| <u>DATE</u> | <u>LOCATION</u> | <u>PROJECT</u> | <u>ACTION</u> |
|-------------|-----------------|--|---|
| 4 | Douglas Co. | <u>Green Valley Lbr. Co.</u> Plans and specifications for modification of WWB | Approved |
| 4 | Lake Co. | <u>Lakeview Lumber Co.</u> Compliance program and schedule for either phase out or modification of WWB | Approved |
| 4 | Lake Co. | <u>Oregon Windor Co., Inc.</u> Compliance program and schedule for phase out of WWB | Approved |
| 7 | Marion Co. | <u>Boise Cascade Corp.</u> Proposal to amend special studies program | Approved |
| 7 | Clackamas Co. | <u>Publishers Paper Co.</u> Proposal to amend emission control program | Approved |
| 7 | Yamhill Co. | <u>Publishers Paper Co.</u> Proposal to amend emission limit compliance program | Approved |
| 10 | Washington Co. | <u>Highway Project: Austin Rd.</u> <u>Interchange Section, Sunset</u> <u>Highway; Notice of intent</u> <u>to apply for Federal aid</u> | Requested OSHD to prepare Environ- mental Impact Statement and review by CWAPA |
| 10 | Marion Co. | <u>Highway Project: Mission</u> <u>Street, S.E. Bellevue St.,</u> <u>S.E. 13th St., Salem; Notice</u> <u>of intent to apply for</u> <u>Federal aid</u> | Requested OSHD to prepare Environ- mental Impact Statement and review by MWVAPA |
| 10 | Deschutes Co. | <u>Bridge Project: Squaw Creek</u> <u>Canal Bridge, FAS 853, Dist.</u> <u>12; Notice of intent to apply</u> <u>for Federal aid</u> | No comment |
| 10 | Lane & Linn Co. | <u>Road Construction Project</u> <u>U.S. Forest Service, Region</u> <u>6, Willamette National</u> <u>Forest</u> | Additional information requested |

AP - 9 PROJECT PLANS, REPORTS, PROPOSALS FOR AIR QUALITY CONTROL DIVISION
FOR APRIL, 1972 (Cont.)

| <u>DATE</u> | <u>LOCATION</u> | <u>PROJECT</u> | <u>ACTION</u> |
|-------------|-----------------|--|---------------|
| 10 | Klamath Co. | <u>Weyerhaeuser Company</u> Plans and specifications for enclosure for particle- board truck dump | Approved |
| 10 | Tillamook Co. | <u>Midway Shake Company</u> Plans and specifications for modification of WWB | Approved |
| 10 | Marion Co. | <u>Boise Cascade Corp.</u> Proposal to amend emission limit compliance program | Approved |
| 10 | Lane | <u>Lane County Mass Transit District</u> , Review of coach specifications | Approved |
| 12 | Tillamook Co. | <u>Diamond Lumber Co.</u> Plans and specifications for modification of WWB | Approved |
| 13 | Jackson Co. | <u>Timber Products Co.</u> Plans and specifications for two (2) wet scrubbers on drying ovens | Approved |
| 14 | Curry Co. | <u>Western States Plywood</u> Compliance program and schedule for modification or phase out of two (2) WWB | Approved |
| 14 | Douglas Co. | <u>Roseburg Shingle Co.</u> Phase out of one (1) WWB | Approved |
| 21 | Crook Co. | <u>Consolidated Pine Co.</u> Compliance program and schedule for hog fuel boiler | Approved |
| 26 | Klamath Co. | <u>Weyerhaeuser Company</u> Compliance program and schedule for Klamath Falls hog fuel boilers | Approved |
| 26 | Klamath Co. | <u>Weyerhaeuser Company</u> Compliance program and schedule for Klamath Falls plywood plant | Approved |

AP - 9 PROJECT PLANS, REPORTS, PROPOSALS FOR AIR QUALITY CONTROL DIVISION
FOR APRIL, 1972 (Cont.)

| <u>DATE</u> | <u>LOCATION</u> | <u>PROJECT</u> | <u>ACTION</u> |
|-------------|-----------------|---|--|
| 26 | Klamath Co. | <u>Weyerhaeuser Company</u> Compliance program and schedule for Klamath Falls hardboard plant | Approved |
| 26 | Klamath Co. | <u>Weyerhaeuser Company</u> Compliance program and schedule for Klamath Falls particleboard plant | Approved |
| 26 | Sherman Co. | <u>Highway Project: Liberty</u> <u>Rd.-Ruggles Rd., FAS 669;</u> Notice of intent to apply for Federal aid | No comment |
| 26 | Marion Co. | <u>Highway Division: Highway</u> <u>Planning and Research Work</u> program | No comment |
| 26 | Marion Co. | <u>MWVAPA: Review of air</u> <u>pollution control program</u> | Additional information requested |
| 26 | Yamhill Co. | <u>City of McMinnville:</u> <u>Municipal Airport Master</u> Plan | Additional information requested |
| 28 | Hood River Co. | <u>J. Arlie Bryant, Inc.</u> Plans and specifications for installation of hot mix asphalt plant | Approved subject to conditions in Stipulation and Order |
| 28 | Hood River Co. | <u>J. Arlie Bryant, Inc.</u> Plans and specifications for installation of portable rock crusher | Approved subject to conditions in Stipulation and Order |
| 28 | Klamath Co. | <u>George R. Stacy Company</u> Plans and specifications for installation of hot mix asphalt plant | Approved subject to conditions in Stipulation and Order |



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. C, June 8, 1972, EQC Meeting

City of Wasco Sewage Treatment

Background

1. The city of Wasco in Sherman County (population approximately 400), operates a community septic tank which discharges to an intermittent stream in Spanish Hollow.
2. The State Sanitary Authority first started trying to get this health hazard corrected in 1949. At that time the city claimed the lack of funds would make it impossible to make any major corrections.
3. By letter from the State Sanitary Authority dated January 22, 1963, it was again brought to the attention of the city that a serious health hazard existed. They were requested to hire a consulting engineer.
4. A preliminary engineering report was completed by Pettijohn Engineering in 1968. The report recommended a series of sewage lagoons.
5. The present septic tank and outfall line is near Highway 97. Proposed plans for relocating the highway delayed the city in acquiring the land necessary for the sewage lagoons.

6. A waste discharge permit, issued in April 1971, required final plans by June 1971 and completion of construction by November 1971.
7. The permit expired December 31, 1971. The city has applied for a renewal of their permit. It has not yet been issued.
8. The city of Wasco has been requested to appear before the Commission at its meeting in Bend on June 8, 1972 to discuss the city's program and time table for constructing adequate sewage treatment facilities.

Evaluation

1. The septic tank effluent which discharges to Spanish Hollow continues to be a health hazard and odor nuisance.
2. Although much of the delay in constructing an approved facility has been unavoidable, there is no doubt that they have not progressed as rapidly as possible.
3. Some additional land has been acquired from the Highway Commission in the vicinity of the septic tank.
4. A consulting engineer has not yet been retained to develop final plans and specifications.

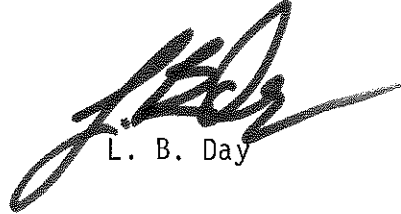
Conclusions

1. The city of Wasco continues to create a health hazard by discharging inadequately treated and undisinfected sewage to Spanish Hollow.
2. The city has never presented a positive program and time table for improving their sewage treatment works.
3. Although some delay has been unavoidable, the city has had ample time to complete the required improvements.

Director's Recommendation

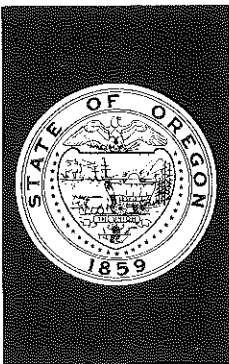
It is the recommendation of the Director that if the city does not present a suitable program and time table for providing adequate sewage treatment facilities, the Department be instructed to schedule a hearing at the earliest possible date and the city of Wasco be requested to appear at the hearing to show cause why an order should not be issued requiring them to complete adequate sewage treatment facilities in accordance with a schedule developed by the Department.

It is also recommended that a waste discharge permit be issued which incorporates the schedule which is developed.



L. B. Day

CKA:vt
5/30/72



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL
GOVERNOR

L. B. DAY
Director

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Portland

ARNOLD M. COGAN
Portland

MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: DIRECTOR

SUBJECT: Agenda Item D, June 8, 1972, Weyerhaeuser Company,
Klamath Falls and Bly Compliance Schedules.

BACKGROUND:

Since the adoption of the Board Products Regulations, OAR, 340, Sections 25-305 through 25-325, the Department has received written compliance schedules for the Klamath Falls hard-board, particleboard and plywood operations. In addition the company has furnished compliance schedules for the hog-fuel boilers in Klamath Falls and Bly as well as a phase-out schedule for the Bly wigwam waste burner.

CURRENT STATUS:

As required by the Environmental Protection Agency and under the provisions of OAR, 340, Section 20-032, Compliance Schedules, the Department has attempted to formalize the compliance schedules submitted by the Weyerhaeuser Company in the form of a "Stipulation and Order."

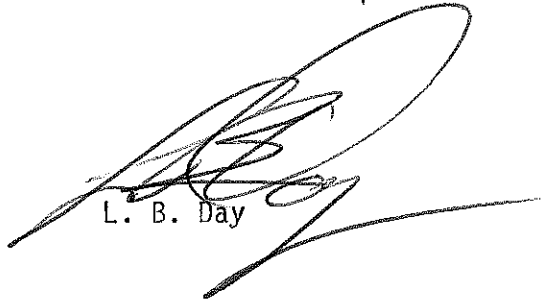
On May 22, 1972, the Department was informed by telephone that the Weyerhaeuser Company had determined that it was not possible for the company to execute the "Stipulation and Order" form submitted by the Department. The company stated that they had no objection to

the conditions contained in the document since they were as proposed by the company. However, it was stated that the company did object to the procedure or format used to establish a formal and enforceable compliance schedule.

Therefore, it appears that the company may be requesting a Public Hearing, as provided under OAR, 340, Section 20-032 (2), and ORS 449.815.

DIRECTOR'S RECOMMENDATION:

It is the recommendation of the Director that a Public Hearing be authorized to adopt an order for compliance including the conditions contained in the attached "Stipulations and Orders."



L. B. Day

April 13, 1972

Hoyermaeuser Company
P. O. Box 2
Klamath Falls, Oregon 97601

Attn: Mr. Doug Kilner Re: Phase-Out Shutdown Date,
Good Products Manager Wigwam Burner, Gly, Oregon
Klamath County

Gentlemen:

This will acknowledge your letter dated March 2, 1972, requesting an extension of the phase-out date for the remaining wigwam waste burner at your Gly, Oregon, operation.

The request of Hoyermaeuser Company for an extension of the use of their unmodified wigwam waste burner at Gly, Oregon, until June 15, 1972, is approved subject to confirmation by the Environmental Quality Commission and the complete execution of the enclosed "Stipulation and Order." (Please sign and return all copies. Your copy will be returned after execution by this office.)

Please advise us when actual phase-out of this wigwam waste burner is accomplished.

If the Department can be of assistance, or if you have any questions, do not hesitate to call.

Very truly yours,
Original Signed By
L. B. Day

APR 19 1972

L. B. Day
Director

B - LBB:KAC

Enclosures

cc: District Engineer

BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

In the Matter of

Weyerhaeuser Company
Klamath Falls, Oregon
a Washington Corporation

)
) No. _____
)
) STIPULATION AND ORDER
)

In lieu of holding a hearing as provided by ORS 449.815 and in accordance with ORS Chapter 183 and Oregon Administrative Rules, Chapter 340, Division 2, Section 20.032, Compliance Schedules, the Department of Environmental Quality, hereinafter referred to as the "Department", and Weyerhaeuser Company, Klamath Falls, Oregon, a Washington Corporation hereinafter referred to as "respondent", following conciliation, conference and per-suasion, do hereby stipulate and agree to the following:

STIPULATION

Pursuant to Oregon Administrative Rules, Chapter 340, Section 20.032, Compliance Schedules, Respondent has submitted its Compliance Schedule to the Department which is designed to achieve compliance with Oregon Administrative Rules, Chapter 340, Section 21-015. The Department, after receiving the proposed Compliance Schedule, finds it satisfactory to meet the intent and purposes of Oregon Revised Statutes, Chapter 449, and Oregon Administrative rules, Chapter 340, Section 21-015.

Now therefore the Company shall:

1. Furnish adequate documentation as to the method of wood residue utilization or disposal for approval of the Department prior to the phase-out of the wigwam waste burner at the Ely plant.
2. Phase-out the wigwam waste burner at the Ely plant no later than June 15, 1972.
3. Insure that no open burning is conducted at the plant site.
4. Not dispose of any wood residues in a landfill or any other solid waste disposal area without prior approval from the Department and only if said site is issued a permit from the Department.

Dated _____, 19 _____

Weyerhaeuser Company, Klamath Falls, Oregon
Respondent

By _____
Title _____

Dated April 19, 19 72

Department of Environmental Quality

By [Signature]
Title Chief Engineering Services

IT IS SO ORDERED

Dated _____, 19 _____

For the Environmental Quality Commission

By _____
Title Director



Weyerhaeuser Company

P.O. Box 9
Klamath Falls, Oregon 97601
A/C 503 • 882-2521

March 2, 1972

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED
MAR 6 1972

Mr. L.B. Day, Director
Department of Environmental Quality
1234 S.W. Morrison
Portland, Oregon 97205

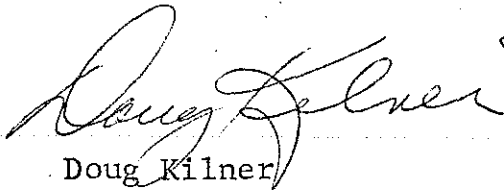
AIR QUALITY CONTROL

Re: Postponement of Shutdown date Wigwam Burner, Bly, Oregon

Dear Sir:

Because of winter weather construction problems, we wish to advise that the permanent shutdown of the remaining wigwam burner at our Bly, Oregon, operation will not occur until approximately May 30, 1972.

We will advise you upon its actual shutdown.



Doug Kilner
Wood Products Manager

DK/vw

cc-Kent Ashbaker, D.E.Q., Bend, Ore.

BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

In the Matter of)
)
Weyerhaeuser Company) No. _____
Klamath Falls, Oregon,)
a Washington Corporation) STIPULATION AND ORDER

In lieu of holding a hearing as provided by ORS 449.815 and in accordance with ORS Chapter 183 and Oregon Administrative Rules, Chapter 340, Division 2, Section 20.032, Compliance Schedules, the Department of Environmental Quality, hereinafter referred to as the "Department", and Weyerhaeuser Company, Klamath Falls, Oregon, a Washington Corporation hereinafter referred to as the "Respondent", following conciliation, conference and persuasion, do hereby stipulate and agree to the following:

STIPULATION

Pursuant to Oregon Administrative Rules, Chapter 340, Section 20.032, Compliance Schedules, Respondent has submitted its Compliance Schedule to the Department which is designed to achieve compliance with Oregon Administrative Rules, Chapter 340, Sections 25-305, 25-310 and 25-325. The Department, after receiving the proposed Compliance Schedule, finds it satisfactory to meet the intent and purposes of Oregon Revised Statutes, Chapter 449, and Oregon Administrative Rules, Chapter 340, Sections 25-305, 25-310 and 25-325.

Now therefore the Respondent agrees that it shall, for the Klamath Falls Hardboard Plant:

1. Complete all engineering of plans and specifications as necessary for modification of the Hardboard Truck Dump and submit them for review to the Department on or before May 31, 1972.
2. Complete all construction and modifications as necessary to the Hardboard Truck Dump in accordance with plans and specifications that have received prior approval from the Department.
3. Complete all construction and modifications of the Hardboard Truck Dump on or before September 30, 1972.
4. Submit to the Department the report and analysis of the Company's study relating to modification or elimination of the tempering ovens on or before July 30, 1972.
5. Eliminate the tempering oven operation, modify the tempering oven, or control all emissions from the tempering oven as required, in accordance with plans and specifications that have received prior approval from the Department.

6. Complete any other modifications or changes in the Hardboard Plant as required for compliance with OAR, 340, Section 25-325, in accordance with plans and specifications that have received prior approval from the Department.

7. Complete all necessary modifications or changes in the Hardboard Plant and submit to the Department a statement that the facility is in compliance with OAR, 340, Section 25-325, on or before September 30, 1972.

8. Submit reports of the Company's progress on their Compliance Program and Schedule as and when they may be required by the Department.

9. Insure that no open burning is conducted on the plant site.

10. Not dispose of any wood waste residues in a landfill or any other solid waste disposal area without prior approval of the Department and only if said site is issued a permit from the Department.

Dated _____, 19__

Respondent _____

By _____

Title _____

Dated May 4, 1972

Department of Environmental Quality

By A. H. Bertch

Title Chief, Engineering Services

IT IS SO ORDERED

Dated _____, 19__

For the Environmental Quality Commission

By _____

Title Director



Weyerhaeuser Company

P.O. Box 9
Klamath Falls, Oregon 97601
A/C 503 • 882-2521

November 9, 1971

Mr. H. Patterson
Department of Environmental Quality
P.O. Box 231
Portland, Oregon 97207

Dear Mr. Patterson:

The Weyerhaeuser Company at Klamath Falls operates a Hardboard manufacturing plant. The particulate emission at this plant has been surveyed by the Weyerhaeuser Company's Technical Department.

Examination of the data resulting from this survey indicates that the following conditions exist:

| | |
|---|----------------------|
| Total Measured Cyclone Emission (LB/Hr) | 31.2 LB |
| Maximum 8-Hour Production Capacity of Plant | 85.0 M Surface 7/16" |
| Maximum Hourly Production Capacity of Plant | 10.6 M Surface 7/16" |
| Maximum 1/8" Production Hourly (Dues are paid to the National Hardboard Association on the basis of a 3:1 conversion to 1/8) | 31.8 Ft/Hr 1/8 |

The measured emissions are a sum of readings taken from cyclone collectors operating to serve the Hardboard plant on the plant site.

A plan altering the product mix to eliminate the production of oil tempered board is now being formulated. Process changes in other portions of the plant are also under study. When the study is completed, we will inform you if there are significant changes in the operation. These two activities will be reported on prior to July, 1972.

Mr. H. Patterson

-2-

November 9, 1971

Please note the attached schedule which gives dates at which we plan to modify the Hardboard truck dump.

We hope that this information will enable you to establish our degree of control as defined under paragraph "a" of regulations section 25-315.

Should significant changes in plant operation indicate the need for a new survey, your office will be contacted.


Douglas Kilner
Wood Products Manager

DK/vw

Attachment

cc-C. Goll, Tacoma
H. Carrels
G. Gjertsen
J. Brooks

SCHEDULE OF IMPLEMENTATION
PARTICULATE HANDLING MODIFICATIONS.

WEYERHAEUSER CO - KLAMATH FALLS OREGON

ITEM

HARDBOARD
TRUCK DUMP

ENGINE
 INST & OPER

MONTH 10 12 2 4 6 8 10 12 2 4 6 8 10 12

YEAR 71 ← 1972 → 1973 → 1974 →



Weyerhaeuser Company

RECEIVED
NOV 11 1971

P.O. Box 9
Klamath Falls, Oregon 97601
A/C 503 • 882-2521

AIR QUALITY CONTROL

November 9, 1971

Mr. H. Patterson
Department of Environmental Quality
P.O. Box 231
Portland, Oregon 97207

Dear Mr. Patterson:

The Weyerhaeuser Company at Klamath Falls operates a plywood manufacturing plant. The particulate emission at this plant has been surveyed by the Weyerhaeuser Company's Technical Department.


Examination of the data resulting from this survey indicates that the following conditions exist:

| | |
|---|-------------|
| Total Measured Cyclone Emission (LB/Hr) | 3.241 |
| Maximum 8-Hour Production Capacity of Plant | 120 M (3/8) |
| Maximum Hourly Production Capacity of Plant | 15 M (3/8) |

The measured emissions are a sum of readings taken from six cyclone collectors operating to serve the plywood plant on the plant site.

We hope that this information will enable you to establish our degree of control as defined under paragraph "a" of regulations section 25-315.

Should significant changes in plant operation indicate the need for a new survey, your office will be contacted.


Douglas Kilner
Wood Products Manager

DK/vw

cc-C. Goll, Tacoma G. Gjertsen
H. Carrels J. Brooks

Handwritten signature: Harold Erickson

BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

In the Matter of)
Weyerhaeuser Company)
Klamath Falls, Oregon)
A Washington Corporation)

No. _____

STIPULATION AND ORDER

In lieu of holding a hearing as provided by ORS 449.815 and in accordance with ORS Chapter 183 and Oregon Administrative Rules, Chapter 340, Division 2, Section 20.032, Compliance Schedules, the Department of Environmental Quality, hereinafter referred to as the "Department", and Weyerhaeuser Company, Klamath Falls, Oregon, a Washington Corporation hereinafter referred to as the "Respondent", following conciliation, conference and persuasion, do hereby stipulate and agree to the following:

STIPULATION

Pursuant to Oregon Administrative Rules, Chapter 340, Section 20.032, Compliance Schedules, Respondent has submitted its Compliance Schedule to the Department which is designed to achieve compliance with Oregon Administrative Rules, Chapter 340, Sections 25-305, 25-310 and 25-315. The Department, after receiving the proposed Compliance Schedule, finds it satisfactory to meet the intent and purposes of Oregon Revised Statutes, Chapter 449, and Oregon Administrative Rules, Chapter 340, Sections 25-305, 25-310 and 25-315.

Now therefore the Respondent agrees that it shall, for the Klamath Falls Plywood Plant:

1. Maintain and operate the Plywood Plant in continuous Compliance with OAR, Chapter 340, Sections 25-305, 25-310 and 25-315.
2. Notify the Department of any significant changes in the plant facility, its production capabilities or of any new emission sources prior to installation or modification of equipment with emissions to the atmosphere.
3. Insure that no open burning is conducted on the plant site.

4. Not dispose of any wood waste residues in a land-fill or any other solid waste disposal area without prior approval of the Department and only if said site is issued a permit from the Department.

Dated _____, 19__

Respondent _____

By _____

Title _____

Dated May 4, 1972

Department of Environmental Quality

By A. A. Berhelf

Title Chief, Engineering Services

IT IS SO ORDERED.

Dated _____, 19__

For the Environmental Quality Commission

By _____

Title Director



Weyerhaeuser Company

P.O. Box 9
Klamath Falls, Oregon 97601
A/C 503 • 882-2521

November 9, 1971

Mr. H. Patterson
Department of Environmental Quality
P.O. Box 231
Portland, Oregon 97207

Dear Mr. Patterson:

The Weyerhaeuser Company at Klamath Falls operates a Particleboard manufacturing plant. The particulate emission at this plant has been surveyed by the Weyerhaeuser Company's Technical Department.

Examination of the data resulting from this survey indicates that the following conditions exist at present:

| | |
|--|------------|
| Total Measured Cyclone Emission (LB/Hr) (Plant is in start-up phase at present) | 21.488 LB |
| Maximum 8-Hour Production Design Capacity of Plant | 80 M (3/4) |
| Maximum Hourly Production Design Capacity of Plant | 10 M (3/4) |
| Production x 3 (LB/Hr) | 30 LB |

The measured emissions are a sum of readings taken from 23 cyclone collectors operating to serve the Particleboard plant on the plant site.

We hope that this information will enable you to establish our degree of control as defined under paragraph "a" of regulations section 25-315.

It has been determined that certain modifications may be necessary. The schedule of implementation is attached, should action be required. The amount of particulate emitting from the sources listed can only

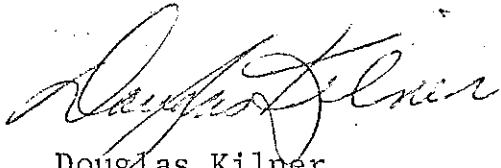
Mr. H. Patterson

-2-

November 9, 1971

be determined when full scale operation has been achieved. Information on this matter will be supplied by the end of the R & D phase shown, or no later than July, 1972.

Should significant changes in plant operation indicate the need for a new survey, your office will be contacted.




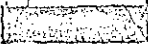


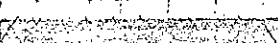



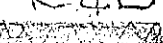

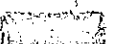
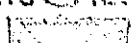
Douglas Kilner
Wood Products Manager

DK/vw
Attachment

cc-C. Goll, Tacoma
H. Carrels
G. Gjertsen
J. Brooks

SCHEDULE OF IMPLEMENTATION
PARTICULATE HANDLING MODIFICATIONS.

WEYERHAEUSER CO - KLAMATH FALLS OREGON

| ITEM | | | | | | | | | | | | | | | | | | | | |
|---|---|----------|---|-----------|--|-----------|----------|----|---|---|---|----------|----|----|---|---|---|---|----|----|
| RAW MATERIAL STORAGE; SANDER DUST COLLECTOR, ~ P. BOARD |  | R&D |  | ENGR |  | INST&OPER | | | | | | | | | | | | | | |
| ROTARY OIL FIRED DRIER CYCLONES AT P. BOARD |  | R&D |  | ENGR |  | INST&OPER | | | | | | | | | | | | | | |
| FLASH DRIER CYCLONES AT P. BOARD |  | R&D | | | | | | | | | | | | | | | | | | |
| MISC. CYCLONES SERVING PART. BOARD PLANT |  | R&D |  | ENGR |  | INST&OPER | | | | | | | | | | | | | | |
| PARTICLE BOARD TRUCK DUMP |  | ENGR |  | INST&OPER | | | | | | | | | | | | | | | | |
| MONTH | 10 | 12 | 2 | 4 | 6 | 8 | 10 | 12 | 2 | 4 | 6 | 8 | 10 | 12 | 2 | 4 | 6 | 8 | 10 | 12 |
| YEAR | 71 | ← 1972 → | | | | | ← 1973 → | | | | | ← 1974 → | | | | | | | | |

BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

In the Matter of)
Weyerhaeuser Company,)
Klamath Falls, Oregon,)
a Washington Corporation)

No. _____
STIPULATION AND ORDER

In lieu of holding a hearing as provided by ORS 449.815 and in accordance with ORS Chapter 183 and Oregon Administrative Rules, Chapter 340, Division 2, Section 20.032, Compliance Schedules, the Department of Environmental Quality, hereinafter referred to as the "Department", and Weyerhaeuser Company, Klamath Falls, Oregon, a Washington Corporation hereinafter referred to as the "Respondent", following conciliation, conference and persuasion, do hereby stipulate and agree to the following:

STIPULATION

Pursuant to Oregon Administrative Rules, Chapter 340, Section 20.032, Compliance Schedules, Respondent has submitted its Compliance Schedule to the Department which is designed to achieve compliance with Oregon Administrative Rules, Chapter 340, Sections 25-305, 25-310 and 25-320. The Department, after receiving the proposed Compliance Schedule, finds it satisfactory to meet the intent and purposes of Oregon Revised Statutes, Chapter 449, and Oregon Administrative Rules, Chapter 340, Sections 25-305, 25-310 and 25-320.

Now therefore the Respondent agrees that it shall, for the Klamath Falls Particleboard Plant:

1. Construct an enclosure over the Particleboard Truck Dump in accordance with the approved plans and specifications that were submitted to the Department on February 29, 1972.
2. Add a venting system if, after construction, the enclosure does not attain compliance with OAR, Chapter 340, Section 25-320 (a).
3. Complete all construction and modifications of the Particleboard Truck Dump as required for compliance on or before September 30, 1972.
4. Complete any modifications or changes in the Particleboard Plant as required for compliance in accordance with plans and specifications that have received prior approval from the Department.
5. Complete all modifications or changes in the Particleboard Plant and submit to the Department a statement that the facility is in compliance with OAR, Chapter 340, Section 25-320, on or before September 30, 1972.

6. Submit reports of the Company's progress on their Compliance Program and Schedule as and when they may be required by the Department.

7. Insure that no open burning is conducted on the plant site.

8. Not dispose of any wood waste residues in a landfill on any other solid waste disposal area without prior approval of the Department and only if said site is issued a permit from the Department.

Dated _____, 19__

Respondent _____

By _____

Title _____

Dated May 4, 1972

Department of Environmental Quality

By *[Signature]*

Title Chief, Engineering Services

IT IS SO ORDERED

Dated _____, 19__

For the Environmental Quality Commission

By _____

Title Director

Weyerhaeuser Company

Date _____, 1972

By _____

Title _____

DEPARTMENT OF ENVIRONMENTAL QUALITY

Date 17 March 72, 1972

By (AMS)

Title Chief, Engineering Services

IT IS SO ORDERED

For the Environmental Quality Commission

Date _____, 1972

L. B. Day

Director, Department of Environmental Quality



Weyerhaeuser Company

P.O. Box 9

Klamath Falls, Oregon 97601

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
603 • 882-2521

RECEIVED
MAR 2 1972

February 29, 1972

AIR QUALITY CONTROL

Mr. L.B. Day, Director
Department of Environmental Quality
1234 S.W. Morrison Street
Portland, Oregon 97205


Re: Compliance Board Products Regulations

Dear Sir:

In compliance with our schedule regarding particulate emission control, we are submitting an engineering drawing covering the construction of an enclosure over our Particleboard truck dump.

We are not including a vent in this design. If after construction the enclosure's performance indicates a venting system is required, it will be added and piped to the adjacent raw material storage building.

A completed form NC-1 is attached. Please advise if further information is required.


Doug Kilner
Wood Products Manager

DK/vw

Attachment

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY CONTROL DIVISION
1234 S. W. Morrison
Portland, Oregon 97205
Telephone: 229-5630

NOTICE OF CONSTRUCTION AND APPLICATION FOR APPROVAL

To Construct, Install, Establish or Alter an Air Contaminant Source and/or Control Facility
(As Required by ORS 449.712)

Business Name: WEYERHAEUSER COMPANY Phone: 882-2521

Address of Premises: _____ City: Klamath Falls Zip: 97601

Nature of Business: PARTICLEBOARD, LUMBER, PLYWOOD

Responsible Person to Contact: Doug Kilner Title: Wood Products Manager

Other Person Who May be Contacted: Eugene G. Gjertsen Title: Plant Engineer

Corporation Partnership Individual Government Agency

Present Legal Owner: WEYERHAEUSER COMPANY

Legal Owner's Address: _____ City: Tacoma, Wa. Zip: 98401

Description of Proposed Construction (Air Contamination Source: _____)

Description of Air Pollution Control Equipment: Enclosure over Particleboard truck dump.

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

Estimated Cost: Basic Air Contaminant Source Equipment: \$ _____
Air Pollution Control Equipment: \$ 5,000.00

Estimated Installation Date: Sept. 1, 1972 Estimated Operation Date: _____

Name of Applicant ~~or Owner of Business~~: Weyerhaeuser Company - Doug Kilner

Title: Wood Products Manager Phone: 882-2521 Ext. 271

Signature: *Doug Kilner* Date: February 29, 1972

NOTE: A Notice of Approval must be received from this Department 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 applicable Rules and Regulations.

(Department Use Below This Line)

De Rec'd _____ EI _____ SIC _____ Grid _____ N/C 92

Date Notification to Technical Service _____

BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

In the Matter of)
) No. _____
Weyerhaeuser Company,)
Klamath Falls, Oregon,)
a Washington Corporation)
) STIPULATION AND ORDER

In lieu of holding a hearing as provided by ORS 449.815 and in accordance with ORS Chapter 183 and Oregon Administrative Rules, Chapter 340, Division 2, Section 20.032, Compliance Schedules, the Department of Environmental Quality, hereinafter referred to as the "Department", and Weyerhaeuser Company, Klamath Falls, Oregon, a Washington Corporation hereinafter referred to as the "Respondent", following conciliation, conference and persuasion, do hereby stipulate and agree to the following:

STIPULATION

Pursuant to Oregon Administrative Rules, Chapter 340, Section 20.032, Compliance Schedules, Respondent has submitted its Compliance Schedule to the Department which is designed to achieve compliance with Oregon Administrative Rules, Chapter 340, Sections 21-005, 21-010, 21-015 and 21-020. The Department, after receiving the proposed Compliance Schedule, finds it satisfactory to meet the intent and purposes of Oregon Revised Statutes, Chapter 449, and Oregon Administrative Rules, Chapter 340, Sections 21-005, 21-010, 21-015 and 21-020.

Now therefore the Respondent agrees that it shall for the Klamath Falls Hog Fuel Boiler and Powerhouse facility:

1. Submit to the Department a report and analysis of test results of the Company's investigations of visible and particulate emissions from the Hog Fuel Boilers on or before May 31, 1972.
2. Submit a proposed Compliance Program and Schedule for the Hog Fuel Boilers for review by the Department on or before July 30, 1972.
3. Complete all construction and modifications as required in accordance with plans and specifications that have received prior approval from the Department.
4. Complete all construction and modifications as necessary to achieve compliance with OAR, Chapter 340, Sections 21-015 and 21-020 on or before December 31, 1973.
5. Demonstrate that the Hog Fuel Boilers can operate in compliance with OAR, Chapter 340, Sections 21-015 and 21-020 by isokinetically sampling the emissions from the boiler stacks as prescribed by OAR, Chapter 340, Section 20-040 and in accordance with the Department established procedures. All test data must be submitted to the Department to confirm compliance on or before November 30, 1972.

6. Submit reports of the Company's progress on their Compliance Program and Schedule as and when they may be required by the Department.

7. Submit reports and/or records of any monitoring of visible or particulate emissions that may be required by regulation or the Department.

8. Insure that no open burning is conducted on the plant site.

9. Not dispose of any wood residues in a landfill or any other solid waste disposal area without prior approval from the Department and only if said site is issued a permit from the Department.

Dated _____, 19 _____

Weyerhaeuser Company,
Klamath Falls, Oregon

Respondent

By _____
Title _____

Dated May 4, 19 72

Department of Environmental Quality

By A.H. Barrett
Title Chief, Engineering Services

IT IS SO ORDERED.

Dated _____, 19 _____

For the Environmental Quality Commission

By _____

Title Director



Weyerhaeuser Company

P.O. Box 9
Klamath Falls, Oregon 97601
A/C 503 • 882-2521

April 14, 1972

Mr. L. B. Day, Director
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

Re: Your letter of February 24, 1972
Hog Fuel Boiler Emissions
Klamath Falls, Klamath County

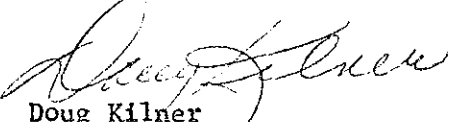
Gentlemen:

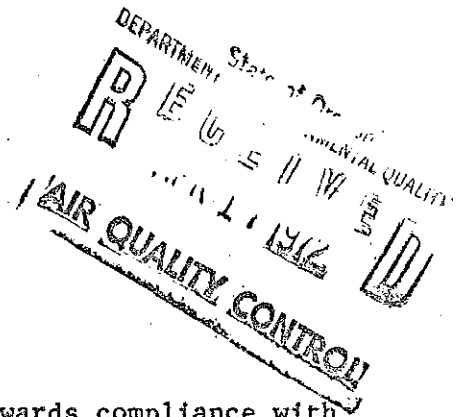
Following is our status regarding our efforts towards compliance with the applicable Administrative Rules, Chapter 340, Selections 21-005, 21-010, 21-015 and 21-020 covering the operation of existing hog fuel fired boilers.

Our Engineering Department is currently engaged in the investigation of the problem and will be issuing a report covering the measures necessary to abate the smoke and particulate fallout, in such a manner as to comply with current Oregon law.

We estimate the report to be available about May 25, 1972. Submission of a preliminary plan to you will follow on May 30, 1972. The date of the submission of a final plan to you will be contingent on the complexity of the engineering task. The completion date will naturally depend on the magnitude of the necessary construction.

We trust this arrangement will be satisfactory to you.


Doug Kilner
Wood Products Manager





Weyerhaeuser Company

P.O. Box 9
Klamath Falls, Oregon 97601
A/C 503 • 882-2521

April 14, 1972

Mr. L. B. Day, Director
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

Re: Your letter of February 24, 1972
Hog Fuel Boiler Emissions
Bly, Klamath County

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
APR 17 1972
AIR QUALITY CONTROL

Gentlemen:

Following is our status regarding our efforts towards compliance with the applicable Administrative Rules, Chapter 340, Sections 21-005, 21-010, 21-015, and 21-020 covering the operation of existing hog fuel fired boilers.

A consulting engineering firm has been engaged to investigate the problem and prepare a preliminary report recommending those changes necessary to abate smoke and particulate fallout in order to meet current Oregon law. We estimate the report will be available May 15, 1972.

We are currently considering plans which could greatly influence the work we would need to do to improve the operation of the boiler in question. However, we will submit the plan with the provision that it may be modified to fit our business plans.

You will be advised promptly as our plans develop.


Doug Kilner
Wood Products Manager

*File
Weyerhaeuser Co.
Klamath Falls
Klamath County.*



Weyerhaeuser Company

*This letter & schedule
has been revised by the company
and a corrected schedule was submitted
in letters to the Dept. on Nov 9, 1971.*

Law Department
Tacoma, Washington 98401
(206) 824-2082

TMP

October 1, 1971

Department of Environmental Quality
P. O. Box 231
Portland, Oregon 97207

Gentlemen:

Weyerhaeuser Company, at its Klamath Falls operation, has a hardboard manufacturing plant, a particleboard manufacturing plant, and a plywood manufacturing plant. The particulate emission at these three plants has been surveyed by the Weyerhaeuser Company Longview Technical Center.

Examination of the data resulting from this survey indicated specific areas require modification. A schedule identifying these areas, with dates for validation of data, engineering, and start-up, follows:

1. Sander dust collector located adjacent to particleboard raw material storage building.
 - A. Research and development complete by end of November 1971.
 - B. Engineering complete by end of May 1972.
 - C. Operational by end of November 1972.
2. Cyclone serving fired fiber driers adjacent to particleboard raw material storage building.
 - A. Research and development complete by end of March 1972.
 - B. Engineering complete by end of March 1973.
 - C. Operational by end of September 1973.

Weyerhaeuser Company

3. Cyclone serving ^{bayer} ~~tail~~ flash driers and located adjacent to particleboard raw material storage building.
- A. Research and development complete by end of May 1972.
 - B. Engineering complete by end of May 1974.
 - C. Operational by end of December 1974.
4. Miscellaneous cyclone serving particleboard plant.
- A. Research and development complete by end of February 1972.
 - B. Engineering complete by end of September 1972.
 - C. Operational by end of May 1973.

The regulations also require the enclosure of two truck dumping areas. Their schedule is as follows:

- 1. Truck dump serving particleboard plant.
 - A. Engineering complete by end of January 1972.
 - B. Operational by end of September 1972.
- 2. Truck dump serving hardboard plant.
 - A. Engineering complete by end of May 1972.
 - B. Operational by end of September 1972.

This implementation plan will be reviewed and adjusted periodically to respond to the success of the program and to essential changes in plant operations.

Very truly yours,

WEYERHAEUSER COMPANY

By

Mill Manager
Klamath Falls Operation



Weyerhaeuser Company

Law Department
Tacoma, Washington 98401
(206) 824-2082

October 1, 1971

Department of Environmental Quality
P. O. Box 231
Portland, Oregon 97207

Gentlemen:

The Weyerhaeuser Company at its Coos Bay operation has a plywood manufacturing plant and a particleboard manufacturing plant. The particulate emission at these two plants has been surveyed by the Weyerhaeuser Company Longview Technical Center.

Examination of the data resulting from this survey indicated the six (6) cyclones serving the particleboard plant require modification. A schedule identifying the dates for validation of data, engineering, and start-up follows:

- A. Research and development, complete by July, 1972.
- B. Engineering, complete by December, 1972.
- C. Installation, complete by December, 1973.

This implementation plan will be reviewed and adjusted periodically to respond to the success of the program and to essential changes in plant operations.

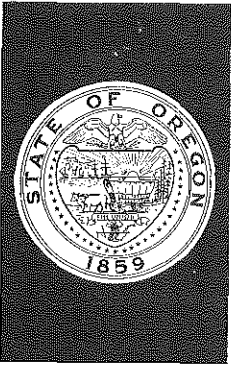
Very truly yours,

WEYERHAEUSER COMPANY

By

Mill Manager
Coos Bay Operation

vp



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

From: Director

B. A. McPHILLIPS
Chairman, McMinnville

Subject: Agenda Item No. E, June 8, 1972, EQC Meeting

EDWARD C. HARMS, JR.
Springfield

S - Winchester Bay Sanitary District
(Salmon Harbor) Status Report

STORRS S. WATERMAN
Portland

GEORGE A. McMATH
Portland

Background

ARNOLD M. COGAN
Portland

1. On March 24, 1972 the EQC after hearing a staff report on the matter of sewage disposal deficiencies in the Winchester Bay Area and testimony by interested persons adopted a motion that:
 - a. Directed the Sanitary District to proceed to provide the necessary sewage collection treatment facilities.
 - b. Requested the county to prohibit the construction of further people-attracting facilities in the area.
 - c. Requested cooperation of all entities involved in the area to help in providing the needed facilities and that the department promote and assist in the development of the area-wide program.
 - d. Schedule a formal public hearing at this meeting in Bend if adequate progress is not made by May 1, 1972.
2. Meetings were held in April in which the department assisted in discussing the alternatives that are involved with all entities and persons in the Winchester Bay area to solve the sewage problem.

3. On May 1, 1972 at a special meeting of the Board of Directors of the Sanitary District a bond election was scheduled for June 6, 1972 in an amount of \$138,000.
4. On May 9, 1972 the Douglas County Budget Committee tentatively approved \$100,000 as the county's contribution to the proposed Winchester Bay Sanitary District's collection and treatment facilities. An additional request in the amount of \$113,000 has been included in the budget for site improvements at Salmon Harbor.

Evaluation

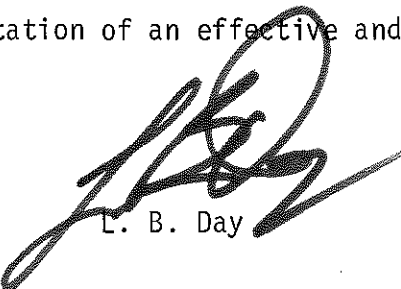
1. The Sanitary District has scheduled a \$138,000 bond issue for June 6, 1972 as requested.
2. The county has cooperated and prohibited construction in the area at this time.
3. Presently a voluntary, cooperative program has been achieved but this has not resulted in a complete financial program.
4. Until the local financing situation is resolved by the Sanitary District, negotiations on the county's contribution cannot be determined.

Conclusion

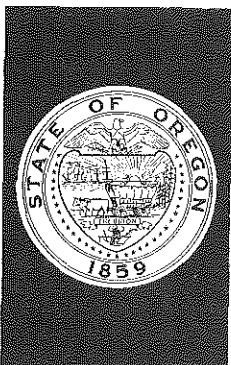
1. It is concluded that reasonable progress has been made at this time in regard to providing the necessary sewerage facilities in the area.

Recommendation

1. The Department of Environmental Quality should review the outcome of the scheduled bond issue and evaluate the program as proposed by the District.
2. If the bond issue is not approved, schedule a formal public hearing for the July 1972 meeting of the EQC to order the implementation of an effective and timely program.



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. F, June 8, 1972, EQC Meeting

Regulations Pertaining to Oil Spills into Public Waters (for final adoption)

On March 24, 1972, the EQC held a public hearing to receive testimony on proposed regulations pertinent to Oregon's Oil Spill Act (ORS 449.155 to 449.175).

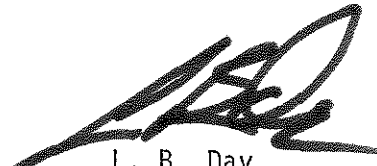
Testimony of an excellent quality was received. The staff took recommendations from the testimony and made appropriate changes in the proposed regulations that would enhance both the clarity and effectiveness of the document.

The proposed regulations were then prepared in final form and presented to the EQC for adoption at the April 21, 1972, meeting. At this meeting the question was raised as to whether or not Oregon's Oil Spill Act and Regulations might be in conflict with similar limitations and exemptions in federal statutes. With this question before it, the Commission delayed adoption of the regulations until the June meeting, which would allow legal counsel time to consider the matter of possible conflicts.

Legal counsel has since determined that Section 15 of Oregon's act assures that there will be no conflict with federal statutes. ORS 449.175(2) reads as follows: "Nothing in this 1971 Act or the rules and regulations adopted thereunder shall require or prohibit any act if such requirement or prohibition is in conflict with any applicable federal law or regulation."

Director's Recommendation

Now that the question of conflict has been resolved, it is recommended that the proposed regulations pertaining to oil spills into public waters as amended at the April 21, 1972, EQC meeting, be adopted.



L. B. Day

REGULATIONS PERTAINING TO OIL SPILLS INTO PUBLIC WATERS

Department of Environmental Quality

June 8, 1972

These regulations are to be made a part of OAR Chapter 340, Division 4, Subdivision 7.

A. Purpose

The purpose of these regulations is to prescribe procedures for reporting and controlling oil spills into public waters, and for regulating the removal and disposal of spilled oil and rehabilitating and restoring any public resource damaged thereby, pursuant to ORS 449.155 to 449.175.

B. Definitions

As used in these regulations unless otherwise required by context:

- (1) "Oils" or "oil" shall mean oil, including gasoline, crude oil, fuel oil, diesel oil, lubricating oil, sludge, oil refuse and any other petroleum related product.
- (2) "Having control over oil" shall include but shall not be limited to any person using, storing or transporting oil immediately prior to entry of such oil into the waters of the state, and shall specifically include carriers and bailees of such oil.
- (3) "Public waters" or "waters of the state" includes lakes, bays, ponds, impounding reservoirs, springs, wells, rivers, streams, creeks, estuaries, marshes, inlets, canals, the Pacific Ocean within the territorial limits of the State of Oregon and all other bodies of surface or underground waters, natural or artificial, inland or coastal, fresh or salt, public or private (except those private waters which do not combine or effect a junction with natural surface or underground waters), which are wholly or partially within or bordering the state or within its jurisdiction.
- (4) "Spill" shall mean any unlawful discharge or entry of oil into public waters or waters of the state including but not limited to quantities of spilled oils that would produce a visible oily slick, oily solids or coat aquatic life, habitat or property with oil, but excluding normal discharges from properly operating marine engines.

- (5) "Department" shall mean the Department of Environmental Quality.
- (6) "Director" shall mean the Director of the Department of Environmental Quality.
- (7) "Person" shall mean the United States, and agencies thereof, any state, any individual, public or private corporation, political subdivision, governmental agency, municipality, industry, copartnership, association, firm, trust, estate or any other legal entity whatsoever.

C. Notice, Control and Cleanup of Oil Spills Required

- (1) Any person owning or having control over oil that is spilled into public waters or on land such that there is a substantial likelihood it will enter public waters shall:
 - a. Immediately stop the spilling;
 - b. Immediately collect and remove the spilled oil unless not feasible in which case the person shall take all practicable actions to contain, treat and disperse the same in a manner acceptable to the department.
 - c. Immediately proceed to correct the cause of the spill;
 - d. Immediately notify the Department of the type, quantity, and location of the spill, corrective and cleanup actions taken and proposed to be taken (immediate notification to the U.S. Coast Guard of oil spills in marine estuaries and inland navigable waters will suffice as notification to the Department); and
 - e. Within seven days following a spill, submit a complete and detailed written report to the Department describing all aspects of the spill and steps taken to prevent a recurrence.
- (2) Cleanup of oil spills shall proceed in a timely and diligent manner until written notice is obtained from the Department that satisfactory cleanup has been achieved.
- (3) Compliance with the above requirements does not relieve the owner or person having control over oil from liability, damages or penalties resulting from spill and clean up of such oil.

D. Approval Required for Use of Chemicals

- (1) No chemicals shall be used to disperse, coagulate or otherwise treat oil spills except inert absorbant materials that are completely removed in the clean up process or other materials as may be specifically approved by the Department.
- (2) Physical removal of oil spills will ordinarily be required except where use of chemical dispersants is warranted by extreme fire danger or other unusually hazardous circumstances.

E. Approval Required for Disposal of Spilled Oils

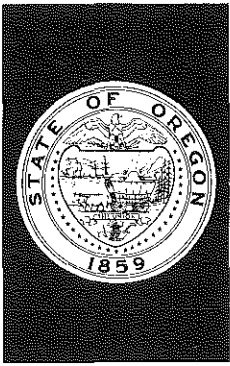
- (1) Spilled oils and oil contaminated materials resulting from control, treatment, and clean up shall be handled and disposed of in a manner approved by the Department.
- (2) Disposal of oils and oily wastes resulting from clean up of an oil spill may be achieved by reclaiming and recycling, disposal at a disposal site operated under and in accordance with a permit issued pursuant to ORS Chapter 459 or treated and discharged in accordance with a permit obtained pursuant to ORS 449.083.

F. Violations

In addition to liability for costs of removal and clean up of oil spills, liability for damages to resources resulting from oil spills and cleanup of oil spills and other penalties provided by law, any person who intentionally or negligently causes or permits the discharge of oil into the waters of the state shall incur a civil penalty of an amount up to \$20,000 for each violation, pursuant to ORS 449.995.

In determining the amount of civil penalty the Director shall give consideration to the following:

- (1) Gravity of the violation.
- (2) Previous record of compliance or non-compliance.
- (3) Timeliness of notice to the Department of an oil spill.
- (4) Timeliness and effectiveness of cleanup efforts.
- (5) Other appropriate considerations.



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

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ARNOLD M. COGAN
Portland

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. G , June 8, 1972, EQC Meeting

Reduction of Civil Penalties

Background

Under the provisions of ORS 449.970-973 the Environmental Quality Commission adopted administrative rules pertaining to Civil Penalties (OAR 340, Sections 12-005 through 12-010).

The Director has issued numerous warnings and three (3) penalties have been levied: Pennington Manufacturing Company, Rogge Lumber Company, and Jeld-Wen, Inc. In each case, the Department recommended and the Director mitigated the penalty. Under the statutes the penalty "may be remitted or mitigated upon such terms and conditions as the Environmental Quality Commission in its discretion considers proper and when deemed necessary".

Factual Analysis

Rogge Lumber Sales, Inc., Coos County

Following the adoption and filing of an Order dated January 18, 1972, to require Rogge Lumber Co. to submit a schedule for phase out or modification of two (2) wigwam waste burners (Bandon and Port Orford), the Director, on February 9, 1972, issued notification to levy a Civil Penalty in the amount of \$500 per day when the company failed to comply with the Order. Such penalty began on February 28, 1972.

The company filed a compliance schedule by telegram dated February 25, 1972, although unacceptable (and not in conformity to the final date in the Commission Order). Following numerous telephone calls, letters and including several meetings and site visits, the problems

were resolved.

The company ceased operation of the wigwam waste burners within the final date (May 15, 1972) in the Order and currently operates a landfill under a permit issued by the Solid Waste Management Division.

Pennington Manufacturing Company, Klamath County, Klamath Falls

Open burning in violation of OAR 340, Section 23-011, was observed on February 19, 1972. On February 23, 1972, a staff member visited with Mr. Al Pennington concerning this matter and advised him that a certified warning letter would be mailed. The letter was mailed on February 29, 1972, advising that a penalty would be assessed if further violation occurred. The company refused service and the letter was returned to the office.

On March 21, 1972, an additional open burning violation occurred. In a letter dated March 23, 1972, a Civil Penalty of \$500 was imposed and was acknowledged as received on March 28.

In a detailed letter, Mr. Pennington explained: That the fire resulted from a fire hazard reduction operation which included adjacent grass and weeds; that the previous mill had burned; that the mill had been rebuilt to use 100% of all wood residues; apologized for prior letter rejection; pleaded financial hardship; and acknowledged current awareness of open burning regulations.

On April 12, 1972, Mr. Pennington advised he had not received a response to his letter of April 2, 1972 (Department letter mitigating the penalty crossed in the mail).

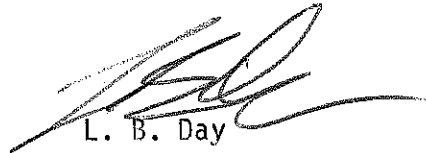
Jeld-Wen, Inc., Klamath County

On March 3, 1972, a notice of violation was sent to Jeld-Wen, Inc., Klamath Falls, concerning open burning and advising that a penalty would be imposed if any further violations were observed. On March 30 and April 1, 1972, open burning was observed and documented. By a letter of April 3, 1972, a Civil Penalty in the amount of \$200 was imposed by the Director. The company advised by letter of April 11, 1972, that the open burning had actually been conducted on the property of and by Thomas Lumber Company. They are adjacent properties. Thomas Lumber Company property was acquired by Jeld-Wen, Inc. on April 1, 1972.

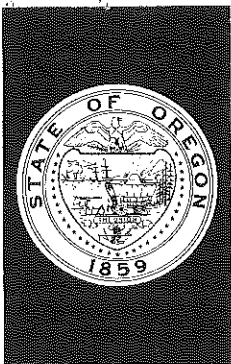
Director's Recommendation

It is recommended that the Environmental Quality Commission mitigate the Civil Penalties levied in accordance with the following:

| | <u>Initial Penalty</u> | <u>Mitigated Penalty</u> |
|---|----------------------------|------------------------------|
| Rogge Lumber Sales, Coos Co. Bandon | \$500 per day | 0 |
| Pennington Manufacturing Co. Klamath Falls | \$500 per day | \$50 |
| Jeld-Wen, Inc. Klamath Falls | \$200 per day | 0 |


L. B. Day

HHB:ms
5/17/72



DEPARTMENT OF ENVIRONMENTAL QUALITY

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MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: Director

SUBJECT: Agenda Item No. H, June 8, 1972, EQC Meeting

Oregon Clean Air Act Implementation Plan Clarifications and Amendments

BACKGROUND:

On April 18, 1972 the Department staff met with officials of Region X, EPA concerning their evaluation of the Oregon Clean Air Act Implementation Plan adopted by the Environmental Quality Commission at the January 24, 1972, meeting and submitted to EPA by Governor McCall by letter of January 25, 1972.

The Department was advised that the items and subject matter presented at the April 18, 1972 meeting represented not only the views of Region X, but all other EPA offices also. Following this April 18th meeting, Region X, EPA, provided an evaluation in writing by a letter dated April 26, 1972.

The evaluation and comments were classified into two broad categories of (1) clarifications, corrections and submission of new material, and (2) those of a substantive nature.

After a review of the evaluation and comments, the Department prepared the necessary explanation and revisions and Governor McCall submitted the information and plan revisions to William D. Ruckelshaus, Administrator, EPA, by letter dated May 3, 1972, a copy of which is attached. The Department then issued an addendum to all holders of the State of Oregon Clean Air Act Implementation Plan, a copy of which is also attached.

The following is a brief explanation of those additional submissions to EPA:

1. A specific date, May 30, 1975, was added to the Implementation Plan for accomplishing the control strategy and for meeting the national primary and secondary ambient air standards pertaining to particulates, CO, SOx, NOx and hydrocarbons.
2. Oregon's Public Information Act, ORS Chapter 192, was made part of the plan addendums and clarification was made that the public would have access to emission and related data.
3. The Pendleton ambient air background surveillance station was incorporated as part of the Plan.
4. Additional information and descriptions were provided relative to ambient air sampling methods and source test methods and procedures.
5. Explanations were made relative to air quality control program costs and projected costs as included in the Implementation Plan.
6. Additional assurances were given relative to inter-governmental cooperation with the State of Washington.
7. The emergency action plan was clarified to include hydrocarbons and carbon monoxide as well as particulates and SO₂.
8. Assurances were given that food and agriculture (feed mills) could be required to monitor and report to the Columbia-Willamette Air Pollution Authority.
9. Rule Additions:

Two rule additions were found necessary for approval by the Federal government of the Oregon Clean Air Act Implementation Plan.

A. Records, Maintenance and Reporting

A new rule was necessary which requires upon notification of the Director, air contaminant source owners must "keep and maintain written records of the nature, type and amount of emissions....."

While the adoption of a rule must be considered substantive, the impact is less significant. Existing rules already require monitoring and submission of data when required.

To meet the requirements set forth by EPA, a temporary rule was adopted, which is as follows:

"RECORDS; MAINTAINING AND REPORTING (1) Upon notification from the Director of the Department of Environmental Quality, all persons owning or operating a stationary air contaminant source within the State shall commence to keep and maintain written records of the nature, type and amounts of emissions from such source and other information as may be required by the Director to determine whether such is in compliance with applicable emission rules, limitations or other control measures.

(2) The records shall be prepared in the form of a report and submitted to the Department of Environmental Quality on a semi-annual basis commencing with the first full semi-annual period after the Director's notification to such persons owning or operating a stationary air contaminant source of these record-keeping requirements. Except as may be otherwise provided by rule, semi-annual periods are January 1, June 30 and July 1, December 31.

(3) The reports required by this rule shall be completed on forms furnished by the Department of Environmental Quality and shall be submitted within 30 days after the end of each reporting period."

B. Compliance Schedules

All compliance schedules are required to be submitted with the first semi-annual report. The first semi-annual report period ends December 31, 1972 and are due in EPA office within 45 days after that period or February 15, 1973. In the design and adoption of the veneer drier standard, the final compliance schedule date of March 30, 1973 was established in the adopted rule.

In order to meet the requirements set forth by EPA, the Board Products Industries rule, and specifically sections 25-315, Veneer and Plywood Manufacturing Operations, subsection (d) was amended as follows:

"Section 25-315 - (d) No later than September 30, 1972, every person operating a veneer drier shall submit to the Department of Environmental Quality, a specific proposal for complying with this subsection, and by no later than [March 30, 1973] 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 practicable treatment and control. In no case shall final compliance be achieved by later than December 31, 1974."

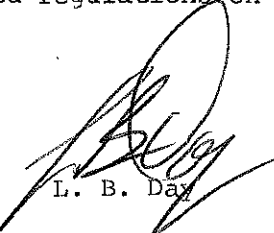
SUMMARY:

In order to clarify portions of the Oregon Clean Air Act Implementation Plan, information was submitted to EPA; corrections and amendments were made to the Implementation Plan; and two temporary rules were adopted in accordance with administrative procedures.

It is now necessary to authorize a public hearing for the purpose of adopting the rule and amended rule as a normal part of OAR, Chapter 340.

DIRECTOR'S RECOMMENDATION:

It is recommended that the Commission authorize the Director to hold a public hearing on the proposed regulations on a date and at a location yet to be determined.


L. B. Day



TOM McCALL
GOVERNOR

OFFICE OF THE GOVERNOR
STATE CAPITOL
SALEM 97310

May 3, 1972

Mr. William D. Ruckelshaus, Administrator
Environmental Protection Agency
Waterside Mall, Fourth & M Streets S.W.
Washington, D.C. 20460

Dear Mr. Ruckelshaus:

Region X, Environmental Protection Agency, has requested certain clarifications and assurances to the Oregon Clean Air Act Implementation Plan submitted to EPA by my letter of January 25, 1972, as required under the Federal Clean Air Act as Amended in 1970.

In order to assist the Environmental Protection Agency, attachments are submitted including:

- No. 1: ORS Chapter 449, 1971 Replacement Part. This includes Oregon Law 1971 combined with previously existing law relating to Water and Air Pollution Control.
- No. 2: ORS Chapter 192, 1971 Replacement Part. Public Records and Reports, which is to become part of the amended plan as Appendix I-E and is known as Oregon's Public Information Act.
- No. 3: OAR Chapter 340, Rules and Regulations pertaining to Air Pollution Control. This includes all rules in codified and indexed format, including those rules submitted in the Implementation Plan in the adopted form.

As Attachment 4, you will find an opinion from the Attorney General concerning acceptability of proceedings, hearings' record, adoption, and filing of the State of Oregon Clean Air Act, Implementation Plan.

Statutory authority for air pollution control of motor vehicle operation is contained in ORS 449.747, 449.751 and 449.753, and also in 449.949 to 449.965. In addition, 449.845, 481.190 and 483.800 to 483.820 pertain to air pollution control of motor vehicles. Further, of course, the police powers of the state are available.

The Federal Clean Air Act, as amended, and regulations adopted thereunder allows a State to authorize a local agency to carry out parts of a State Implementation Plan. In Oregon, the Department of Environmental

William D. Ruckelshaus, Administrator
Environmental Protection Agency
May 3, 1972
Page 2

Quality has authorized Regional authorities to administer various portions of the Plan in specific areas of the State. Federal regulations further provide that such State authorization shall not relieve the State of responsibility under the Act for carrying out the Plan. In Oregon, the State possesses the authority to meet this responsibility. ORS 449.820(2), 449.855(3); 449.905 and 449.910.

I assure you that it is my intention, that of the Legislative Assembly, and the intention of the people of Oregon for the State to carry out its responsibilities to not only maintain air quality but to improve the quality of the environment for Oregon and the nation. To this end, I, as chief executive officer of the State, direct the Department of Environmental Quality to do whatever is necessary to insure our Implementation Plan is fully carried out. It is my personal view, the State of Oregon has full authority to provide for continuous enforcement and administration of the Plan, and if necessary supersede local agencies' rules, to insure that an effective clean air program is maintained. If necessary, I will enter appropriate executive orders, as Governor of Oregon, to enable the Department of Environmental Quality to act immediately to enforce the regulations necessary for the attainment and maintenance of the National Ambient Air Standards.

The specific areas covered in EPA's Region X letter of April 26, 1972, are covered in the sequence and as itemized in that letter.

Item A-1. It was the intent as stated in the letter of April 26, 1972 that the Implementation Plan specifically achieve the ambient air standards by 1975. It is concluded that more than being implied, it is stated in the last sentence on page I, paragraph 4 of the Introduction, "The emission standard and other measures described in Section 2 and justified in Section 3, represents the sum total of general regulatory actions by which the State intends to control air pollution and meet national ambient air standards by 1975.", and quoting from page 3-7, "It is the object of this Implementation Plan to achieve compliance with both the primary and secondary standards for particulate matter by 1975.", and further quoting from page 3-40(a) "3.4.6 Summary. It seems clear that attainment of national ambient air standards for carbon monoxide, hydrocarbons and nitrogen oxides can be met in Portland by 1975....".

However to assure no misunderstanding, the Introduction, page I, is being amended by adding a new paragraph three (3) to specifically state that both the primary and secondary National ambient air quality standards will be achieved in 1975. Paragraph three (3) now states "The State of Oregon intends to meet both primary and secondary National ambient air quality standards in all air quality control regions in the State by May 30, 1975." Attached is an amended copy of page I as Attachment No. 5.

William D. Ruckelshaus, Administrator
Environmental Protection Agency
May 3, 1972
Page 3

Item A-2. The Oregon Public Information Act has been submitted as Appendix I-E as Attachment No. 2. To add clarification that source emission data is available for public inspection, Section 9 of the Plan has been amended. The revision to page 9-4 adds an Item 7 to the policy statement of the Department, which reads as follows: "7. Provide a reasonable opportunity for such groups to inspect source emission data upon reasonable request."

To assure no misunderstanding, the procedure for the release of information as practiced and as required under ORS Chapter 192 Section 192-020 is paraphrased and added to page 9-5 as follows, "The Department of Environmental Quality, as custodian of public records, shall furnish proper and reasonable opportunity to the general public for the inspection of emission data, as correlated with applicable emission limitations and other control measures, collected by the Department of Environmental Quality from owners or operators of stationary sources in the State of Oregon." Attached is a copy of page 9-4 and 9-5 as amended, as Attachment No. 6.

Item A-3. The recently established Pendleton background monitor station for suspended particulate that is discussed on page 3-24 of the Plan is now listed in Table 5.7 on page 5-45 of the Plan as requested. A copy of revised Table 5.7 is attached as Attachment No. 7.

Item A-4. An expanded description of ambient air quality sampling and analysis procedures used by the Department of Environmental Quality at the present time has been provided as requested as Attachment No. 8. These procedures are on file and available to the public. As indicated in the Implementation Plan, EPA reference methods will be required unless other methods are subsequently approved.

Item A-5. The description of source sampling methods and procedures that are being used in determining compliance with emission regulations are attached as Attachment No. 9. In general for all particulate sampling the RAC train is used. This is described in detail under our Boiler Sampling Procedures Method as derived from the Federal Incinerator Method for Source Sampling. For particulate sampling of wood products industry cyclones, a high volume method is employed, as described in the Interim Sampling Method for Cyclone Emissions, also attached.

The method for gas sampling of combustion sources is also included in the Boiler Test Procedure in Attachment No. 9. A method for the measurement of SO₂ from sulfite pulp mills is also included as part of our procedures.

A file, available to the public of approved test methods, is maintained by the Department of Environmental Quality.

William D. Ruckelshaus, Administrator
Environmental Protection Agency
May 3, 1972
Page 4

Item A-6. In reference to Item 6 wherein a difference was noted between Tables 7-3, 7-5 and 7-7 and those values indicated in Table 7-1 page 7-7, the following is submitted:

Table 7-7 refers to the Mid-Willamette Valley Air Pollution Authority estimate of cost by function in thousands of dollars. For the "Present" column, the cost is shown as "158". On page 7-7, Table 7-1, a typographical error occurred. The approved Federal grant upon which MWVAPA operates is \$157,549 and not \$153.549.

Table 7-5 refers to the Columbia-Willamette Air Pollution Authority estimate of cost by function in thousands of dollars, and the total under "Present" is \$456.7. The current approved Federal grant upon which CWAPA operates is \$504,999. The current estimate of expenditures is \$465,424 as is shown on the 1972-73 Federal grant application recently submitted to EPA. The difference is caused by the failure of a participating member of the CWAPA Region, Washington County, to pay their total share of funds. The budget has been adjusted to reflect funds authorized, based upon local funds available. The expenditure estimate may be further adjusted upward should additional funds become available. The Columbia-Willamette Air Pollution Authority, Department of Environmental Quality and Region X of EPA have continued to work diligently to resolve this problem.

Table 7-3 refers to the Department of Environmental Quality wherein the total is shown as 463.1 and the Federal grant application total reflects \$437,781 as shown in Table 7-1 on page 7-7. The Federal grant total, Table 7-1, reflects the Air Quality Control Division, including Laboratory personnel and services. The total in Table 7-3 reflects, in addition, total Department personnel including Administration, Administrative Services, and Field Services Division, in addition to the Air Quality Control Division, based upon an assessment of services received. It is not practical to assess these amounts more accurately on a Federal grant application.

Item A-7. You have requested additional assurances of inter-governmental cooperation between the States of Washington and Oregon. Even before and since the joint announcement by myself as Governor and Governor Evans in September of 1967 instructing the two State air quality agencies to work together and the following joint meeting of the two State air authorities on September 26, 1968 at the Clark-Skamania County Health Department, the two State agencies have worked closely together developing plans, reports and exchanging data. The history of the accomplishments of the ongoing relationship is covered in the Implementation Plan, Section 8.

William D. Ruckelshaus, Administrator
Environmental Protection Agency
May 3, 1972
Page 5

For the purposes of 51.21(c), you are assured that the State of Oregon will promptly transmit information on factors which may significantly affect air quality in any portion of Washington. Attachment No. 10 is correspondence between the Department of Ecology in Washington and the Oregon Department of Environmental Quality agreeing to and committing both agencies to continued cooperation and meeting the requirements of 51.21.

Further the Plan is amended on page 8-9 by adding a new paragraph as follows, and is included as Attachment No. 11. "8.3.4.6 Clarification of Commitment to the State of Washington as required by the Federal Register 51.21: Specifically, all notices of construction and compliance schedules (including major changes therein) for significant sources within 25 miles of the Washington border will be transmitted for the Department of Ecology review and comment. All other emission data and ambient air quality data will be submitted on request. Should the Department of Ecology desire advance information on new, expanding or modified sources beyond the 25 mile zone, it will also be supplied."

Item A-8. While no Item A-8 was included in the EPA Region X letter, it has been inserted to clarify the following corrections and amendments:

- a) A new Figure 1-2 page V, which is a map of the Oregon Federal Air Quality Control Regions has been provided as Attachment No. 12. The original had a typographical error.
- b) A corrected Table 6.2, which is the Quantitative Episode Criteria has been provided as Attachment No. 13.

Item B-1. All compliance schedules, including the veneer driers compliance schedules will be submitted with the first semiannual report as described in the Implementation Plan. Reconciliation of the date by which compliance schedules for veneer driers are required has been accomplished by modification of the regulation OAR Chapter 340, Section 25-315 advancing the compliance schedule date to December 31, 1972. This rule modification has been adopted by the Oregon Environmental Quality Commission and is included as Attachment No. 17.

Item B-2. The Emergency Action Plan regulation, OAR Chapter 340, Subdivision 7, Section 27-020, developed as part of the Implementation Plan provides the authority to require emission control plans from any source and for any contaminant.

As the automobile contributes 97% of the CO in the metropolitan area, the strategy was to control the CO emissions by controlling the motor vehicle. There are nineteen (19) carbon monoxide sources that come under the emergency action plan requirement (100 tons per year emissions), eight (8) of these are currently developing action plans. Emergency action plans will be required of the remaining

William D. Ruckelshaus, Administrator
Environmental Protection Agency
May 3, 1972
Page 6

eleven (11) sources. The strategy as outlined will remain the same; at the alert and warning level, no action will be taken by these sources; at the emergency level, action will be taken as required by regulation. There are nine (9) hydrocarbon sources that come under the emergency action plan requirements. All of the hydrocarbon sources under the plan will be required to be part of the emergency action plan. The strategy for these sources is as described for the carbon monoxide point sources.

The Implementation Plan speaks of particulate and SO₂ controls. The necessary amendments have been made to page 6-6 and Appendix 6-B-1 to reflect the inclusion of CO and HC emissions control in the emergency action plan strategy. Amended copies of these pages are included as Attachment No. 14.

Item B-3. This item requests that an additional requirement for stationary source owners and operators to maintain records be added to the Plan. It should be noted that the State of Oregon believes it already meets this requirement by virtue of statutes and rules relating to monitoring, reporting, and registration. However to assure no misunderstanding, the attached regulation was adopted by the Oregon Environmental Quality Commission. The regulation, as adopted, is attached as Attachment No. 15.

For the purposes of 51.19(a) you are assured that periodic reporting is being done and is required under OAR, Chapter 340, Section 20-015. This is applicable to all regional authorities as their rules can be no less strict than the State rules requiring annual reporting.

Item B-4. Requirements for monitoring and reporting emissions by the food and agriculture industry relate to the Columbia-Willamette Air Pollution Authority and the relative high percentage of total particulate from the grain elevators and milling operations. The authority to require monitoring is contained in the CWAPA rules that are in Section 2 of the Implementation Plan. Rule 3, Section 3.7 provides the authority to require monitoring and reporting.

Columbia-Willamette Air Pollution Authority will supply to the Department of Environmental Quality compliance schedules prior to December 31, 1972 which the DEQ will submit with the first required report. These compliance schedules will detail the schedule for reducing emissions to achieve compliance with the ambient air standards by 1975.

To provide additional clarification, page 2-16 is amended by adding a new paragraph stating "Monitoring and reporting of emissions from other stationary sources will be required as necessary to effectuate the control strategy. Attached is an amended copy of page 2-16 as Attachment No. 16.

William D. Ruckelshaus, Administrator
Environmental Protection Agency
May 3, 1972
Page 7

With these clarifications and amendments, we believe that Oregon's Implementation Plan fully meets all Federal requirements.

Your favorable and early consideration of the Oregon Implementation Plan will be greatly appreciated. If more clarification or information is required, please advise.

Sincerely,

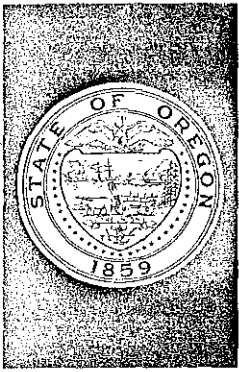
A handwritten signature in cursive script that reads "Tom McCall".

Governor

TM:h

Enclosures

cc: EPA, Region X



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

May 3, 1972

TOM McCALL
GOVERNOR

L. B. DAY
Director

ENVIRONMENTAL QUALITY
COMMISSION

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Chairman, McMinnville

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GEORGE A. McMATH
Portland

ARNOLD M. COGAN
Portland

To: All Holders of State of Oregon Implementation Plan
From: Air Quality Control Division
Subject: State of Oregon Implementation Plan

Since the Implementation Plan was submitted to the Environmental Protection Agency several corrections have been made.

The enclosed amended sheets are to be inserted into the plan:

1. Amended Introduction, Page I. Reaffirms that national air quality will be met by May 30, 1975.
2. Amended Page 9-4, clarifies that source emission data is available to the public.
3. Amended Page 9-5, further clarified availability of source emission data.
4. Amended Page 5-45, Table 5.7, includes new background monitoring station near Pendleton.
5. Amended Figure 1-2, Page, corrects a typographical error.
6. Amended table 6.2, corrected to comply with the adopted regulations for emergency episodes.
7. Amended Pages 6-6 and 6-B-1, reflect inclusion of CO and HC emissions control in the emergency action plan strategy.
8. Amended Page 2-16, clarifies monitoring and reporting of emissions from stationary sources.
9. Amended pages 8-9, clarifies working relations with the state of Washington.

In addition, other clarifications were made pertinent to control of motor vehicles; availability of files of ambient air sampling and analysis procedures and source sampling procedures; explanation of cost differences in tables; and additional assurances of cooperative interstate efforts by Oregon and Washington.

These latter items were primarily non-text, assurances and clarifications made to EPA and as such have not been included in the amended plan. The methods of sampling and analysis are available at the offices of the Department of Environmental Quality.

Telephone: (503) 229-5696

I.

CLEAN AIR ACT
IMPLEMENTATION PLAN FOR OREGON

INTRODUCTION

The Clean Air Act Amendments of 1970, enacted by the Congress of the United States and signed by the President on December 31, 1970, made broad and sweeping changes in the national strategy for combating air pollution.

Among the most important provisions of the new Amendments were those providing for the establishment of national ambient air standards, and the requirement that every State prepare and submit to the Federal Government an Implementation Plan by which it proposes to comply with the national standards.

The state of Oregon intends to meet both primary and secondary national ambient air quality standards in all air quality control regions in the State by May 30, 1975.

This document represents the proposal of the state of Oregon to the U. S. Environmental Protection Agency, describing in detail how the State intends to fulfill its responsibilities under the Clean Air Act as amended. More importantly, however, it represents the commitment of the Department of Environmental Quality to the people of Oregon to achieve and maintain high standards of air quality consistent with the needs and expectations of the people for a healthful and esthetically pleasing environment.

The Implementation Plan described in this document has been prepared according to guidelines issued by the Environmental Protection Agency and published in the Federal Register on August 14, 1971. Each section of the Plan may be placed in one of two categories:

- 1) Substantive control measures and explanation, including Sections 2 and 3.
- 2) Background information and program details, comprising the remainder of the Plan.

The first category, substantive control measures, should be considered by far the most important part of the Plan. The emission standards and other measures described in Section 2, and justified in Section 3, represent the sum total of general regulatory actions by which the State intends to control air pollution and meet national ambient air

time such developments and decisions are finalized.

4. Provide such groups with copies of significant documents related to the Plan, such as revisions and semi-annual progress reports to EPA.
5. Be responsive, consistent with Department workload and responsibilities, to complaints and inquiries of groups and individuals.
6. Encourage the regional air pollution authorities to establish similar liaison activities with local interest groups.
7. Provide a reasonable opportunity for such groups to inspect source emission data upon reasonable request.

In establishing the policy described above, the Department takes note of several conflicting factors. It is recognized that significant disagreements exist among the commercial, civic, and public interest groups having a legitimate interest in the State air pollution control program. Additionally, the process of consultation and development of consensus positions may be difficult and time-consuming, so that some conflict between citizen participation and the need for timely action should be expected.

It should further be recognized that the ultimate responsibility for decision-making, and accountability for actions taken, rest with the Department of Environmental Quality and regional air pollution authorities.

With the full understanding of all groups and individuals concerned, the program of public participation outlined in this section can work to the advantage of the public. Without a proper spirit of understanding and cooperation, the procedure poses a potential for disruption and obstruction

of the State program. The Department of Environmental Quality intends to give its best effort to the development of effective public participation; it is hopeful that an equal commitment exists on the part of other concerned groups.

The Department of Environmental Quality, as custodian of public records, shall furnish proper and reasonable opportunity to the general public for the inspection of emission data, as correlated with applicable emission limitations and other control measures, collected by the Department of Environmental Quality from owners or operators of stationary sources in the State of Oregon.

TABLE 5.7
 PLANNED SUSPENDED PARTICULATE SURVEILLANCE NETWORK

| Site No. | County | Location | Agency Responsible | Sampler | Sampling Schedule | Land Use | UTM X | Coordinates Y | Note |
|---|-----------|--|--------------------|---------------------------|--|----------------------------|---------|---------------|--------|
| <u>Region 190 - Central Intrastate Air Quality Control Region</u> | | | | | | | | | |
| 090405 | Deschutes | Bend Deschutes County Courthouse | DEQ | Hi-Vol | Every 4th day, for first year (see text) | Commercial/ Residential | 636,200 | 4,880,200 | M |
| 181014* | Klamath | Klamath Falls Broad & Wall Sts. | DEQ | Hi-Vol AISI tape | Every 4th day Continuous | Commercial/ Residential | 604,200 | 4,672,800 | E |
| 181015 | Klamath | Klamath Falls Oregon Technical Institute | DEQ | Hi-Vol | Every 4th day | Rural | | | |
| 331716 | Wasco | The Dalles 400 E. 5th St. | DEQ | Hi-Vol | Every 4th day | Commercial/ Residential | 641,600 | 5,050,600 | |
| <u>Region 191 - Eastern Intrastate Air Quality Control Region</u> | | | | | | | | | |
| 311612 | Union | La Grande EOC Science Bldg. | DEQ | Hi-Vol | Every 4th day | Residential | 414,800 | 5,018,900 | |
| 302018* | Umatilla | Pendleton Umatilla County Courthouse | DEQ | Hi-Vol Tape Sampler | Every 4th day Continuous 2- Hour Samples | Commercial/ Residential | 360,600 | 5,058,800 | M E |
| 300001 | Umatilla | Skyview Memorial Gardens | DEQ | Hi-Vol | Every 4th day | Rural/ Agricultural | 359,300 | 5,448,000 | |
| 010404 | Baker | Baker 1925 Washington St. | DEQ | Hi-Vol | Every 4th day | Commercial/ Residential | 434,000 | 4,957,900 | |

M = Station located in area of estimated maximum pollutant concentration
 E = Episode Monitoring station
 T = Telemetry-equipped station (CWAPA network)

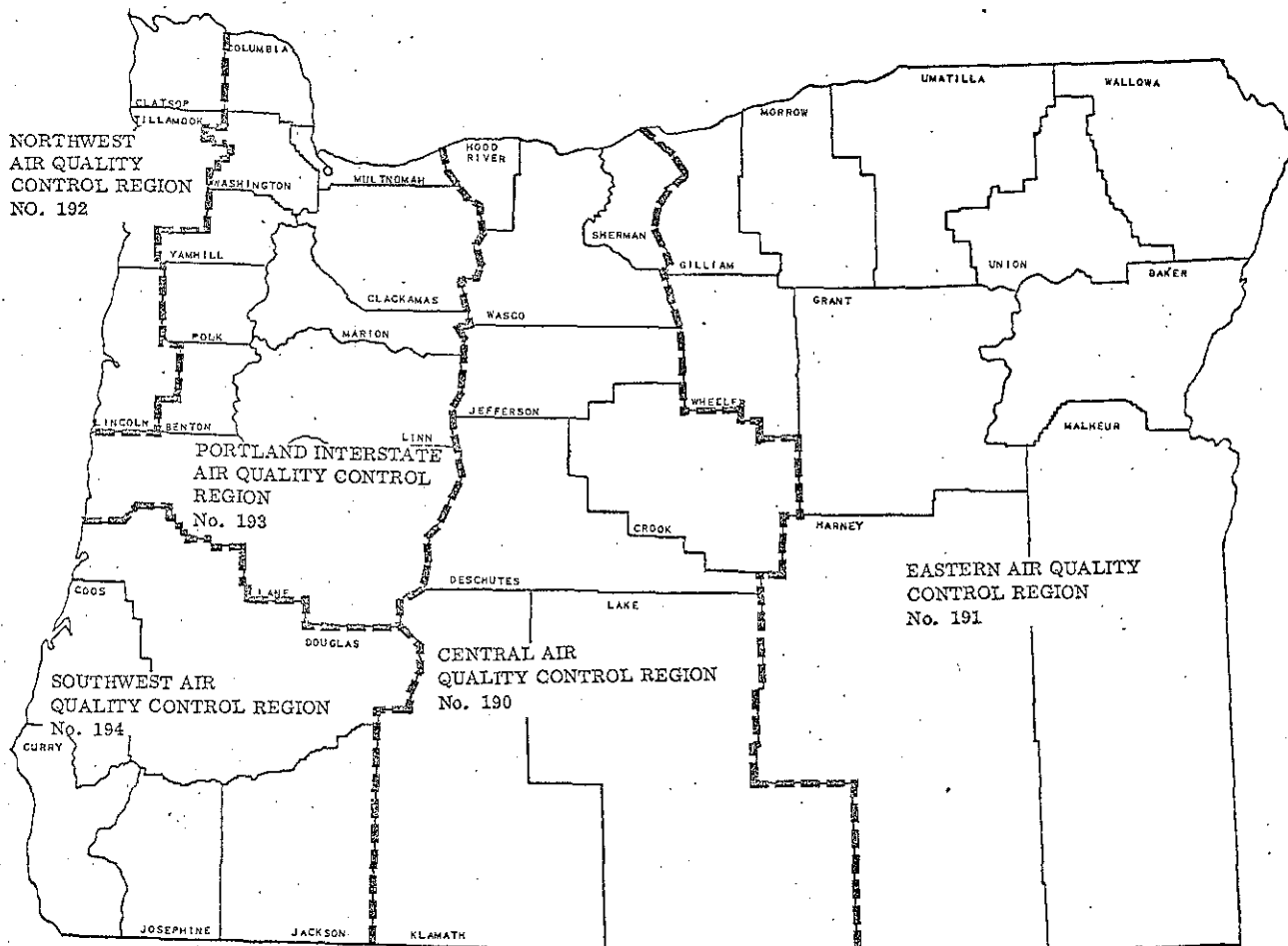


FIGURE 1-2
 OREGON
 FEDERAL AIR QUALITY
 CONTROL REGIONS

TABLE 6.2 QUANTITATIVE EPISODE CRITERIA

| EPISODE STAGE | Sulfur Dioxide (SO ₂) | Suspended Particulate | Particulate-SO ₂ Product | Carbon Monoxide | Photochemical Oxidant | Nitrogen Dioxide |
|--|--|---|--|---|---|---|
| FORECAST ----- Meteorological Forecast of Atmospheric Stagnation ----- | | | | | | |
| ALERT (Stated levels accompanied by meteorological forecast of 12 hrs. stagnation) | 800 ug/m ³ (24 hr. avg.) | 3.0 COH * or 375 ug/m ³ (24 hr. avg.) | 525 (ug/m ³)(COH) (24 hr. avg.) | 17 mg/m ³ (8 hr. avg) | 200 ug/m ³ (1 hr. avg) | 1130 ug/m ³ (1 hr avg) or 282 ug/m ³ (24 hr. avg) |
| WARNING (Stated levels accompanied by meteorological forecast of 12 hours stagnation) | 1600 ug/m ³ (24 hr. avg) | 5.0 COH or 625 ug/m ³ (24 hr. avg) | 2100 (ug/m ³)(COH) (24 hr avg) | 34 mg/m ³ (8 hr avg) | 800 ug/m ³ (1 hr avg) | 2260 ug/m ³ (1 hr avg) or 565 ug/m ³ (24 hr avg) |
| EMERGENCY (Declared Before stated levels are reached if they appear imminent) | 2100 ug/m ³ (24 hr. avg) | 7.0 COH or 875 ug/m ³ (24 hr. avg) | 3144 (ug/m ³)(COH) (24 hr avg) | 46 mg/m ³ (8 hr avg) or 69 mg/m ³ (4 hr avg) or 115 mg/m ³ (1 hr avg) | 1200 ug/m ³ (1 hr avg) or 960 ug/m ³ (2 hr. avg) or 640 ug/m ³ (4 hr avg) | 3000 ug/m ³ (1 hr avg) or 750 ug/m ³ (24 hr avg) |

* COH = Coefficient of haze; 1.0 COH is approximately equivalent to 125 ug/m³

1. Point Source Emergency Emission Reduction Plans - for major industrial, commercial, and governmental point sources of contaminants.

Each major source (emitting a minimum of 100 tons/year of any contaminant, although smaller sources will be required to submit plans) is required to submit a plan for review by the Department or regional authority within 30 days of a written request. Plans are subject to review and approval by the agency and plans obtained by regional authorities are to be reported to the Department in summary form. Guidelines for preparation of point source emergency emission reduction plans have been prepared (Appendix 6-B).

2. Area Source Emergency Emission Reduction Plans - for city, county or other governmental bodies responsible for control of motor vehicles or major airports.

Recognizing that traffic reduction and other measures designed to reduce motor vehicle emissions on an emergency basis can be implemented effectively only by state and local police, the EAP regulation requires City and County governments to submit plans for doing so upon request. The Department of Environmental Quality will be responsible for requesting, reviewing, and approving these plans. The Regional Authorities will be consulted in this activity.

Since the EAP regulation requires closure of airports at the Emergency stage, major public airports in Portland, Eugene, and Salem will also be required to submit plans specifying their

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY CONTROL DIVISION

EMERGENCY EMISSION REDUCTION PLANS
GUIDELINES FOR PREPLANNED STRATEGIES - POINT SOURCES

INTRODUCTION:

These guidelines have been prepared to assist persons responsible for submitting preplanned strategies for reducing air contaminant emissions on an emergency basis. They are applicable to industrial, commercial, and governmental sources. Emergency reduction plans prepared in accordance with these guidelines will be invoked whenever an Air Pollution Alert or Air Pollution Warning is declared as a result of excessive levels of contaminants, or whenever an Air Pollution Emergency is declared for any reason.

EMERGENCY REDUCTION PLAN - GENERAL REQUIREMENTS:

1. The Emergency Reduction Plan (ERP) must indicate the name of an official who has the full responsibility and authority to implement the ERP. His telephone number and the name and telephone number of his alternate shall appear on the Plan.
2. The ERP must specify all actions required to meet these guidelines.
3. Action called for in previous stages remain in effect if further stages are declared.
4. Actions are to be taken only on direct notification from the Department of Environmental Quality or responsible Regional Authority. ERP will go into effect immediately upon direct notification.
5. Action plans cannot assume that discretionary natural gas will be available from the gas distributing utilities for episode control use.

2.4.1 Emission Monitoring-Stationary Sources

The following major stationary sources are required, as part of comprehensive specific regulations adopted on an industry-wide basis, to monitor and report emissions according to the schedules indicated:

- a. Aluminum reduction plants - Particulate emissions, gaseous fluorides emissions, ambient air levels and forage uptake monitored and reported monthly.
- b. Kraft pulp mills - Each major particulate source sampled once monthly. Total reduced sulfur monitored continuously with monthly data summaries submitted.
- c. Sulfite pulp mills - Monthly particulate samples, and frequent periodic sampling of SO₂ sources where continuous monitoring is not feasible, will be required under monitoring schedules currently being negotiated.

Monitoring and reporting of emissions from other stationary sources will be required as necessary to effectuate the control strategy.

In addition, the provisions of OAR Chapter 340, Sections 20-020 to 20-025, may be invoked to require stationary source operators to sample at any time emissions data is deemed essential. The most frequent occasions, as practiced by the Department of Environmental Quality and regional authorities, include the following:

- a. Performance testing of new sources and newly installed control equipment.
- b. Exhaust temperature monitoring of modified wigwam waste burners and fume incinerators.
- c. Cases in which visible emission violations are contested.

It is the judgment of the Department that the legal authority to require sampling and monitoring should be applied selectively in order to assure that genuine needs

Under emergency episode condition, Tri-Met will be requested to provide additional services. A plan to be worked out in coordination with the city of Portland by September 1, 1972 will provide for these services.

8.4.3.4 City of Eugene

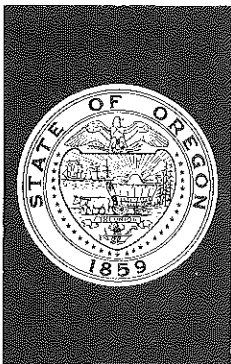
The city of Eugene will be required under the Emergency Action Plan regulation to prepare an emergency plan, to be completed by September 1, 1972, for control of motor vehicle traffic under episode conditions. The responsibilities for the City under this plan, described in detail in section 6, include provisions for stopping or rerouting traffic, policing the enforced-carpool provision, and other matters.

8.4.3.5 City of Salem

The city of Salem may be required under the Emergency Action Plan regulation to prepare an emergency plan similar to that required for Portland and Eugene. A final decision on whether such a plan will be required will be made after a continuous air monitoring station is placed into operation as part of the surveillance system described in Section 5, and it is determined whether a motor vehicle related episode in Salem is a credible event.

8.4.3.6 Clarification of Commitment to the State of Washington as required by the Federal Register 51.21:

Specifically, all notices of construction and compliance schedules (including major changes therein) for significant sources within 25 miles of the Washington border will be transmitted for the Washington Department of Ecology review and comment. All other emission data and ambient air quality data will be submitted on request. Should the Washington Department of Ecology desire advance information on new, expanding, or modified sources beyond the 25 mile zone, it will also be supplied.



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL
GOVERNOR

Memorandum

L. B. DAY
Director

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COMMISSION

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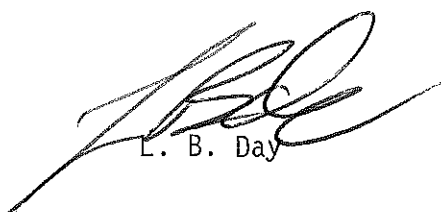
ARNOLD M. COGAN
Portland

To: Environmental Quality Commission
From: Director
Subject: Agenda Item I, June 8, 1972, EQC Meeting

Tax Credit Applications

Attached are review reports on 5 tax credit applications. These applications and the Recommendations of the Director are summarized as follows:

| <u>Applicant</u> | <u>Appl. No.</u> | <u>Facility</u> | <u>Cost</u> | <u>Director's Recommendation</u> |
|------------------------------------|------------------|--|--------------|----------------------------------|
| Crown Zellerbach West Linn | T-227 | Saveall | \$207,620.00 | Issue |
| John H. Dirksen Forest Grove | T-317 | Manure Tank | 4,900.00 | Issue |
| Elwyn L. Putnam Bend | T-324 | Manure Tank | 6,959.78 | Issue |
| Hull Oakes Lumber Monroe | T-320 | Wood Waste Processing Facilities | 61,489.67 | Issue |
| Olson-Lawyer Timber Co. Medford | T-255 | Wood Waste Furnace and Accessories | 1,307,513.00 | Issue |


L. B. Day

HLS:vt
6/1/72

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Crown Zellerbach Corporation
West Linn Division
West Linn, Oregon 97068

The applicant operates a 200 T/day groundwood pulping and 550 T/day specialty paper mill at West Linn. Approximately 350 T/day of chemical pulp is shipped to the West Linn mill from other Crown Zellerbach pulping operations.

2. Description of Claimed Facility

The claimed facility consists of a disc filter saveall and appurtenant structural and electrical work, pumps, plumbing, chests and the necessary engineering. The facility serves the #9 paper machine.

The facility was placed in operation in June 1970 and completed in September 1970.

Certification is claimed under the 1969 Act with 100% of the cost allocated to pollution control.

Facility cost: \$207,620.00 (Accountant's certification was provided.)

3. Evaluation of Application

Installation of the claimed facility, although not specifically required by the DEQ, has contributed substantially to the overall suspended solids removal effort at the West Linn mill. The 0.4 MGD whitewater discharge in question has been reduced in suspended solids concentration from 3.2 #/1000 gal. to 0.1 #/1000 gal. and has been kept out of the clarifier as an additional load.

This installation removes approximately 97% of pulp fiber solids from the whitewater discharge of one paper machine which utilizes 100% kraft pulp. Although centrifuged whitewater from all other paper machines was plumbed into the clarifier at the time of its construction, this paper machine discharged untreated whitewater until installation of the saveall was completed in the summer of 1970. The saveall discharge will be plumbed into the secondary treatment system as of July 1, 1972.

The saveall facilities claimed have operated at consistently high removal efficiency, although total mill suspended solids discharge has been somewhat erratic due to maintenance problems with centrifuges. All centrifuges will be replaced with more dependable coil filter equipment by the fall of 1972.

The applicant indicates that fiber valued at \$19,300 is recovered annually by the facility while estimated operating expenses of the facility are \$16,816 (return on investment of 1.2% before taxes). Department evaluation indicates that recycling of some whitewater from the #9 machine resulted in recovery of some fiber before installation of the claimed facility. The net value of increased fiber recovery as a result of installation of the facility is calculated by the Department to be \$8,178 per year. This would result in a net loss on the facility.

It is concluded that the facility was installed for pollution control purposes.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the facilities claimed in Application T-227, bearing the actual cost of \$207,620.00 with 80% or more allocated to pollution control.

mjb

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

John H. Dirksen
Dairy De Bonte Hoe
Route 1, Box 222
Forest Grove, Oregon 97116

The applicant owns and operates a dairy at the above address west of Forest Grove, in Washington County.

2. Description of Claimed Facility

42,000-gallon manure tank with Mitchell PTO pump, valves, sprinkler, stand and mounting rim.

The facility was completed September 15, 1971 and placed in operation October 15, 1971.

Certification is claimed under the 1969 Act with 100% allocated to pollution control.

Claimed cost: \$4,900.00 (Documentation was submitted.)

3. Evaluation of Application

Prior to installation of the claimed facility, manure was placed on a hillside and eventually ran into the adjacent drainage way.

Manure is now spread on 57 acres of land so as to minimize runoff.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the actual cost of \$4,900.00 with 80% or more allocated to pollution control be issued for the facilities claimed in Application T-317.

mjb

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Elwyn L. Putham
Route 2, Box 925
Bend, Oregon 97701

The applicant owns and operates a dairy located 11 miles northwest of Bend on Cline Falls Market Road and 1/4 mile west on Innes Road in Deschutes County.

2. Description of Claimed Facility

38,500-gallon reinforced concrete manure tank with Superior agitator and Superior 1000-gallon self-loading spreader.

The facility was placed in operation September 15, 1971 and completed October 7, 1971.

Certification is claimed under the 1969 Act with 98% allocable to pollution control.

Facility cost: \$6,959.78 (Documentation was provided.)

3. Evaluation of Application

Prior to installation of the claimed facility, all manure and milking parlor waste was discharged to an irrigation ditch supplying water to adjacent farms. All waste is now spread on pasture land. The Department approved plans prior to construction.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the actual cost of \$6,959.78 with 80% or more allocated to pollution control be issued for the facilities claimed in Application T-324.

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Hull-Oakes Lumber Company
Route 1
Monroe, Oregon 97456

The applicant produces dimensioned lumber from logs.

This application was received on February 23, 1972.

2. Description of Facility

The facility claimed in this application is described as consisting of a log transfer, a chipper conversion, an infeed extension to the chipper and sawdust conveyors, all of which are additions and modifications to equipment covered by Pollution Control Facility Certificate No. 198 issued to the applicant on January 5, 1972, under Tax Application No. T-237.

The facility was completed on January 31, 1972. Construction was started on May 1, 1971.

Certification is claimed under the 1969 Act. The percentage claimed for pollution control is 100%.

Facility cost: Total expenditures were \$61,489.67. (Accountant's certification was provided).

3. Evaluation of Application

The claimed facility represents further additions and modifications to a previously completed system. (Barker, Hog, Conveyors, and Fuel Bins.)

The wood residue from this sawmill was formerly burned in a wigwam waste burner. The Mid-Willamette Valley Air Pollution Authority, in accordance with a Schedule of Compliance, approved the facilities as a means of phasing out the applicant's wigwam waste burner. The initial portion of the total system was completed prior to the equipment additions and modifications covered by this application.

The Department has been advised by the Mid-Willamette Valley Air Pollution Authority of the following facts:

- a. The facilities were installed pursuant to a schedule of compliance agreement approved by the Authority.
- b. On June 7, 1971, current progress and program status was reviewed in the field by the Authority. At that time the Authority determined that the equipment covered by this application was a necessary part of the total system required to complete phase-out of the wigwam waste burner.
- c. On January 12, 1972, the operation of the total system was observed by the Authority. The Authority determined that the facility did conform to agreed plans and the operation of the wigwam waste burner had been phased out.
- d. The Authority judges that there are no better alternates for disposal of the wood waste residues from this mill.
- e. The planned facilities did accomplish and were necessary to attain complete phase-out of the wigwam waste burner as required by the compliance agreement.

There was no increase of income from the facilities covered by this application and the total facility would show an operating loss.

Therefore, it is concluded that the facilities were installed to accomplish the phase-out of the wigwam waste burner resulting in compliance with Regional Air Quality regulations.

4. Director's Recommendations

It is recommended that a Pollution Control Facility certificate bearing the cost of \$61,489.67 with 80% or more of the cost allocated to pollution control, be issued for the facility modifications and additions claimed in Tax Application T-320.

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Olson-Lawyer Timber Company
Post Office Box 847
Medford, Oregon 97501

The applicant procures timber, operates log debarkers and sells and distributes logs. The facility is located at 7890 Agate Road in White City, Oregon, Jackson County.

This application was received on November 11, 1971. Additional information was received February 25, 1972.

2. Description of Claimed Facility

The facility claimed in this application is described as consisting of a Nichols Herreschoff Multiple Hearth Furnace, a Wyatt & Kipper high pressure steam boiler, and bark and wood waste handling facilities.

The facility was completed May 31, 1971. Construction was started on April 18, 1969.

Certification is claimed under the 1969 Act. The percentage claimed for pollution control is 100%.

Facility cost: \$1,307,513.00 (Accountant's certification was provided.)

3. Evaluation of Application

This application was presented for consideration at the last Environmental Quality Commission meeting and was referred to the Staff for reconsideration.

The claimed facility processes bark and wood residues from the Olson-Lawyer debarking operations and bark procured from outside sources. All of the utilized wood waste was formerly burned in wigwam burners in the area.

The applicant is utilizing, on an annual basis, approximately 53,000 tons of bark from outside sources and approximately 80,000 tons of bark and wood residues from the applicant's own operation. In addition to eliminating the wigwam burners, the applicant has been able to close down three older gas and oil-fired boilers with a total rated capacity of 1300 HP.

The claimed facility produces char which is sold for use in the manufacture of charcoal briquets. In addition, steam is sold to Olson-Lawyer Lumber, Incorporated, Lawyer Veneer Company and Royal Oak Charcoal Company.

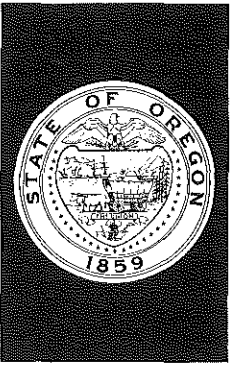
Appl. T-255
5-31-72
Page 2

Evaluation of Application (Continued)

The applicant reported an annual income of \$375,847.28 from the sale of these by-products for the year ending 4-30-71. The operating expenses for the same period were reported to be \$445,605.16. The Department concludes that the claimed facility provides controlled combustion for wood wastes formerly burned in several wigwam burners in the area, which have as a result been eliminated. Thus it does operate to reduce emissions to the atmosphere.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$1,307,513.00, with 80% or more of the cost allocated to pollution control, be issued for the facility claimed in the Tax Application T-255.



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL
GOVERNOR

L. B. DAY
Director

ENVIRONMENTAL QUALITY
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GEORGE A. McMATH
Portland

ARNOLD M. COGAN
Portland

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. J , June 8, 1972, EQC Meeting

Variance Request
Ponderosa Mouldings, Inc., Redmond, Deschutes County

Background

This company, located in Redmond, east of U. S. Highway 97, manufactures wood mouldings. Prior to May, 1971, the company did, on occasion, dispose of a limited amount of waste shavings from the moulders, sawdust and chips in the wigwam waste burner. In May, 1971, the company notified the Department that it had been successful in its efforts to develop a full utilization program and that all residues would be shipped to the particleboard plant in Bend. However, the company stated that if a breakdown in mill equipment or a shut-down of the particleboard plant occurred, it would then be necessary to find other utilization alternatives or activate the wigwam waste burner until the upset condition had been corrected.

In May, 1971, the company stated that they were attempting to also solve their open burning problem for disposing of two (2) to three (3) units per week (about 100 units per year) of shim stock. This has now been eliminated by the purchase of a new chipper and materials handling system. These residues now are utilized at the particleboard plant.

Current Program

Ponderosa Mouldings, Inc. has requested a variance to Oregon Administrative Rules, Chapter 340, Sections 25-005 through 25-020, "Construction and Operation of Wigwam Waste Burners" because the two (2)

week vacation schedule at the particleboard plant would not coincide with their vacation period resulting in a four (4) day period without any shipments (from July 3 to July 7, 1972).

Factual Analysis

1. The company will be required to cease operation during this period if no other means of disposal are found.
2. Every effort will be used to minimize use of the wigwam waste burner during this four (4) day period.
3. The duration of time requested, a four (4) day period from July 3 to July 7, 1972, is not covered under the provisions in OAR, 340, Sections 21-065 through 21-075, "Upset Conditions". Under Section 21-075, "Malfunction of Equipment", subdivision (3) the company would be required to "Cease or discontinue operation of the equipment or facility no later than 48 hours after the beginning of the breakdown or upset period".
4. This type of upset condition does not appear to fall within the meaning of Section 21-075, "Malfunction of Equipment", nor will it be terminated within the 48 hour limitation.
5. The company has made tremendous strides in finding markets for utilization of all residues resulting in almost a total phase out of the wigwam waste burner.

Conclusions

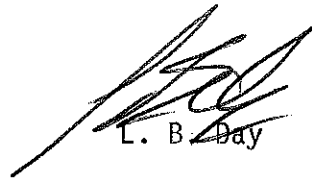
1. The use of this wigwam waste burner from July 3 to July 7, 1972, will be minimized.
2. The contribution to air pollution in this area will be insignificant as compared to when this wigwam waste burner was used every day.
3. The company would be forced to close for this four (4) day period if no other means of disposal are found.

4. There is a very limited use for shavings, sawdust and chips at this time of year, especially for animal bedding.
5. The particleboard plant will not accept residues in excess of the storage facilities since there is already a surplus of wood residues at the plant.

Director's Recommendations

It is recommended that Ponderosa Mouldings, Inc. request for a variance for the operation of the wigwam waste burner from July 3 to July 7, 1972, at the plant site in Redmond be approved subject to the following conditions:

1. That the company notify the Department by telephone with confirmation in writing of the dates and times the wigwam waste burner would be placed in service during this four (4) day period.
2. That the company would agree to make every attempt to utilize these residues thereby minimizing the use of the wigwam waste burner.


L. B. Day

RAR:ms
5/16/72

PONDEROSA MOULDINGS, Inc.

MAIN OFFICE: P. O. BOX 518. REDMOND, OREGON 97756 • (503) 548-2171

May 8, 1972

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED
MAY 11 1972

AIR QUALITY CONTROL

Mr. L. D. Day, Director
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

Gentlemen:

Please consider this letter as an application for variance from rules, regulations or orders under ORS 449.810.

Our wigwam burner for all practical purposes is not in use. There were several emergency or upset conditions in the past year when we were forced to burn because of mechanical failures for no more than a day at a time.

Currently all our dry shavings, sawdust, and chips are hauled to Brooks-Willamette Particleboard plant in Bend, Oregon.

We recently received notice that they will be closed for plant maintenance and vacations for four (4) of our working days---July 3rd to July 7th. At that time we plan on having our regular truck hauler move the waste to various feed lots in the area. We have contacted him already in order that he may make the necessary plans.

However, there is a possibility that he will not be able to move all the waste. If this does occur, our only other alternative is to burn.

We will do everything possible to avoid burning but would appreciate your granting a specific variance under the conditions outlined above.

Please advise if there is additional information needed to assist you in making a determination.

Thank you very much.

Yours very truly,

PONDEROSA MOULDINGS, INC.

Kieran P. Madden
Kieran P. Madden, President

KFM/dn



DEPARTMENT OF ENVIRONMENTAL QUALITY

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TOM McCALL
GOVERNOR

L. B. DAY
Director

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ARNOLD M. COGAN
Portland

MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: Director

SUBJECT: Agenda Item No. K, June 8, 1972, EQC Meeting

Variance Request, Coin Millwork Company
Prineville, Crook County

BACKGROUND:

Coin Millwork Company phased-out operation of their wigwam waste burner in May, 1971. Prior to that time, all of the wood waste residues from the mill were disposed of by burning in the wigwam waste burner. The company negotiated contracts with Brooks-Willamette Corporation for the sale of their sawdust and wood shavings for particle-board production and with Clear Pine Molding, Inc. for the sale of the residual waste wood board ends for further re-manufacture as laminates. These contracts enabled Coin Millwork Company to accomplish the desired phase-out of the wigwam waste burner.

CURRENT STATUS:

Brooks-Willamette Corporation and Clear Pine Molding, Inc. have now advised Coin Millwork Company that they will both undergo their annual plant-wide shut downs during the first two (2) weeks in July and will not be able to accept any of the regular wood waste residue shipments from Coin Millwork Company during that period.

The Coin Millwork Company utilizes a staggered vacation schedule during the year in their plant and operates the facility on a continuous production schedule.

Consequently, Coin Millwork Company has requested a variance to Oregon Administrative Rules, Chapter 340, Section 25-015 and 25-020 in order to operate their existing wigwam waste burner during the period from June 30, 1972 through July 14, 1972.

ANALYSIS:

1. Coin Millwork Company cannot utilize or sell to other outlets any of the wood waste residues produced during the period of June 30, 1972 through July 14, 1972.
2. The wood waste residues are unsuitable and unacceptable to their regular customers if they have been stockpiled.
3. There are no landfill or other solid waste disposal sites that could be utilized to dispose of the wood waste residues.
4. Coin Millwork Company does not have an annual plant shut-down period that could coincide with Brooks-Willamette Corporation and Clear Pine Molding, Inc.
5. The only disposal method that is available to Coin Millwork Company is to burn the wood waste residues and it is judged that this would be accomplished with a minimum amount of air pollution if it is done in the wigwam waste burner.

DISCUSSION:

It appears that the particular problem of disposal of waste wood residues in other than the usual accepted methods for short periods of time will reoccur annually for Coin Millwork Company and any other companies that ordinarily sell this type of wood waste residues for re-manufacturing by others. The wood waste residues are perishable in that they cannot be successfully stockpiled and still be of suitable color and quality for re-manufacture.

In some instances it might be possible to coordinate annual shutdown periods at the producing and the consuming plants, but where

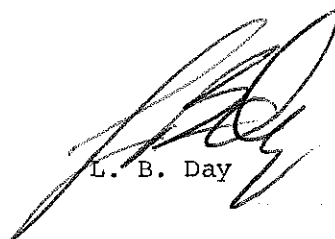
the producer does not have an annual shut-down, this solution is not possible.

Possible future alternates to the problem raised in this request for a variance would be to identify this particular condition in the annual permit and allow operation of existing unmodified wigwam waste burners during some certain period of time or to insist that companies that are producing wood waste residues also must maintain a modified wigwam waste burner.

The only apparent method for disposal of the wood waste residues that is available to Coin Millwork Company during the period from June 30 through July 14 is burning and this can best be accomplished in the existing wigwam waste burner.

RECOMMENDATION:

It is recommended that Coin Millwork Company be issued a variance for operation of the existing wigwam waste burner for disposal of wood waste residues during the period of June 30, 1972 through July 14, 1972.


L. B. Day



COIN MILLWORK CO.

Manufacturers and
Direct Mill Representative

May 24, 1972

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

P. O. Box 369
Prineville, Oregon 97754

Phone 447-4177

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
MAY 25 1972
AIR QUALITY CONTROL

Attn: Mr. Russel Royer

Dear Mr. Royer:

We have been notified by Brooks-Willamette that their Bend operation will be closed from midnight July 1st until midnight July 9th. They will not accept shavings during this period so we will have to burn our waste in our wigwam burner.

We have also been notified by Clear Pine Mouldings that their plant will be down from June 30th until July 14th. They will not accept any wood waste during this period so we will burn the trim ends in our open pit burning area.

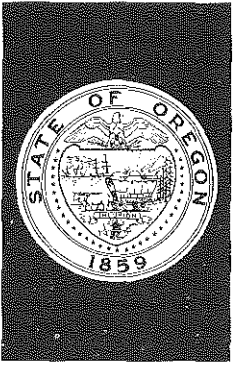
An accumulation of trash was burned this morning in our open pit burning area per our phone conversation of yesterday.

Very truly yours,

COIN MILLWORK CO.

Art Fitzgerald
Art Fitzgerald

AF/cl



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 L, June 8, 1972, EQC Meeting

Columbia-Willamette Air Pollution Authority Variance
No. 44 to Beaver Lumber Company

BACKGROUND:

Beaver Lumber Company operates a sawmill near the town of Clatskanie in Columbia County. The mill utilizes salvage cedar logs to produce cedar lumber. Chips and planer shavings are marketed, while unmarketable residue is disposed of in a wigwam burner.

In January, 1971, Beaver Lumber Company petitioned CWAPA for a variance from application of emission standards in order to allow time to develop alternative means of disposing of cedar residues. A variance ending June 30, 1971, was granted.

The variance specified that the burner comply with then existing DEQ visible emission standards, and specified further that by April 15, 1971, the company submit a specific written program to make the burner comply with all CWAPA emission standards by June 30, 1971.

By letter of June 24, 1971, Beaver Lumber Company petitioned CWAPA for a one-year extension of its variance, in order to continue to seek means of cedar residue disposal other than through the use of its wigwam burner. A variance extension through December 31, 1971, was granted by CWAPA on August 20, 1971. No conditions were specified.

By letters of January 15 and March 29, 1972, Beaver Lumber Company petitioned for another variance from CWAPA's grain-loading requirements with the understanding that such variance would be renewable at one-year intervals as long as the wigwam burner complied with present CWAPA visible emission standards. The letter also stated that the company was proceeding with burner modification work.

On April 24, 1972, CWAPA granted Beaver Lumber Company a variance from emission standards contained in CWAPA rules, Rule 7, through December 31, 1973, with these conditions:

1. Plans and specifications for burner modification, including under and overfire air systems, auxiliary burners and exit gas temperature recording system, to be received for CWAPA review by August 1, 1972.
2. Modifications to be completed by December 31, 1972.
3. By December 31, 1973, a report to CWAPA for consideration of continuance of the variance, including discussion of burner operations, progress toward development of alternative methods of disposal, and expected life of the mill.
4. Temperature and operation records of the burner to be submitted to CWAPA on request.
5. Burner shutdown at CWAPA request, per air pollution emergency rule.

The variance has been forwarded for Department review and Commission action.

All material and information required for Department review has been supplied, and the CWAPA staff review of the situation is reasonably complete. Review in-house has been accomplished in accordance with established Department criteria.

ANALYSIS:

Beaver Lumber Company has been operating its wigwam burner under variance from CWAPA rules since January, 1971. No progress has been made toward implementing alternative means of disposal, so the company is now beginning work on burner modifications to bring the unit into compliance with visible emission limits.

The present variance is the third issued to the company, and they fully expect to request additional variances.

No justification is presented for the additional year granted to the company by CWAPA.

While the company requested a variance from only the particulate emission standards, CWAPA granted a variance from all emission standards in its Rule 7, which includes visible emission standards, particulate matter weight standards and particulate matter size standards.

CONCLUSIONS:

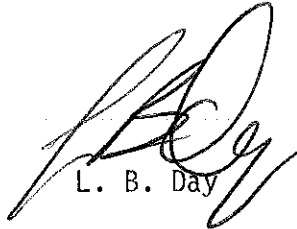
The Department has drawn the following conclusions:

1. All procedural requirements for Department review of variances have been met.
2. The additional year in the variance (January 1, 1973, through December 31, 1973) granted by CWAPA, which is more than that requested by Beaver Lumber Company, has not been justified in the documents and information supplied to the Department.
3. The variance from the CWAPA visible emission standards, though granted, was not requested by Beaver Lumber Company, and is not justified in the documents and information supplied to the Department. Therefore, there is no assurance any visible emission limitations will be met during the year after modification of the burner.
4. It is expected that more requests for a variance from CWAPA emission standards will be made in the future by Beaver Lumber Company.

DIRECTOR'S RECOMMENDATION:

The Director recommends Columbia-Willamette Air Pollution Authority's variance No. 44, to Beaver Lumber Company, be approved, subject to the following conditions and modifications:

1. On or before August 1, 1972, Beaver Lumber Company will submit for Columbia-Willamette Air Pollution Authority review and approval, detailed plans and specifications for modifications to their wigwam wood waste burner which will allow it to achieve and maintain visible emissions in compliance with OAR Chapter 340, Subdivision 5, Section 25-020, Emission and Operation Standards for Wigwam Waste Burners.
2. On or before December 31, 1972, Beaver Lumber Company will complete modifications to its wigwam burner as required in 1. above.
3. The variance termination date shall be December 31, 1972.


L. B. Day

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

8 May 1972

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

Attention: L. B. Day, Director

Subject: Request for Approval of Variance -
Beaver Lumber Company, Clatskanie, Oregon

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

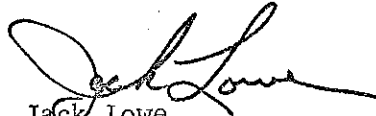
Gentlemen:

Submitted herewith for your consideration, with request for approval, is a copy of Variance No. 44 issued to Beaver Lumber Co., by the Board of Directors, 24 April 1972.

Also enclosed are supporting documents as suggested in your letter of 10 November 1971, plus additional materials.

For the Program Director.

Very truly yours,



Jack Lowe
Administrative Director

JL:sm

Enclosures:

1. Variance No. 44
2. Advisory Committee Minutes, 6 April 1972
3. Board of Directors Minutes, 24 April 1972
4. Staff Paper-Criteria for Review of Variance, 28 April 1972

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED
MAY 10 1972

AIR QUALITY CONTROL

CONCLUSION

The conditions set forth in the Petition and as verified by Authority investigation, are within the provisions of ORS 449.810 and Columbia-Willamette Air Pollution Authority rules, Rule 9 and that a variance for a limited period of time under certain conditions should be granted.


ORDER

NOW THEREFORE, IT IS HEREBY ORDERED, the Beaver Lumber Co. of Clatskanie, Inc. is granted a variance to operate a wigwam waste burner to and including 31 December 1973 as part of its sawmill operation near Clatskanie, Oregon, in violation of the emission standards contained in Columbia-Willamette Air Pollution Authority rules, Rule 7, subject to the following conditions:

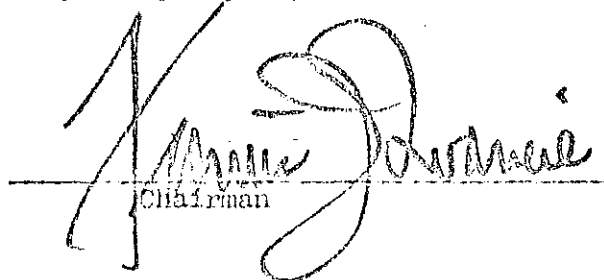
1. On or before 1 August 1972 Beaver Lumber will submit for staff review and comment, detailed plans for modification to their burner which will consist as minimum an underfire and overfire air system, auxiliary burners and continuously recording pyrometer to record exit gas temperature.
2. On or before 31 December 1972 Beaver Lumber Company will complete modifications as above set out to the wigwam waste burner.
3. On or before 31 December 1973 Beaver Lumber will submit a detailed report to the Authority for consideration of continuance of the variance which will include,
 - a. Any significant change in operation of the burner pertaining to the quantity of material burned, nature of material, hours of operation and mechanical conditions of the burner;
 - b. Progress toward development of further utilization of wood residue including economic feasibility of utilization or alternate means of compliance and life expectancy of the operation.
4. Beaver Lumber will submit records of temperature and burner operation as requested by the Authority staff.
5. Beaver Lumber will cease operation of the burner when notified by the Authority staff a condition of air pollution exists such that public health may be effected and action is required to be taken in accordance with Columbia-Willamette Air Pollution Authority rules, Rule 11, "Air Pollution Emergencies".

Entered at Portland, Oregon, the 24th day of April, 1972.

Certified a True Copy



Jack Lowe, Administrative Director



Chairman

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
1010 NE Couch Street, Portland, Oregon 97232

Encl 3.

BOARD OF DIRECTORS MEETING
9:30 a.m., Monday, 24 April 1972
Auditorium, Portland Water Service Bldg.

Present:

Board of Directors: Francis J. Ivancie, Chairman
Fred Stefani, Vice-Chairman
Don Clark, representing Multnomah County
(due to illness of Ben Padrow)

Staff:

R. E. Hatchard, Program Director
Wayne Hanson, Deputy Program Director
Jack Lowe, Administrative Director
Emory Crofoot, General Counsel
George Voss, Public Information Representative

Others:

Mr. Carleton Whitehead, CWAPA Advisory Committee
Mr. Peter Schnell, Publishers Paper Company
Mr. Jim Luxford, Beaver Lumber Company
Mr. Storrs Waterman, Environmental Quality Commission
Mr. Richard Borst, Western States Rendering
Mr. Rodney Burroughs, Hervin Company
Mr. E. S. Mills, Assistant City Manager, Hillsboro
Mr. Norm Peterson, Harris Stud Mill
Mrs. MaryAnn Donnell, Coalition for Clean Air
Mr. Tom Donaca, Associated Oregon Industries

Minutes

The meeting was called to order by Chairman Ivancie. The minutes of the 17 March 1972 Board meeting were approved as recorded.

Advisory Committee Recommendations - Publishers Paper Co. and Beaver Lumber Co.

Carleton Whitehead reported that at their regular meeting, 6 April, the Advisory Committee considered the request of Publishers Paper Company, Molalla Division, to remove the restriction on the amount of wood waste that can be burned in their wigwam burner, in item #5 of the variance granted until 30 June 1972. After considering the staff report, the Advisory Committee recommended that the Board approve the request providing the burner operates within the visible emission standards of the rules.

Mr. Whitehead further reported that condition #7 of the variance granted Publishers Paper Company required they submit in writing a statement setting forth the research and development completed towards the utilization or disposal methods for handling said waste products other than by burning. Mr. Whitehead stated the Advisory Committee found that Publishers Paper has failed to comply with this condition of the variance, and therefore recommends that the Board of Directors direct the Program Director to obtain this report from the company, and if it is not forthcoming, to take appropriate action against the company for non-compliance with the variance conditions.

Mr. Hatchard stated that a supplementary report had been received 20 April 1972 from Publishers Paper to fulfill condition #7 of the variance, and copies had been mailed to the Advisory Committee for their consideration.

Mr. Schnell of Publishers Paper stated that it was his company's understanding that they had met all conditions of the variance; however, he added they were happy to furnish additional information.

Mr. Whitehead reported that the Advisory Committee had considered a request from Beaver Lumber Company for a variance to operate their wigwam burner. This company, one of three companies which still operates a burner in this region out of 32 originally, is requesting a variance, under certain conditions, to operate the wigwam burner until 31 December 1973. The Advisory Committee carefully considered the request, special physical conditions existing for this mill and other aspects of the request, and recommended to the Board that the variance request be granted.

Mr. Jim Luxford stated that Beaver Lumber Company found the Advisory Committee recommendation satisfactory.

After discussion, Commissioner Stefani moved, Commissioner Clark seconded and the motion carried to adopt the recommendations of the Advisory Committee concerning Beaver Lumber Company and Publishers Paper; 1) to grant Beaver Lumber Company a variance to operate their wigwam burner until 31 December 1973; 2) to remove the restriction on the amount of wood waste burned by Publishers Paper, Molalla Division, while they are operating under a variance; and 3) to direct the Program Director to take appropriate action against Publishers Paper if conditions of the variance are not met.

Solid Waste Disposal Sub-committee

Mr. Whitehead read, from the minutes of the 6 April 1972 Advisory Committee meeting concerning the report of the Sub-committee on Solid Waste, that the development of a needed solid waste disposal program was blocked by political and emotional attitudes. Commissioners Ivancie and Stefani commented that Washington County residents continue to use Portland and Clackamas County refuse disposal facilities, which will shorten the life of these facilities, while failing to develop disposal facilities in Washington County. Mr. Storrs Waterman, Environmental Quality Commission, commented that funds will be made available from pollution control bonds to be used for solid waste programs, and hopefully this will help solve the problem.

In answer to Chairman Ivancie's inquiry, Mr. Charles Haney, Chairman of the Sub-committee on Solid Waste, commented on the difficulties of locating a solid waste disposal site in Washington County and suggested that if they approach the problem from two areas, one site for garbage and another site for demolition debris, the problem might be handled faster. He added he felt the residents of Washington County did not want a disposal site in their backyard, so to speak.

Commissioner Stefani commented that the Clackamas County site on the edge of Oregon City is a properly operated disposal site and there have been no complaints or problems raised by the residents of the area, so it was quite possible to operate a site near residential areas with no ill effects.

TAB D

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

10 N. E. COUCH STREET

PORTLAND, OREGON 97232

PHONE (503) 233-7176

6 April 1972

TO: Board of Directors and Advisory Committee
FROM: R. E. Hatchard, Program Director
SUBJECT: Variance Request, Beaver Lumber, Clatskanie

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

Ladies and Gentlemen:

On 9 December, Beaver Lumber Company, Clatskanie, submitted a request for an extension of their variance for emissions from their wigwam waste burner for a period of one year. The request was reviewed by the Advisory Committee on 3 February 1972 and based on their recommendation, Beaver Lumber resubmitted the variance request on 29 March 1972 (copies of correspondence attached).

Background

The Beaver Lumber Company operates a cedar sawmill approximately two miles northeast of Clatskanie. The sawmill produces cedar lumber (approx. 40,000 board feet daily) and markets wood chips and planer shavings. The unmarketable wood residue, consisting of sawdust, barky slabs, edgings and some planer shavings, are disposal of by burning in their wigwam waste burner.

Beaver Lumber originally was granted a variance for emissions from their burner in January 1971 for a period of six months which was extended in July 1971 for another six months until 31 December 1971.

On 3 February 1972 the Advisory Committee reviewed the variance request submitted on 9 December and after considering information supplied, requested "Beaver Lumber, prior to 30 March 1972, submit another variance request to include specific modifications to their burner which will bring it into compliance with the visible emission standards, the variance request to be that the burner be allowed to operate although it cannot meet the particulate emission standards of the rules." It was the consensus of the committee if Beaver Lumber would present such a plan, the Advisory Committee would recommend approval of the variance to the Board of Directors. As requested, Beaver Lumber resubmitted their variance request containing the necessary information.

Staff Review

The authority staff has thoroughly reviewed the variance request. It is the opinion of the authority staff satisfactory information has been submitted by Beaver Lumber Company, that demonstrates a special physical condition

6 April 1972

exists that would render compliance burdensome and impractical; alternate methods of disposal, such as landfill and marketability of the material, is not yet available and the effect of the air pollution will be minimized by modifications to the burner.

Staff Recommendation

It is the authority staff recommendation a variance from the authority Rules be granted to the Beaver Lumber Company with the following conditions:

- 1) On or before 1 August 1972, Beaver Lumber will submit for staff review and comment, detailed plans for modification to their burner which will consist as minimum an under fire and over fire air system, auxiliary burners and continuously recording pyrometer to record exit gas temperature.
- 2) On or before 31 December 1972 Beaver Lumber will complete modifications to their burner.
- 3) On or before 31 December 1973 Beaver Lumber Co. will submit a detailed report to the authority for consideration of continuance of the variance which will include:
 - a) any significant change in operation of the burner pertaining to the quantity of material burned, nature of material, hours of operation and mechanical condition of the burner.
 - b) progress or development of further utilization of wood residue, including economic feasibility of utilization or alternate means of compliance and life expectancy of the operation.
- 4) Beaver Lumber will submit records of temperature and burner operation as requested by the authority staff.
- 5) Beaver Lumber will cease operation of the burner when notified by the authority staff a condition of air pollution exists such that public health may be affected and action is required to be taken in accordance with Rule 11, "Air Pollution Emergencies" of the authority Rules.

Respectfully submitted,


R. E. Hatchard

Exhibit 4

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

28 April 1972

Beaver Lumber Co., Clatskanie, Oregon

Criteria for Review of Variance

1. Does it meet conditions of ORS 449.810?

"The Environmental Quality Commission may grant specific variances from the particular requirements of any rule, regulation or order to such persons or class of persons or specific air contamination source, upon ..."

a) "...such conditions as it may deem necessary to protect the public health and welfare,"

Condition 5 of the variance requires Beaver Lumber Co. to cease operation of the burner when notified by the Authority staff a condition of air pollution exists such that public health may be affected and action is required to be taken in accordance with Rule 11 "Air Pollution Emergencies" of the Authority Rules.

b) "... if it finds that strict compliance with such rule, regulation or order is inappropriate because of conditions beyond the control of the persons granted such variance..."

Strict compliance is not possible because:

i) Alternatives for disposal by landfill on property have been investigated but are not feasible due to the probability of creating a water pollution problem (See TAB A, attachment C, 17 May 71)

ii) Use of material as a marketable product is not possible because of mill location and no stable market for hogged cedar is available. (See TAB A, Beaver Lumber Co. letter, 24 June 71, with attachments)

iii) Modifications of the burner that are possible, will not result in strict compliance of the Authority emission standards. (See TAB A)

c) "... burdensome or impractical due to special physical conditions."

The burner is located on an island (see TAB B, photograph) which imposes special physical limitations in providing access to the burner area for transporting the material, and limitations on development of alternative methods of disposal.

d) "... because strict compliance would result in substantial curtailment or closing down of business, plant or operation..."

The closure of the mill has been considered as an alternative, and Beaver Lumber Co. letter of 9 December 1971 (TAB C) describes the economic such closure would have on the local community.

e) "Such variance may be limited in time."

The variance terminates on 31 December 1973 at which time Beaver Lumber is required to submit to the Authority for consideration of continuance of the variance, a detailed report which will include any significant changes in the operation of the burner and progress or development of further utilization of wood residue. Specific details are included as a condition of the variance.

Based on the above facts, it is the opinion of the Authority staff that the variance request meets the requirements of ORS 449.810.

2. Did the applicant demonstrate a good-faith effort to comply prior to applying for the variance?

In 1968-1969 Beaver Lumber upgraded the existing burner to improve combustion. Upon completion it was recognized that such improvements would not attain compliance of the Authority rules. Since that time, as shown in the attached letters and reports, Beaver Lumber Company has attempted to attain compliance by investigating various alternatives in a logical manner.

3. Is the situation of the applicant unusual in comparison with similar sources in the general area?

The problem of disposing of cedar wastes in an acceptable manner is limited primarily to two mills in the CWAPA region. At the present time, neither mill has found an acceptable solution. There are no similar sources within the same general area. Consequently no inequity exists with the granting of this variance.

4. Were alternate or interim measures considered along with the variance?

As previously described and supported in the attached letters and reports, alternative and interim measures such as landfill, hog fuel, etc., have been adequately investigated and fully considered.

5. Is the variance properly conditioned to protect air quality to the fullest extent, including requirements for intermediate compliance steps and submittal of plans, specifications and progress reports?

Conditions of the variance include:

i) On or before 1 August 1972, Beaver Lumber will submit for staff review and comment, detailed plans for modification to their burner which will consist, as a minimum, of an underfire and overfire air system with auxiliary burners, and the modifications are to be completed on or before 31 December 1972.

ii) In addition, to assure adequate combustion is taking place, the Authority is requiring installation of a continuously recording pyrometer to record exit gas temperature, and the submission of such records to the Authority upon request.

6. Is the variance period the shortest practicable and will compliance be achieved at the end of it?

The shortest practicable time has been allowed for the submission of detailed plans and specifications and completion of the modification that would satisfy compliance with the D.E.Q. wigwam burner regulation. Full compliance of the Authority Rules cannot be attained until adequate progress has been made in the solid waste field to develop adequate disposal sites or alternate use of cedar wastes.

7. Did the Regional staff fully investigate the application and submit a detailed staff report and recommendation to the Board?

The agency staff report of 6 April 1972 to the Advisory Committee and Board of Directors is attached at TAB D. In addition, the agency files contain information detailing staff plant-site inspections and visits. Also, the Beaver Lumber Company appeared before both the Board of Directors and the Advisory Committee.

BEAVER *Lumber Company*

CLATSKANIE, OREGON
BOX 547 TELEPHONE 1495

March 29,

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

Attention: Mr. Wayne Hanson, Deputy Director

Gentlemen:

| ROUTING | |
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| 1972 | |
| | <i>W.A.</i> |
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| From: | |
| Action: | |

In accordance with discussions and with Mr. Whitehead's motion at the February 3, 1972 meeting of the Advisory Committee, Goebel, Jarrard & Company, Certified Public Accountants have conducted a feasibility study concerning the projected financial capability of our Clatskanie cedar mill to absorb the cost of modifications to our wigwam waste burner.

It is our understanding that the Committee will look favorably on a program toward achieving compliance with visible emission standards even though it is mutually understood that compliance with the particulate emission standards of the Authority may not be possible at all times, even with the best current combustion engineering design.

On this basis, it is Goebel, Jarrard & Company's advice that we proceed with such a burner modification program in phases, testing each phase as completed for the most economical compliance with your visual emission standards.

We are therefore proceeding in good faith on the basis of informal expressions from the Committee that such an investment will provide reasonable assurance of our being allowed to continue operation if our burner is able to perform in compliance with visible smoke emission standards. We have instructed our consulting engineer, Mr. Harold W. McKenzie, in conjunction with Acme Metal Company, to proceed in preparing the necessary plans and the work will be accomplished as early as possible.

As schedules are dependent upon river flood levels and dredging company equipment availability, we are not able to set definite dates at this time, but anticipate that the actual construction can start about July 1, 1972 and should be completed by phases before December 31, 1972.

We therefore respectfully request a variance for one year from the particulate emission standards of the Columbia-Willamette Air Pollution Authority under the understanding that such variance will thereafter be renewable at one year intervals as long as we continue to comply with the now applicable visible emission standards.

Very truly yours,

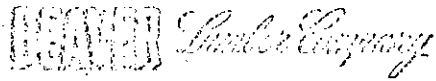
BEAVER LUMBER COMPANY OF CLATSKANIE, INC.

James M. Luxford
James M. Luxford, Vice President

RECEIVED
MAR 30 1972

COLUMBIA - WILLAMETTE
AIR POLLUTION AUTHORITY

TAB C



CLATSKANIE, OREGON
BOX 547 TELEPHONE 1495

| ROUTING | |
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| WET | WET |
| 70 | WET |
| WET | WET |
| From: | |
| Action: | |

December 9, 1971

Columbia - Willamette Air Pollution Authority
1010 NE Couch Street
Portland, Oregon 97232

Gentlemen:

As a condition to the last variance granted us for the operation of a wigwam burner near Clatskanie, Oregon we were requested to submit a definite plan of compliance by December 31, 1971.

Attached, and made a part of this letter by reference, are our previous letters and proposals submitted for your consideration.

To summarize our efforts to solve this problem we have explored the following:

1. Modification of our Existing Wigwam Burner - Primarily because of the continued assertions by your staff that under no circumstances would a modified burner be acceptable to them, this study has been abandoned. Secondly, our independent consulting engineer indicates in the attached correspondence that literal compliance with your regulations is not feasible, and because of the physical lay-out of our plant and topography appears unfeasible;
2. Hogged Fuel - We have been unable to secure a continuing market for hogged cedar, and hogging does not seem feasible without a firm market because of storage problems and related leaching explained in the following paragraphs;
3. Hogged Refuse for Landfill - Without a market the only alternative for hogged fuel is landfill. It appears that cedar residue hogged and used for landfill may not be stored where surface water leaching through the landfill flows into a stream, since it is toxic to fish and marine life. All our land is below river level, is diked and the surface water pumped into a Columbia River tributary;
4. Allied Problems of Disposal - Because of the peculiar nature of salvage cedar logs it is virtually impossible to debark them satisfactorily for chipping or hogging. Disposal of this bark presents the same problems as in studies of (2) and (3) foregoing.

COPIES
AIR POLLUTION

December 9, 1971

We therefore can see only two alternative solutions to the problem.

1. Entire closure of the sawmill;
2. Request another variance for a continuing study and/or solution to our problem.

Our mill is located approximately two miles from the city of Clatskanie, Oregon, population approximately 1,100 people. Clatskanie is located in Columbia County, Oregon and for many years has been classified for most governmental purposes as a "depressed" area. Closure of our mill would have a definite economic impact on the community, since we employ 35 to 40 people, practically all of whom live in Clatskanie and our annual payroll is approximately \$300,000. In addition we purchase logs from a marketing area substantially beyond Clatskanie, including most of Columbia County. Our mill is the only mill on the lower Columbia River utilizing essentially salvage cedar logs. Without the market provided by our mill the loggers would have to develop another market or leave the logs in the woods.


We therefore request a one year extension of variance as provided under Section 9.1 of the Rules of the Columbia-Willamette Air Pollution Authority, "Due to special circumstances which would render compliance unreasonable, burdensome, or impractical, due to special conditions or cause, or because the effect of air pollution is minimal in comparison with the effect of abatement, or because no other alternative facility or method of handling is yet available."

We would also request that new minimum standards of air quality emissions from the burning of cedar residues to be developed by your staff so that the disposal of this particularly troublesome cedar by-product be exempted from the usual standards for wigwam burners.

Thank you for your consideration.

Very truly yours,

BEAVER LUMBER COMPANY OF CLATSKANIE, INC.

By 
James M. Lusford, Vice President

Encl.

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

| | | | |
|---------------------------------------|---|--------------------|--------|
| IN THE MATTER OF |) | | |
| |) | VARIANCE | NO. 27 |
| VARIANCE TO |) | | |
| |) | INCLUDING | |
| BEAVER LUMBER CO. OF CLATSKANIE, INC. |) | | |
| |) | FINDINGS AND ORDER | |
| a Corporation |) | | |

FINDINGS

I

At its regular meeting, 24 October 1969, the Board of Directors adopted an order requiring all wigwam waste burners situated within Special Control Areas A and B of the Columbia-Willamette Air Pollution Authority be in compliance with the emission standards contained in Rules of said Columbia-Willamette Air Pollution Authority on or before 31 December 1970.

II

By letter dated 15 January 1971 and by oral statements of James M. Luxford presented to the Board of Directors in open meeting, 18 January 1971, it was represented to Columbia-Willamette Air Pollution Authority that the wigwam waste burner operated by Beaver Lumber Co. of Clatskanie, Inc. at Clatskanie, Oregon, is not yet in compliance with the Rules of Columbia-Willamette Air Pollution Authority and that an extension of time not beyond 30 June 1971 is required to bring said burner in compliance with said Rules.

III

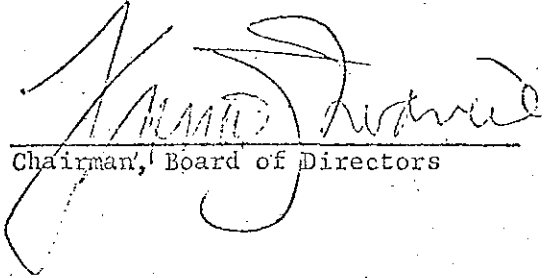
A variance should be granted to Beaver Lumber Co. of Clatskanie, Inc. of Clatskanie, Oregon to operate the above mentioned wigwam waste burner in violation of emission standards contained in the Rules of Columbia-Willamette Air Pollution Authority for a period of time not beyond 30 June 1971.

ORDER

NOW THEREFORE it is hereby ordered that a VARIANCE be granted to Beaver Lumber Co. of Clatskanie, Inc. to operate a wigwam waste burner at Clatskanie, Oregon in violation of emission standards contained in Rules of Columbia-Willamette Air Pollution Authority for a period of time not beyond 30 June 1971 subject to the following conditions:

1. The operation of the wigwam waste burner shall comply with the provision of Oregon Administrative Rules, Chapter 340, Section 25-020.
2. The Beaver Lumber Co. of Clatskanie, Inc., shall on or before 15 April 1971 furnish to Columbia-Willamette Air Pollution Authority a written report setting forth with specificity, the program to be employed to make said burner comply with the emission standards contained in Rules of Columbia-Willamette Air Pollution Authority and the methods or procedures to be employed in implementing said program on or before 30 June 1971.

Entered at Portland, Oregon the 18th day of January 1971.


Chairman, Board of Directors

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

| | | | |
|---------------------------------------|---|--------------------|--------|
| IN THE MATTER OF |) | VARIANCE | |
| |) | (Extension) | |
| VARIANCE TO |) | | |
| |) | INCLUDING | No. 27 |
| BEAVER LUMBER CO. OF CLATSKANIE, INC. |) | | |
| a Corporation |) | FINDINGS AND ORDER | |

FINDINGS

I

At its regular meeting, 18 January 1971, the Board of Directors granted a variance to Beaver Lumber Co. of Clatskanie, Inc. to operate a wigwam waste burner at Clatskanie, Oregon in violation of emission standards contained in Rules of Columbia-Willamette Air Pollution Authority for a period of time not beyond 30 June 1971.

II

During the period of the variance, Beaver Lumber Co. of Clatskanie, Inc. has retained professional firms to assist in the development of methods for disposal of wood wastes from the mill other than by burning. Several methods, none of which proves feasible, were investigated.

III

The petition requested a variance extension for a period of one year to and including 30 June 1972.

IV

The Advisory Committee recommended that because of the difficulty of the petitioner in developing alternative means of disposing of the wood waste from the mill, the variance previously granted be extended through 31 December 1971.

ORDER

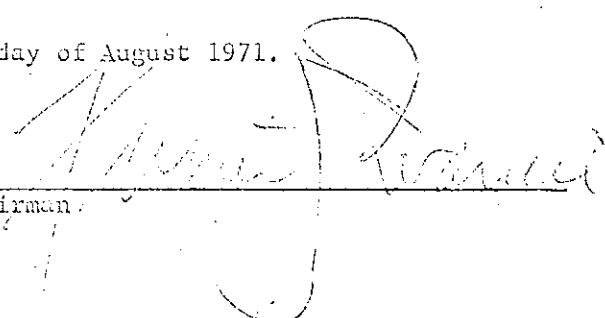
NOW THEREFORE, it is hereby ordered that the variance previously granted Beaver Lumber Co. of Clatskanie, Inc. to operate a wigwam waste burner at Clatskanie, Oregon in violation of emission standards contained in Rules of Columbia-Willamette Air Pollution Authority be extended for the period through 31 December 1971.

Entered at Portland, Oregon the 20th day of August 1971.

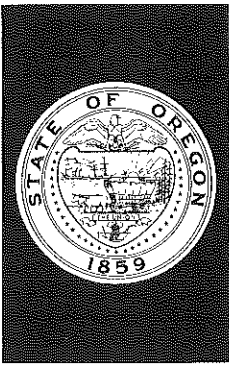
Certified a True Copy



Jack Lowe, Administrative Director



Chairman



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL
GOVERNOR

L. B. DAY
Director

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COMMISSION

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Portland

ARNOLD M. COGAN
Portland

MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: DIRECTOR

SUBJECT: Agenda Item No. M , June 8, 1972, EQC Meeting

Proposed U. S. National Bank of Oregon 219 - Vehicle
Underground Parking Facility

Background:

On January 24, 1972, as part of the Clean Air Act Implementation Plan for Oregon, a regulation was adopted, OAR Chapter 340, Sections 20-050 through 20-070, requiring Commission approval prior to commencing construction of parking facilities in the Portland, Salem and Eugene metropolitan areas.

A primary purpose of the regulation is to ensure that construction of parking facilities will be consistent with environmentally sound transportation 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 on the environment, an environmental impact study may be required.

The regulation delegates the primary responsibility for review of proposed parking facilities to the regional authorities. In conformance with this responsibility, the Columbia-Willamette Air Pollution Authority has reviewed the U. S. National Bank proposal for a parking facility and has delineated a recommendation for Commission action upon the proposal.

The U. S. National Bank of Oregon proposes to construct a 219-vehicle underground parking facility as an integral part of an office and retail-commercial complex development in downtown Portland. The proposed complex is to be constructed at a site bounded by West Burnside, S. W. Oak, S. W. 5th, and S. W. 6th Streets commencing in June, 1972. The construction is to proceed in two phases. Construction of the first phase is to include a one level shopping mall, six levels of bank offices and two underground levels of parking, service, and storage. Approximately 1800 employees will occupy the first phase development.

The upper level of parking will provide 49 automobile spaces for Bank-owned pool cars and messenger cars, which will be used frequently during the day by Bank employees. The lower level of parking will contain 170 short-term spaces for the use of the public. Ultimately most of these spaces will be used only for Bank executive parking. At night these spaces will be used for Bank employee parking.

The second phase of development, planned for the latter part of this decade will be a high-rise office tower with about 3200 additional occupants. No additional parking facilities are planned for the final stage of development.

At the present time there are two off-street parking facilities on the construction site. One facility, with spaces for approximately 140 cars, is used mainly for short-term parkers during the day. The other facility, with spaces for approximately 100 cars, is used mainly for long-term parkers.

In addition to these two off-street facilities, there are 56 on-street parking spaces within or adjacent to the project site.

During the first phase of construction all of these off and on-street parking spaces will be abolished. The proposed underground parking facility for 219 vehicles will replace the present surface parking for 296 vehicles, resulting in a net decrease in 77 available parking spaces for the area.

Parking and service access and curb cuts for the first phase development have been approved by the City Engineer and City Traffic Engineer. Design review and conditional use approval by the Portland City Planning Commission was granted May 2, 1972. The first phase development has been determined to be consistent with the objectives of the Downtown Plan.

The complete CWAPA file for the U. S. National Bank proposal was received in DEQ offices May 26, 1972 and has been reviewed. Attached as an appendix, are the U. S. National Bank's environmental impact statement and CWAPA's recommendation to the Commission for approval of the proposed parking facility.

Analysis of the Proposed Parking Facility:

A. Effect Upon Air Quality

1. The location of the proposed parking facility is in or near one of the most severe problem areas for carbon monoxide in the City of Portland.
2. The proposed facility will provide 219 parking spaces for short-term use during the day.

At the present time there are approximately 196 short-term parking spaces located on or adjacent to the construction site which will be abolished during construction.

There are also presently approximately 100 long-term parking spaces located on the construction site which will also be

abolished during construction.

Thus while there will be a net increase of 23 short-term parking spaces at the site, there will also be a net decrease of 100 long-term spaces at the site.

3. Upon completion of the first phase development approximately 1800 employees will be located at the site. A bank survey indicates that 62% of its employees presently commute via mass transit to work. Assuming the percent of employees riding mass transit to work remains constant, approximately 684 employees can be expected to commute to work by automobile. Assuming an average car occupancy of 1.5 persons per car for people who commute to work, indicates that a parking demand for 456 long-term parking spaces will be created in the general vicinity of the proposed site.

However, the Bank indicates that many of the employees who drive already park in the vicinity of the site, thus limiting the additional parking demand for the area.

4. Upon completion of the second phase development approximately 3200 additional employees will be located at the site. Assuming that 50% of these employees will ride mass transit to work and a 1.5 persons per car occupancy for employees who drive to work, indicates that a parking demand for 1067 additional long-term parking spaces will be created in the general vicinity of the proposed site.

The effect of the proposed parking facility upon air quality is expected to be minimal since the result will be a net decrease in available parking spaces for the area. The effects of the slight

increase, 23 spaces, in short-term parking should be offset by the large decrease in long-term parking at the site.

The effect of the second phase development upon air quality cannot be determined at the present time since the proposed parking facility is not intended for the use of those employees. It is likely that the 6000-car parking structure proposed by DeLeuw, Cather for the Downtown Plan, which is to be sited on the north side of West Burnside across the street from the proposed Bank development, would be used by many of the employees.

B. Effect Upon Noise Levels

Since the proposed parking facility is to be located underground and the number of parking spaces available at the site will be less than presently available, the effect upon ambient noise levels should be minimal.

C. Adverse Effects Upon Water Quality or Solid Waste Management

No adverse effects are expected to occur as construction involves routine operations.

D. Visual Impact

Since the proposed parking facility will be located underground and unsightly surface parking will be removed, the visual impact of the parking facility should be positive.

E. Effect Upon the Quality of Life

Adverse effects of the proposed parking facility upon the quality of life in the area should be minimal, however the impact of

of the concentration of 5000 employees at the bank high-rise complex may have a major impact upon the quality of life and liveability of the area and downtown Portland.

F. Columbia-Willamette Air Pollution Authority Recommendation

The CWAPA review of the proposed parking facility resulted in their recommendation that the Commission notify the U. S. National Bank of Oregon that the construction may proceed. CWAPA's reasons for its recommendation for approval are as follows:

1. The proposed parking facility will result in a net reduction in the number of available parking spaces at the site.
2. The 219 spaces proposed appear to be a minimum to sustain 24-hour operation and maintenance of the bank development.
3. Planned improvements in vicinity traffic flow, ingress and egress to parking facilities, etc. will reduce local congestion and thus reduce vehicle air contaminant emissions.
4. The proposed parking facility conforms with the Downtown Plan and City planning requirements.
5. The proposed parking facility will encourage the use of mass transit and car pooling since no employee parking is being provided.
6. Effects upon noise and visual appearance will be minimized since the proposed parking facility will be located underground.
7. The ultimate concentration of 5000 employees at the site is approvable only if:
 - a. The transportation control strategy being developed by the City of Portland is effective.
 - b. The motor vehicle inspection program being developed by DEQ is implemented.

- c. The Federal emissions standards for 1975 automobiles are achieved.

The Department is in basic agreement with CWAPA's reasoning and recommendations. However, there are a few points that need further clarification.

1. It is obvious from the information submitted by the Bank that the proposed parking facility and bank complex have been designed to conform with the objectives of the Downtown Plan. In general, the Department is of the opinion that this is a positive measure. However, there are basic elements of the Downtown Plan which have yet to be finalized and the subsequent environmental impacts evaluated. These include the Parking Plan, the Vehicle Circulation Plan, and the Mass Transit Plan which are still under development by DeLeuw, Cather & Co. and the Mt. Hood Freeway which is still in the planning stages.
2. The transportation control strategy that the City of Portland is developing as required under the Clean Air Act Implementation Plan for Oregon is a vital part of the effort to attain Federal ambient air standards by May 30, 1975 and maintain those levels thereafter. The influx of 5000 additional employees into one of the most severe problem areas for carbon monoxide in the City of Portland can only be justified if effective measures are developed and implemented.

Unfortunately, at the present time, the efforts of the City have not yielded any known significant proposals and the City is considered behind schedule in meeting the August 1, 1972 deadline for completion of the transportation control strategy.

Conclusions:

1. The proposed 219 vehicle parking facility will have only a minimal environmental impact.
2. The only aspect of the bank complex development that may have a major adverse impact upon the environment is the ultimate concentration of 5000 employees in the bank headquarters and high-rise office tower.

The impact of this development will be in large part dependent upon the environmental impact of the transportation portions of the Downtown Plan and the implementation of an effective transportation control strategy by the City of Portland.

3. The only portion of the bank complex development being evaluated under OAR Chapter 340, Sections 20-050 through 20-070 is the proposed 219 vehicle parking facility.

Director's Recommendation:

In view of the minimal environmental impact of the proposed 219-vehicle parking facility, I recommend that the Commission grant approval for the U. S. National Bank of Oregon to commence construction.

This recommendation should in no way be considered to imply Department approval of the bank headquarters and high-rise office tower of which the proposed parking facility is an ancillary part.


L. B. Day

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

26 May 1972

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

Attention: Mr. H. M. Patterson, Director
Air Quality Control Division

Gentlemen:

A parking facility notice of construction and environmental impact study filed by the U.S. National Bank of Oregon on 10 May 1972 with CWAPA has been reviewed.

It is the findings of CWAPA that the proposed U.S. National Bank of Oregon 219-car underground parking facility to be located near S.W. 5th Avenue and S.W. Pine Street in downtown Portland conforms with the policies set forth in the D.E.Q. Parking Facility regulations (OAR Chapter 340, Sections 20-050 through 20-070). Therefore, it is recommended that the Department of Environmental Quality notify U.S. National Bank of Oregon that construction may proceed.

Following are major technical facts upon which CWAPA based its findings.

1. The proposed underground parking facility for 219 vehicles will replace present surface parking for 296 vehicles, resulting in a net decrease in 77 available parking spaces for the area. The 219 spaces appear a minimum to sustain 24-hour operation and maintenance of the planned adjoining bank office and retail facility. Planned improvements in vicinity traffic flow (signalization of S.W. 5th and Pine, conversion of Pine Street to a two-way) should improve present ingress and egress of vehicles to parking facilities with a net effect of less total vehicle emissions for vehicles using the parking facility than under existing conditions.

2. The proposed parking facility conforms with the downtown plan and city planning requirements.

BOARD OF DIRECTORS

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Washington County

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Program Director

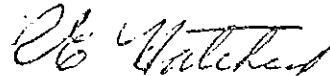
Parking facility access has been designed to alleviate congestion and conflict with planned exclusive bus lanes along S.W. 5th Avenue. The entire U.S. Bank complex including parking facility has been reviewed in light of the downtown plan guidelines by the City of Portland Planning Commission and conditional use granted. Incidental to the parking facility, the U.S. National Bank office complex provides for a pedestrian street, sky-way and transit mall, all of which are key elements of the downtown plan to enhance the movement of people by means other than automobile.

3. The proposed parking facility will encourage U.S. Bank complex occupants to utilize other means of transportation aside from automobiles since no parking is being provided for building occupants. Under the first phase of construction, occupancy will be approximately 1800. Final site development will reach 5000 occupancy with no planned increase in on-site parking.

4. The proposed parking facility will be underground, thereby minimizing other environmental impacts such as noise and visual appearance.

5. The ultimate concentration of a relatively large number of people at this site can be approved only on the basis that on going activities to reduce the carbon monoxide concentrations will proceed concurrently at an acceptable rate of improvement. This involves the City of Portland's project to reduce carbon monoxide through traffic signalization, diversion and other means, the transportation improvements including peripheral parking, the D.E.Q. developing program for motor vehicle inspection and maintenance program and the E.P.A. emission standards for 1975 model automobiles will be achieved.

Very truly yours,



R. E. Hatchard
Program Director

REH:sm

ENVIRONMENTAL IMPACT STATEMENT
FOR
UNDERGROUND PARKING FACILITIES
FOR
U.S. NATIONAL BANK OF OREGON
IN
DOWNTOWN PORTLAND

RECEIVED

COMMUNITY DEVELOPMENT
AIR POLLUTION AGENCY

May 1972
CH2M/HILL

I. Description of the Proposed Facility and Its Surroundings.

A. Type of Facility. Combined Class I (short-term) and Class II (long-term) parking facility.

The U.S. National Bank of Oregon is in the process of developing an office and retail-commercial complex in Downtown Portland bounded on the south by S.W. Oak Street and on the north by West Burnside, on the east by S.W. 5th Avenue and on the west by S.W. 6th Avenue. The site includes portions of S.W. 6th Avenue, S.W. Pine Street and S.W. Ankeny Street which have been vacated by the Portland City Council under Ordinance No. 132075.

In connection with this project, the Bank proposes to locate 219 off-street parking spaces underground within the project site. The parking spaces will be situated on two levels as shown on the preliminary architectural plans (Exhibit A). The Bank also plans to provide underground service and loading areas. The Bank development is not primarily a parking facility, but does provide a minimum number of parking spaces necessary for daily operations. The Bank is not providing employee parking, with the exception of night employees.

B. Major Design Features. The major design feature of the parking facility is that it will be located underground on the site. This will allow development of the ground level as a pedestrian-oriented area.

Separate entrances are provided for automobiles and service vehicles for (1) ease of maintenance, (2) security and (3) to avoid congestion.

As indicated on the preliminary architectural plans, the entrance and exit for automobiles will be located on the west side of S.W. 5th Avenue at a location in line with S.W. Pine Street. The entrance and exit for all service vehicles will be located on the south side of West Burnside Street between 5th and 6th avenues. The Bank has received approval from the City Engineer and the City Traffic Engineer for approval of curb cuts for both of these driveways. Approval also has been given for the signalization of the intersection of 5th and Pine coupled with the conversion of S.W. Pine Street between 4th and 5th avenues to a two-way street (Exhibit B). Pine Street is changed to a two-way street to accommodate the ingress and egress of automobiles to the parking facility to alleviate congestion and conflict with the planned exclusive bus lanes along S.W. 5th Avenue.

A 26-foot wide automobile entrance and exit with 7'6" clearance on the 5th Avenue side of the site will provide access to lower mezzanine level and second basement level parking areas. The lower mezzanine level will provide 49 automobile spaces for Bank-owned pool cars and messenger cars. These will be used frequently during the working day by Bank employees. The mezzanine level will

have a minimum floor to ceiling height of 7'6" and an area of approximately 25,000 square feet.

Two interior driveway ramps will provide access to the second basement parking level from the lower mezzanine level. This level will contain 170 "self-park" spaces. These will be operated as short-term spaces during the working day. It has not been determined at this time whether these spaces will be available to the general public or whether they will be restricted to customers of the retail stores to be situated on the mall level of the building. Most of these spaces will ultimately be used only for Bank executive parking. At night these spaces will be used for Bank employee parking. The trapezoidal dimensions of the B-2 parking level are 230 feet wide by 330 feet on the short side and 387 feet on the long side. Minimum floor to ceiling height will be 7'9". This level contains an area of approximately 88,000 square feet including mechanical rooms, elevators, stairs and driving ramps. The parking at this level will be controlled by a parking attendant located on the mezzanine level. This location will provide adequate reservoir waiting area for cars entering the facility. A sign located at the entrance to the building will indicate when the public parking facility is full. The average parking stall will be 9 feet wide by 20 feet long. There will be 7 compact car spaces each 16 feet long.

The service area, which is not considered a parking facility, will have a 24-foot wide ramped driveway from Burnside Street with a 14-foot clearance. This will enable the Bank to accept most types of trucks. All service vehicles will enter and exit in a forward motion. Adequate turn-around area will be provided at the service level. The service area and ramp contain approximately 16,000 square feet. Floor to ceiling height will be 21'5". There will be five truck loading spaces, three armored truck loading spaces and four messenger car loading spaces. There will be frequent in-and-out movements throughout the day and night, to and from the service level.

C. Traffic Data. Existing traffic flow in the vicinity of the project site is indicated on Map 1. It is anticipated that development of the first phase bank complex will not increase vehicular traffic during the next two years in the vicinity. Fewer parking spaces will be provided than exist today (219 compared to 296 respectively).

The number of Bank employees will not be sufficiently increased, but rather will be shifted to this location from several existing locations in the vicinity. These include the Pittock Block, Commonwealth Building, Crown Plaza and Head Offices. About 1,800 employees will occupy the first phase development. Consolidating employees in one location will reduce the need for messenger car transfers in Downtown. Many of the employees who drive already park in the immediate vicinity, so no additional parking demand is anticipated because of the first phase development. Consolidation of employees in one location will provide the opportunity to form additional car pools which will decrease parking demand.

Pine Street to the east will have an increase in bank destined traffic, but will have a decrease in general traffic as it will no longer be a through street. Ankeny Street will also cease to be a through street and will therefore have less traffic. Traffic now using Ankeny and Pine streets will gravitate to Oak, Stark and Burnside streets which are planned as major traffic streets in the Downtown Plan.

Overall vehicular traffic generated in the vicinity by the first phase development should be less than exists today.

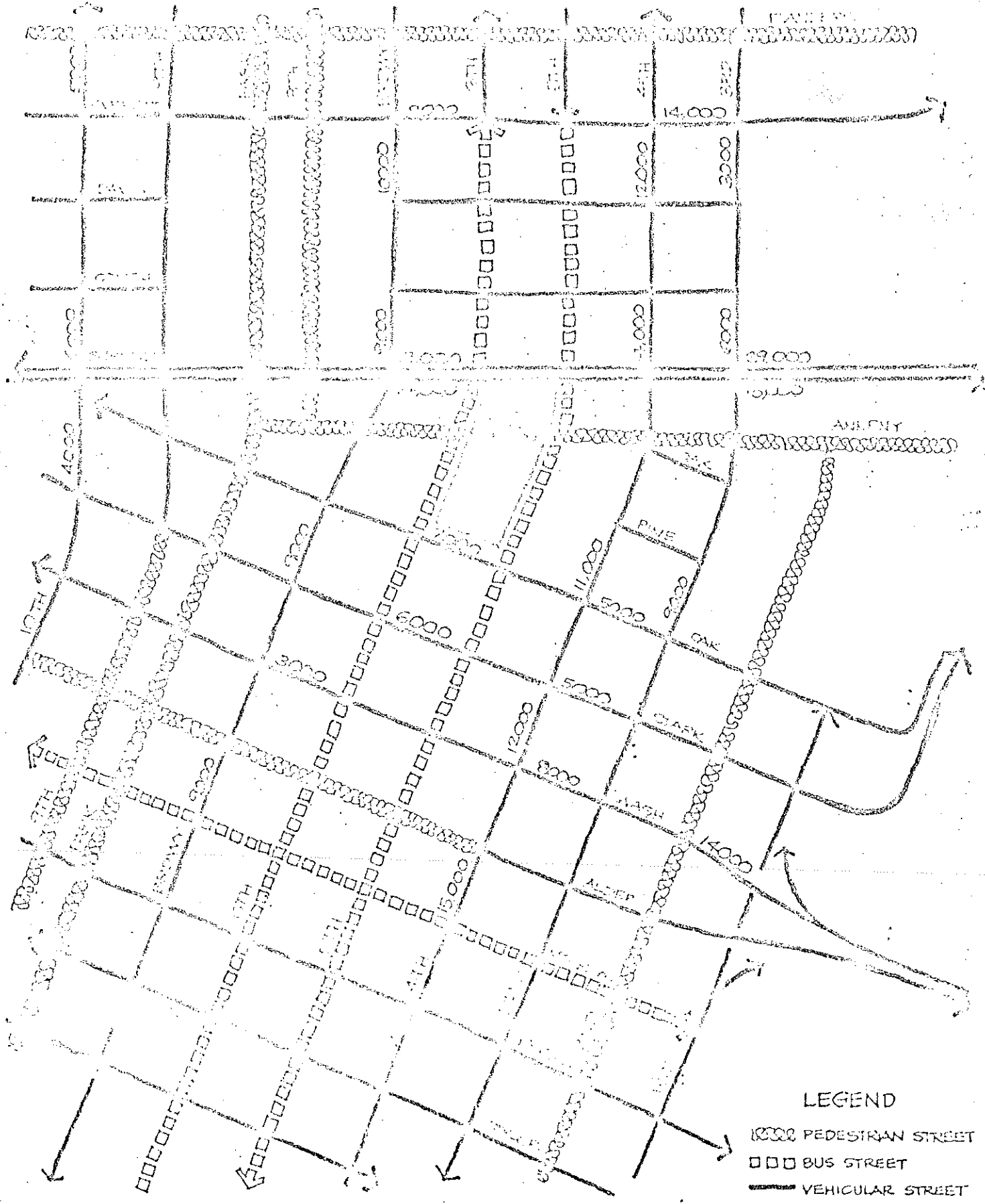
Sometime before 1980, the Bank contemplates phase two development, a high-rise office tower with about 3,200 additional occupants. It is assumed, by that time, a more efficient mass transit system will be in operation which can accommodate the added population and that additional vehicular traffic and parking demand created by the development will be negligible. A survey of Bank employees shows that 62 percent currently ride mass transit to work. It is likely that a high percentage of the occupants of both the first and second phase developments will ride mass transit, especially if the service is improved.

At the present time, there is no good way to substantiate the probable 1990 condition because of the mass transit factor. The Portland Downtown Plan (Exhibit C) proposes a more efficient traffic and parking system for Downtown which if implemented will increase the use of mass transit, increase the efficiency of vehicular traffic, decrease the demand for parking and decrease air pollution. Map 2 indicates preliminary projected 1990 vehicular volumes which have been developed by the circulation and parking consultants to the Downtown Plan. These preliminary figures assume the implementation and proper phasing of the following improvements:

- (1) Reorganization of major streets in Downtown.
- (2) Closure of certain streets for use by other modes of circulation.

- (3) Peripheral parking facilities around the edges of Downtown.
- (4) Elimination of much of the on-street parking.
- (5) Exclusive bus lanes on 5th and 6th avenues.
- (6) Express bus system to Downtown.
- (7) Outlying park-and-ride stations.

One location for peripheral parking facilities is indicated in the area north of Burnside with good access to and from the Stadium Freeway and the Broadway, Steel and Burnside bridges. The parking consultant has not yet determined the exact size or placement of the facilities needed. Exclusive bus lanes planned for 5th and 6th avenues will provide convenient and frequent (maximum two-minute intervals) shuttle service through the core area. Also, an overhead, enclosed, skyway system is planned which will tie the peripheral parking facilities across Burnside to the heart of the office and retail core. All of these planned facilities would be available to occupants or users of the Bank development complex.



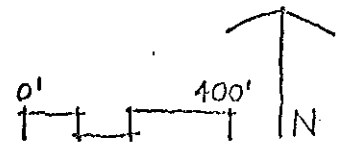
D. Vicinity Maps.

Map 3 - Vicinity Map Showing Buildings.

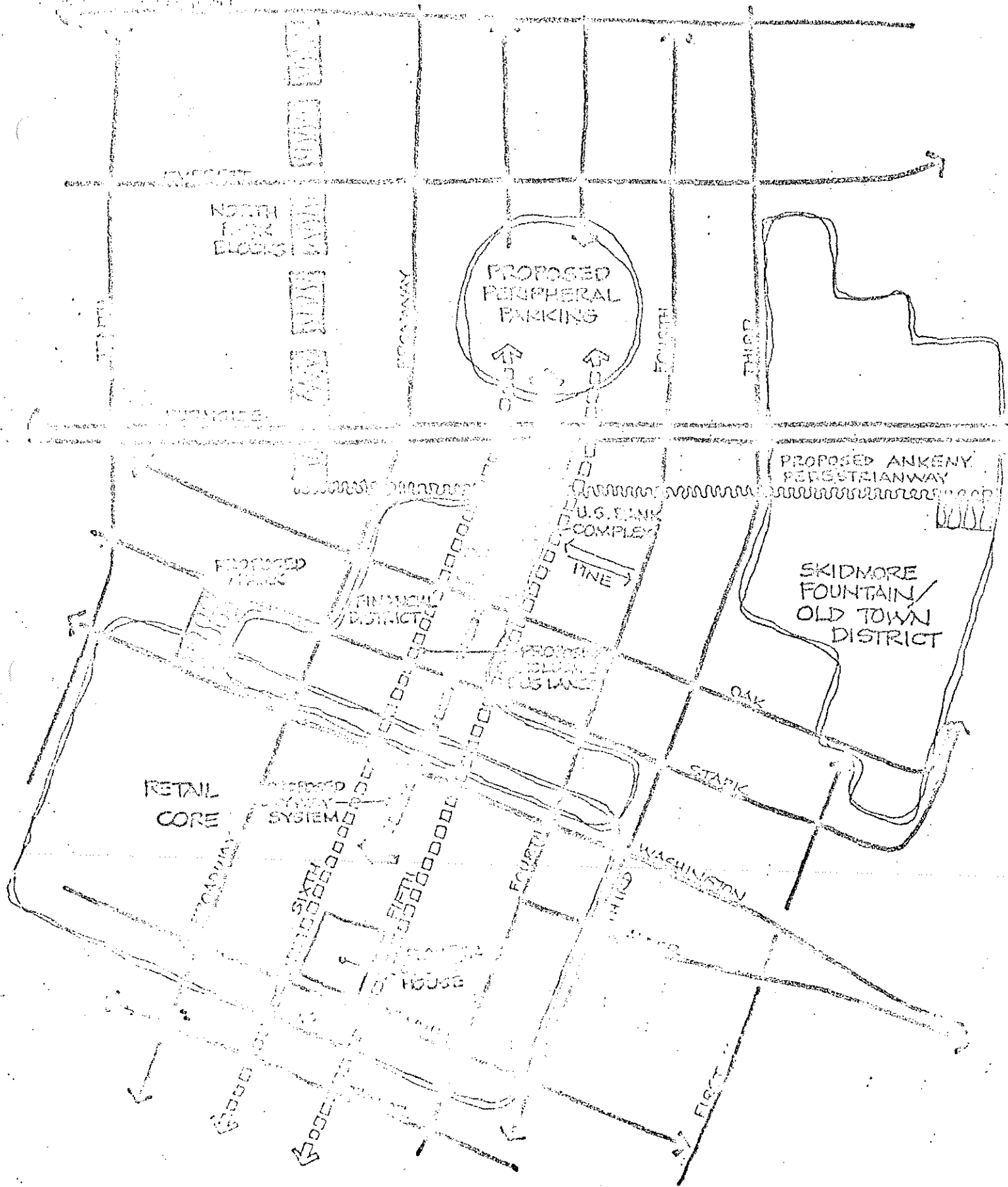
Map 4 - Special Features and Planned Developments.



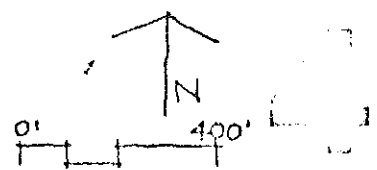
VICINITY MAP



3



UNIVERSITY OF MICHIGAN
 DEPARTMENT OF URBAN PLANNING
 1960



E. Land Use Description. The site and surrounding topography is relatively flat. There are no outstanding topographic features within the vicinity. The Willamette River is located approximately one-third of a mile to the east and the Stadium Freeway (I-405) is located one-half mile to the west.

Existing land use in the vicinity is mainly offices in multi-story buildings (Map 5). There is a half block, two-level, 150 car parking ramp on Pine Street between 4th and 5th avenues. An older, multi-level 550 car garage is on the half block along the south side of Pine Street between 6th Avenue and Broadway. This obsolete garage will likely be removed in the next few years. There are several ground level parking lots in the vicinity, most of which are interim uses.

Proposed land use in the vicinity is shown as it appears in the Portland Downtown Plan (Exhibit C). Major office development with supporting ground level service-commercial is proposed between 4th Avenue and Broadway south of Burnside Street. North of Burnside is indicated as mixed use development including commercial, office and housing.

F. Status of Project. After examining several alternative locations, the Bank chose the subject site for the following reasons:

- (1) To stay in close proximity to their existing headquarters.
- (2) To stay in the established Downtown financial district.
- (3) To provide impetus for revitalizing this section of Downtown.
- (4) To provide direct access to mass transit (62 percent of the Bank employees ride mass transit).
- (5) To provide easy access for the large percentage of part-time personnel who come from Portland State University.
- (6) To provide good access from the freeway system and bridges.

Demolition of existing structures will begin May 15, 1972. Excavation for the new development is programmed to begin June 15, 1972. Construction of the first phase development--a one level shopping mall, six levels of bank offices and two underground levels of parking, service and storage--will be completed by April 1, 1974, barring construction difficulties. The architectural firm of Skidmore, Owings & Merrill, with Pietro Belluschi as Design Consultant, is currently completing final working drawings for the first phase project. Parking and service access and curb cuts for the first phase development have been approved by the City Engineer and City Traffic Engineer (Exhibit B). Design review and conditional use approval by the Portland City Planning Commission was granted May 2, 1972 (Exhibit D).

The concept design for the final development of the site has been completed. This will include, in addition to the first phase development, a multi-story office structure on the north portion of the site. In the interim period (5 to 10 years), this portion of the site will be used as a landscaped plaza.

G. Existing Parking Facilities. There are two existing parking facilities on the project site. A surface parking lot of 22,000 square feet for about 140 cars is located on 6th Avenue between Oak and Pine streets. It is used mainly for short-term parkers during the day. At night, it is used by Bank employees.

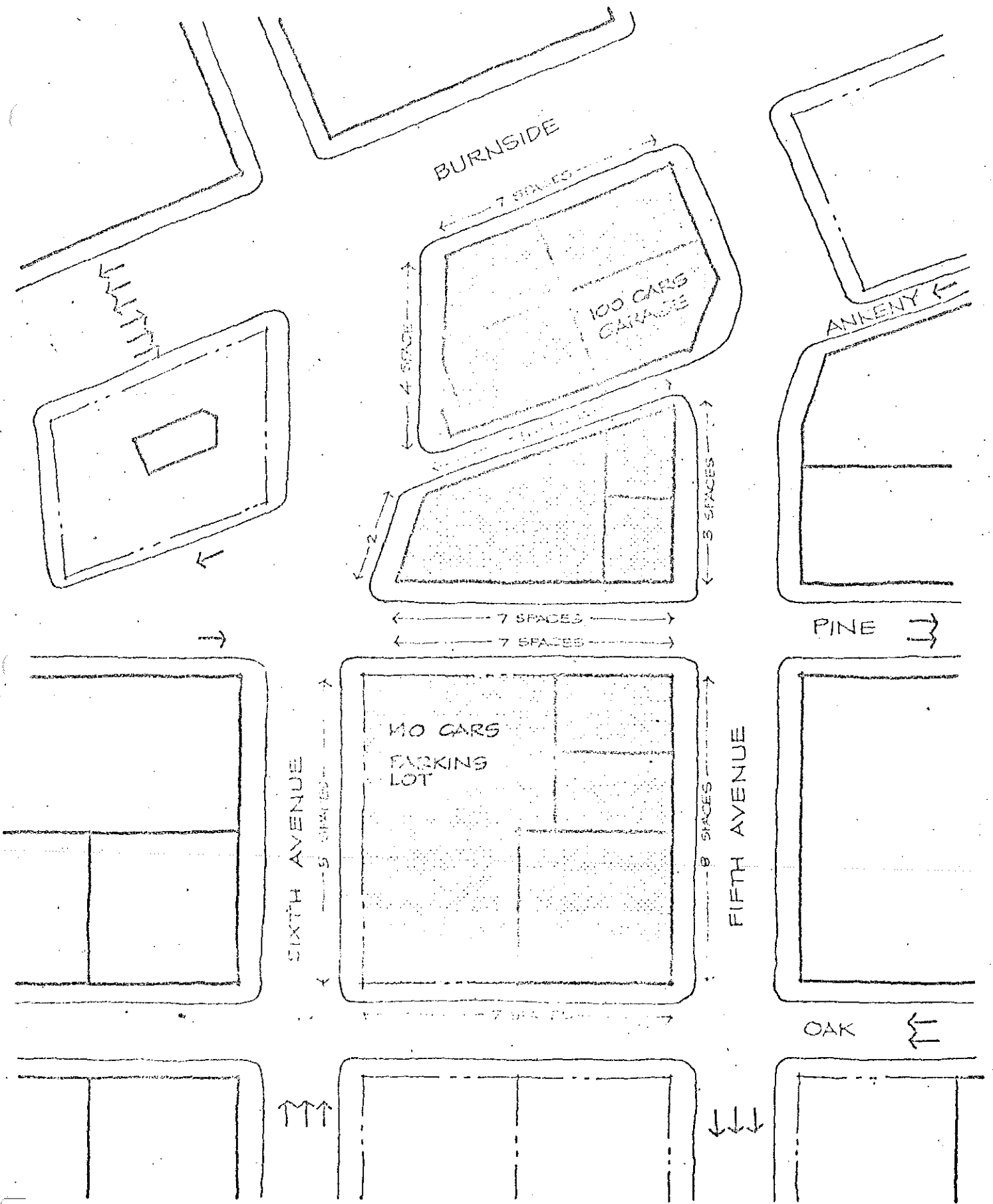
A four-story elevator-type parking garage is situated at the northwest corner of 5th Avenue and Ankeny Street. This garage contains approximately 5,000 square feet per floor. About 100 cars are parked in the facility, most on a monthly basis.

In addition to these two off-street facilities, there are 56 on-street parking spaces within or adjacent to the project site. No on-street parking will be provided around the perimeter of the site during or after completion of construction.

Deficiencies of the existing parking facilities include the following:

- (1) Many curb cuts creating pedestrian-vehicle conflict.
- (2) Congestion caused by cars waiting on the street to get into surface lots or into curb spaces.
- (3) Inefficient use of the land and street for surface and curb parking.
- (4) Inefficiency of an elevator-type parking garage.
- (5) Inefficiency of attendant parking causing cars to stack up which creates congestion, noise and air pollution.

The new complex will consolidate Bank facilities in one location from at least four existing locations. This will create less travel between buildings using pool cars. All on-street parking will be eliminated which will alleviate traffic congestion around the site.



1. THE CITY OF INDIANAPOLIS
 2. THE BOARD OF ZONING AND PLANNING
 3. THE BOARD OF HEALTH
 4. THE BOARD OF PUBLIC WORKS
 5. THE BOARD OF WATER UTILITIES
 6. THE BOARD OF UTILITIES
 7. THE BOARD OF TRANSPORTATION
 8. THE BOARD OF PARKS AND RECREATION
 9. THE BOARD OF EDUCATION
 10. THE BOARD OF SOCIAL SERVICES
 11. THE BOARD OF COMMUNITY DEVELOPMENT
 12. THE BOARD OF ECONOMIC DEVELOPMENT
 13. THE BOARD OF ENVIRONMENTAL AFFAIRS
 14. THE BOARD OF HISTORIC PRESERVATION
 15. THE BOARD OF INDIAN AFFAIRS
 16. THE BOARD OF LABOR RELATIONS
 17. THE BOARD OF LEGAL SERVICES
 18. THE BOARD OF LIBRARIES AND ARCHIVES
 19. THE BOARD OF MUSEUMS AND HISTORIC SITES
 20. THE BOARD OF NATURE AND SCIENCE
 21. THE BOARD OF OCCUPATIONAL SAFETY AND HEALTH
 22. THE BOARD OF PROFESSIONAL SERVICES
 23. THE BOARD OF PUBLIC DEFENSE
 24. THE BOARD OF PUBLIC HEALTH
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 36. THE BOARD OF STATE'S WORKERS COMPENSATION
 37. THE BOARD OF STATE'S YOUTH SERVICES
 38. THE BOARD OF STATE'S ZONING AND PLANNING
 39. THE BOARD OF STATE'S ZONING AND PLANNING
 40. THE BOARD OF STATE'S ZONING AND PLANNING

1. THE CITY OF INDIANAPOLIS
 2. THE BOARD OF ZONING AND PLANNING
 3. THE BOARD OF HEALTH
 4. THE BOARD OF PUBLIC WORKS
 5. THE BOARD OF WATER UTILITIES
 6. THE BOARD OF UTILITIES
 7. THE BOARD OF TRANSPORTATION
 8. THE BOARD OF PARKS AND RECREATION
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H. Economic Factors. The first phase development will have approximately 1,800 occupants. The ultimate site development will have approximately 5,000 occupants.

The assessed value of the project site including existing structures is approximately \$2,000,000. The first phase development will be a \$15,000,000 project including land costs. The project will increase the City property tax base.

The total development of the project will constitute a major benefit to the surrounding area and will be one of the factors triggering future development in this part of Downtown. It will help to protect and improve property values and will be a catalyst for the following:

- (1) Renovation of older buildings in the surrounding financial district.
- (2) Restoration of buildings in the nearby Skidmore Fountain historic district.
- (3) Redevelopment of the deteriorating area north of Burnside Street.

II. Probable Impact of the Proposed Facility on the Environment.

A. Consistency with Mass Transit Objectives. A great amount of reliance will be placed on mass transit to serve the project. The use of mass transit is stressed by the fact that only 219 total parking spaces will be provided to serve an ultimate project population of 5,000 people. It is assumed that a large percentage of employees will continue to use mass transit.

The development is consistent with local and regional mass transit goals and plans to develop increased mass transit ridership to Downtown and to develop exclusive bus lanes within Downtown. The project site is located between the proposed transit malls on 5th and 6th avenues. The development is designed to complement and be compatible with the transit malls plan. Ingress and egress to the project site is located so that automobile and truck traffic entering or leaving the complex will not interfere with the exclusive bus lanes on 5th and 6th avenues.

B. Consistency with Land Use Objectives. The development is consistent with the Portland Downtown Plan. The Bank sought the advice of the Downtown planning team during the conceptual design phase of the project so as to develop a project plan which is in harmony with the Downtown Plan. The underground parking included in the project does not interfere with the goals and planning guidelines set out in the Downtown Plan.

C. Effects on Air Quality. The underground parking facility will create a less adverse effect on air quality in Downtown and in the metropolitan area because fewer automobile spaces will be provided than exist today. Existing surface parking lots will be eliminated and ground level air quality will be improved in the immediate vicinity. Automobile fumes generated within the underground parking structure will be exhausted out the top of the seven-story above-ground shopping and office structure. This will alleviate ground-level air pollution conditions.

D. Effect on Noise Levels. The underground parking facility will cause a reduction in above-ground automobile noise as compared with the noise created by the existing parking lot and above-ground parking garage on the project site.

E. Effect on Water Quality and Solid Waste Management. The underground parking facility will have no adverse effect on water quality or solid waste management during or after construction.

F. Visual Impact. Eliminating existing on-grade parking and putting future parking underground will have a positive visual impact on the surroundings. The parking facility (as part of the overall development) will have a positive visual impact on local beautification by providing new building development in Downtown Portland and by providing attractive landscaping and trees to improve the local appearance.

The development project will not interfere with any local or regional beautification and restoration plans or objectives including the Skidmore Fountain/Old Town historic restoration area between 3rd and Front avenues.

G. Effect on Quality of Life and Liveability. The project will enhance the quality of life and liveability in the immediate vicinity and within the central business district by (1) eliminating unsightly on-grade parking lots and putting new parking underground; (2) creating a pleasant ground-level pedestrian environment with a) wide sidewalks, b) trees and planting, c) an enclosed shopping mall above the parking facility, and d) pedestrian access through the site in both north-south and east-west directions.

Two streets have been vacated within the project site eliminating some short and awkwardly shaped blocks. This will alleviate traffic congestion and will eliminate pedestrian-vehicle conflicts.

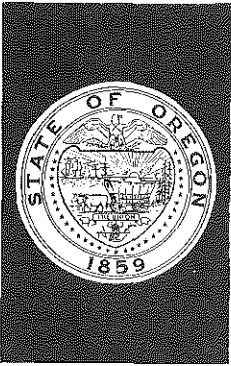
III. Alternatives.

A. Design Alternatives. Several alternatives have been explored by the Bank and the Bank architects. These alternatives included parking facilities for 500 to 700 automobiles. The final design solution includes a parking facility for 219 automobiles. The only design alternative which would further minimize the environmental impact of the project is to completely eliminate parking and service facilities. This is an unrealistic alternative in that the Bank complex has definite service, delivery, messenger, and car pool needs. The additional parking indicated in the preliminary architectural plans will provide a minimum number of spaces for night-time employees who do not have bus service available to them and for day-time workers and shoppers who need to use their automobiles for business.

B. Alternative Modes of Transportation. The project relies heavily on the development of good alternative modes of transportation, particularly the contemplated exclusive bus lanes in Downtown and increased mass transit service in the metropolitan area to provide better accessibility to Downtown.

LIST OF EXHIBITS

- Exhibit A: Preliminary Architectural Plans & Photographs
- Exhibit B: Memorandum to Commissioner Anderson from Traffic Engineer, March 24, 1972 re. driveways, conversion of Pine to two-way and signalization of 5th and Pine intersection.
- Letter to G. T. Frey, Skidmore, Owings & Merrill, from Traffic Engineer, May 1, 1972, re. traffic access, loading and parking.
- Letter to J. A. Labadie, U.S. National Bank, from City Engineer, May 5, 1972, re. driveway curb cuts.
- Exhibit C: Planning Guidelines, Portland Downtown Plan, February 1972.
- Exhibit D: Conditional Use and Downtown Plan Review Report, Portland City Planning Commission, May 2, 1972.



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

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Chairman, McMinnville

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Springfield

STORRS S. WATERMAN
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GEORGE A. McMATH
Portland

ARNOLD M. COGAN
Portland

Memorandum

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. N., June 8, 1972, EQC Meeting

Hearing re: Amendment of Regulations Pertaining to
Section 41-022 IMPLEMENTATION OF TREATMENT
REQUIREMENTS AND WATER QUALITY STANDARDS
and REGULATIONS PERTAINING TO WASTE DISCHARGE
PERMITS

Background

On March 24, 1972, a hearing was held regarding adoption of a revised Plan for Implementation and Enforcement of Water Quality and Waste Treatment Standards. The revised plan included an amendment of OAR Chapter 340, Section 41-022 to provide that facilities needed to insure compliance with Waste Treatment and Water Quality Standards shall be provided in accordance with specific permit conditions. The Commission adopted the revised implementation plan at the March 24, 1972 meeting. Subsequent to adoption, it became apparent that the legal notice for the hearing may not have adequately covered the proposed amendments to Section 41-022. Therefore, a new notice was prepared and a new hearing scheduled at this time and place to insure proper legal adoption of the proposed rule amendment. The proposed amended rule is included in the attached notice of hearing.

On February 25, 1972, a hearing was held on "Regulations Pertaining to Waste Discharge Permits." These rules were adopted on March 24, 1972. Recent actions relative to activities which adversely

affect water quality have demonstrated a need to amend the language of sections of these rules to strengthen the Department's control of such activities in addition to controlling the actual discharges of waste. The proposed amended language is included in the attached hearing notice.

Director's Recommendation

It is recommended that the proposed amendments to rules as set forth in the attached notice of hearing be adopted as rules of the Department of Environmental Quality.



L. B. Day

Attached
HLS:vt
5/30/72

BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

| | | |
|--------------------------------|---|---------------------|
| In the Matter of the Amendment |) | |
| of Regulations Pertaining to |) | |
| Implementation of Treatment |) | NOTICE OF HEARING |
| Requirements and Water Quality |) | AND INTENDED ACTION |
| Standards and Pertaining to |) | |
| Waste Discharge Permits |) | |

1. A. On June 8, 1972, beginning at 7:00 p.m., a public hearing will be held in the auditorium, Bend Senior High School, 230 East Sixth, Bend, Oregon, to consider the amendment by the Environmental Quality Commission of section 41-022 of Oregon Administrative Rules, chapter 340, pertaining to the implementation of treatment requirements and water quality standards.

B. It is proposed that section 41-022 be amended to read as follows:

"41-022 IMPLEMENTATION OF TREATMENT REQUIREMENTS AND WATER QUALITY STANDARDS. Waste treatment and control requirements prescribed under 41-010, 41-015 and 41-020 and such other waste treatment and controls as may be necessary to insure compliance with the standards contained in this subdivision shall be provided in accordance with specific permit conditions for those sources or activities for which permits are required and the following implementation program:

(1) For new or expanded waste loads or activities, fully approved treatment or control facilities or both shall be provided prior to discharge of any wastes from the new or expanded facility or conduct of the new or expanded activity.

(2) For existing waste loads or activities necessary treatment or control facilities or both shall be provided in accordance with a specific program and timetable incorporated into the waste discharge permit for the individual discharger or activity. In developing treatment requirements and implementation schedules for existing installations or activities, consideration shall be given to the impact upon the overall environmental quality including air, water, land use and aesthetics."

2. A. On June 8, 1972, beginning at 7:00 p.m., a public hearing will be held in the auditorium, Bend Senior High School, 230 East Sixth, Bend, Oregon, to consider the amendment by the Department of Environmental Quality of subsection 4) of Section B

and of subsections 1)a) and 1)f) of Section C of the "Regulations Pertaining to Waste Discharge Permits" adopted by the Department of Environmental Quality on March 24, 1972.

B. (i) It is proposed that subsection 4) of Section B be amended to read as follows:

"B. DEFINITIONS

As used in these regulations unless otherwise required by context:

* * * *

4) 'Wastes' means sewage, industrial wastes, and all other liquid, gaseous, solid, radioactive, or other substances which will or may cause pollution or tend to cause pollution of any waters of the state."

(ii) It is proposed that subsections 1)a) and 1)f) of Section C be amended to read as follows:

"C. PERMIT REQUIRED

1) Without first obtaining a permit from the Department, no person shall:

a) Construct, install, expand or significantly modify any industrial, commercial, agricultural or other establishment or activity, the operation or conduct of which would result in a new or enlarged waste discharge into public waters, or which would otherwise alter the physical, chemical or biological properties of any waters of this state in any manner not already lawfully authorized.

* * * *

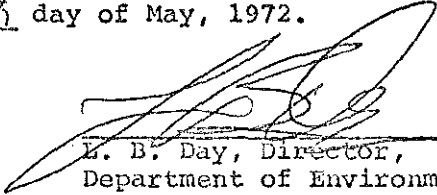
f) Operate or conduct any industrial, commercial, agricultural or other establishment or activity, the operation or conduct of which will or may cause or tend to cause pollution of any public waters or which would alter the physical, chemical or biological properties of any waters of this state in any manner not already lawfully authorized."

3. Interested persons may present their data, views or arguments, either orally or in writing, at the hearing or may submit them to the Director, Department of Environmental Quality, Terminal Sales Building, 1234 S.W. Morrison Street, Portland, Oregon, 97205, in writing prior to the hearing for inclusion

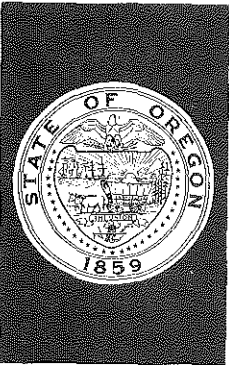
in the hearing records.

4. The Environmental Quality Commission will preside over and conduct the hearing.

Dated this 4th day of May, 1972.



L. B. Day, Director,
Department of Environmental Quality



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

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ARNOLD M. COGAN
Portland

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. 0, June 8, 1972, EQC Meeting

Sewage Disposal Well Elimination in Central Oregon Status Report

Background

1. For many years the primary method of sewage disposal in the lava terrane of Central Oregon has been to discharge septic tank effluent into lava fissures or sewage disposal wells (drainholes).
2. Because this method of sewage disposal was threatening to contaminate valuable ground water resources, the State Sanitary Authority (predecessor to the Environmental Quality Commission) adopted regulations for the orderly phase out of drainholes. The regulations were adopted May 13, 1969.
3. The regulations require that drain holes in rural areas, which must be replaced by an acceptable method of individual sewage disposal, be phased out by January 1, 1975. In most instances this will require the installation of a shallow leachage ditch system.

4. In urban areas where concentrations of drainfields are not possible, the drainholes will be phased out through the construction of community sewerage systems. The communities have until January 1, 1980, to complete their sewerage systems.
5. Within those communities which have submitted a program of sewer construction that will phase out the drainholes by 1980, continued construction and use of drainholes is permitted. Permits are acquired from the local health department. Those communities which have committed themselves to construct sewerage systems before 1980 are Bend, Redmond and Madras.
6. High construction costs in the fractured basalt area of Bend and Redmond make it financially impossible for the communities to finance construction of sewers without substantial grants from governmental agencies.
7. A two-year delay in submitting grant applications to the Department of Housing and Urban Development (HUD) has been experienced because of the HUD requirement for a regional clearinghouse. The Central Oregon Council of Governments was dissolved in 1970. Those municipal entities within District 10, which covers the counties of Jefferson, Deschutes and Crook, have again organized an intergovernmental council. It appears that it will satisfy the certification requirements of HUD by July or August.

Evaluation

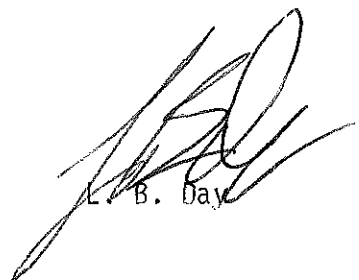
1. Sewer construction has not proceeded as rapidly as anticipated. Funding has been the major bottleneck.
2. Each city is prepared to give a report of their individual progress.
3. Other communities in Central Oregon are finding that in order to eliminate their drainholes, sewers will undoubtedly have to be constructed. The community of Culver has established a schedule for constructing a sewerage system by the end of 1973. The community of Metolius will probably do likewise.

Conclusions

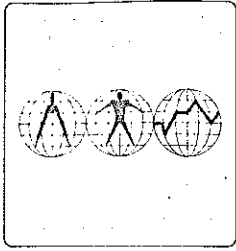
1. The practicability of non-gravity sewer construction (pressure or vacuum) should be investigated with the objective of minimizing the amount of rock to be excavated.
2. Alternate methods of rock excavation other than the standard "drill and shoot" methods commonly employed need to be developed.
3. Substantial outside funding assistance will be necessary if conventional sewer system construction is to be carried out on an extensive basis in fractured basalt areas.

DIRECTOR'S RECOMMENDATIONS

1. The Department of Environmental Quality should actively seek and support a Research and Development project for non-gravity sewer construction in the area.
2. The Department should actively seek and support the investigation and demonstration of alternative methods of rock excavation.
3. The Department should actively seek and support special federal and/or state funding to assist Redmond and Bend in financing extraordinary sewer construction costs.



L. B. Day



CORNELL, HOWLAND, HAYES & MERRYFIELD

1600 S. W. Western Blvd., P.O. Box 428, Corvallis, Oregon 97330, Telephone: 503/752-4271

Cable: CH2M CVO

Corvallis Regional Office

ENGINEERS PLANNERS ECONOMISTS

6 June 1972

Project No. C5866.0

State of Oregon
Department of Environmental
Quality
P. O. Box 1243
Bend, OR 97701

Attention: Mr. C. K. Ashbaker

Gentlemen:

We have been asked by the City of Madras to report the progress the City has made toward providing a sewage collection and treatment facility for its citizens.

Since 3 February 1972 (the date of the last report to the Department), the City has been actively engaged in finding a site for the treatment facility at the City-County Airport. The Federal Aviation Administration must approve the selected site and several alternatives have been discussed with them. At a meeting with FAA in Seattle on 16 May 1972, preliminary approval of a site southwest of Runway 11/29 was received, subject to the submission of an airport land use and layout plan prior to beginning construction of the project. The City and Jefferson County, jointly, intend to submit the required plan as soon as possible. The FAA preliminary approval will, however, permit the City to continue sewerage system planning on a firm basis.

On 2 May 1972, the City met with representatives of the Farmers Home Administration to discuss conditions of a grant and loan to assist in the construction of the system. The loan is for \$1,216,000.00 and the grant is \$217,000.00. FHA has said that the loan funds are readily available, however, the grant funds are not, and it could be as much as two years before the grant could be funded. The City intends to proceed with the financing of the project on the basis of no FHA grant since each month delay in construction costs them an additional \$14,000.00 to \$17,000.00 as a result of the current inflationary trend.

A tentative financial plan has been adopted by the City Council and it will be presented to the citizens at a public meeting tentatively scheduled for 18 July. The public meeting will be legally advertised in order that questions concerning environmental impact may also be discussed, as required by the Environmental Protection Agency.

Assuming the results of the public meeting and necessary bond election are favorable, the following schedule could be met:

1. 18 July:
Public hearing on financing and environmental impact.
2. 19 July to 29 August:
Additional public meetings as necessary to discuss and promote a favorable bond election.
3. 8 August:
Call for \$1,216,000.00 general obligation bond election at regular Council meeting.
4. 29 August:
General obligation bond election.
5. 12 September:
Authorize final design of the project at regular Council meeting.
6. 12 September 1972 to 1 February 1973:
Complete final design of project.
7. 2 to 12 February:
Obtain approval of plans from DEQ, FHA, and EPA.
8. 13 February:
Call for construction bids at regular Council meeting.
9. 8 March:
Open construction bids.
10. 13 March:
Award construction contract(s) at regular Council meeting subject to FHA and EPA approval.
11. 14 March to 12 June:
Wait for EPA's review of
 - a. Affirmative Action Program
 - b. Manpower Projection Report for Affirmative Action

- c. Equal Employment Opportunity Agreement
- d. Project sign
- e. Notice to Labor Unions or other Organization of Workers
- f. Certification of Nonsegregated Facilities
- g. Proposal of Low Bidder(s)
- h. Proposed Construction Contract(s) and Performance and Payment Bond(s).

12. 13 June 1973 to 15 April 1974:

Construct project.

13. 16 to 30 April:

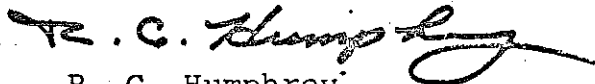
Make final inspection of completed project.

14. 1 May 1974:

Place completed system in operation.

On behalf of the City of Madras, we hope this brief report meets the approval of the Commission.

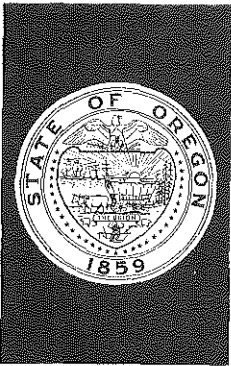
Very truly yours,



R. C. Humphrey

skw

cc: Department of Environmental
Quality (Portland)
Mr. A. P. Miller
Mr. Sumner Rodriguez
Mr. Kenneth K. Keudell (FHA)
Mr. Bruce K. Kohler (FHA)



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

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ARNOLD M. COGAN
Portland

Memorandum

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. 0, June 8, 1972, EQC Meeting

City of Culver Request to Become Waste Disposal Well Authorized Area

Background

1. When the regulations were adopted May 13, 1969, for the orderly phase-out of waste disposal wells in Central Oregon, provisions were made in the regulations for continued construction and use of drainholes by permit.
2. In order to be classified as a "waste disposal well permit area," the following criteria had to be complied with:
 - (a) An acceptable sewerage program for eliminating all drainholes in the shortest time possible, but not later than January 1, 1980 had to be approved by the Department.
 - (b) An annual report must be submitted each January which demonstrates that reasonable progress is being made toward implementing the approved sewerage program.
3. The only communities that have been classified as waste disposal well permit areas are Bend, Redmond, and Madras.

4. The city of Culver in Jefferson County has concluded that it will be unable to eliminate the waste disposal well method of sewage in the city without a sewage collection system. A preliminary engineering plan has been prepared as part of a county-wide comprehensive sewerage plan. The city has retained a consulting engineer and has submitted a program and timetable for providing sewerage facilities by October 1973.
5. The city has requested that it be classified as a waste disposal well permit area.

Evaluation

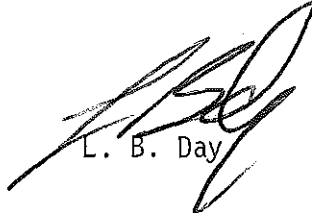
1. If the city of Culver keeps on schedule it will satisfy the intent of the waste disposal well regulations by eliminating all of the drainholes before 1974.
2. At the present time there are drainholes in Culver which are failing and need to be replaced.
3. There is not much growth being experienced in Culver so it is anticipated that most permits issued would be to replace or repair existing drainholes.

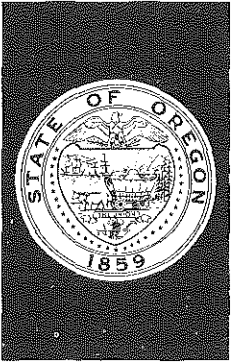
Conclusions

1. Unless drainhole permits are issued within the city limits of Culver, a health hazard will exist.
2. The city has embarked on an acceptable program for sewerage the area.

Director's Recommendation

It is the recommendation of the Director that the city of Culver be classified as a waste disposal well permit area and that this classification will continue as long as the city implements the schedule which was submitted February 10, 1972. In accordance with the regulations the city must submit a written report each January until the project is completed.


L. B. Day



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Portland

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. P, June 8, 1972

Status Report - Air Quality - Bend, Redmond and Prineville

Since the Commission is again meeting in Central Oregon it seems appropriate and somewhat customary to present a status report relative to the progress industry has made and the general improvement in air quality.

Bend Area:

1. Brooks-Willamette Corporation: Since the adoption of the Board Products Regulations, OAR, Chapter 340, Sections 25-305 through 25-325, this company has completed the control of several sanderdust handling systems. The company has submitted its compliance schedule and stated that the facility will be in compliance with OAR, 340, Section 25-320, on or before December 31, 1973. Presently, the Department is completing the preparation of a formal compliance schedule for all sources at this facility. (See Exhibit A.)

2. Brooks-Scanlon, Inc.: A separate status report is to be presented at this meeting relating to the boiler emission control program.

3. Bend Millwork: This company manufactures mouldings and is located in the Bend Industrial Park. Residues produced during the production process are shavings and sawdust (approximately 22,000 tons per year). Currently, the company is shipping them to the Weyerhaeuser Company in Klamath Falls for utilization in its particleboard plant.

4. Graves Manufacturing Company: This company operates a remanufacturing plant. No apparent problems exist at this time.

5. Cascade Forest Products, (Jeld-Wen): This moulding plant has been able to utilize all wood waste residues. The only remaining residues amounting to approximately two (2) units per year of mill clean-up are hauled to the local landfill. Sawdust and shavings are shipped to Brooks-Willamette in Bend for utilization in particleboard.

6. Kerns Furniture Division of DeSota, Inc.: According to their registration this company produces approximately

5,460 units of wood wastes (shavings and sawdust) per year which is shipped to Brooks-Willamette in Bend for utilization in particleboard.

7. Oregon Woodwork Limited, (Brooks-Scanlon, Inc.): This is a moulding manufacturing plant which operates an oil fired boiler for general heating. Residues consisting of sawdust and shavings are shipped to Brooks-Willamette in Bend for utilization in particleboard.
8. Cascade Pumice Company: The only emissions from this operation are from crushing activities which have not been observed to materially contribute to air quality problems.
9. The Central Oregon Pumice Company: Again, only crushing activities are conducted with little noted effect on air quality.
10. Deschutes Ready-Mix (R. L. Coats):
 - a. Stationary Asphalt Plant: A DEQ-AQC source sampling team sampled this facility on June 6, 1971. The results from this effort indicated that emissions exceeded the limitations of OAR, 340, Section 25-110. A formal compliance program will be developed for this plant, but due to its low and intermittent production no special emphasis has been placed on this program.
 - b. Portable Asphalt Plant: A new Cedar Rapids portable asphalt plant was purchased last year by Mr. Coats and is currently located at Madras. This plant is scheduled to operate in the Hampton area on U. S.

Highway 20. However, one of the sites currently has an eagles nest in the center of the quarry with two (2) small eaglets in the nest. This situation has made the company plans as to its next location somewhat uncertain. The plant was sampled by a DEQ-AQC source sampling team and results indicated that this plant also exceeded emission limitations. Because of these results the company requested the Cedar Rapids Manufacturing Company to make certain improvements and resample the emissions to verify compliance. These new source test results are expected to be forwarded to the Department for review in the near future. (See Exhibit B.)

11. Mid-Oregon Iron Works, Inc.: This company operates a small cupola furnace without any control on a reported schedule of three (3) hours per day, one (1) day per week. Estimated emissions from a total production of 130 tons per year are: approximately one (1) ton of particulate matter and ten (10) tons per year of CO. Complaints during the last year relate primarily to odors during the pours and occasionally to observations of visible emissions. Further staff evaluations will be made of the operation of this plant and its emission sources.
12. Bend Aggregate and Paving Company: This company operates two (2) asphalt plants. A DEQ-AQC source sampling team attempted to sample emissions from the East Side Plant on July 11, 1971. Plugging of the sampling

probe resulted due to high moisture conditions in the gas stream resulting in the termination of the test program. Currently the Department is undergoing a program of survey and evaluation which will result in formalized compliance programs for these plants on or before January, 1973.

Redmond Area:

1. Brooks-Willamette Corporation: At this location, this company operates a sawmill and plywood plant. Residues are disposed of in several ways: (1) As fuel for the hog fuel fired boilers; (2) as raw material feed to the particleboard plant in Bend; (3) sold for pulp and paper, (4) and as a last resort burned in the modified wigwam waste burner. The only emission sources yet to be verified as in compliance with applicable regulations are the boiler emissions and the cyclones handling dry materials - i.e. from the touch sanding operation. The Department will be requesting the company to conduct an emission source sampling program to verify compliance for the hog fuel boilers.
2. F & F Products: The only emission source is a cyclone which has not been noted as causing any air quality problem. All waste residues from this operation are shipped to the local landfill.

3. Central Oregon Wood Products, Inc.: This moulding plant produces approximately 25 units per year of wood waste residues which are used by a local farmer. Emission sources at this plant are cyclones which have not been noted as causing any air quality problems.
4. Ponderosa Mouldings, Inc.: A separate Variance Request has been prepared and will be presented at this meeting. All wood waste residues are shipped to Brooks-Willamette Corporation in Bend for utilization in particleboard.
5. Whittier Moulding Company, (Brooks-Scanlon, Inc.): This company produces mouldings and has developed a means of disposing of all residues to the particleboard plant in Bend. This has resulted in the termination of the use of the wigwam waste burner. However, a recent complaint indicated that the wigwam waste burner was used on the evening of April 21, 1972. In confirming this with the company it was learned that a broken pneumatic conveyor pipe had caused a temporary upset resulting in the use of the wigwam waste burner. In the future the company will notify the Department and District Office of any upsets.
6. K. L. Boyle Manufacturing Company: As reported in the initial registration of this source the company

open burns approximately 16 units per year. Some eight (8) units per year are shipped to the particle-board plant in Bend. No staff contact has as yet been made with this source.

Prineville Area:

1. Coin Millwork: This company has made a request for a Variance to operate the wigwam waste burner for a two (2) week period this summer. This request will be presented at this meeting. All residues are normally utilized which has resulted in the phase-out of the use of the wigwam waste burner.
2. Clear Pine Moulding: This company has developed contracts for all waste residues and has successfully phased-out the wigwam waste burner.
3. Consolidated Pine: All residues are currently utilized for pulp chips, particleboard and hog fuel. Currently the company is proceeding with a program to reduce steam demands within the sawmill by replacing the "shot gun" and "log turner" with an electric unit. Upon completion of this project the company has been requested to source sample the boiler stacks to demonstrate compliance.
4. Pine Products: The wigwam waste burner has been phased-out. The company operates a hog fuel boiler facility

utilizing some 14,000 units/year of wood wastes.

The Department will request that the company conduct an emission source sampling program to determine compliance with OAR, 340, Section 21-020, prior to December 31, 1972.

5. Ochoco Lumber Company: This company operates one (1) water tube and five (5) fire tube boilers utilizing approximately 26,450 units of wood waste residues per year. The Department will request that the company conduct an emission source sampling program to determine compliance with OAR, 340, Section 21-020, prior to December 31, 1972. Visual observations have indicated that the boiler facility is operated in compliance with OAR 340, Section 21-015.

6. Hudspeth Pine: Since the last meeting held in Bend on June 4, 1971, the company has completed an extensive wood utilization program which has resulted in the phase-out of the two (2) wigwam waste burners. A new fire tube, stoker fired, HRT, hog fuel boiler has been installed. In addition the large wigwam waste burner has been converted to a fuel storage bin. The new hog fuel boiler was tested by a DEQ-AQC source sampling team on April 18, 1972. Results indicate that an emission of 0.169 gr/SCFM were emitted under varying firing conditions (from 11,000 lb/hr. to

14,000 lb/hr. steaming rate). This result indicates that the emissions are exceeding the emission limitations of OAR, 340, Section 21-020. However, several comments are in order:

- a. The low percentage of CO₂ present in the flue gas stream (on the order of 8.8 to 9.2%) would indicate that adjustments to the air dampers would improve firing conditions within the combustion chamber.
- b. The small size of the particulates collected (77.5% were smaller than 3.6 μ) would indicate that the multiclone collector is operating at or near maximum efficiency. However, it should be noted that a fly-ash re-injection system is utilized and that this could contribute to excessive fine particulate being emitted.
- c. Visual emissions by the staff indicate that the facility is well within the limits of OAR, 340, Section 21-015.

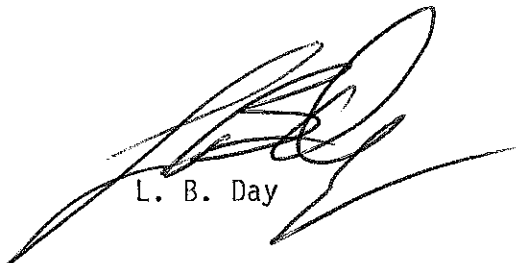
7. Ochoco Feed and Seed Company: Staff observations have indicated that an emission problem does exist from the cyclones at this facility. To date no contact has been made by the staff since the adoption of rules by the Environmental Quality Commission covering this type of facility and its related emission problems were promulgated on February 15, 1972, and are cited as OAR, 340, Sections 21-035 through 21-045.

CONCLUSIONS:

Air quality in the Bend, Redmond and Prineville areas has improved significantly due to the substantial efforts of those industrial sources with control programs approved by the Department. As noted above there are some smaller sources which will need to complete the development of their respective emission control programs. It is anticipated by the technical staff that acceptable compliance programs will develop as a result of the on-coming Permit Program for which Public Hearings will be scheduled in July, 1972.

DIRECTOR'S RECOMMENDATION:

It is the Director's recommendation that the Department continue to work toward the development of compliance schedules from those remaining sources as soon as practicable and in accordance with the State Clean Air Act Implementation Plan.



L. B. Day

ALPINE PARTICLEBOARD

BROOKS-WILLAMETTE CORPORATION
P. O. BOX 1245 @ BEND, OREGON 97701 @ (503) 382-6001

Department of Environmental Quality
Terminal Sales Building
1234 S. W. Morrison Street
Portland, Oregon 97201

Attention: Mr. H. H. Burkitt

Gentlemen:

May 26, 1972
State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
MAY 30 1972
AIR QUALITY CONTROL

Re: Emissions Control Progress

This letter is to inform you of our progress in working toward compliance with the Department's air quality regulations.

The initial step of our control program was the testing of emission sources by a consulting engineering firm in May of 1970. From the test data it was determined that the plant emissions were 417.5# per hour. By modifying a particularly high emission source cyclone the plant emissions were reduced to 274.8#/hr.

In January of 1971 an enclosure was installed at a raw material shaker screen. This effectively controlled wind-blown particulate at the screen.

A cloth filter dust collector was installed at the sander dust storage bin in March of 1971. This filter eliminated 34.8# of dust from being discharged to the atmosphere.

During August of 1971 a cinder collection system was installed at the sander dust-fired boiler. This equipment removes about 12# per hour of flyash from the stack.

The primary sander dust cyclone exhausts were controlled by a cloth filter dust collector system which was completed in November, 1971. This system further reduced dust emissions by 72#/hr.

In January of 1972 the exhausts of three cyclones at the raw material storage building were ducted into the storage building which serves as a large settling chamber, thus minimizing emissions from this source.

Since the collection device operation results in more dust to be disposed of in the boiler and because of difficulty in balancing supply and demand of sander dust, a system was devised to introduce some of the dust back into the board through the forming machine. This method of dust disposal

EXHIBIT "A"

Department of Environmental Quality
May 26, 1972
Page Two

has been in operation since April, 1972 and has reduced the necessity to incinerate and blow steam to the atmosphere.

We are now in the construction phase of the American Air Filter wet scrubber project for control of emissions from two Heil rotary dryers. Due to delays in equipment delivery this project is now scheduled for completion during the first week in July. Emission reduction from the wet scrubber installation is estimated to be 105#/hr.

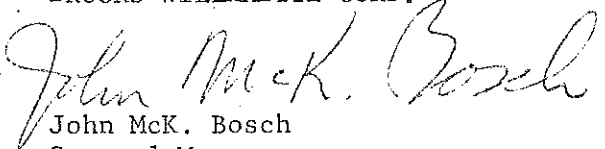
With the completion of the scrubber units we will have expended approximately \$250,000 for emissions control for a reduction of about 357#/hr. Based on the 1970 survey this will leave about 60#/hr. plant emissions.

Before we consider further control measures a complete operational test period should be experienced with the wet scrubber installation and a test program set up to cover any other sources which should be considered for control.

We are quite confident that final compliance can be achieved as scheduled by June of 1973.

Very truly yours,

BROOKS-WILLAMETTE CORP.


John McK. Bosch
General Manager

JMB/ns

State Spares Eagle Nest

The Oregon Highway Commission has postponed a repaving project on the Central Oregon Highway so it won't have to disturb the nest of two golden eagle chicks.

The nest was discovered when highway officials and the contractor looked over the site of a rock quarry that is to serve as the source of material for the job.

The nest is located in a Juniper tree.

The project, between Fredricks Butte Road and Hampton, will be started in July when the chicks leave the nest.

Golden eagles are an endangered species.

EXHIBIT "B"



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. Q , June 8, 1972, EQC Meeting Brooks-Scanlon, Inc., Bend, Deschutes County, Hog Fuel Boiler Compliance Program.

BACKGROUND:

At the June 4, 1971, Environmental Quality Commission meeting, held in Bend, the technical staff presented a status report on the company's progress and problems relative to solving its emission problems from the new power house. Results from a source sampling program conducted by MEI (Metallurgical Engineers, Inc.) and Wes Snowden in May, 1971, had demonstrated that the maximum steam flow rate should be 50,000 pounds per hour in order to meet the requirements of OAR, 340, Section 21-020, Fuel Burning Equipment Limitations, which limits emissions to 0.2 grains per standard cubic foot corrected to 12% CO₂.

Based upon these results and the analysis of them by the Brooks-Scanlon engineers a recommendation to the Commission was formulated which requested the company to "develop a program for complete phase-out of the old hog fuel boilers unless proper flyash control equipment is installed." Also, the staff recommended that the company "undertake a program for more assured and permanent control of emissions, namely additional boiler capacity." The Commission adopted these recommendations and requested the company to report back to them at the July, 1971, meeting as to what the economic effects would be if

the company could not utilize the old power boilers and directed that the company complete the development of a firm compliance program as recommended by the technical staff for presentation at the September, 1971, Environmental Quality Commission meeting.

The company did complete both reports to the Commission resulting in the adoption of a formal compliance program at the September 17, 1971, meeting. This program was to accomplish the following by March 31, 1972:

1. Reduce the steam demand to under 100,000 lb/hour total steam flow, or to a maximum of 50,000 lbs/each boiler by generating less electricity, modifying the deaerator system, and using electric instead of steam pumps. This would reduce the steam load on the two (2) new boilers to a point that the previous sampling tests indicated as within compliance with current grain loading standards for existing hog-fuel fired boilers and result in the phase-out of the six (6) old hog-fuel fired boilers.
2. Level steam demand by installing modulating steam valves on the dry kilns. This would control the peak demands on the boilers and assist in controlling the "puffing" effect of the boilers.
3. Modify the hog fuel feed system by installing a secondary feed system to increase reliability. This would stabilize the fuel feed rate and provide for more uniform steam generation.

CURRENT STATUS:

The above compliance program was completed in the most part on schedule resulting in the termination of the old boilers on February 25, 1972. The company has noted a marked improvement in the total operation of the power house and dry kilns.

However, a recent particulate emission source test conducted by Valentine, Fisher & Tomlinson revealed that emissions were still exceeding the established limitations of 0.2 grains per SCFM. Test results for the boilers were as follows:

| <u>Run No.</u> | <u>Boiler #1</u> | <u>Boiler #2</u> |
|----------------|------------------|------------------|
| 1 | 0.261717 | 0.234003 |
| 2 | 0.224516 | 0.24054 |

During the course of a staff visit and conference on May 18, 1972, it was learned that these weights in grains (1/7000 pounds) per standard cubic foot (standard conditions = 14.7 psia @ 60°F) were emitted at a firing or steaming rate of 60,000 pounds per hour on each boiler or a total of 120,000 pounds per hour for the power house. The company has now discovered that current plant requirements are approximately 120,000 per hour instead of the forecast or estimated 100,000 pounds per hour.

The company has verbally stated that steam losses are currently estimated to be approximately 3,000 to 5,000 pounds per hour. This is due in part to routing of the steam through the old power house prior to introduction into the main steam distribution system.

Also, during the recent staff visit on May 18, 1972, it was learned that air damper positions on the boilers were not exactly known. This situation has existed since the units were installed. Because of this, the company is not sure of where the settings should be to obtain the best possible firing conditions.

On May 20th and 21st, 1972, the company had engineers from the Western Precipitation Division of Joy Manufacturing Company conduct an inspection of the flyash multiclone collection system. By telephone the company stated that this inspection revealed the following:

| <u>Boiler</u> | <u>Number of Bad Multiclones</u> | <u>Number of Leaking Pipes</u> | <u>Number of Bad Gaskets</u> |
|---------------|----------------------------------|--------------------------------|------------------------------|
| 1 | 8-10 | 2 | None |
| 2 | 12 | 2 | 12 |

FACTUAL ANALYSIS: (Based upon information previously supplied and in conference with the company. Confirmation in writing is expected prior to the Commission meeting in Bend on June 8, 1972.)

1. The company apparently has steam losses which cannot be accounted for and will require installation of steam flow meters on all main distribution lines in order to make an accurate determination.
2. Current steaming rates are at 120,000 pounds per hour. This is 20,000 lb/hour greater than estimates had predicted.
3. Department evaluation of emission sampling data submitted by the company in May, 1971, indicated that a maximum of 50,000 lb/hour on each boiler or a total power house output of 100,000 lb/hour would be necessary in order to attain compliance using current installed collection equipment.
4. Department recommendations adopted by the Environmental Quality Commission at the September 17, 1972, meeting held in Astoria required a reduction in steam flow to a maximum of 50,000 lb/hour per each boiler.
5. Steam flows might be reduced by approximately 3,000-5,000 lb/hour if the old power house piping and valving arrangements are moved into the new power house.
6. Further steaming rate reductions in the order of 5,200 lb/hour could be made if the cinder re-injection system could be eliminated.

7. Improper air damper valve settings as explained during the staff visit on May 18, 1972, could result in poor firing conditions in the boilers resulting in excessive emissions.
8. It would be expected that further reductions in particulate emissions would result in the repair of the Western Precipitator Multiclone Flyash Collectors, since the source sampling engineer, Wes Snowden of Valentine, Fisher & Tomlinson in Seattle has verbally concluded in conference with the staff that the large size of some of the particulate collected in the sampling train would definitely be eliminated by maintenance of the collection system. This, in itself, could conceivably bring these boilers into compliance.
9. The inspection conducted by Western Precipitator on May 20th and 21st, 1972, has prompted Brooks-Scanlon, Inc. to schedule the replacement of all of the cones with smaller diameter ones so as to increase collection efficiency.
10. The company has stated by letter dated May 15, 1972, that since these modifications cannot be accomplished while the new boilers are operating, it will be necessary to fire four (4) of the old boilers to complete the drying schedule of the lumber in the dry kilns (from June 23 through July 9, 1972). However, it has been concluded in consultation with the company that this length of time (17 days) will not be necessary since the company will schedule the sawmill to cut species that would only require a four (4) to six (6) day drying schedule in the dry kilns.

COMPANY PROGRAM: (As proposed in conference with the Department)

1. Repair and modify the multiclone collectors as per the recommendations of Western Precipitator engineers.
2. Re-route all steam piping and valving into the new power house so as to eliminate steam losses occurring in the current steam piping system.
3. Install new steam flow-meters on all mains so as to better determine steam losses and demands.
4. Install 150 pound orifices in air ejectors and condensate and cooling water turbines.
5. Install a new hot well and D. A. tank.
6. Make all necessary changes to the boiler air dampers systems and permanently mark settings to insure proper operation.
7. Fire four (4) of the old hog-fuel boilers for a period of four (4) to six (6) days to complete the drying of production in the dry kilns.

DIRECTOR'S RECOMMENDATIONS:

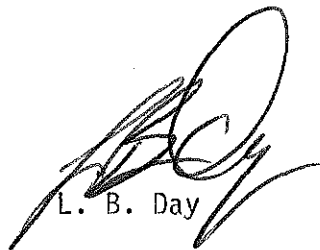
It is the recommendation of the Director that the above modification and maintenance program be conducted during the mid-year shut-down provided that the company furnish supporting data in writing that it will accomplish the above program and demonstrate that as a result of the program compliance with applicable regulations will be achieved.

In addition to the above it is requested that the company again source sample the boiler stacks after completing all of the above maintenance program to demonstrate compliance with OAR, Chapter 340, Section 21-020. At the time these stacks are sampled it is requested that the company remove the screen from one of the flyash classifiers in order to determine the amount of cinders actually being re-injected into the boilers as well as the effects, if any, on particulate

emissions. If the steam re-injection system could be eliminated, the result would be an additional 5,200 lb/hour reduction in required steaming capacity. This would then require disposal of the cinders at some nearby location.

It is recommended that if the above noted emission source tests do not confirm compliance with OAR, Chapter 340, Section 21-020, the steaming rates will have to be reduced to a level where emission source tests do confirm compliance. The company has previously demonstrated compliance at a steaming rate of 50,000 pounds/hour on each boiler. The company will then be required to operate the individual boilers at steaming rates no greater than those used to demonstrate compliance during the emission source tests.

It is also recommended that the company be allowed the use of four (4) of the old boilers to generate steam only for the dry kilns in order to complete the drying schedule of the production in the kilns. It is understood that this will result in from four (4) to six (6) days usage and that the company will plan their production schedule within the sawmill so as not to cut species which would require longer drying schedules.


L. B. Day

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY**RECEIVED**
MAY 16 1972

May 15, 1972

AIR QUALITY CONTROL

Mr. H. H. Burkitt, Chief
Engineering Services Section
Environmental Quality Commission
State Office Building
1400 S. W. 5th Avenue
Portland, Oregon 97201

Dear Hal:

We have completed the power house program as proposed to the Department of Environmental Quality last September 17 with the exception of installing the additional flow meters, moving the D.A. tank and converting the turbine auxiliaries to 150 lb. steam. These items could not be completed during the time the plant was down at the first of the year because of late equipment delivery. We will complete these items at the mid-year shutdown.

We have been very pleased with the operational improvement in the power house performance due to this project. We were able to shut down the old boilers on February 25 and have not fired them at any time since. The only upset we have experienced was when a gasket on a 600 lb. valve failed and we had to shut down one boiler long enough to repair it.

The particulate emission tests were conducted on April 20. The results were readings of .261717 and .224516 on #1 boiler and .234003 and .24054 on #2, both at the rate of approximately 60,000 lbs. per hour. Because of the large size of some of the particulate, we believe we may have a problem in the cinder collectors. We also have not been able to reduce the steam demand on the boilers to 100,000 lbs. per hour as we had anticipated. As you know, we were estimating the steam produced from the old boilers because we didn't have flow meters on them. Apparently our estimates were considerably low, which has resulted in a greater demand on the new boilers than we planned, even though the steam saving portions of the project have been successful. We have not been able to balance the steam flow and won't be able to do this until we have the proposed flow meters installed.

We are requesting your recommendation to the Commission for an extension of the time period in which to comply. We also need to fire the old boilers during the period from June 23 through

July 9 in order to shut down the new power house. During this shutdown we will do the following:

- 1) Inspect and repair the cinder collectors. This will be done by Western Precipitator.
- 2) Install flow meters on the steam lines that don't currently have them.
- 3) Install a new hotwell and D.A. tank.
- 4) Install 150 lb. orifices in air ejectors and condensate and cooling water turbines.

We feel this request for additional time is justified because we have made a sincere effort to meet the DEQ standards on air quality: We have shut down the old power house and the new one is in compliance with the smoke standards and very close on the particulate emission.

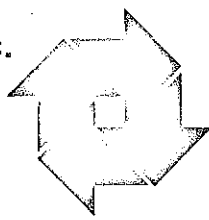
Sincerely,



Leo Hopper
Production Manager

LH/cf

cc: Air Quality File
Hank Brooks
W. O. Stevens



May 22, 1972

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

Mr. H. H. Burkitt, Chief
Engineering Services Section
Environmental Quality Commission
State Office Building
1400 S. W. 5th Avenue
Portland, Oregon 97201

Dear Hal:

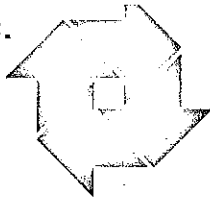
In confirmation of our telephone conversation this morning, Mr. Joseph H. Main from Preferred Equipment Engineering, Inc., of Seattle, who is the authorized representative of Western Precipitator, was in over the weekend and evaluated the cinder collectors on the boilers. In each boiler he found 10 to 12 multicones with holes in them and holes in the inlet pipes and some bad gaskets. We will have proposals within a week covering the repair of these cinder collectors, which is now tentatively scheduled to be done during the summer shutdown.

Also, we have talked about removing the screen from one sound classifier in order to determine the amount of cinders we are getting. We feel that this should probably be done at the time the particulate tests are made in order to determine the decrease, if any, in particulate emission as well as the total amount of cinders to be disposed of if we should stop reinjecting.

Sincerely,

Leo Hopper
Production Manager

LH/cf



May 30, 1972

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

Mr. H. H. Burkitt, Chief
Engineering Services Section
Environmental Quality Commission
State Office Building
1400 S. W. 5th Avenue
Portland, Oregon 97201

RECEIVED
MAY 31 1972

AIR QUALITY CONTROL

Dear Hal:

In reply to your questions on the phone this morning, we will reroute the sawmill and dry kiln steam lines and work on the dampers in the boilers during vacation. As you know, the steam now has to pass through the header in the old power house, where there are many leaks. This header can not be isolated so it can be repaired. We will install new piping to bypass this during the shutdown. We have estimated that we will save from 3 to 5 thousand pounds of steam per hour by doing this. We also have reason to believe the dampers in the air system on the boilers are not always responding correctly to the commands from the controls. We will inspect, adjust and mark the damper positions on all of the shafts so we can keep them in adjustment in the future. This should help to further stabilize the boiler operation.

We have contracted with U. S. Tank for the work on the cinder collectors. The delivery of the cones is going to be very tight but we will make it if they are delivered as now scheduled. We still don't have the written report from Preferred Equipment Engineering, Inc., but they will send one copy directly to you.

I am enclosing a copy of Snowden's report.

If there are any other questions, please call or we can talk about them Friday.

Sincerely,

Leo Hopper
Production Manager

LH/cf

Encl.

cc: Hank Brooks

VALENTINE, FISHER & TOMLINSON

CONSULTING ENGINEERS

A.S.T.M.E., A.C.E., A.A.A.E., P.E., M.E., E.E.

520 LLOYD BUILDING • MAIN 3-0717
SEATTLE, WASHINGTON 98101

WM. M. VALENTINE, M.E.
ARTHUR K. FISHER, M.E.
GEORGE D. TOMLINSON, E.E.

ASSOCIATES:

WAYNE A. HANSON, M.E.
P. "CHIC" DICCHETTI
DOUGLAS W. PASCOE, E.E.
PHILIP W. WOODRUFF
DENNIS W. FINLAYSON
HENRY L. ROYCE, ILLUM.
THOMAS G. JOHNS, M.E.
WILLIAM T. McDONALD
DEAN A. HANNIG

May 23, 1972
RECEIVED

MAY 25 1972

BROOKS SCANLON, INC.
BEND, OREGON

Mr. Leo Hopper
Production Manager
Brooks-Scanlon, Inc.
P. O. Box 1111
Bend, Oregon 97701

Dear Leo:

Re: Atmospheric Emission Evaluation at Brooks-Scanlon, Inc.
in Bend, Oregon on April 20, 1972

The four atmospheric emission evaluations we conducted on April 20, 1972 at Brooks-Scanlon were above 0.20 grains per standard cubic foot reported at 12% carbon dioxide.

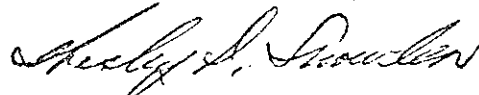
Noteworthy items evident from this evaluation are:

1. Emissions are much lower than the first evaluation and are within 25% of the allowable (See separate enclosures).
2. Boiler combustion efficiency has been markedly improved. The average carbon dioxide readings from the four evaluations were close to 12% in comparison with 8 to 9% on the first evaluation.
3. Over half of the total particulate for the four evaluations was collected in the crude sampling cyclone (See enclosure). The sampling cyclone collects primarily the particulate that the multiclones should collect. If the sampling cyclone catch is reduced by 50% the boilers would meet the 0.20 grains/standard cubic foot regulation.

It has been a pleasure working with Walt, Hank, Dennis and yourself on this project.

Yours truly,

VALENTINE, FISHER & TOMLINSON



Wesley D. Snowden, P.E., Manager
Environmental Services

cc: Mr. W.O. Stevens
W.O. Stevens Consulting Engineers

This copy for:

Mr. H. R. Baskitt

WESTERN PRECIPITATION DIVISION



JOY MANUFACTURING COMPANY

1000 WEST NINTH STREET, LOS ANGELES, CALIFORNIA 90015 • MADISON 7-4771

REPLY TO: PREFERRED EQUIPMENT ENGINEERS, INC.
12597 CORLISS AVENUE, NO., SEATTLE, WASHINGTON 98133

TELEPHONE: (206) 365-8300

May 30, 1972

Brooks-Scanlon, Inc
P.O. Box 1111,
Bend, Oregon 97701

Attention: Mr. L. Hopper

Subject: Inspection of Multiclone Collectors
Boilers #1 and #2
Brooks-Scanlon Plant
Bend, Oregon

Herewith a summary of observed condition of various components of the subject collectors and our recommendations for improving their performance. Both collectors are virtually in the same condition and the following apply to both:

- vanes are clean with no signs of plugging,
- inside surfaces of collecting tubes are clean but approximately 15% of them had holes in them; these holes were located at various points in the lower half of the tubes. Most of the collecting tubes without holes are badly eroded and will be wearing through at a relatively early date.
- collecting tube gaskets are satisfactory.
- outlet tubes are badly worn, two in each collector had holes in them with a cross sectional area of about two to six square inches, and the remainder of the front row in each collector (12 in each case) show advanced wear while the remainder are at varying points in their life span.
- outlet tube gaskets show leakage in about 12% of the cases and others showed signs of advanced wear.
- the hoppers, while warped, have been well repaired and show no signs of leakage.
- the rotary airlocks appear to be well maintained and with a 2" negative pressure which is kept across the hopper to the classifier are probably totally effective.
- draft gage connection fittings are plugged and no draft gage is connected to them.
- about 5% of the outlet tube retaining wedges are not securely in place.

Our recommendations which were given to Mr. W. Stevens, your consulting engineer, on May 22nd and which resulted in your purchase order # 2056 for approximately \$11,500.00 for replacement parts are as follows:

- Replace all the interior components of the two collectors except

RECEIVED
JUN 1 1972

WESTERN PRECIPITATION DIVISION



JOY MANUFACTURING COMPANY

1000 WEST NINTH STREET, LOS ANGELES, CALIFORNIA 90015 - MADISON 7-4771

REPLY TO: PREFERRED EQUIPMENT ENGINEERS, INC.
12597 CORLISS AVENUE, NO., SEATTLE, WASHINGTON 98133

TELEPHONE: (206) 365-8300

Page 2

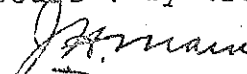
the collecting tube sheets and the outlet tube sheets. This action would eliminate all leaks between the inlet and the outlet chambers of the collectors, and bring the collectors' operating efficiency back to a maximum.

The vanes we ordered for the job have the same "pitch" as those currently installed and should yield the highest efficiency possible for the units.

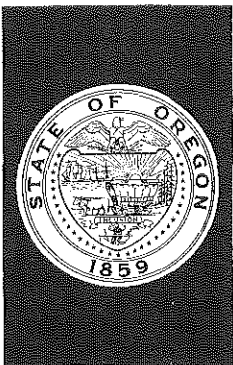
We have taken special steps to have the required material for the rebuild on your site no later than July 3rd and hopefully by June 26th. We will finalize arrangements for factory-trained personnel to supervise the installation upon further advice from you or Mr. Stevens.

We wish to thank you for the opportunity to serve you and hope that you will contact us for any further information you may need.

Yours very truly,


J.H. Main P.E.,
Preferred Equipment Engineers, Inc.

cc: H.H. Burkitt
W.O. Stevens



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL
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L. B. DAY
Director

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Portland

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. R , June 8, 1972, EQC Meeting

Brooks-Scanlon, Inc., Bend, Oregon

Background

1. Brooks-Scanlon, Inc. owns a large sawmill in Bend, Deschutes County, Oregon.
2. The sawmill is located adjacent to the Deschutes River. A section of the river about 1/2 mile long is used for log unloading, storage and general log pond operations.
3. Some of the logs are put into the river by cranes working from cold decks on the river banks. Others are dumped into the river at three brow log dumps.
4. The company periodically dredges the river in the vicinity of the brow log dumps. They also have a debris removal system below the log slip which removes floating bark debris from the river.
5. NOTE: The only extensive cold decking area available to Brooks-Scanlon is on the opposite side of the river from the mill.

6. The company has filed an application for renewal of their permit so as to continue discharging boiler blowdown water and cooling water to the river and to continue using the river for log handling.
7. A permit was issued in 1968 which required the company to submit a detailed program by January 15, 1969 for providing by July 1, 1969, complete and continuous control, removal and proper disposal of all debris generated in the river from log handling. The company submitted a letter in February 1969 which outlined a short-term proposal for improving debris control but appealed for more time to study and evaluate its long-term debris control operations.
8. A second waste discharge permit was issued in February 1969 which specifically required that:
"A detailed program and time schedule shall be submitted by July 1, 1970 for either:
 - a. Terminating log handling in the Deschutes River, or
 - b. Providing by August 1970, a year-around control of debris equivalent to dry handling of logs or handling in a pond physically separated from the river."
9. The company submitted a letter in June 1970 which claimed that present log debris control is reasonably adequate and submitted a proposal for studying the feasibility of diverting the river channel to provide land area adjacent to the mill for dry log handling. If changing the river channel proved unfavorable, the company would convert all brow log dumps to some method of easy letdown and continue to use the river.

10. A third permit was issued in December 1970 which specifically required the following:
 - "1. All plant processes and all waste collection, treatment, and disposal facilities shall be operated and maintained at all times at maximum efficiency and in a manner which will minimize waste discharges.
 2. By October 30, 1971, the permittee shall conduct and submit a written report to the Department of Environmental Quality concerning the feasibility and desirability of relocating the Deschutes River Channel such that the river will bypass the permittee's plant and enable said plant to operate without putting logs into the river.
 3. If the study referred to in Item 2 above is favorable to a channel change, the report shall include a detailed program for completing the change by not later than July 31, 1972, subject to written approval by the Department of Environmental Quality before construction is begun.
 4. If the study of Item 2 is unfavorable toward a channel change, the report shall include a detailed alternative program and timetable for fully effective debris control."
11. The company submitted a letter in October 1971 which stated that their study indicated that the river channel change was not economically feasible. They further indicated that their present method of log handling was adequate and that they had complied with the terms and conditions of the permit.

Evaluation

1. The company's present log handling practices in the river results in total blockage of the river surface in the area.
2. Continued brow log dumping generates significantly more debris than other more acceptable methods.
3. Other than a few improvements made to the surface debris collection system, no significant changes have been made in log dumping and handling since the issuance of the first permit in 1968.
4. Their bark and debris removal system is relatively effective in removing surface floating bark and debris.
5. One can visually observe sunken bark and debris escaping from the collection system at all times.
6. Investigation has revealed considerable bottom deposits of bark, debris and logs in the vicinity of their log handling.

Conclusions

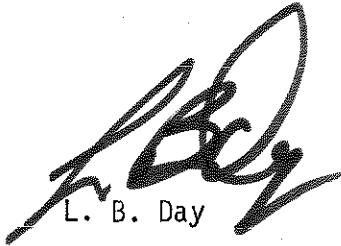
1. Complete utilization of the river for a log pond is not a proper use for a public waterway.
2. Present bark and debris control processes do not provide control equivalent to the dry handling of all logs as required by prior permits.

3. Ample opportunity has been given to the company for submitting the necessary control programs.

Director's Recommendation

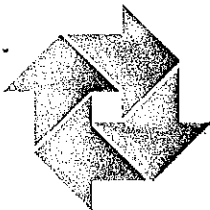
The company has been requested to appear before the Commission at its meeting in Bend on June 8, 1972 to explain why it has not complied with permit conditions pertaining to debris control.

It is the recommendation of the Director that if the company does not present a specific program and timetable for providing control equivalent to dry handling of logs and restoring public use of the Deschutes River in the vicinity, that the Department be instructed to establish a specific date for removing essentially all log handling operations from the river.



L. B. Day

CKA:HLS:ak
5/5/72



June 5, 1972

Mr. Jack Weathersbee, Deputy Director
Department of Environmental Quality
Terminal Sales Building
1234 S. W. Morrison St.
Portland, Oregon 97205

Dear Mr. Weathersbee:

In response to Mr. Day's letter to me of May 8 and following our meetings in your office on May 26 and on June 2, we request that the Environmental Quality Commission grant Brooks-Scanlon a Waste Discharge Permit with terms and conditions similar to those in our previous permit with the following additional provisions:

1. By October 1, 1972 all the company's log decks by the Deschutes River will be far enough from the river so that none of the log debris or log deck sprinkling water will enter the Deschutes River.
2. The company will abandon use of its upper log dump by June 23, 1972, the beginning of the vacation period. This will have the effect of reducing the portion of the Deschutes River used for log handling by 40% and will reduce the volume of logs which can be in the river at any one time by at least 40%.
3. The permit will expire October 1, 1974, by which time the company will conduct its log handling operations out of the Deschutes River or will have an alternative method of handling logs in operation which the Department of Environmental Quality has approved as being equally effective.

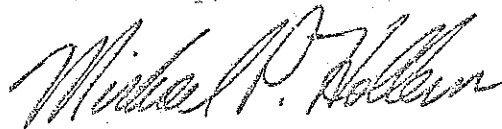
We have carefully considered the installation of easy-release dumps to replace the two Brow log dumps which would remain, but because of the blasting of rock and dredging which would be required to achieve water depth necessary for their operation, we do not believe they are a logical alternative. Beginning not later than March 1973, we will put an estimated minimum of 20% of our log requirements into the river with a front-end loader. We have considered the purchase of additional front-end loaders and installation of ramp dumps. Such a system would require very substantial capital outlay and increased operating cost and because of the added handling, would cause additional degrade of logs. In our

opinion these added costs cannot be justified by the improvement in debris control which would result during the period ending October 1, 1974, by which time the company will have achieved fully effective debris control.

We understand the staff of the Department of Environmental Quality supports this proposal and will recommend its approval to the Environmental Quality Commission. We believe it accomplishes your objectives as we understand them.

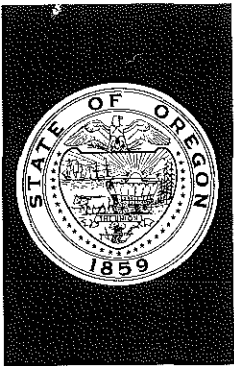
To the best of our knowledge, our operations in the Deschutes River have not harmed and are not harming water quality in the river. We are proud of our record of corporate citizenship. We remain committed to maintaining and improving environmental quality in Central Oregon, and we believe our achievements and contributions provide evidence of this commitment.

Sincerely,

A handwritten signature in cursive script, reading "Michael P. Hollern".

Michael P. Hollern
President

MPH/cf



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MEMORANDUM

TO: Environmental Quality Commission
FROM: Director
SUBJECT: Agenda Item 8., June 9, 1972, EQC Meeting
Status of Alkali Lake Disposal Site

BACKGROUND

The Alkali Lake disposal site was established in 1968 by Chemical Waste Storage and Disposition, Inc. The site has been utilized for storage of 2,4-D, 2,4,5-T and MCPA pesticide manufacturing wastes from Rhodia Inc., Chipman Division, and for disposal of metallic chlorides from Oregon Metallurgical and other miscellaneous wastes.

Pesticide Wastes - During the period from February 1969 through December 1971, approximately thirty thousand 55 gallon drums of pesticide manufacturing wastes from the Portland plant of Rhodia Inc., Chipman Division were transported to Chem-Waste's Alkali Lake site. These wastes were to be stored at the site until experimental work could be completed and suitable disposal procedures could be developed. At the request of Chem-Waste, agreement was reached for Oregon State University to conduct appropriate experimental land disposal studies for these wastes at Alkali Lake.

In 1969, Oregon State University was awarded a Federal grant to determine the feasibility of land disposal of such pesticide wastes. Under this program, OSU has been conducting experiments at the Alkali Lake site to determine the rate of biological degradation of these wastes in soil for various application rates and methods.

Preliminary results of these studies indicate that soil disposal of these wastes appears to be feasible. An area of approximately 500 to 750 acres would be required for disposal by this method based on a one-time application. It has also been noted in these experiments that sagebrush and greasewood in the test areas are susceptible to these wastes while the native grasses are apparently unaffected. This observation indicates a potential beneficial use of these wastes in areas where sagebrush and greasewood control is desirable. It is expected that OSU's studies at Alkali Lake will continue through the latter part of this year. A final report will be issued after completion of this program.

Metallic Chlorides and other Wastes - In 1970, Oregon Metallurgical Corporation contracted with Chem-Waste for disposal of metallic chlorides which are produced in Ore-Met's titanium plant at Albany. Approximately 100 tons of this waste material was buried at the Alkali Lake site during the period from December 1970 through August 1971. Disposal of these metallic chloride wastes was monitored by DEQ and was conducted according to our recommendations.

In addition to the pesticide and metallic chlorides wastes, an unknown quantity of miscellaneous materials including paint pigment and solvent wastes has been stored and disposed at the site.

REGULATORY ACTIVITIES

With the passage of H.B.1931 by the 1971 Oregon legislature, regulatory authority over Environmentally Hazardous Wastes was assigned to DEQ. Pesticide wastes were defined in this statute as environmentally hazardous and therefore this Department became responsible for regulating storage and disposal of pesticide wastes at the Alkali Lake site. Under an earlier statute, the State Department of Agriculture had previously issued Chem-Waste a permit for storage at the site, but not for disposal. The Department of Agriculture permit expired June 30, 1971. In late 1971 the Departments of Agriculture and Environmental Quality reviewed the conditions and activities at the site. Several undesirable conditions and operations, such as numerous leaking drums, and inadequate security were noted at that time, in addition to the more than 1 1/2

million gallons of stored pesticide wastes without a practical disposal method having been demonstrated. Consequently, DEQ and the Department of Agriculture issued two joint directives, one on December 8, 1971 and a second on January 24, 1972 which required Chem-Waste to:

1. Cease transporting any waste materials to the site and to not dispose of any wastes at the site;
2. Bring all operations at the site into strict compliance with the permit issued by the State Department of Agriculture;
3. Prepare and submit for DEQ approval a detailed plan for ultimate disposition of wastes stored at the site;
4. Move all pesticide waste containers into the 10 acre fenced enclosure and improve security measures at the site;
5. Prepare and submit an inventory of all pesticide waste containers at the site;
6. Mark all containers at the site;
7. Rebarrel all leaking containers or transfer contents to bulk storage and;
8. Provide sound pallets under all drums.

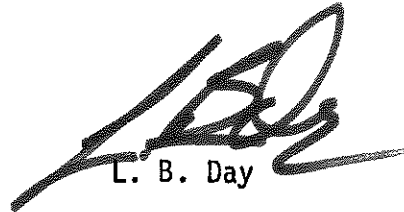
These criteria were to apply until Chem-Waste applied for and obtained a properly conditioned permit for disposal of the stored wastes and other wastes that might be brought to the site for disposal in accordance with permit conditions.

Transportation of wastes into the site has been discontinued and all drums have been moved into the 10 acre enclosure. However, compliance with the other requirements of the directives has not been achieved.

On March 24, 1972, as you will recall, the EQC adopted Procedures for Issuance, Denial, Modification and Revocation of Licenses for the Disposal of Environmental Hazardous Wastes. These rules became effective

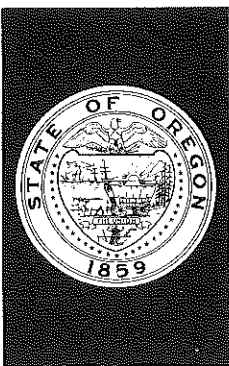
April 15, 1972. As required by H.B.1931, Chem-Waste must apply to this Department within 60 days thereafter, or by June 14, 1972 if they wish to continue storage or disposal of pesticide wastes at the Alkali Lake site.

On April 18, 1972 a letter was sent to Chem-Waste informing them of these requirements. This letter was accompanied by an application form and copies of all rules and statutes pertaining to Environmentally Hazardous Wastes. As yet we have had no indication whether Chem-Waste intends to apply for a license for its Alkali Lake site. Further action on this matter by the Department will await the June 14, 1972 deadline.



L. B. Day

PHW:mm
5/30/72



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL
GOVERNOR

L. B. DAY
Director

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Portland

MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: DIRECTOR

SUBJECT: Agenda Item No. T, June 9, 1972.
Status Report - Air Quality - Lakeview

BACKGROUND:

Since the Commission is meeting in Lakeview it appears appropriate to present a status report relative to the progress industry has made and the general improvement in air quality.

1. Freemont Sawmill, Division of Ostrander Construction Company: The Department is in the process of formalizing the compliance schedule for the operations at the Lakeview and Paisley sawmills as presented to the EQC in October, 1971. This compliance program will result in a mill modernization program, the phase-out or modification of the Lakeview and Paisley wigwam waste burners and a complete boiler modification at the Lakeview sawmill so as to attain compliance with applicable regulations on or before October 1, 1973.
2. Eastern Oregon Pine Company: This company formerly operated two (2) wigwam waste burners. On February 14, 1972, the Department granted approval for the phase-out of one (1) wigwam and modification of the other wigwam waste burner. On March 2, 1972, the company notified

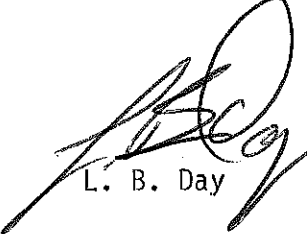
the Department that they had been successful in obtaining a market for their shavings which would change the wigwam waste burner modification requirements. At this time the company is gathering new information and data on the amounts of residue to dispose of. This information along with any change in the wigwam waste burner modification plans will be submitted to the Department for review and approval. In addition to the one (1) active wigwam waste burner the company operates an oil fired (PS-400) water tube boiler and has one shavings cyclone.

3. Mazama Timber Products, Inc.: The company completed the modifications to the wigwam waste burner during April, 1972, and was observed during a check-out and inspection of the facility on May 16, 1972, as capable of operations in compliance with OAR, 340, Section 25-020. This company also operates a hog-fuel fired water tube boiler consuming approximately 50 tons/year of bark and sawdust. The Department will request the company to sample the emissions from this boiler to demonstrate compliance with OAR, 340, Sections 21-015 and 21-020. The only other emission source is the pneumatic wood chip handling system for loading railroad cars which has not been noted as causing an emission problem.
4. Dame Lumber Company: On November 4, 1971, the company advised that it would notify the Department by May 1, 1972, that it would either phase-out or modify the wigwam waste burner prior to July 1, 1972. To date the company has not advised the Department of its intended decision. It is understood that the company intends to phase-out the wigwam waste burner. The residues (shavings and sawdust) would be shipped to Weyerhaeuser Company in Klamath Falls. A representative of the company will be present to confirm their compliance program.

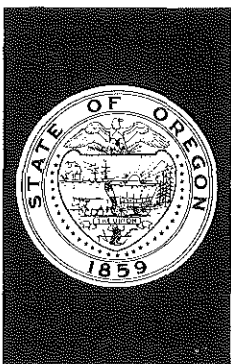
5. Lakeview Lumber Products Company: The company is committed to a program to modify the wigwam waste burner to comply with OAR, 340, Section 25-020 on or before July 15, 1972. The company also operates three hog-fuel fired, fire tube, boilers consuming approximately 11,300 unit/year of waste wood residues. The Department will request the company to sample these boilers to demonstrate compliance with OAR, 340, Sections 21-015 and 21-020 prior to December 31, 1972. Currently there are five (5) cyclones, three (3) of which handle some 15,000 tons/year of hog-fuel and shavings. These cyclones have not been noted as causing any emission problems.
6. Oregon Windor Company, Inc.: This company is operated adjacent to Lakeview Lumber Company and is under the same ownership. The company has been successful in contracting with the Weyerhaeuser Company to utilize the wood waste residues (shavings) in the Klamath Falls particleboard plant. This will result in total phase-out of the wigwam waste burner on or before July 15, 1972. Any unusable wood wastes will be burned in the modified wigwam waste burner located at the Lakeview Lumber Company.
7. Asphalt Paving Company: The company has moved this plant to Klamath Falls and will not operate this year.
8. Lakeview Ag Center, Inc.: This grain processing company handles in excess of 100,000 bushels/year. Particulate emissions from the cyclone and ancillary sources are estimated to be approximately 600 pounds/year. All wastes are fed to livestock or hauled to the county disposal area.

DIRECTOR'S RECOMMENDATIONS:

It is the Director's recommendation that the Department continue to work with these companies to insure that their compliance programs remain on a timely schedule.



L. B. Day



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TOM McCALL
GOVERNOR

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Portland

MEMORANDUM

TO: ENVIRONMENTAL QUALITY COMMISSION

FROM: DIRECTOR

SUBJECT: Agenda Item No. T, June 9, 1972
Status Report - Air Quality - Klamath Falls

BACKGROUND:

This report briefly summarizes the current status and the past progress that industry has made towards the general improvement in air quality.

1. Weyerhaeuser Company: A status report was presented at the Bend meeting on June 8, 1972. Compliance Programs and Schedules for the hardboard, particleboard, plywood and the hog-fuel boilers have been developed. These programs and schedules will be formalized by Public Hearings.
2. Metler Brothers Inc.: This company has recently been acquired by Jeld-Wen Inc. and currently operates under a compliance program that requires phase-out of the wigwam waste burner on or before October 1, 1972.
3. Jeld-Wen Inc.: This company presently operates a molding and door manufacturing facility. The company has acquired Metler Brothers, Inc. and Thomas Lumber Inc.

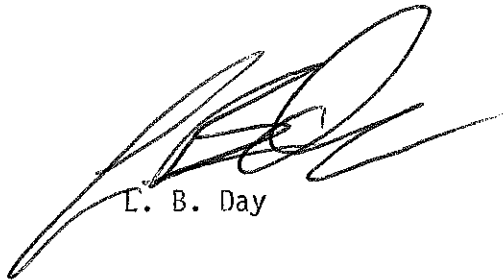
and is in the process of consolidating these operations in a new sawmill facility that is scheduled for completion by October, 1972. Arrangements are being made to dispose of all of the wood waste residues for further utilization in manufactured products or as boiler fuel.

4. Kingsley Field: The Department has been advised that a Compliance Program is under consideration whereby the present coal fired boilers would be converted to use natural gas for fuel. A formal Compliance Program and Schedule will be developed in the near future.
5. Columbia Plywood Corporation: The company was among the first of the area's industries to install a continuous tape recording device for monitoring their hog-fuel boiler stack emissions. The company will be required to demonstrate compliance with the Board Products Regulations, OAR, Chapter 340, Section 25-315, by no later than December 31, 1973.
6. Klamath Iron Works: This company operates a cupola in their iron foundry. Estimated emissions of particulates from this source are two (2) tons/year. At this time no formal program has been implemented with this company.
7. Klamath Lumber Company: This company operates a sawmill and hog-fuel boilers. Present plans encompass a testing program for the boiler stack emissions and, when concluded, certification that the entire facility is in compliance with regulations.
8. Klamath Tallow Company: The company renders animal fats and wastes and operates on oil fired boiler. Further staff evaluations will be made concerning the odors that are sometimes emitted during operation.

9. Modoc Lumber Company: The company operates a saw-mill and the hog-fuel boilers of the former Consumers Heating Company's plant. The wigwam waste burner was phased-out in 1970. The company currently is working with consulting engineering firms to develop an automated fuel feed and draft control system. A Compliance Program and Schedule will be submitted to the Department when the engineering plans and specifications for the modifications are completed.
10. Modoc Veneer: This company operates a veneer mill at Modoc Point on Klamath Lake. The wigwam waste burner will be modified by June 30, 1972, in accordance with the company's Compliance Program and Schedule.
11. Lakeside Corporation: This company operates a small veneer and stud mill. The emission sources are cyclones and the company is not regarded by the Department as a significant air pollution source.

DIRECTOR'S RECOMMENDATION:

It is the Director's recommendation that the Department continue to work toward the development of compliance schedules from these remaining sources as soon as practicable to ensure that the compliance programs are achieved on a timely schedule and in accordance with the State Clean Air Act Implementation Plan.



E. B. Day



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Portland

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. U, June 9, 1972, EQC Meeting

Status Report on Klamath River Log Debris

In May, 1968, the Oregon State Sanitary Authority (predecessor of the DEQ) adopted a Revised Implementation and Enforcement Plan for the Klamath Basin in Oregon. One of its main objectives was to improve poor water quality conditions caused by bark, other timber debris, and leachates from logs stored and handled in Lake Ewauna and the Klamath River. Four companies utilized the lake and river as integral parts of their wood products manufacturing plants. They were Modoc Lumber Company, Klamath Lumber Company, Columbia Plywood Corporation-Klamath Division, and Weyerhaeuser Company which, collectively, often had over 40,000,000 board feet of timber in the water at one time.

In 1968 none of the companies exercised effective bark or debris controls or made any attempt to recover such materials that river currents swept downstream from their operations. The net effect was a large surface area of the river choked with log rafts, bark, and log debris. Likewise, the underlying bottom zones were paved up to 8 feet thick with submerged logs, bark, and pieces of timber debris.

Because of this predicament the Oregon State Sanitary Authority in May and June, 1968, issued waste discharge permits to the four timber companies requiring that each submit by not later than December 31, 1968, a detailed program for providing complete and continuous control, removal and disposal of all bark and debris generated in the river from log handling and processing, and clean up of debris from past operations.

Each company submitted a program as required. The Sanitary Authority considered the programs at its January, 1969, meeting. Although the programs as approved were different in approach, they were considered equivalent. Subsequent to the January, 1969, meeting renewal waste discharge permits were issued delineating an approved program for each mill.

On May 11, 1972, DEQ staff members toured the Klamath River by boat from Klamath Falls to Keno for a visual survey of overall conditions and an evaluation of permit compliance. Substantial improvement has been made in the appearance and cleanliness of the river since 1968; however, further improvements are needed.

Hereinafter is a current status report on each company's efforts and effectiveness in meeting the terms of their waste discharge permits:

Modoc Lumber Company

Modoc Lumber Company's present permit which expires 3/31/74 contains the following provisions relative to logs in water:

1. Prior to June 1, 1974, the permittee shall plan, construct, and place into operation such facilities as are necessary to dry handle at least 90% of the logs currently stored in Lake Ewauna. It is the Sanitary Authority's intention that all logs be dry handled unless continued wet handling is a proven necessity.

2. Prior to July 1, 1969, the permittee shall plan, construct, and place into operation the following interim facilities and controls to minimize the generation of debris and maximize the control, removal, and proper disposal of all debris generated in Lake Ewauna from log handling and processing:
 - a. Double stiff booms around the storage area to control floating material.
 - b. Approved log transfer mechanism to replace the conventional over-the-side dumping operation.
 - c. A wire mesh fence at the downstream end of the storage area to extend four (4) feet below the water surface.
 - d. Remove all pilings and booms from vacated storage areas.
 - e. Continue program of removing existing debris and sunken logs.

Modoc Lumber Company has shifted the larger part of their log inventory to land storage, from which they feed mechanically by front end loader directly into the mill. They still rotate annually about 4,000,000 board feet of pine logs through water storage in Lake Ewauna, mostly in the fall and winter months. These are set into the water by front end loader, which is considerably less abrasive than over-the-side dumping used in prior years. Logs from the water are then taken into the mill by an endless chain conveyor.

Before 1969 the company rotated annually up to 56,000,000 board feet of logs through Lake Ewauna. Thus, they have reduced this number by about 93%.

In keeping with terms of their waste discharge permit, Modoc Lumber Company has installed double stiff booms around the water area utilized for log storage and handling. This area, incidentally, is about 10% of that utilized before 1969. The stiff booms appear to be effective in controlling floating wastes. Over-the-side log dumping,

as already mentioned, has been phased out. They have installed a hanging curtain of wire mesh from the stiff boom at the downstream end of their water area to intercept suspended debris. A surface debris collection and removal facility has been functional for several years. To date they have retrieved over 6,000,000 board feet of sunken logs from the lake bottom, and that operation is still going on. All abandoned and unnecessary piling in the company's zone of Lake Ewauna have been removed, which greatly improves the beauty and recreational value of the lake.

In summary, Modoc Lumber Company has met the terms of their waste discharge permit. Although this program has significantly reduced the debris problem, some debris still enters the river from the operations. Complete elimination of log handling in the river would be necessary to totally eliminate debris.

Klamath Lumber Company

Klamath Lumber Company, soon after receiving their 1969 waste discharge permit, moved their total log storage and handling operations out of the Klamath River and on to dry land. Associated fixtures in the water were, likewise, removed. There are still a few piling remaining in their old river working area which the company officials have volunteered to remove even though such removal is not a permit requirement.

Klamath Lumber operations no longer contribute to the debris problem in the Klamath River.

Columbia Plywood Corporation, Klamath Division

Their 1969 waste discharge permit contained four provisions relative to logs in the water:

1. Placing, handling, and storage of logs in the Klamath River shall be done in a manner to minimize the generation of debris and overall effects on water quality.
2. Log debris shall be continuously collected, removed, and disposed of in a manner not to cause aesthetic nuisance or air or water pollution.

3. Past accumulations of submerged and bottom deposited logs, bark, and sunken debris and bankside debris shall be cleaned up and disposed of in a manner not to cause nuisance conditions or air or water pollution.
4. A detailed program shall be submitted to the Sanitary Authority by not later than January 1, 1972, for providing by not later than January 1, 1974, complete and continuous control of log debris equivalent to dry handling or complete separation of log ponding operations from the river.

Columbia Plywood Corporation's Klamath Division utilizes approximately 35 million board feet of white fir logs annually, which calculates out to be between 130,000 and 150,000 board feet through the mill each working day. Of the total yearly usage, not more than 10 million board feet are in their Klamath River storage and handling area at one time - less than 3 million in the summer months.

Prior to 1969 their river storage often exceeded 20 million board feet.

The company has no dry land log storage at the mill, purely because they neither have sufficient land of their own nor neighbors that are willing to sell or rent space for logs. Therefore, logs are delivered to the mill by truck and placed in the river with an easy let-down sling device. Large diameter logs are flat rafted and small logs are either now or soon will be banded to assist their bouyancy. Bark and debris generation at the dump have not been eliminated, but substantially reduced.

The company has built a collection chamber and removal conveyor for floating debris generated near the unloading site and log slip to the mill. The collection device is serviceable, but has less than adequate effectiveness. Some of the floating debris is forced under its perimeter wall, and it does not intercept bark and debris in suspension. There is not a large amount of bark and debris generated in the log storage area, neither is there any means for collection and removal.

Double boom-sticks that surround the log storage and handling zone appear to be reasonably effective in restricting the loss of floating bark and debris; however, most of these floating particles sink to the bottom after a short time - 4 or 5 days. Columbia Plywood Corporation, like the other Klamath River mills, has conducted an extensive operation for retrieving sunken logs. The company has thus far been unable to develop a workable alternative for removing logs from the river by January 1, 1974, as required by condition 4 of their permit due to lack of suitable land. A separate report has been prepared regarding this problem and will be presented later.

Weyerhaeuser Company

The Weyerhaeuser Company waste discharge permit which expires 8/31/73 was issued July 27, 1971. An earlier permit required phase out of log storage and brow log dumping in the river by 9/30/70 and allowed the company to feed logs from cold decks to the mill by way of a river corridor within a stiff boom. The company has complied with this requirement. The main debris control condition of the present permit reads as follows:

"6. All floating bark and debris generated by the permittee log handling in the Klamath River shall be removed by the permittee."

The company presently takes approximately 900,000 board feet of logs daily from land storage and places them into the river with front end loaders for water delivery to the mill. At such a high log demand and hectic delivery rate the entry sites and river feedway are jammed with logs bashing and grinding against each other. Bark, other log debris, broken logs, and occasionally whole logs are forced out beneath and over a single line of perimeter boom sticks. The in-river log delivery zone is approximately 250 feet wide and 1500 feet long, so there is a substantial area from which floating waste can be lost. These uncontrolled materials are carried down river by wind and water currents. This situation was observed on May 11, 1972.

The Company has a floating debris removal conveyor newly constructed at the downstream end of their operations, but it is not yet functional. Neither is there any method provided to direct waste to it.

Also, there is evidence that wood wastes are entering the river from landfilling operations adjacent to the river.

Added to Weyerhaeuser's ordinary wood wastes in the river is a sizeable portion of large particle flyash out of their boiler chimney.

Typically, much of the wood waste that enters the river here soon sinks to become a permanent bottom deposit. Weyerhaeuser has taken several million board feet of sunken logs off the river bottom, but the finer materials remain in place. Likewise, the company has removed all old piling from the river that is no longer needed for log storage.

In summary, Weyerhaeuser Company's debris control program is inadequate and is not considered to be in compliance with permit conditions. Based on the volume of logs handled, it appears that it will be necessary for the company to totally eliminate the wet feed system to the mill.

General Conclusions

Further efforts are needed to satisfactorily control debris from remaining log handling operations in the Klamath River. Once the floating wood debris problem is under control, the Department staff will conduct an intensive survey of water quality and bottom conditions to determine the remaining effect of leachates and bottom deposits and whether further actions are needed.

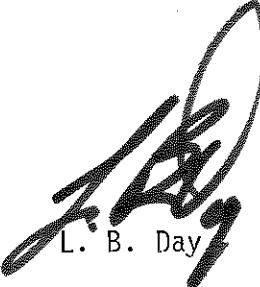
The shifting of massive log storage and handling operations from the water to land bases has resulted in a "trade-off" problem that must be considered. Bark and log debris accumulations in the land handling sites are produced at a staggering rate. Most of it is now going to landfills near the mills; however, in a short time the readily available disposal sites will be exhausted. Planning for permanent disposal or utilization methods should begin immediately. This problem is not uncommon throughout Oregon's timber manufacturing industries since restrictions were placed on burning.

Directors Recommendations

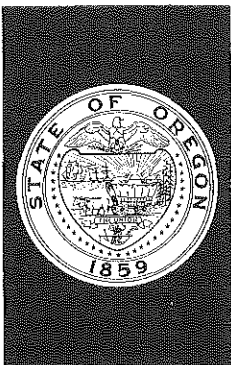
It is recommended that the following actions be taken to insure further improvement in Klamath River Debris Control:

1. Weyerhaeuser Company should be required to submit a program by October 1, 1972, for providing such facilities as are necessary to eliminate the use of the Klamath River as a wet feed channel for the mill and clean up residual debris in the river by not later than October 1, 1974. The company should also be required to immediately improve its present debris controls for the interim.
2. Modoc Lumber should be required to submit prior to expiration of its present permit on 3/31/74, a report and program for eliminating remaining log storage and handling in the Klamath River by not later than 3/31/75.

Requirements for Klamath Plywood will be considered in a separate report. Klamath Lumber Company controls are fully adequate.



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

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Chairman, McMinnville

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Portland

GEORGE A. McMATH
Portland

ARNOLD M. COGAN
Portland

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. V , June 9, 1972, EQC Meeting

Columbia Plywood Corporation - Klamath Plywood Division

Background

1. Klamath Plywood Division of Columbia Plywood Corporation operates a plywood mill on the banks of the Klamath River in Klamath County.
2. They use the Klamath River for storing and transporting white fir logs to the mill.
3. They have a small secondary treatment plant for glue and vat wastes which discharges about 12,000 GPD of treated waste to the Klamath River.
4. This is a permit renewal application. A temporary permit was issued December 28, 1967. After that a regular permit was issued May 24, 1968, amended September 27, 1968, and renewed June 27, 1969.
5. Prior to 1969, all industrial wastes from the plywood mill were discharged to the Klamath River without treatment. The permit issued May 24, 1968 required secondary treatment of

waste by March 1969. It was later amended to require secondary treatment by June 1, 1969. The permit also asked for a detailed program by December 31, 1968 for bark and debris control.

6. Because of delay in designing and constructing treatment facilities, the renewed permit issued June 27, 1968 extended the deadline for secondary treatment to October 17, 1969. This permit also required procedures to minimize bark generation at log dumps and improved debris control and removal. The permit also required that a detailed program be submitted by January 1, 1972 for providing dry handling of logs or equivalent debris control by January 1, 1974.

Evaluation

1. After many in-plant improvements and design modifications, they are still experiencing difficulty achieving secondary treatment for the industrial wastes. The tube settler is not working properly and they had freezing problems this winter. They are proposing to use the sludge lagoon as a polishing pond to improve treatment efficiency.
2. A tilting "A" frame easy let-down device is in operation at the log dump. The generation of bark and debris has been reduced significantly, but not eliminated.
3. The bark and debris removal apparatus near the log slip is in operation but is not adequate. A significant amount of bark still passes by the removal system.

4. The detailed program to have been submitted by January 1, 1972 for providing dry handling of logs or equivalent debris control was not submitted. A letter from them dated August 31, 1971 indicated that an acceptable area for dry handling logs was not available, and that they felt that their debris control was adequate.

Conclusions

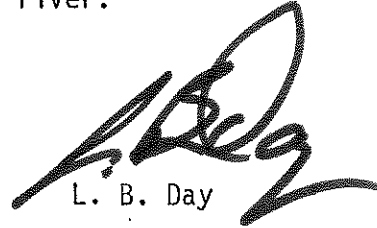
1. The current degree of bark and debris control is not adequate for a long range operation at that site.
2. The required program for providing debris control equivalent to dry handling has not been received.
3. The company has had ample opportunity to submit the required control program.

Director's Recommendation

The company has been requested to appear before the Commission at its meeting in Lakeview on June 9, 1972 to explain why it has not complied with the conditions of its permit pertaining to debris control.

It is the recommendation of the Director that if the company does not present a suitable program and timetable for providing control equivalent to dry handling of logs, that the Department be instructed

to establish a specific date for removing essentially all
log handling operations from the river.



L. B. Day

CKA:HLS:ak
5/5/72



To: AQCD Files

Date: June 6, 1972.

From: H. H. Burkitt

Subject: Weyerhaeuser Company, Klamath Falls Boiler Plant Maintenance Schedule

Chuck Carlson of the Weyerhaeuser Company in Klamath Falls reported by telephone this morning that a maintenance program had been implemented for the boiler house in preparation for the boiler inspectors. Included in this maintenance program will be the replacement of an old multiclone dry collector system which will be reported on in more detail at the Bend EQC meeting on June 8, 1972 by the Weyerhaeuser staff.

The schedule, as reported this a.m., is as follows:

1. #1 Erie City (50,000 lb/hr. dutch oven water tube boiler - June 6,-16, 1972.
2. #5 Combustion Engr. (100,000 lb/hr spreader-stoker water tube boiler) - June 16,-July 1, 1972.
3. #2 Erie City (50,000 lb/hr. dutch oven water tube boiler) July 1 -10, 1972.
4. #4 Erie City (50,000 lb/hr dutch oven boiler) - July 10 - 15, 1972.

Maintenance was performed on the #3 Erie City boiler earlier this year.

The Hardboard Plant will be down during the period of June 16 to July 1, 1972 to coincide with the maintenance of the larger #5 boiler.

It should be noted that smoke emissions will be excessive during this period (from June 6 through July 15, 1972) since the company will lack at least 50,000 lbs/hr of steaming capacity.

PLEASE SIGN

| Name | Address | Organization |
|-------------------|-----------------------------------|--------------------------------|
| A. G. Osborne | Portland | Burlington Northern |
| John L. Schwabe | Portland | U.S. Furmice |
| J. K. Herscher | St. Helens | Shell Chemical Co. |
| John D. Bell | Portland | U.S. Forest Service |
| Clay R. Beal | " | " " " |
| James L. Baker | " | " " " |
| Mike Mich. P. | Lake Oswego | Automated Combustion |
| Quen P. Cramer | P.O. Box 3141, Portland 97208 | U.S. Forest Service Expt. Sta. |
| Joe Jones | Portland | F.C.O. |
| Kelly R. Brown | ptlv | FCO |
| Don Wagoner | Lake Oswego | OEC |
| T. C. Donovan | PORTLAND | AOI |
| A. G. HEIZENRANZ | " | OCAPA |
| Douglas R. Hoptel | U of Oregon Eugene, 97403 | Survival Center, U of O |
| Thomas Donnell | 1200 1/2 S. Butterworth Eugene | Coalition for Clean Air |
| Oliver Morgan | Sprucefield | W. of Columbia |
| V. J. Ash | Franklin | Eugene |
| Carla Bell | MHC Outdoors Portland | Portland |

Bend
6-8-72

PLEASE SIGN

| Name | Address | Organization |
|-------------------|-------------------------------|----------------------------------|
| Lawrence R. Doe | P.O. Box 847 MEDFORD OREG | OLSON-LAWYER TIMBER COMPANY |
| Carl M. Brophy | P.O. Box 128 Medford, Ore. | Olson - Lawyer Timber Company |
| Robert L. Haines | West Lane, Ore. | Crown Zellerbach |
| James W. Wilkins | Prineville, Ore. | Coin Millwork Co. |
| Art Fitzgerald | Prineville Ore | Coin Millwork |
| Oliver Morgan | Prineville, Ore. | Weyerhaeuser |
| David R. Richards | Wasco, Ore. | Wasco |
| SAM JOHNSON | REDMOND OREG | ST. REPRESENTATIVE |
| Paul Carlson | Sisters, Ore. | Sons of Norway, etc. |
| Howe Kenzie | Beaverton, Ore. | CONSTRUCTING ENGR. |
| JOEL ZABUDO | 1131 CLEVELAND AVE | BEND MILLWORK |
| VINCE TRETTER | 700 SW 24th Ave | Georgia + Pacific |
| JAY GRUENFELD | BEND | BROOKS-SEANLON |
| Carter | DEA | |
| Tom Dowaga | PORTLAND | ASSOC. ORGANIZED |
| JERRY BARLUP | BEND | BEND MACHINE DESIGN Co |
| NOLTON JOHNSON | " | " |
| Don Hatfield | Madras | City |

X

6-9-72

Lakeview
EQC MEETING

June 9, 1972

PLEASE SIGN

| Name | Address | Organization |
|----------------------------|---------------------------|--------------------------------|
| Oliver Morgan MRS. MRS. | Springfield | Member |
| Donnis Hill | Lakeview, Ore | Ourselves |
| W. H. FERRY | 2900 SW. 1ST AVE PORTLAND | COLUMBIA PLYWOOD CORP. |
| JOEY CAREY | 5928 Belando Wy, K. Falls | Columbia Plywood Corp. |
| ALTON E. HESTS | KLAMATH FALLS, ORE | COLUMBIA PLY. CORP. |
| Robert M. Karcher | Lakeview, Ore | ASCS |
| Archie C. T. Day | Lakeview, Ore | OSU Nat Service |
| E. S. McKinnon | Lakeview | K O W |
| Chas. Shelton | Lakeview, Ore | Fremont National Forest |
| Grant D. Simpson | Lakeview | Fremont Nat Forest |
| John L. McDonald | Lakeview, Oregon | Lakeview Lumber Prod. Co. |
| Don J. Smith | Lakeview Oregon | County Museum |
| Donald H. Gips | Lakeview, Ore | Bureau of Land Mgmt. |
| Glen D. Carter | Hillsboro, Ore | DFO |
| Alvin A. Martin | Lakeview | OSCC |
| Frank Croghan | " | " |
| Alvane C. Crane | Lakeview | Soil Conservation Service USDA |
| Garrett E. Cooper | Lakeview | nty. Self |

PLEASE SIGN

| Name | Address | Organization |
|----------------|----------------------------------|--------------------|
| Maxwell Wood | 9000 1st Lakeview WA Lake County | |
| Jim Smith | Siberia, Pa | |
| Gary Cook | Siberia, Pa | Lake County, Co |
| Del Lyle | 370 1st Lakeview | Tuna Transit |
| B. J. Johnson | Klamath Falls | Weyerhaeuser Co. |
| Key Schmidt | Klamath Falls | Madoc Lbr Co |
| Thomas J. Shaw | P.O. Box 257 K. Falls | Madoc Lumber Co. |
| Al Maloney | K. Falls Oregon | Madoc Lumber Co. |
| Lloyd Gift | Klamath Falls | County House Comm. |
| H.M. Peterson | Portland | DEA |
| Zella Jones | Weyerhaeuser K.F. Falls | |
| Gary Johnson | K.F. Falls | Weyerhaeuser |
| J.R. Baker | Weyerhaeuser Co. | Klamath Falls |
| Bill Johnson | Klamath Falls | Weyerhaeuser |
| | | |
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REMARKS BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY BOARD
AT BEND, OREGON, JUNE 8, 1972

By Mayor Gerold Barrett, Redmond, Oregon

Redmond has also previously submitted to your Department our Preliminary Sewer Plans, action reports and information pertaining to our efforts and progress in behalf of our sewer program with an estimated cost of 9 million dollars. As Mayor and spokesman for the City of Redmond, the City Council and citizens have instructed me to make the statement that, it is absolutely necessary to secure Federal and/or State grants before we embark on a positive program. With cost estimates by our consulting engineers three times the cost of similar sewer systems in the Willamette Valley, our citizens feel that for 3,800 population and 1,200 water hook-ups, the Federal along with the State of Oregon should provide funds through grants to take care of the differential.

The tremendous recreation use of our Central Oregon area is ever on the increase by the whole State of Oregon. Therefore, our citizens feel the appeal for State and Federal funds to offset the differential in sewer costs related to the Willamette Valley and Central Oregon would have great State of Oregon appeal.

The citizens of Redmond and Bend are in great sympathy with the sewer needs of our fast growing cities. However, they also tell us, by not voting - school taxes, city tax budgets and vehicle license tax levies that our projected cost for these sewer programs is prohibitive for the local taxpayers to shoulder this burden alone.

The City of Redmond has joined forces with the City of Bend in search of answers pertaining to newer and more modern methods of construction, vacuum, gravity and pressure systems utilizing Federal and State funding adjusting the final costs to our citizens. The only way to accomplish this is through a Demonstration and Research Grant through the Environmental Protection Agency. We, as a body, are soliciting your good office to lend your guidance, expertise, and strength to obtain such a program. However, if we are successful in securing the Demonstration and

Page 2

Research Grant, the big financial problem of constructing adequate facilities still must be resolved.

As Mayor of the City of Redmond and along with the Mayor of Bend, we jointly urge the Department of Environmental Quality to join forces with us in the solving of the problems referred to in our brief presentation - fully keeping before us that we only have from 1972 to 1980 which is our stated deadline -- 8 years to make our cities a more liveable place to enjoy, ^Bbut we need a program that all citizens and our children to come can and will pay for.

Gentlemen, we appeal to you for help. Help in developing a workable formula of State participation and increased Federal participation. The legislature must be informed and must act as quickly as possible to help us "money-wise" comply with the urgent need to prevent pollution.

We need your help in influencing HUD and Federal agencies to be more conscious of our problem and to provide grants which would relieve our taxpayers of the excessive cost of construction.

You are already aware of our efforts of appeal to our Congressmen. We think this has been effective and for one thing will result in Environmental Protection Agency assistance. Perhaps the Demonstration grant our area so desperately needs will be forthcoming. However, this is not assured and we need your active support and assistance.

We will also need your help in accurately defining the sub-surface pollution problem. We will need empirically developed facts to provide a knowledgeable citizenry to approve bond issues. As you know, factual information will be critical to success at the polls.

In closing I want to show you an example of the League of Oregon Cities' appreciation of the unique problem of sewer construction in lava rock. This is a resolution approved by the League Executive Committee and directed to the State of

Oregon and the Environmental Protection Agency. It reads as follows:

SPECIAL SEWER PROBLEMS OF THE BEND-REDMOND AREA

WHEREAS, the unique and unusual geological conditions in the Bend and Redmond areas of Central Oregon present a particularly difficult problem to the conventional installation of a sewer collection system, and

WHEREAS, the cost of conventional installation of a sewage collection system presents a prohibitive burden on the people of this area of the state,

NOW, THEREFORE, be it resolved by the executive committee of the League of Oregon Cities that the state of Oregon and the Department of Environmental Quality are urged to assist in seeking federal and state funds to develop economically feasible methods of excavation and construction for the installation of sewage collection systems in this unique area of the state.

Adopted at the League of Oregon Cities
Executive Committee Meeting
June 2, 1972

/s/ Don Jones
Executive Secretary

Gentlemen, Central Oregon has moved forward - both Redmond's and Bend's officials are cognizant of the dangers which threaten our environment, we now have an active COG which will be certified before long, Congressmen are alerted to our overwhelming construction problems but - we can't go much further without the benefit of your knowledge and influence. Our plea is to work with you towards a mutually defined goal and to keep Central Oregon liveable.

REMARKS BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY BOARD
AT BEND, OREGON, JUNE 8, 1972

By Mayor Richard Gervais, Bend, Oregon

We have previously submitted a collection of letters and information to you relative to the City of Bend's efforts to secure grants, so in the interest of time, we will not recite the number of agencies that we have contacted. I will merely state that to install a sewage collection system for the City to meet the 1980 deadline, it is absolutely necessary to secure Federal and/or State grants before we embark on a positive program. With costs estimated by our consulting engineer as three times the cost of normal installation costs for sewers, it is prohibitive for the local taxpayers to shoulder this burden alone.

To date, our attempts to secure grants can be characterized as one frustrating experience after another, but we have not diminished our efforts and have in fact, accelerated our quest for funds in conjunction with the City of Redmond. It is our belief that the problems in the Bend-Redmond area are identical and we are working together to jointly resolve the difficulty of financing our sewage facilities.

The only current ray of hope on the horizon is a demonstration and research grant through the Environmental Protection Agency. Our Congressional delegation through the leadership of Senator Hatfield and Representative Ullman, are seeking funds to determine an innovative means for rock excavation for sewers and to test the possibility of a vacuum system.

The orthodox system of drilling and blasting in volcanic rock in presently built up sections is dangerous, damaging, costly and noisy. The proposed research and demonstration project seeks to apply mechanical excavation by innovative means already demonstrated to be practicable but lacking in field experience and thus eliminate or reduce the objections of the orthodox system.

In the past, we have been unsuccessful in securing a research and demonstration grant because of our uniqueness. The past few months this picture has changed because we have discovered 68 cities in 16 states have rock problems and so far, 18

cities have expressed great interest in the development of mechanical means for sewer construction in rock terrane. This should assist us in our current effort with the Environmental Protection Agency.

The development of techniques relating to the type of system and method of excavation is only the first step to the installation of sewers in the Bend-Redmond area. If we are successful in securing the demonstration and research grant, the big financial problem of constructing adequate facilities still must be resolved.

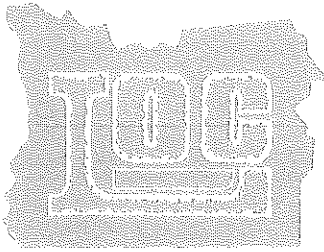
A report filed in April, 1972, on cost updating of the proposed sewerage system for Bend indicates that it would cost approximately \$11,250,000 to construct the system in 1972. With costs increasing each year for construction, we will be looking at a much higher figure before actual construction can take place.

The City of Bend has constructed a sewage treatment plant and sewers have been installed in new subdivisions in the proximity of the plant by the orthodox means of blasting. We still have to sewer 92% of the City through built-up areas and need to proceed as rapidly as possible from both a cost and environmental standpoint.

As Mayor of Bend, I urge the Department of Environmental Quality to take a more active role to use your tremendous influence and expertise to assist the local officials in the Bend-Redmond area in securing Federal and State grants to the end that it will enable us to develop a timetable and schedule to proceed in an orderly manner to install our sewage systems. This might take the form of a task force comprising of Congressional representatives, State Legislators, Local Officials and your agency to do the job.

I am confident that we will find a way if we can pool our efforts and concentrate our energies together.

I respectfully request that you consider this procedure. Thank you.



SALEM: Local Government Center
1201 Court Street N.E.

P.O. Box 928, Salem 97308

Telephone: (503) 585-6987

EUGENE: Commonwealth Hall
University of Oregon

P.O. Box 3177, Eugene 97403

Telephone: (503) 585-6987

League of Oregon Cities

MEMBER, NATIONAL LEAGUE OF CITIES • OFFICIAL PUBLICATION "WESTERN CITY"

Salem, Oregon

June 5, 1972

To: Members of the Environmental Quality Commission

Mr. B. A. McPhillips

Mr. Edward C. Harms, Jr.

Mr. Storrs S. Waterman

Mr. George A. McMath

Mr. Arnold M. Cogan

Gentlemen:


The executive committee of the League of Oregon Cities has requested that I write to you on behalf of all Oregon cities to urge your early action in expediting the resolution which you adopted at your March 24 meeting regarding the reinstatement of the federal-state matching grant program for sewage works construction. It is our understanding that the necessary agreement for reinstatement of the matching grant program has not yet reached EPA offices, and that this is holding up implementation of the full matching grant program for Oregon.

In a resolution adopted by the League of Oregon Cities at its 1971 convention, a request was made by cities for the state to provide sufficient funds to maximize the use of available federal funds for the construction of sewage treatment works. It is our understanding that the State of Oregon has received \$17 million in federal funds for sewer grants for fiscal year 1971-72 and may receive up to an additional \$1.8 million for this fiscal year. Since the 1972 sewer grant priority list includes projects totaling \$20.5 million and the projects recently identified for fiscal year 1973 total \$23.4 million, it appears that the decision to reinstate the full matching grant program must be made prior to the end of this fiscal year so that all 1972 projects will be included in the full matching grant program in order to utilize fully the federal funds allocated to Oregon.

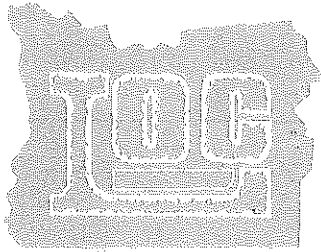
The League executive committee feels strongly that the state cannot afford to gamble at this time on the passage of the new federal water pollution control legislation but must move ahead aggressively to take full advantage of presently available federal assistance for sewage treatment works construction.

Thank you for your careful consideration of this request.

Sincerely yours,


Francis J. Ivancie
President

cc: Governor Tom McCall



SALEM: Local Government Center
1201 Court Street N.E.

P.O. Box 928, Salem 97308

Telephone: (503) 585-6987

EUGENE: Commonwealth Hall
University of Oregon

P.O. Box 3177, Eugene 97403

Telephone: (503) 585-6987

League of Oregon Cities

MEMBER, NATIONAL LEAGUE OF CITIES • OFFICIAL PUBLICATION "WESTERN CITY"

SPECIAL SEWER PROBLEMS OF THE BEND-REDMOND AREA

WHEREAS, the unique and unusual geological conditions in the Bend and Redmond areas of central Oregon present a particularly difficult problem to the conventional installation of a sewer collection system, and

WHEREAS, the cost of conventional installation of a sewage collection system presents a prohibitive burden on the people of this area of the state,

NOW, THEREFORE, be it resolved by the executive committee of the League of Oregon Cities that the state of Oregon and the Department of Environmental Quality are urged to assist in seeking federal and state funds to develop economically feasible methods of excavation and construction for the installation of sewage collection systems in this unique area of the state.

Adopted at the League of Oregon Cities
Executive Committee Meeting
June 2, 1972

Signed



Executive Secretary



ENGINEERS PLANNERS ECONOMISTS

CORNELL, HOWLAND, HAYES & MERRYFIELD

1600 S. W. Western Blvd., P.O. Box 428, Corvallis, Oregon 97330, Telephone: 503/752-4271

Cable: CH2M CVO

Corvallis Regional Office

6 June 1972

Project No. C5866.0

State of Oregon
Department of Environmental
Quality
P. O. Box 1243
Bend, OR 97701

Attention: Mr. C. K. Ashbaker

Gentlemen:

We have been asked by the City of Madras to report the progress the City has made toward providing a sewage collection and treatment facility for its citizens.

Since 3 February 1972 (the date of the last report to the Department), the City has been actively engaged in finding a site for the treatment facility at the City-County Airport. The Federal Aviation Administration must approve the selected site and several alternatives have been discussed with them. At a meeting with FAA in Seattle on 16 May 1972, preliminary approval of a site southwest of Runway 11/29 was received, subject to the submission of an airport land use and layout plan prior to beginning construction of the project. The City and Jefferson County, jointly, intend to submit the required plan as soon as possible. The FAA preliminary approval will, however, permit the City to continue sewerage system planning on a firm basis.

On 2 May 1972, the City met with representatives of the Farmers Home Administration to discuss conditions of a grant and loan to assist in the construction of the system. The loan is for \$1,216,000.00 and the grant is \$217,000.00. FHA has said that the loan funds are readily available, however, the grant funds are not, and it could be as much as two years before the grant could be funded. The City intends to proceed with the financing of the project on the basis of no FHA grant since each month delay in construction costs them an additional \$14,000.00 to \$17,000.00 as a result of the current inflationary trend.

A tentative financial plan has been adopted by the City Council and it will be presented to the citizens at a public meeting tentatively scheduled for 18 July. The public meeting will be legally advertised in order that questions concerning environmental impact may also be discussed, as required by the Environmental Protection Agency.

Assuming the results of the public meeting and necessary bond election are favorable, the following schedule could be met:

1. 18 July:
Public hearing on financing and environmental impact.
2. 19 July to 29 August:
Additional public meetings as necessary to discuss and promote a favorable bond election.
3. 8 August:
Call for \$1,216,000.00 general obligation bond election at regular Council meeting.
4. 29 August:
General obligation bond election.
5. 12 September:
Authorize final design of the project at regular Council meeting.
6. 12 September 1972 to 1 February 1973:
Complete final design of project.
7. 2 to 12 February:
Obtain approval of plans from DEQ, FHA, and EPA.
8. 13 February:
Call for construction bids at regular Council meeting.
9. 8 March:
Open construction bids.
10. 13 March:
Award construction contract(s) at regular Council meeting subject to FHA and EPA approval.
11. 14 March to 12 June:
Wait for EPA's review of
 - a. Affirmative Action Program
 - b. Manpower Projection Report for Affirmative Action

- c. Equal Employment Opportunity Agreement
- d. Project sign
- e. Notice to Labor Unions or other Organization of Workers
- f. Certification of Nonsegregated Facilities
- g. Proposal of Low Bidder(s)
- h. Proposed Construction Contract(s) and Performance and Payment Bond(s).

12. 13 June 1973 to 15 April 1974:

Construct project.

13. 16 to 30 April:


Make final inspection of completed project.

14. 1 May 1974:

Place completed system in operation.

On behalf of the City of Madras, we hope this brief report meets the approval of the Commission.

Very truly yours,



R. C. Humphrey

skw

cc: Department of Environmental
Quality (Portland)
Mr. A. P. Miller
Mr. Sumner Rodriguez
Mr. Kenneth K. Keudell (FHA)
Mr. Bruce K. Kohler (FHA)

**KLAMATH
PLYWOOD
DIVISION**



COLUMBIA PLYWOOD CORPORATION
2300 S.W. FIRST AVENUE/PORTLAND, OREGON 97201/503 • 224-5300

June 9, 1972

Environmental Quality Commission
Lakeview,
Oregon 97630

Commission Members:

In response to the Department of Environmental Quality Report and Recommendations of May 8, 1972, we are submitting the attached report of the methods and procedures which have been taken by the Klamath Plywood Division of Columbia Plywood Corporation in its attempt to fully comply with the requirements and provisions of Waste Discharge Permit Number 458.

Very truly yours,

KLAMATH PLYWOOD DIVISION

Aaron E. Abts
Resident Manager

AEA:smw
Encl.

COLUMBIA PLYWOOD CORPORATION

KLAMATH DIVISION

REPORT OF METHODS AND PROCEDURES

PROCESS WASTE MANAGEMENT

Through many in-plant changes, the total mill steam vat and glue waste has been reduced from about 50,000 GPD with a B O D load of 1,100 pounds to about 10,000 GPD with a B O D load of under 200 pounds. Secondary treatment of this reduced volume of waste has, with minor exceptions, continuously met the compliance standards of at least 85% reduction of B O D and Suspended Solids before discharge to the Klamath River.

Other control measures taken include the installation of a baffled weir trap which is designed to prevent petroleum base products and debris from entering the river.

PLACING, HANDLING AND STORAGE OF LOGS

The log storage area in the Klamath River has been reduced from several to just one contiguous area directly adjacent to the mill. The total log volume stored in the river has been reduced by approximately forty percent at its maximum. The logs are now impounded within a double log stiff boom and all towing outside the boom area has been discontinued. During the past two winter seasons a significant quantity of logs has been stored in the woods. The log volume stored in the river is at a minimum during the late spring and summer periods.

A tilting "A" frame easy let-down facility, which handles an entire truck load of logs as a unit, has replaced the previous brow log dumping procedure.

Recently, a system was initiated to bundle the small logs prior to placing them in the river to control the sinkers and bobbers. Additional facilities, including a "cherry picker" type of log grapple, is projected to retain and handle the individual logs at the log slip.

DEBRIS CONTROL

Past accumulation of submerged and bottom deposited logs, bark and sunken debris and bankside debris has been cleaned up. This procedure is continuing on a periodic basis through dredging, diving and clean-up.

Facilities for directing and removing the floating and partially submerged debris has been installed adjacent to the log slip located at the lower end of the log storage area. These facilities include:

An extended shear wall submerged to a depth of four feet which, angled to gain assistance by the river current, directs the debris from the river toward the conveyor inlet;

A series of water jets which further directs the debris to the conveyor;

A high capacity water pump which draws the debris and water into the conveyor;

A perforated plate on the bottom of the conveyor, functioning as a dewatering device, allows the debris to remain in the conveyor;

A box chain conveyor that removes the debris from the river and introduces it into the mill hog fuel system for disposal in the boiler.

The minor quantity of small bark particles which pass by the debris removal facilities floats on down inside the log storage area and is retained by the double log stiff boom. It is then periodically removed from the river and disposed of.

DETAILED PROGRAM

A detailed program, Item 5 - Waste Discharge Permit #458, was to be submitted to D E Q by not later than January 1, 1972, for providing by not later than January 1, 1974, complete and continuous control of log debris equivalent to dry handling or complete separation of log ponding operations from the river. On August 31, 1971, a letter was written to D E Q explaining the difficulties encountered in trying to obtain sufficient land area adjacent to the present mill site to convert to dry land log handling. Unfortunately, even with further inquiry, we received no written response from D E Q until the letter and memorandum of May 8, 1972.

Following is a brief review of the problems relative to land procurement.

The present Klamath Plywood property is of limited area and is occupied by buildings, working area, employee parking area, railway siding and railway right-of-way which leaves no space available for log storage. Further, the plant site is bounded on the South and East by the Klamath River and on the West by Highway 97. Klamath Lumber Company and Reames Country Club and Golf Course join the North property lines.

Klamath Lumber Company was contacted with an offer to buy, rent, or lease acreage for log storage, but this land is required for their own operation. More than half of the then potential area is now occupied by their bark operation.

Initial discussions with the officers of the Reames Country Club indicated sympathy to our problem providing adequate land area could be retained for the Golf Course. We, therefore, engaged a golf course engineering firm from Sacramento, California, who worked out a proposal for altering their present golf course. This plan was submitted to the Country Club Board of Directors who rejected this proposal.

Recently, members of D E Q suggested that it might be possible for Klamath Plywood to obtain a permit to use the river for towing and limited storage of debarked logs. This suggestion allowed Klamath Plywood to consider two other parcels of land for potential dry land storage sites.

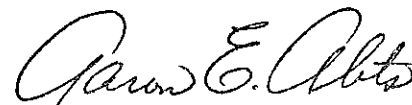
The owner of the property across the river from the mill site emphatically rejected our inquiry because the noise, dust and associated congestion of log handling would subsequently force him out of his home.

The owner of the property to the West of Highway 97 would only consider leasing on a year to year basis. The capital investment required to initiate this program could not possibly be justified on a short term based lease such as this.

APPARENT ALTERNATIVES

At this time, our apparent alternatives in order of priority are:

1. Acquire additional land of sufficient area to convert to dry land storage and remove log handling from the river. It appears that all potential sites have been investigated. It is our plan to continue to re-evaluate the above listed properties and search for new approaches. Any help or suggestions in this area would be appreciated.
2. Continue to handle logs in the river and instigate whatever measures are necessary to assure that the compliance standards are met and maintained.
3. If adjacent land is unavailable and river storage cannot be continued, there appears to be no other alternative but to close the plant. Our investigations showed that a remote log storage area would come under this category because such a plan would not allow us to remain competitive but force us out of business.



Aaron E. Abts
Resident Manager

MOTIONS - EQC Meetings, June 8 & 9, 1972

A. Minutes of April 21, 1972 Meeting

Harms - MOVED, McMath Seconded

B. Project Plans for April 1972

McMath - MOVED, seconded by

C. City of Wasco Sewage Treatment

Harms - Mr. Chairman at this point I think it points out the difficulty of attempting to resolve this matter without a full hearing and I am therefore going to MOVE that we adopt the Director's recommendation with reference to scheduling a hearing at the earliest possible date, citing the city of Wasco to appear and show cause why an order shouldn't be issued. Seconded by Cogan.

E. Winchester Bay Sanitary District

No action taken

F. Oil Spill Regulations

Harms - I would MOVE the adoption of the Oil Spill Regulations as amended at the April 21, 1972 EQC meeting and as attached to our agenda marked June 8, 1972.

G. Civil Penalties

Cogan - Mr. Chairman I will MOVE that we accept the Director's recommendations and mitigate the civil penalties levied in accordance with his program here. Seconded by

H. Revisions to Oregon's Clean Air Act Implementation Plan

Waterman - Mr. Chairman I would MOVE that the recommendation of the Director be approved to hold a public hearing on these proposed regulations. Seconded by Cogan.

I. Tax Credit Applications

Harms - Mr. Chairman I would MOVE that the recommendations of the Director certifying tax applications # T-227, T-317, T-324, T-320 and T-255 that certification be granted. Seconded by McMath.

D. Weyerhaeuser Company

Harms - Mr. Chairman I would MOVE that the recommendation of the Director be adopted, that a public hearing be authorized to adopt an order for compliance, including the conditions which have been suggested since Weyerhaeuser's attorneys seem to disagree with stipulation and order involved(?). Seconded by.

J. Ponderosa Mouldings, Redmond

Harms - I would MOVE that this variance be granted upon the conditions set forth in the Director's recommendations. Seconded by Waterman

K. Coin Millwork, Prineville

Cogan MOVED the Director's recommendation that the Commission give the Director authority to grant the variances as they are recommended. Also, in the case of emergency the strike creates additional problems, to resolve it as much as possible because our next meeting may not be soon enough for us to recognize this and I (Day) will come in with a complete report on what should be done to solve it once and for all so that if they are faced with a similar problem we'll have it solved. Seconded by McMath.

L. Beaver Lumber Co.

McMath - Mr. Chairman I will MOVE approval of the Director's recommendation. Seconded by

M. U.S. National Bank Building, Portland

Cogan - MOVED the Director's recommendation. Seconded by Waterman.

N. Hearing re: Amendment of regulations pertaining to Section 41-022
IMPLEMENTATION OF TREATMENT REQUIREMENTS AND WATER QUALITY STANDARDS
AND REGULATIONS PERTAINING TO WASTE DISCHARGE PERMITS

Cogan - I'll MOVE approval of the Director's recommendation. Seconded by

O. Bend-Redmond-Madras Sewerage Programs

(Culver) Waterman -Mr. Chairman I would MOVE to approve the recommendation of the Director with respect to the city of Culver.

Bend-Redmond-Madras - Approve Director's recommendations 1, 2 and 3 and in 3 insert between funding and to in second line "and to develop criteria for additional state funding where there are special geographic, geological and economic factors to pose really undue and unreal burdens on communities."

Cogan - Would like to add a 4th point. MOVE that 4 points be approved

4. That the Department should encourage the certification of successful operations of the Council of Governments. Seconded by Waterman.

P. Bend-Prineville-Redmond Area AQC

No action taken.

Q. Brooks-Scanlon, Bend, Boiler Stack Emission Control Program

Waterman - Mr. Chairman I'll MOVE that the recommendations of the Director be approved. Seconded by

R. Brooks-Scanlon, Bend, Log Debris Control Program

Harms - I would MOVE that a WDP be prepared for Brooks-Scanlon with terms and conditions similar to those in their previous permit with 3 additional conditions specified in the letter from Mr. Hollern of June 5. Seconded by McMath.

Meeting in Lakeview - June 9, 1972

S. Alkali Lake Waste Disposal Site

No action taken

T. Air Quality Control - Lakeview & Klamath Falls Areas

No action taken

U. Lake Ewauna and Klamath River - Log Debris Control Program

McMath - Mr. Chairman I'll MOVE approval of the Director's recommendations.
Seconded by Cogan

V. Columbia Plywood Corporation, Klamath Division - Log Debris Control

No action taken.

Mr. Day suggested to the Commission that perhaps we continue the matter for many days and to try to work with Mr. Abts to find suitable land for dry storage or other alternatives for him and then report back to the Commission our joint efforts.