3/2/1973

OREGON ENVIRONMENTAL QUALITY COMMISSION MEETING MATERIALS



State of Oregon
Department of
Environmental
Quality

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AGENDA

Environmental Quality Commission Meeting
March 2, 1973

Portland Water Bureau Auditorium 1800 S.W. 6th Avenue, Portland

9:00 a.m		
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A. Minutes of January 26, 1973 EQC Meeting (Chairman)

B. Project Plans for January 1973 (Weathersbee)

C. National Pollutant Discharge Elimination System (NPDES) (Sawyer)

(Consideration of DEQ Participation)

10:00 a.m.

D. PUBLIC HEARING to consider issuance of NPDES Permit to OREGON (Sawyer) STEEL MILLS, Front Avenue Plant, Portland, Oregon

E. P. A. Tworoger & George Corrigan, Bend, Oregon (Borden)
(Appeal of Waste Disposal Well Permit Denial)

F. National Metallurgical Corp., Springfield, Oregon (Skirvin)

(Transfer Air Quality Control Jurisdiction to Lane

Regional Air Pollution Authority)

2:00 p.m.

G. PUBLIC HEARING to consider adoption of a regulation to initiate (Householder) MOTOR VEHICLE EMISSION INSPECTION in Clackamas, Columbia, Multnomah & Washington Counties.

H. North Florence Area Mandatory Annexation, Lane County (Curran)

I. Solid Waste Planning Grants (Status Report) (Jackman)

J. Tax Credits

K. Parking Structures (Terminal Sales Bldg.) (Downs)

ATTENDANCE LIST

Date: March 2, 1973	
Public Hearing for: Motor Vehicle Emission I	nspection Regulations
Location: Portland Water Bureau Auditorium	
NAME, Samuella	REPRESENTING
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ATTENDANCE LIST

Date: March 2, 1973	
Public Hearing for: Motor Vehicle Emission	Inspection Regulations
Location: Portland Water Bureau Auditorium	
NAME	REPRESENTING

MINUTES OF THE FORTY-THIRD MEETING

of the

Oregon Environmental Quality Commission March 2, 1973

The forty-third meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 9:00 a.m., Friday, March 2, 1973, in the Portland Water Bureau Auditorium, 1800 S.W. 6th Avenue, Portland, Oregon. All members were present including B.A. McPhillips, Chairman, Arnold M. Cogan, George A. McMath, Edward C. Harms, Jr., and Storrs S. Waterman.

Participating staff members were Diarmuid F. O'Scannlain, Director; E.J. Weathersbee and K.H. Spies, Deputy Directors; Harold M. Patterson, Harold L. Sawyer and E.A. Schmidt, Division Administrators; Harold H. Burkitt, R.C. Householder, F.A. Skirvin and M.J. Downs, Air Quality Control Engineers; C. Kent Ashbaker and P.D. Curran, Water Quality Control Engineers; John E. Borden, Assistant District Engineer, and Ray P. Underwood, Legal Counsel. MINUTES OF JANUARY 26, 1973 COMMISSION MEETING

It was $\underline{\text{MOVED}}$ by Mr. McMath, seconded by Mr. Waterman and carried that the minutes of the forty-second meeting of the Commission held in Portland on January 26, 1973 be approved as prepared.

PROJECT PLANS FOR JANUARY 1973

It was MOVED by Mr. McMath, seconded by Mr. Waterman and carried that the actions taken by the Department during the month of January 1973 as reported by Mr. Weathersbee regarding the following 37 domestic sewerage, 13 industrial waste, 4 air quality control and 4 solid waste disposal projects be approved:

Water Quality Control

		· ·	
<u>Date</u>	<u>Location</u>	Project	<u>Action</u>
Municipal	Projects (37)		
1-9-73	Mt. Hood National Forest	U.S. Forest Service waste sludge study	Comments submitted
1-10-73	Inverness	Change order #1, Unit 5A-2 sewage pumping station contrac	Approved t
1-10-73	Wallowa	Change Order B-1 sewer system project	Approved
1-10-73	Eugene	Change Order #6 sewage treat- ment plant project	Approved
1-10-73	Sunriver	Mt. Village West II, Phase I and Ranch Cabins, Phases 2 and 3 sewers	Prov. app.

Water Quality Control - continued Municipal Projects (37) continued

Date	Location	<u>≃</u> Project	Action
1-10-73	Rainier	Change Order #3, sewage treat- ment plant project	Approved
1-10-73	Salem (Willow Lake)	Two sewer projects	Prov. app.
1-10-73	Newport	Embarcadero sewers	Prov. app.
1-10-73	Molalla	Hadley Addn. sewers	Prov. app.
1-10-73	Clackamas County Sewer Dist. I	Johnson City sewer intertie	Prov. app.
1-10-73	Oregon City	Cook Subdivision sewers	Prov. app.
1-12-73	Lebanon	Sewer extension WP-A	Prov. app.
1-15-73	Gresham	Schedeen Subdivision sewers	Prov. app.
1-16-73	Somerset West	Rock Creek #8 sewers	Prov. app.
1-16-73	Government Camp	Frontage Road sewer	Prov. app.
1-16-73	Eugene	Three sewer projects	Prov. app.
1-22-73	USĂ (Fanno Creek)	Fanno Creek interceptor	Prov. app.
•		sewer, Schedules B and C	
1-22-73	Ashland	Hersey Street and Sheridan	Prov. app.
		Street sewers	
1-22-73	Umatilla	Change Order #1, sewage treat-	Approved
1-22-73	Jefferson	ment plant contract Armor's First Addn. sewer	Dway ann
1-22-13	verrerson	Colcord Addn. sewers	Prov. app.
		Armor's First Addn., Phase I sewers	
1-22-73	Medford	N. E. Medford interceptor,	Prov. app.
1-22-75	Medicia	Schedules A, B and C	riov. app.
1-22-73	Gresham	Glisan Street sewer (172nd-	Dwou ann
1-22-13	di estalli	181st)	Prov. app.
1-22-73	Aumsville	Wildwood Addn. #4 sewers	Duou ann
1-22-73	Woodburn	Marcel Court sewers	Prov. app.
1-23-73	Gresham	· · · · · · · · · · · · · · · · · · ·	Prov. app.
1-20-70	Gresnam	Change Order #8, sewage	Approved
1-25-73	Maldrout	treatment plant contract Crestview Hills #5 sewers	Duny ann
1-25-73	Waldport Portland	S.E. 116 and Flavel sewers	Prov. app.
			Prov. app.
1-25-73	Vernonia	Change Order #3 to sewage treatment plant contract	Approved
1-25-73	USA (Tigard)	Cooper Development sewers	Prov. app.
1-30-73	Rogue River	0.20 MGD sewage treatment	Prov. app.
	.	plant and sewer system	t- t- t-
1-31-73	USA (Aloha)	Shadow Wood Subd. sewers	Prov. app.
1-31-73	King City	Sewage treatment plant	Prov. app.
· -		interim expansion and	
		additions	
	•		

Water Quality Control - continued

<u>Industrial Projects (13)</u>

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<u>Date</u>	<u>Location</u>	Project	Action
1-12-73	Hermiston	Lamb Weston, Inc., wastewater control	Prov. app.
1-12-73	Mt. Angel	facilities Erwin Nickodemus Dairy, animal waste facilities	Prov. app.
1-12-73	St. Paul	Sar-Ben Farms, Inc., animal waste facilities	Prov. app.
1-15-73	Stayton	Paris Woolen Mills, Inc., pretreatment facilities	Prov. app.
1-17-73	Toledo	Georgia Pacific Corp., engineering proposal	Prov. app.
1-22-73	Yamhill	Gene Belt Hog Farm, animal waste facilities	Prov. app.
1-22-73	McMinnville	Alford Rieder Dairy, animal waste facilities	Prov. app.
1-22-73	Aumsville	Glen Roby Dairy, animal waste facilities	Prov. app.
1-22-73	Gervais	Wm. Van Smooranburg Dairy, animal waste facilities	Prov. app.
1-25-73	Salem	Van Beek Dairy, animal waste facilities	Prov. app.
1-31-73	Turner	Sudman's Feedlot, animal waste facilities	Prov. app.
1-31-73	Amity	Thomas Dieter Hog Farm, animal waste facilities	Prov. app.
1-31-73	Jefferson	Robert Rieder Dairy Farm, animal waste facilities	Prov. app.
Air Quality	Control		
<u>Date</u>	<u>Location</u>	Project	<u>Action</u>
1-3-73	Jackson Co.	<u>Timber Products Company</u> Plans and specifications for particleboard materials drying system.	Approved
1-15-73	Klamath Co.	Weyerhaeuser Company Plans and specifications for installation of new cinder collector and fly ash re-	Approved
		injection system for hog fuel boilers #1, #2, #3 and #4.	
1-18-73	Multnomah Co.	Fisher Realty Company 59-space Parking structure.	Approved
1-18-73	Multnomah Co.	Piedmont Plaza Apartments 68-space surface parking facility.	Approved

Solid Waste Management

Date	<u>Location</u>	Project	<u>Action</u>
1-3-73	Columbia Co.	Modified Landfill (garbage)	Prov. app.
1-9-73		EPA Proposed Sanitary Landfill Guidelines	Comments
1-12-73	Yamhill Co.	High Heaven Modified Landfill (garbage)	Prov. app.
1-18-73	Multnomah Co.	Esco Corp. Modified Landfill (Industrial)	Prov. app.
1-23-73	Marion Co.	Boise Cascade Sludge Modified Landfill	Prov. app.
1-29-73	Lane Co.	(Letter authorization) Lane County Solid Waste Management Plan	Comments

Chairman McPhillips commented about the fine assistance given by the State Police in keeping a sharp look-out for water quality violations caused by poor farm practices in the rural areas of the state.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

Mr. Sawyer presented a staff report dated February 22, 1973 which explained in considerable detail the requirements set forth by Congress in the 1972 amendments to the Federal Water Pollution Control Act relative to Oregon's participation in the new national waste discharge permit program. He pointed out that under the 1972 FWPCA and the regulations adopted pursuant thereto by EPA very comprehensive guidelines are laid down which dictate to the state what has to be done, how it must be done and when it shall be done. He said that in spite of these excessive federal controls it is the intent of the department to do everything possible and necessary to obtain authorization for issuing NPDES permits.

He also pointed out that all of the requirements are not known at the present time because all of the guidelines have not yet been adopted by EPA. For example, certain application forms are not available, effluent limitations have not been specified and secondary treatment for public systems has not been defined.

It was mentioned that certain changes will have to be made in the Oregon statutes and in the Commission's administrative rules regarding waste discharge permits before the state can qualify for participation in the NPDES program.

Mr. O'Scannlain emphasized that it is the state's desire and intent to obtain authorization to continue to conduct its own permit program and to qualify it as a part of the NPDES. He mentioned the excellent cooperation and assistance which the department has received from Mr. John Vlastelicia and the other EPA employees assigned to Oregon and from Mr. James L. Agee, EPA Region X Administrator in Seattle.

Mr. Larry Williams, Executive Director of the Oregon Environmental Council, read a prepared statement for that organization relative to this matter. He was under the impression that all permits would be issued for the maximum term of 5 years and therefore expressed concern that since all effluent limitations are not established yet such permits might not be as effective as they should be. He also expressed concern about the public involvement in the program.

Mr. Harms said he thought the department should continue to advise the Oregon Congressional delegation that the new federal requirements are wasteful and burdensome and will require diversion of state staff resources that will be non productive as far as water quality control is concerned. He said the new legislation is beyond belief, that it poses more problems than it solves and that it is next to useless in a state like Oregon.

Mr. Waterman said he is extremely disturbed and upset by federal intervention of Oregon's water pollution control program.

It was $\underline{\text{MOVED}}$ by Mr. Harms, seconded by Mr. Waterman and carried that the Director send another letter to the Congressional delegation expressing the Commission's feelings in this matter.

PUBLIC HEARING RE: PROPOSED NPDES PERMIT FOR OREGON STEEL MILLS

Proper public notice having been given as required by statute and administrative rules the public hearing in the matter of the issuance of a proposed NPDES permit to the Oregon Steel Mills plant located on Front Avenue, Portland, Oregon, was called to order by the Chairman at 10:15 a.m. on Friday, March 2, 1973 in the Portland Water Bureau Auditorium, 1800 S.W. 6th Avenue, Portland, Oregon. All members of the Commission were present.

Mr. C. Kent Ashbaker presented the staff report dated February 22, 1973 and containing background information, a description of the applicant's facility and discharge and a copy of the proposed permit which the director recommended be adopted.

In response to a question from the Commission Mr. James Sweeney, EPA engineer who had reviewed the application and assisted in drafting the permit, stated that the implementation schedule required by the permit would result in a reduction of suspended solids discharged to the Willamette from the present 580 lbs/day to only 60 lbs/day in accordance with federal standards.

There being no further comments or testimony it was <u>MOVED</u> by Mr. Harms, seconded by Mr. Cogan and carried that as recommended by the Director the proposed NPDES permit with an expiration date of June 30, 1975 be issued to the Oregon Steel Mills Front Avenue Plant.

The hearing was adjourned at 10:35 a.m.

A copy of the permit as issued is attached to and made a part of these minutes.

NATIONAL METALLURGICAL CORP., SPRINGFIELD, OREGON

Mr. Skirvin presented the staff report dated February 21, 1973 containing the Director's recommendation that air quality jurisdiction for the National Metallurgical Corporation plant at Springfield, Oregon be transferred effective April 1, 1973 by order of the Commission from the Department of Environmental Quality to the Lane Regional Air Pollution Authority.

Mr. Harms said the staff report agrees with his personal observations of the air quality in the vicinity of the plant.

Mr. Verne Adkison of the Lane Regional Air Pollution Authority was present and recommended that the proposed transfer be approved.

It was <u>MOVED</u> by Mr. McMath, seconded by Mr. Waterman and carried that the Director's recommendation in this matter be adopted.

Mr. Waterman commented that this transfer is a good indication of the Commission's position regarding regional air pollution authorities.

TAX CREDITS

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

It was MOVED by Mr. Waterman, seconded by Mr. McMath and carried that as recommended by the Director Pollution Control Facility Tax Credit Certificates be issued to the following applicants for facilities claimed in the respective applications and with 80% or more of the listed costs being allocable to pollution control:

Application No.	<u>Applicant</u>	Cost
T-270	Tektronix, Inc., Beaverton	\$1,045
T-271	Tektronix, Inc., Beaverton	4,451
T-272	Tektronix, Inc., Beaverton	22,400
T-273	Tektronix, Inc., Beaverton	12,720
T-274	Tektronix, Inc., Beaverton	35,794
T-275	Tektronix, Inc., Beaverton	8,941
T-276	Tektronix, Inc., Beaverton	816
: T-277	Tektronix, Inc., Beaverton	6,000
T-278	Tektronix, Inc., Beaverton	1,022
T-279	Tektronix, Inc., Beaverton	765
T-280	Tektronix, Inc., Beaverton	26,060
T-281	Tektronix, Inc., Beaverton	2,066
T-284	Tektronix, Inc., Beaverton	874
T-285	Tektronix, Inc., Beaverton	4,881
T-286	Tektronix, Inc., Beaverton	942
T-287	Tektronix, Inc., Beaverton	10,453
T-376	International Paper Co., Gardiner	3,074.53
T-391	John G & Nicholas D. Sumich, Blachly	11,628.76
T-394	Timber Products Co., Medford	57,999.60
T-397	Weyerhaeuser Co., Springfield	63,722
T-399	Weyerhaeuser Co., Cottage Grove	16,191
T-400	Weyerhaeuser Co., Cottage Grove	6,306
T-405	The Hervin Co., Tualatin	23,841.87
T-416	Boise Cascade Corp.	6,101,818

and that a pollution control facility tax credit certificate for facilities claimed in tax application No. T-409, submitted by Weyerhaeuser Company, Springfield be denied.

It was <u>MOVED</u> by Mr. McMath, seconded by Mr. Waterman and carried that as recommended by the Director Pollution Control Facility Tax Credit Certificates be issued to the following applicants for facilities claimed in the respective applications and with the cost percentages listed being allocable to pollution control:

Application No.	<u>Applicant</u>	Cost	<pre>% Allocable to Poll. Control</pre>
T-207	Georgia-Pacific Corp., Junction City		80% or more
T-208 T-240	Georgia-Pacific Corp., Springfield Amalgamated Sugar Co., Nyssa	63,451.00 42,168.89	80% or more 80% or more
T-387	Cascade Const. Co., Portland	20,204.27	80% or more
T-388	Cascade Const. Co., Portland	6,123.00	80% or more
T-389	Cascade Const. Co., Portland	4,245.00	80% or more
T-390 T-402	Cascade Const. Co., Portland Brooks-Scanlon, Inc., Bend	22,480.00 1,790,445.00	80% or more 60% or more &
T-402	Georgia-Pacific Corp., Toledo	104,713.36	less than 80% 80% or more

Application No.	<u>Applicant</u>	Cost	<pre>% Allocable to Poll. Control</pre>
T-404(b)	Menasha Corp., North Bend	1,330,421.83	80% or more
T-411	Weyerhaeuser Co., Springfield	3,179.00	80% or more
T-418	V. Robert Thomsen, Hood River	16,132.16	80% or more
T-424	Martin Marietta Aluminum, Inc.	1,662,700.51	80% or more
T-425	W.C. Laraway, Hood River	3,306.68	80% or more
T-429	Bickford Orchards, Hood River	5,013.53	80% or more
T-430	M.S. Walton, Hood River	16,056.47	80% or more

and that a pollution control facility tax credit certificate for facilities claimed in tax application No. T-404(a), submitted by Menasha Corporation be denied.

NORTH FLORENCE AREA MANDATORY ANNEXATION

Mr. Curran presented the staff report regarding the proposed sewer plans for an area north of the city of Florence in Lane County which has been designated by the Oregon State Health Division as an emergency health hazard area and therefore subject to mandatory annexation proceedings. He reported that the preliminary plans prepared by consulting engineers under contract with the Health Division had been reviewed and found to be acceptable and adequate to eliminate the health hazard.

It was MOVED by Mr. McMath, seconded by Mr. Waterman and carried that as recommended by the Director the proposal be approved and that such approval be certified to the State Health Division pursuant to ORS 222.865.

SOLID WASTES PLANNING GRANTS

Mr. Schmidt presented a status report dated March 1, 1973 relative to the solid waste management action plan grant applications and grant offers. He stated that 16 applications totaling \$818,190 in grants had been approved and another 8 for grants totaling \$275,163 were being processed, leaving a contingency reserve of \$36,277.

Mr. Cogan asked that in future status reports information regarding local contributions be included.

The meeting was then recessed at 11:30 a.m. and reconvened at 1:30 p.m. P.A. TWOROGER AND GEORGE CORRIGAN, BEND

Mr. Phil Tworoger developer of an apartment complex and Mr. George Corrigan developer of the Forest Hills Subdivision, both located in the same general area in the city of Bend, had asked that the denial of their waste discharge

permit applications by the Department be referred to the Commission members for further consideraton.

The staff report dated February 21, 1973 and containing pertinent background information regarding the problem of using drill holes for sewage disposal, the department's evaluation and the Director's recommendations in this matter were presented by Mr. Borden.

Mr. George Corrigan was present to represent himself. He submitted a list of expenditures totaling \$20,275 which he claimed he had already made toward the development of his proposed "Forest Hills" Subdivision. He mentioned that two other projects in the area had received permits for the use of drill holes for sewage disposal but admitted that one of them had encountered ground water. He said he had proposed to install 2 holes with one of them being held in reserve in case the first one would not be adequate. He expressed confidence that he could put in a drain hole that would be 100 feet above the water table and that would function satisfactorily. He said he would be willing to spend the money necessary to determine if it could be done. He objected to not having any alternative solution.

Mr. Ashbaker pointed out that the whole west side of the city of Bend is a problem area and that in that area well drillers will not guarantee drain holes that are less than 250 feet in depth. He said there are perched water zones at depths of 300 to 400 feet.

Mr. Tworoger was also present to represent himself.

Mr. John Glover, Deschutes County Sanitarian, was also present and supported the conclusions and recommendations of the department.

It was <u>MOVED</u> by Mr. Cogan, seconded by Mr. Harms and carried that as recommended by the Director (1) the Commission confirm the denial by the Department of permits to Mr. P. A. Tworoger for disposal of sewage from a 36-unit multiple housing complex and to Mr. George Corrigan for disposal of sewage from the proposed Forest Hills subdivision both by means of drain holes in the city of Bend, and (2) the Department staff work with the Deschutes County Health Department to establish reasonable restrictions on location of drain holes, depth of drain holes, and size of facility to be connected in problem areas.

PUBLIC HEARING RE: MOTOR VEHICLE EMISSION INSPECTION

Proper public notice having been given as required by statutes and administrative rules the public hearing in the matter of adoption of a regulation pursuant to ORS 481.190 to designate Clackamas, Columbia, Multnomah and Washington Counties as those counties in which motor vehicles registered therein shall be equipped with motor vehicle pollution control systems or shall comply with motor vehicle emission standards adopted by the Commission was called to order by the Chairman at 2:08 p.m. on Friday, March 2, 1973, in the Portland Water Bureau Auditorium, 1800 S.W. 6th Avenue, Portland Oregon. All Commission members were present.

Mr. Householder presented the department's report dated February 21, 1973 regarding this matter. He also said a letter had been received from the EPA Region X office in Seattle commenting favorably on the adoption of the proposed regulation.

Mr. Larry Williams read a prepared statement in which the Oregon Environmental Council gave its support to the proposed regulation.

Mr. Walter Nutting, a member of the CWAPA Advisory Committee, but speaking for himself said he strongly favors state-wide inspection and inspection by private industry.

Mr. Joe French, Attorney, 250 Liberty St. S.E., Salem, representing the truck drivers recommended inspection on a state-wide basis.

Mr. Don Roche who has an automotive business also spoke in favor of a state-wide inspection program.

Mr. Walter J. Widmer, member of the Diesel Club of Oregon, asked that all diesel engines be exempted.

Mr. Curtiss Durree of Clackamas Community College reported on their experience with testing motor vehicle emissions.

Mr. Guy Boag of Cummins Oregon Diesel, Inc., asked questions regarding testing of diesel engines.

A letter from Mr. Richard E. Hatchard, Program Director of the Columbia Willamette Air Pollution Authority, was read into the record. It supported the adoption of the proposed regulation and expressed the hope that subsequently the program could be expanded to cover the entire Willamette Basin.

There being no other witnesses who wished to be heard it was $\underline{\text{MOVED}}$ by Mr. Harms, seconded by Mr. McMath and carried that the proposed regulation

be adopted. The hearing was adjourned by the Chairman at 2:55 p.m.

A copy of the regulation as adopted is attached to and made a part of these minutes.

TERMINAL SALES BLDG. PARKING STRUCTURE

Mr. Downs presented a department report dated February 20, 1973 regarding the revised proposal of Mr. Ralph Schlesinger, owner, to construct a two-level, 152-space parking structure in conjunction with a 16,000 square foot office addition adjacent to the Terminal Sales Building in Portland. In a letter dated February 27, 1973 from the Storch Corporation, designers of the facility, DEQ was advised that the capacity of the proposed parking structure had been reduced to 135 spaces.

It was pointed out that the proposal had not yet been reviewed by the City Planning Commission.

After considerable discussion it was $\underline{\text{MOVED}}$ by Mr. Cogan, seconded by Mr. McMath and carried that the request for the 135-space parking structure be approved pending concurrence and approval by the city of Portland and the Columbia Willamette Air Pollution Authority of the 48,000 square-foot structure. RESIGNATIONS OF MEMBERS

At this point in the meeting Mr. Harms announced that he had sent a letter on February 27, 1973 to Governor McCall in which he submitted his resignation from the Environmental Quality Commission effective at the Governor's pleasure after this March 2 meeting and after 15 years of service to EQC and the state of Oregon. He pointed out that this resignation was necessitated by the requirements contained in the 1972 amendments to the Federal Water Pollution Control Act which prohibit any board member from participating in the NPDES program if he receives a significant portion (defined as 10% or more) of his annual income from a permit holder or applicant.

Mr. Waterman and Mr. McMath then announced that they too would be submitting their resignations for the same reason.

Chairman McPhillips and Mr. Cogan said that they can comply with the new federal statutes and therefore will not have to resign although Mr. McPhillips said he had seriously considered resigning but had finally decided to continue as a member of the Commission.

Mr. Spies, as senior staff member in terms of years of service, expressed the sincere and deep regrets of the entire staff that three such competent and dedicated Commission members were forced to resign in order to satisfy a federal requirement, a requirement which is entirely unnecessary and unjustified as far as the state of Oregon is concerned. He commended the members for the outstanding service they have performed for the state and all of its citizens.

There being no further business the meeting was adjourned at 3:30 p.m.

Prepared by the Staff of the DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended	Expira	ition	Dates	6-30-75
	Page	7	of	3

APPLICANT:

Oregon Steel Mills
Division of Gilmore Steel Corp.
Front Avenue Plant
5200 N. W. Front Avenue
Portland, Oregon 97210

REFERENCE I	NFORMATION
File Number: 65042	
Appl. No.: 1618	Received: 4-17-72
Major Bn: Willamette	Minor Bns
Receiving Stream: Wills	emette River
River Miles7.8	1
County: Multi	nomah

Until such time as this permit expires or is modified or revoked, Oregon Steel Mills, Division of Gilmore Steel Corporation, Front Avenue Plant, is herewith permitted to:

- a. Discharge uncontaminated cooling water to the Willamette River.
- b. Discharge adequately settled rolling mill flushing waste waters to the Willamette River.

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

All other waste discharges are prohibited.

- 1. The quantity and quality of effluent discharged directly or indirectly to the Willamette River shall be limited as follows:
 - a. The monthly average concentration of suspended solids shall not exceed 20 mg/l above natural background levels in the raw water supply.
 - b. Oil and grease (ether solubles) shall not exceed 10 mg/l above background levels in the raw water supply.
 - c. The monthly average concentration of iron shall not exceed 1 mg/l.
 - d. pH shall be within the range of 6.5 to 8.5.
 - e. Flow shall not exceed 7.0 MGD.
 - f. BOD and turbidity of the treated rolling mill waste water effluent shall be essentially unchanged from the raw water supply (Willamette River).
- 2. By September 1, 1974 a detailed program and time schedule shall be submitted to the Department for providing by July 1, 1977 treatment and control facilities to meet the following limitations:
 - a. The monthly average suspended solids discharged in excess of background levels in the intake water shall not exceed 0.02 pounds per ton times tons of steel manufactured, plus 0.10 pounds per ton times tons of product hot formed.
 - b. The monthly average oil and grease discharged shall not exceed 0.1 pounds per ton times tons of product hot formed.

A report detailing progress toward compliance with the above requirements shall be submitted to the Department every six months beginning September 1, 1973.

Prepared by the Staff of the DEPARTMENT OF ENVIRONMENTAL QUALITY

Recom.	Expir.	Date:	6-30-75
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- 3. 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.
- 4. All waste solids shall be utilized or disposed of in a manner which will prevent their entry into the waters of the state and such that health hazards and nuisance conditions are not created.
- 5. No petroleum-base products in excess of the limits in Condition 1 or other substances which might cause the Water Quality Standards of the State of Oregon to be violated shall be discharged or otherwise allowed to reach any of the waters of the state.
- 6. Sanitary wastes shall be disposed of to the City of Portland municipal sewerage system.
- 7. The permittee shall observe and inspect all waste handling, treatment and disposal facilities and the receiving stream above and below each point of discharge at least three times per week to insure compliance with the conditions of this permit. A written record of all such observations shall be maintained at the plant and shall be made available to the Department of Environmental Quality staff for inspection and review upon request.
- 8. The permittee shall effectively monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the wastes discharged. A record of all such data shall be maintained and submitted to the Department of Environmental Quality at the end of each calendar month. Unless otherwise agreed to by the Department of Environmental Quality, data collected and submitted shall include, but not necessarily be limited to, the following parameters and minimum frequencies:

Parameter	Minimum Frequency
Suspended solids (intake water & effluent)	Weekly grab sample
Oil & grease (intake water & effluent)	Weekly grab sample
Iron	Weekly grab sample
рн	Daily
Flow	Daily
Temperature in °F (intake water & effluent)	Daily

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

Prepared by the Staff of the DEPARTMENT OF ENVIRONMENTAL QUALITY

Recom. Expir.	Dates	6-30-75
Page3	_ of	3

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

- 10. Authorized representatives of the Department of Environmental Quality shall be permitted access to the premises of all applicable facilities owned and operated by the permittee at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data and carrying out other necessary functions related to this permit.
- 11. Whenever a significant change in the character of the waste is anticipated or whenever a change in the waste to be discharged in excess of the conditions of this permit is anticipated, a new application shall be submitted together with the necessary reports, plans and specifications for the proposed changes. No change shall be made until plans are approved and a new permit issued.
- 12. In the event that a change in the conditions of the receiving waters results in a dangerous degree of pollution, the Department of Environmental Quality may specify additional conditions to this permit.
- 13. This permit is subject to termination if the Department of Environmental Quality finds:
 - a. That it was procured by misrepresentation of any material fact or by lack of full disclosure in the application.
 - b. That there has been a violation of any of the conditions contained herein.
 - c. That there has been a material change in quantity or character of waste or method of waste disposal.



DEPARTMENT OF **ENVIRONMENTAL QUALITY**

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

TOM McCALL GOVERNOR

Memorandum

Diarmuid F. O'Scannlain

Director

ENVIRONMENTAL QUALITY TO:

COMMISSION B. A. McPHILLIPS

Chairman, McMinnville EDWARD C. HARMS, JR. Springfield

STORRS S. WATERMAN **Portland**

GEORGE A. McMATH Portland

ARNOLD M. COGAN Portland

Environmental Quality Commission

From:

Director

Subject:

Agenda Item No. B, EQC Meeting, March 2, 1973

Project Plans for January, 1973

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

Water Quality Control

- Thirty-seven (37) domestic sewage projects were reviewed: 1.
 - a) Provisional approval was given to:

28 plans for sewer extensions

I plan for sewage treatment works improvements

- b) Approval without conditions given to:
 - 7 contract modifications
- c) Comments submitted to:

1 waste sludge study (U. S. Forest Service)

- 2. Thirteen (13) project plans for industrial waste facilities were reviewed:
 - a) Provisional approval given to:
 - 10 animal waste facilities
 - 3 miscellaneous projects

(Lamb Weston, Inc., Hermiston-wastewater control; Paris Woolen Mills, Inc., Stayton-pretreatment; Georgia Pacific Corp., Toledo-engineering proposal)

Air Quality Control

- 1. Four project plans, reports or proposals were reviewed:
 - a) Approved without conditions were:
 - 2 parking structures (Multnomah Co.)
 - 2 miscellaneous projects (Timber Products, Jackson Countydrying system; Weyhaeuser Co., Klamath Co.-cinder collector)

Solid Waste Disposal

1. Four (4) Project plans were reviewed:

Provisional approval given to:

- 2 modified landfills (garbage)
- 2 modified landfills (industrial waste)

Director's Recommendation

It is recommended that the Commission give its confirming approval to staff action on project plans for the month of January, 1973.

DIARMUID F. O'SCANNLAIN

PROJECT PLANS

Water Quality Division

During the month of January, 1973, 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.

Date	Location	Project	Action
Municipal F	Projects (37)		
1-9-73	Mt. Hood National Forest	U. S. Forest Service waste sludge study	Comments submitted
1-10-73	Inverness	Change Order #1, Unit 5A-2 sewage pumping station contract	Approved
1-10-73	Wallowa	Change Order B-l sewer system project	Approved
1-10-73	Eugene	Change Order #6 sewage treat- ment plant project	Approved
1-10-73	Sunriver	Mt. Village West II, Phase I and Ranch Cabins, Phases 2 and 3 sewers	Prov. approval
1-10-73	Rainier	Change Order #3, sewage treat- ment plant project	Approved
1-10-73	Salem (Willow Lake)	Two sewer projects	Prov. approval
1-10-73	Newport	Embarcadero sewers	Prov. approval
1-10-73	Molalla	Hadley Addn. sewers	Prov. approval
1-10-73	Clackamas County Sewer Dist. I	Johnson City sewer intertie	Prov. approval
1-10-73	Oregon City	Cook Subdivision sewers	Prov. approval
1-12-73	Lebanon	Sewer extension WP-A	Prov. approval
1-15-73	Gresham	Schedeen Subdivision sewers	Prov. approval

. *			
Date	Location	Project	Action
1-16-73	Somerset West	Rock Creek #8 sewers	Prov. approval
1-16-73	Government Camp	Frontage Road sewer	Prov. approval
1-16-73	Eugene	Three sewer projects	Prov. approval
1-22-73	USA (Fanno Creek)	Fanno Creek interceptor sewer, Schedules B and C	Prov. approval
1-22-73	Ashland	Hersey Street and Sheridan Street sewers	Prov. approval
1-22-73	Umatilla	Change Order #1, sewage treat- ment plant contract	Approved
1-22-73	Jefferson	Armor's First Addn. sewer Colcord Addn. sewers Armor's First Addn., Phase I sewers	Prov. approval
1-22-73	Medford	N. E. Medford interceptor, Schedules A, B and C	Prov. approval
1-22-73	Gresham	Glisan Street sewer (172nd- 181st)	Prov. approval
1-22-73	Aumsville	Wildwood Addn. #4 sewers	Prov. approval
1-22-73	Woodburn	Marcel Court sewers	Prov. approval
1-23-73	Gresham	Change Order #8, sewage treat- ment plant contract	Approved
1-25-73	Waldport	Crestview Hills #5 sewers	Prov. approval
1-25-73	Portland	S.E. 116 and Flavel sewer	Prov. approval
1-25-73	Vernonia	Change Order #3 to sewage treatment plant contract	Approved
1-25-73	USA (Tigard)	Cooper Development sewers	Prov. approval
1-30-73	Rogue River	0.20 MGD sewage treatment plant and sewer system	Prov. approval
1-31-73	USA (Aloha)	Shadow Wood Subd. sewers	Prov. approval
1-31-73	King City	Sewage treatment plant interim expansion and additions	Prov. approval

Water Pollution Control

Industrial Projects (13)

<u>Date</u>	Location	Project	Action
1/12/73	Hermiston	Lamb Weston, Inc., wastewater control facilities	Prov. Approval
1/12/73	Mt. Angel	Erwin Nickodemus Dairy, animal waste facilities	Prov. Approval
1/12/73	St. Paul	Sar-Ben Farms, Inc., animal waste facilities	Prov. Approval
1/15/73	Stayton	Paris Woolen Mills, Inc., pretreatment facilities	Prov. Approval
1/17/73	Toledo	Georgia Pacific Corp., engineering proposal	Prov. Approval
1/22/73	Yamhill	Gene Belt Hog Farm, animal waste facilities	Prov. Approval
1/22/73	McMinnville	Alford Rieder Dairy, animal waste facilities	Prov. Approval
1/22/73	Aumsville	Glen Roby Dairy, animal waste facilities	Prov. Approval
1/22/73	Gervais	Wm. Van Smooranburg Dairy, animal waste facilities	Prov. Approval
1/25/73	Salem	Van Beek Dairy, animal waste facilities	Prov. Approval
1/31/73	Turner	Sudman's Feedlot, animal waste facilities	Prov. Approval
1/31/73	Amity	Thomas Dieter Hog Farm, animal waste facilities	Prov. Approval
1/31/73	Jefferson	Robert Rieder Dairy Farm, animal waste facilities	Prov. Approval

AP-9 PROJECT PLANS, REPORTS, PROPOSALS FOR AIR QUALITY CONTROL DIVISION FOR JANUARY, 1973.

DATE	LOCATION	PROJECT	ACTION
3	Jackson	Timber Products Company Plans and specifications for particleboard materials drying system.	Approved
15	Klamath	Weyerhaeuser Company Plans and specifications for installation of new cinder collector and fly ash re- injection system for hog fuel boilers #1, #2, #3 and #4.	Approved
18	Multnomah	Fisher Realty Company 59-space parking structure.	Approved
18	Multnomah	Piedmont Plaza Apartments 68-space surface parking facility.	Approved

PROJECT PLANS

SOLID WASTE MANAGEMENT DIVISION

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

<u>Date</u>	Location	Project	Action
3	Columbia Co.	Mickey's Modified Landfill	Prov. approved
9		EPA Proposed Sanitary Landfill Guidelines	Comments
12	Yamhill	High Heaven Modified Landfill	Prov. approved
18	Multnomah Co.	Esco Corp Modified Landfill (Letter Authorization)	Prov. approved
23	Marion Co.	Boise Cascade Sludge Modified Landfill (Letter authorization)	Prov. approved
29	Lane Co.	Lane County Solid Waste Management Plan	Comments



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL

Diarmuid F. O'Scannlain
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, March 2, 1973, EQC Meeting

National Pollutant Discharge Elimination System (NPDES)

(Consideration of DEQ Participation)

Introduction

The 1972 Amendments of the Federal Water Pollution Control Act became law on October 18, 1972.

This law among other things established two National goals:
(1) the elimination of the discharge of pollutants into navigable waters by 1985, and (2) interim attainment by July 1, 1983, of water quality which provides for recreation and protection of fish and wildlife.

The basic mechanism for carrying out the goals and policies of the 1972 Act is the National Pollutant Discharge Elimination System, otherwise known as the NPDES permit program. The NPDES permit program replaces and expands the Federal Refuse Act Permit Program established under authority of Section 13 of the Rivers and Harbors Act of 1899 to include municipalities and most other categories of point sources as well as industries which discharge to navigable waters (essentially all public waters).

The Act requires that all persons who discharge waste to navigable waters apply for and receive NPDES permits. Applications must be made on Environmental Protection Agency forms (which are not yet available) by April 18, 1973. Dischargers that file completed applications within the alloted time or have Refuse Act Applications on file are immune from prosecution for not having an NPDES permit until December 31, 1974.

The Administrator of the Environmental Protection Agency is authorized to issue NPDES permits for discharges that meet all applicable effluent limitations and discharge criteria established by the Act and regulations promulgated by EPA thereunder. The Act also provides that States may issue NPDES permits for discharges into navigable waters under their jurisdiction if they have programs approved by the Administrator for interim authorization under Section 402(a)(5) or final authorization under Section 402(b). In such cases, EPA is required to suspend issuance of permits in such States.

Interim Authorization Provision

The Act provides that the Administrator of EPA may grant interim authorization to a State which "he determines has the capability of administering a permit program which will carry out the objectives of the Act." Notably, the Act gives the EPA Administrator total veto power over any NPDES permit proposed to be issued during the interim period and in fact no permit can be issued without the OK of EPA.

In order to determine that a State had adequate capabilities to administer a permit program consistent with the objectives of the Act, EPA required that the following points be included in a request for interim authorization:

1. That, in the Director's judgement, the State has authority to issue permits containing effluent limitations, abatement schedules, and monitoring requirements in conformance with the requirements of the Act;

- 2. That effluent limitations can be established which will achieve by not later than July 1977 for all waste sources, the application of "best practicable control technology currently available" for industrial sources and secondary treatment for municipal sources, or compliance with applicable water quality standards, whichever is more stringent;
- 3. That the State understands that all outstanding State permits must be reexamined and reissued to conform to the requirements of the Act;
- 4. That the State will, in fact, undertake to impose the foregoing requirements in permits which it would issue under the interim authority;
- 5. That the State, in conformance with discussions with EPA relative to permit processing priorities, will follow a system of priorities mutually acceptable to the State and EPA, and in the process of formulating conditions for such permits will give due consideration to all available information on control technology currently available, including interim effluent limitations guidance prepared by EPA; and
- 6. That the State, while acting under the interim authority, will take all necessary measures to move toward the objective of obtaining final approval of its permit program under Section 402(b) of the Act.

The State of Oregon applied for interim authorization to issue NPDES permits on November 28, 1972. On December 19, 1972 Oregon was one of the first ten states granted limited interim authorization to conduct a State permit program pursuant to the provisions of the National Pollutant Discharge Elimination System.

This interim authority will terminate, by law, on the 90th day following the first promulgation of guidelines establishing minimum procedural and other elements of a State program or on the date of approval of final authorization, whichever comes first. Because of these requirements, interim authority cannot extend beyond March 18, 1973.

Because of the almost daily changing requirements imposed by EPA and the necessity for final approval of individual permits by EPA, it is becoming questionable whether or not any NPDES permits will actually be issued prior to expiration of interim authorization.

Requirements for Final Authorization

To qualify for final authorization to issue NPDES permits, the Governor of the State must submit to the EPA Administrator in accordance with detailed EPA instructions, a full and complete description of the program it proposes to establish and administer under the State law. In addition, the State Attorney General must submit a statement that the laws of the State provide adequate authority to carry out the described program.

The major elements and authorities for final delegation of NPDES Authority are as follows:

- 1. At the time the State submits its proposed program, all legal authorities cited must be in the form of lawfully promulgated State statutes and regulations and must be in full force and effect. The State then has until January 1, 1974, to actually establish the procedures which meet these requirements, if EPA agrees that it has the legal authority to establish and administer the procedures.
- 2. It is the EPA policy that a State program which does not have authority to do all the things necessary to meet the requirements of the Federal Act, without limitation, will not be approved by the Administrator. New legislation by the State of Oregon is needed in several areas to meet EPA's interpretation of the requirements of the Act.

- 3. The State must be able to prohibit discharges, except as authorized by NPDES permit. In addition, discharges containing certain types of hazardous materials, affecting anchorage and navigation, objected to by the Administrator, and conflicting with an areawide plan must be prohibited altogether.
- 4. The duration of an NPDES permit cannot exceed five years.
- 5. The State must have authority to accept and process applications for NPDES permits. A mechanism must also be available to transmit all information and data received to EPA and a National data bank.
- 6. The State must provide for public notice and participation for each permit application and provide an opportunity for public hearing.

The actual NPDES application and permit process includes:

- a. A tentative determination on each application. If the tentative determination is to issue a permit, the following additional determinations must be made: (1) proposed effluent limits, (2) proposed schedules of compliance, and (3) other proposed special conditions.
- b. An NPDES permit is drafted based on the tentative determinations.
- c. Public notice must be provided to all interested parties describing the applicant's activities and a statement on the tentative determination to issue or deny the application. The notice period

shall not be less than 30 days. A fact sheet which includes effluent data, proposed effluent limits, proposed compliance schedules, and special conditions, and a sketch of the proposed discharge location must also be prepared for discharges greater than 500,000 gpd. This fact sheet will be distributed upon request to any person.

- d. If there is significant comment or objection to a public notice and fact sheet, the Director, at his discretion, may hold a public hearing. At least 30 days notice shall be provided prior to a public hearing.
- e. Notice of all these actions shall also be provided to other governmental agencies, including EPA, the Corps of Engineers, and other affected States.
- f. The public shall have complete access to information, except that which would divulge trade secrets.
- 7. All permits must contain specific effluent limitations. Point sources other than publicly owned treatment works must by July 1, 1977, meet EPA established effluent limitations by application of best practicable control technology currently available, or in cases where the receiving water requires more stringent controls, higher levels of control must be required. Publicly owned treatment works in existence on July 1, 1977, or approved prior to June 30, 1974, must meet limitations based on secondary treatment as defined by EPA.

In addition, by July 1, 1983, each point source other than publicly owned treatment works must meet EPA

established effluent limitations by application of the best available control technology economically available.

Standards of performance for new sources will also be established by EPA, which will require the degree of effluent reduction achievable through demonstrated control technology. Where practicable, these standards must prohibit discharges.

The Administrator has until October 18, 1973, to develop all these guidelines and effluent limitations.

- 8. Pretreatment standards and notification procedures for changes in discharge must be provided for all dischargers to publicly owned treatment works.
- 9. Where elimination or reduction of a discharge is required to meet guidelines, schedules of compliance shall be included in the NPDES permit. Interim progress deadlines and progress reports shall also be incorporated in the permit. Quarterly progress reports outlining compliance or non-compliance for each such permit must be submitted to EPA by the State.
- 10. The State must have authority to modify, suspend, or revoke a permit for cause, including but not limited to:
 - a. violation of any condition;
 - b. obtaining permit by misrepresentation or failure to fully disclose all relevant facts;
 - c. a change in any condition that requires temporary or permanent elimination or reduction in the discharge of pollutants.

- 11. The State must be able to enter upon any permit holder's premises for any inspection or sampling.
- 12. There must be adequate authority to prohibit the discharge of any material which may at any time be determined by the Administrator to be toxic.
- 13. The State must have the authority to include monitoring requirements in NPDES permits. For discharges greater than 50,000 gpd, or which contain toxic pollutants, or where requested by EPA, monitoring requirements shall be provided for flow and significant pollutants. Record keeping and reporting requirements must also be included in the permits. Monitoring reports must be submitted to the State at least annually.
- 14. The State must have the capabilities for the receipt, evaluation, investigation and follow-up of all notices and reports required in a permit.
- 15. The State must have criminal and civil penalties and civil injunctive powers consistent with the Federal Act.

 The maximum civil penalties and criminal fines recoverable must be comparable to that in the Act or represent an actual and substantial economic deterrent.
- 16. The State must have the authority to control disposal of pollutants into wells; including procedures to issue permits to control or prohibit all discharges to wells. No uncontrolled discharges to wells or discharges which would pollute ground and surface water resources would be permitted.

- 17. It must be domonstrated that the State has sufficient manpower, personnel qualifications, funding, and other resources available to administer the proposed program.
- 18. Sufficient manpower and resources must be available for periodic inspections (not less than one per year for each source under NPDES permit); systematic, onthe-spot, comprehensive surveys; random sampling and surveillance; and follow-up of possible violations of permit conditions.
- 19. The State must have an approved continuous planning process prior to EPA approval of the State's request for final authorization and must assure that the planning process is at all times consistent with the Act.
- 20. No agency "board or body" which approves permit applications or portions thereof shall include any person who receives, or has during the previous two years, a significant portion of his income directly or indirectly from permit holders or applicants for a permit.

In summary, the 1972 Amendments to the Federal Water Pollution Control Act requires all persons who discharge wastes to public waters to:

1. Submit a fully completed application for an NPDES permit on approved Federal forms by not later than April 18, 1973. (NPDES application forms are not yet available.)

2. After timely filing of a complete application, obtain an NPDES permit by December 31, 1974, the day that immunity from prosecution for those with a completed pending application expires.

The Act provides a mechanism for eliminating duplicative State and Federal permits by substituting NPDES permits for present State permits. By modifying its statutes, regulations and procedures to conform to the Federal Act and the regulations, guidelines and interpretations of EPA and upon specific EPA approval, a State may be allowed to issue NPDES permits under strict and detailed EPA dictates.

Evaluation

The Department staff has spent considerable time attempting to evaluate the Federal Act and regulations proposed or adopted so far and the resultant impact on DEQ's program and the cities and industries of Oregon. This evaluation has been guided by the desire:

- 1. To eliminate the necessity and requirement for Oregon industries and municipalities to obtain two separate permits for the same activity issued by two agencies.
- 2. To continue the effectiveness and efficiency of Oregon's established program and to obtain maximum Federal funding and direct assistance program benefits for the State and its local governmental entities and citizens such that overall water quality in Oregon is best served.
- 3. To continue to have all significant discharges or potential discharges and all approved waste treatment and disposal facilities covered by specific enforceable waste discharge permits.

The Federal Act, which was enacted to upgrade water pollution control programs in some States, has actually had an upsetting and degrading effect upon Oregon's already established program.

The "bookkeeping", documenting, reporting and intricate procedural provisions of the Act have forced the diverting of manpower from productive field evaluation and problem solving to non-productive paper shuffling.

Oregon presently has most sources under State permit. Many renewal permit applications are presently pending. Most of the pending permits would have been issued by now if it were not for the extensive procedural changes and resulting delays brought about by the Federal Act and NPDES. Also under NPDES procedures, it will be necessary to reissue a majority of Oregon's present valid permits and issue a large number of additional permits to small sources which are presently exempt under Oregon Law. It is highly unlikely that all sources can be brought under NPDES permits by December 31, 1974 as contemplated by the Federal Act.

The new Federal Act and particularly the NPDES permit system pose substantial budgeting and staffing problems to the Department. The DEQ budget for the 1973-75 biennium was prepared before the passage of the Act and incorporates additional manpower and funds needed to strengthen Oregon's present programs. The budget does not consider increased manpower needs imposed by the Act.

The Department's best estimate of increased manpower needs imposed by the Act is as follows:

Additional

	FTE Positions
NPDES Permits (Procedural Processing)	3.5
Compliance Monitoring and Reporting	2.5
Continuing Planning	2.0
Total	8.0

It is highly unlikely that sufficient additional federal funds will be available to Oregon to fund these 8 new positions needed to carry out the requirements of the Federal Act and NPDES and 10 essential new positions proposed in the Governor's budget to be funded with increased federal funds. Therefore, additional State General Fund money will be needed if DEQ is to receive final authority to issue NPDES permits.

Conclusions

There appears to be two possible alternatives for the State to consider regarding the NPDES permit procedure. These are as follows:

- Proceed to seek legislation, budget and staffing increases and work to obtain EPA authorization to issue NPDES permits as soon as possible after March 18, 1973 and then proceed immediately to attempt to issue NPDES permits for all waste sources in accordance with detailed EPA specifications and requirements.
- 2. Phase in the NPDES system by continuing the State permit system as an interim program until individual State permits can be replaced by State approved NPDES permits. Under this procedure, EPA could begin to issue NPDES permits, with DEQ cooperation (Section 401 of the Federal Act provides that States must give notice and certify NPDES permits prior to issuance by EPA). When a certified NPDES permit is issued to a particular waste source, by regulation the Department could then drop the State permit and adopt the NPDES permit.

This alternative has the attractive advantage of allowing EPA to work the bugs out of the NPDES procedure prior to State assumption of the program. It also cuts the State out of the middleman role of having to supply EPA with

the reams of paper required during the early run-in phase of the NPDES process.

The disadvantages to the phase-in approach is that it appears to be a cop-out by the State and abandonment of its industries and cities to the Federal Bureaucracy. In fact, the Federal bureaucratic requirements, including federally dictated application forms, minimal effluent limits and deadlines for compliance, will by Federal law and regulations, be imposed with or without participation by the States.

The Act also provides that a State can request NPDES authorization at any time.

Regardless of how tempting alternate (2) above is, the Department has been and is proceeding to attempt to obtain authority for issuing NPDES permits. If the required legislative changes are obtained and if sufficient staff can be obtained and if all of the many other things can be done to EPA's satisfaction, the Department presently intends to do its best to implement the NPDES permit system with maximum EPA assistance.

Director's Recommendation

This report is presented for information and discussion purposes and no specific EQC action is recommended at this time.

DIARMUID F. O'SCANNLAIN

HLS:ak February 22, 1973



DEPARTMENT OF **ENVIRONMENTAL QUALITY**

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

TOM McCALL GOVERNOR

Diarmuid F. O'Scannlain

Director

ENVIRONMENTAL QUALITY COMMISSION

> B. A. McPHILLIPS Chairman, McMinnville

EDWARD C. HARMS, JR. Springfield

STORRS S. WATERMAN Portland

GEORGE A. McMATH

Portland ARNOLD M. COGAN Portland

MEMORANDUM

To:

Environmental Quality Commission

From:

Director

Subject: Agenda Item No. D, March 2, 1973, EQC Meeting

Oregon Steel Mills, Front Avenue Plant, NPDES Permit (Including DEQ Procedures for Issuance of NPDES Permits During the Period of Interim Authority)

Background

In anticipation of the passage of the Federal Water Pollution Control Act Amendments of 1972, the Director of the Department of Environmental Quality entered into a Memorandum of Agreement with the Regional Administrator of the Environmental Protection Agency on July 6, 1972. This was done in order to coordinate the EPA and DEQ responsibilities regarding waste discharge permits and to adapt the DEQ permit program to more nearly meet the expected requirements of the pending legislation. The Memorandum of Agreement provided for joint participation of DEQ and EPA in the preparation and issuance of permits. Some of the specific operational procedures established by the Memorandum of Agreement are as follows:

1. DEQ would continue to process applications for permits in accordance with OAR 340 Division 1, Subdivision 4, "Procedures for Issuance, Denial, Modification and Revocation of Permits."

TELEPHONE: (503) 229-5696

- DEQ would issue a public notice within 15 days of the receipt of a complete application. The public notice must allow 30 days for written comments.
- 3. An opportunity for consideration of a public hearing to be provided on all permit applications. A public hearing to be held at the discretion of the Director when sufficient public controversy is involved or when sufficient public comments on the public notice are received.
- 4. After the period of public participation is over the Department has 45 days to complete processing and to issue a permit.
- 5. The Department to hold quarterly hearings to formally adopt permits as the official implementation plan for the Water Quality Standards.
- The expiration dates of the existing permits to be considered as the primary basis for establishing permit processing priorities.
- Each permit to include conditions which would insure compliance with all applicable State and Federal standards, guidelines, and regulations.
- 8. The EPA would review each proposed permit prior to sending it to the applicant for his review.
- 9. Prior to issuance of the permit, EPA would furnish a statement in writing regarding their agreement or dissent with the final permit. This information is to be transmitted to the permittees by the Department.
- 10. Copies of all issued waste discharge permits to be provided to the Regional Administrator of EPA.

The Federal Water Pollution Control Act Amendment of 1972 as finally adopted has provisions for transferring authority to states for issuance of NPDES waste discharge permits, thus avoiding a duplication of effort between EPA and the state pollution control agencies. The Act also provides for the EPA Administrator to authorize states with adequate permit programs to issue NPDES permits during the 90 day interim period while final guidelines and procedures are being established with EPA having veto power over each permit to be issued. On December 19, 1972, Oregon was granted this interim authority.

The procedures which EPA and the Department agreed upon for this 90 day interim period are as follows:

- Continue to follow the permit processing procedures outlined under the Memorandum of Agreement.
- Expand the public notice to include the requirements
 established by the EPA guidelines and include effluent
 characteristics.
- 3. Expand permit conditions to include EPA guidelines for effluent limitations and monitoring.

After the Memorandum of Agreement was signed in July 1972, DEQ developed public notice procedures and started issuing public notices on October 4, 1972. Between October 4 and December 19, 1972, DEQ issued public notices on 69 applications. After December 19, 1972, the public notice procedures had to be modified to reflect the new authority which had just been granted to DEQ to issue NPDES permits during the interim period. Since 50 of the 69 applications already given public notice had discharges to surface water and would require

NPDES permits, DEQ issued a revised public notice dated January 11, 1973, to let the public know that it was the intent of DEQ to consider each of the 50 applicants for an NPDES permit.

The public notices issued for the first time after the delegation of interim authority were revised to include a tentative determination statement as required by the EPA guidelines, certain other factual information concerning the effluent to be discharged and implementation programs.

Since December 19, 1972, there have been 38 additional public notices issued. All but 5 of these were intended to be NPDES permits. This made a total of 83 proposed NPDES permits to be processed during the interim period.

On January 29, 1973, the first six proposed NPDES permits were ready to send to the EPA Regional Administrator for his formal approval. Just prior to sending the permits to EPA we were informed that NPDES permits could only be issued to applicants who had filed a Section 13 permit application under the old Corps of Engineers permit program. This automatically eliminated 3 of the 6 we were ready to send and 47 of the remaining 80 proposed NPDES permits.

After EPA received our first three finally proposed permits we intended to issue as NPDES permits, we were notified that some additional changes would be required in the permits. We were also notified that the Regional Administrator could not approve any of our NPDES permits until at least one public hearing was held. The hearing could either be for a single permit or a batch of permits.

After receiving the news from EPA that at least one hearing was required, the Department decided to pick one of the applicants from the Portland metropolitan area and have a public hearing at the March 2, 1973, Commission meeting. Since none of the 107 public notices issued since October 1972 had generated sufficient public interest to warrant a hearing and no petitions for a hearing had been received, the Department picked at random Oregon Steel Mills Front Avenue Plant. The purpose for this hearing today is to solicit public comment on the application of Oregon Steel Mills for an NPDES permit and to give public exposure to the procedures DEQ is following under interim authorization.

Description of Applicant Facility and Discharge

The applicant operates a steel mill on N.W. Front Avenue in Portland. The mill produces up to 600 tons per day of structural steel bars and shapes from scrap.

Water from the Willamette River is used for cooling furnaces and for flushing oxide scale in the rolling mill operation. Iron oxide scale and emulsified oils and grease are present in the rolling mill wastewater. Flushing pits collect a portion of the scale solids. Water from the flushing pits and furnace cooling is treated in a settling pond and then discharged to the Willamette River at river mile 7.8.

The waste discharge has the following typical characteristics:

Flow about 7.0 million gallons per day

Suspended Solids 20 mg/l

Iron 1 mg/1

pH 6.5 to 8.5

Oil and Grease

less than 10 mg/l

Conclusions

This facility has been in operation since 1942 and has been operating under the provisions of a state waste discharge permit since 1968. The existing and proposed permits list effluent limitations and call for effluent monitoring and reporting. The waste discharges have not caused a violation of water quality standards and no measurable degradation of water quality in the Willamette River has been noted. A copy of the proposed permit is attached.

Director's Recommendation

It is recommended that an NPDES permit be issued to Oregon Steel

Mills Front Avenue Plant with an expiration date of June 30, 1975,

either as proposed or as may be modified in response to comments

received or as a result of the testimony received at this hearing.

DIÁRMUID F. O'SCANNLAIN

CKA:1jb

2/22/73

Prepared by the Staff of the DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended	Expiration	Date: 6-30-75
	Page 1	of 3

APPLICANT:

Oregon Steel Mills
Division of Gilmore Steel Corp.
Front Avenue Plant
5200 N. W. Front Avenue
Portland, Oregon 97210

REFERENCE	INFORMATION
File Number: 650)42
Appl. No.: 1618	Received: 4-17-72
Major Bn: Willamette	Minor Bns
Receiving Streams Wi	lamette River
River Miles 7.8	3
County: Mul	Ltnomah
	<u> </u>

Until such time as this permit expires or is modified or revoked, Oregon Steel Mills, Division of Gilmore Steel Corporation, Front Avenue Plant, is herewith permitted to:

- a. Discharge uncontaminated cooling water to the Willamette River.
- b. Discharge adequately settled rolling mill flushing waste waters to the Willamette River.

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

All other waste discharges are prohibited.

- 1. The quantity and quality of effluent discharged directly or indirectly to the Willamette River shall be limited as follows:
 - a. The monthly average concentration of suspended solids shall not exceed 20 mg/l above natural background levels in the raw water supply.
 - b. Oil and grease (ether solubles) shall not exceed 10 mg/l above background levels in the raw water supply.
 - c. The monthly average concentration of iron shall not exceed 1 mg/l.
 - d. pH shall be within the range of 6.5 to 8.5.
 - e. Flow shall not exceed 7.0 MGD.
 - f. BOD and turbidity of the treated rolling mill waste water effluent shall be essentially unchanged from the raw water supply (Willamette River).
- 2. By September 1, 1974 a detailed program and time schedule shall be submitted to the Department for providing by July 1, 1977 treatment and control facilities to meet the following limitations:
 - a. The monthly average suspended solids discharged in excess of background levels in the intake water shall not exceed 0.02 pounds per ton times tons of steel manufactured, plus 0.10 pounds per ton times tons of
 - product hot formed.
 - b. The monthly average oil and grease discharged shall not exceed 0.1 pounds per ton times tons of product hot formed.

A report detailing progress toward compliance with the above requirements shall be submitted to the Department every six months beginning September 1, 1973.

Prepared by the Staff of the DEPARTMENT OF ENVIRONMENTAL QUALITY

Recom. Expir.	Date:	6+30-75
Page 2	of	.3.

- 3. 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.
- 4. All waste solids shall be utilized or disposed of in a manner which will prevent their entry into the waters of the state and such that health hazards and nuisance conditions are not created.
- 5. No petroleum-base products in excess of the limits in Condition 1 or other substances which might cause the Water Quality Standards of the State of Oregon to be violated shall be discharged or otherwise allowed to reach any of the waters of the state.
- 6. Sanitary wastes shall be disposed of to the City of Portland municipal sewerage system.
- 7. The permittee shall observe and inspect all waste handling, treatment and disposal facilities and the receiving stream above and below each point of discharge at least three times per week to insure compliance with the conditions of this permit. A written record of all such observations shall be maintained at the plant and shall be made available to the Department of Environmental Quality staff for inspection and review upon request.
- 8. The permittee shall effectively monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the wastes discharged. A record of all such data shall be maintained and submitted to the Department of Environmental Quality at the end of each calendar month. Unless otherwise agreed to by the Department of Environmental Quality, data collected and submitted shall include, but not necessarily be limited to, the following parameters and minimum frequencies:

Parameter	Minimum Frequency
Suspended solids (intake water & effluent)	Weekly grab sample
Oil & grease (intake water & effluent)	Weekly grab sample
Iron	Weekly grab sample
рН	Daily
Flow	Daily
Temperature in °F (intake water & effluent)	Daily

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

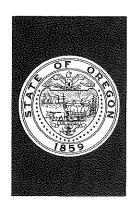
PROPOSED WASTE DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the DEPARTMENT OF ENVIRONMENTAL QUALITY

Recom. Expir.	Date:	6-30-75
Page 3	of	3

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

- 10. Authorized representatives of the Department of Environmental Quality shall be permitted access to the premises of all applicable facilities owned and operated by the permittee at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data and carrying out other necessary functions related to this permit.
- 11. Whenever a significant change in the character of the waste is anticipated or whenever a change in the waste to be discharged in excess of the conditions of this permit is anticipated, a new application shall be submitted together with the necessary reports, plans and specifications for the proposed changes. No change shall be made until plans are approved and a new permit issued.
- 12. In the event that a change in the conditions of the receiving waters results in a dangerous degree of pollution, the Department of Environmental Quality may specify additional conditions to this permit.
- 13. This permit is subject to termination if the Department of Environmental Quality finds:
 - a. That it was procured by misrepresentation of any material fact or by lack of full disclosure in the application.
 - b. That there has been a violation of any of the conditions contained herein.
 - c. That there has been a material change in quantity or character of waste or method of waste disposal.



DEPARTMENT OF **ENVIRONMENTAL QUALITY**

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

MEMORANDUM

TOM McCALL GOVERNOR

Diarmuid F. O'Scannlain

Director

ENVIRONMENTAL QUALITY COMMISSION

B. A. McPHILLIPS Chairman, McMinnville

EDWARD C. HARMS, JR. Springfield

STORRS S. WATERMAN Portland

GEORGE A. McMATH Portland

ARNOLD M. COGAN. Portland

To:

Environmental Quality Commission

From:

Director

Subject: Agenda Item No. E., March 2, 1973, EQC Meeting

A. Tworoger & George Corrigan, Bend, Oregon (Appeal of Waste Disposal Well Permit Denial)

Phil Tworoger Apartment Complex at Newport and Juniper, Bend and George Corrigan Forest Hills Subdivision, between Newport and Portland Avenues and between Juniper Street and College Way, Bend.

Introduction

- A Waste Discharge Permit application dated November 27, 1972 was received by the Department for the Phil Tworoger Apartment Complex. The application was for a permit to discharge chlorinated septic tank effluent from a 36-unit apartment complex down a drilled drain hole near the corner of Newport Avenue and Juniper Street in Bend, Oregon.
- 2. A Waste Discharge Permit application dated January 15, 1973 was received by the Department from George Corrigan for the Forest Hills Development Corporation. The application was for a permit to discharge chlorinated septic tank effluent from a 64-unit multiple housing development down a drilled drain hole system between Portland and Newport Avenues and between Juniper Street and College Way in Bend, Oregon.

Environmental Quality Commission Page 2 March 2, 1973

- 3. On January 19, 1973 the Department sent letters by certified mail to each applicant denying the issuance of a permit.

 The applicants were advised that they could request a hearing before the Environmental Quality Commission or its authorized representative to contest the denial.
- 4. A request dated January 26, 1973 for an appeal of the January 19 decision was received by the Department from Jan M. Wick, P. E. for Mr. George Corrigan of Forest Hills Development Corporation.
- 5. A request dated February 6, 1973 for an appeal of the January 19 decision was received by the Department from P. A. Tworoger for the Phil Tworoger Apartment Complex.
- 6. The appeals are considered jointly in this 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 (drain holes). Initially, very little thought was given to ground water contamination since there were few wells and the ground water table was over 300 feet below the ground surface. As natural fissures and seepholes became used up, well drilling rigs were hired to search for underground caverns and areas of fractured basalt.
- 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 drain holes. 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.

Environmental Quality
Commission
Page 3
March 2, 1973

- 4. In urban areas where concentrations of drainfields are not possible, the drain holes were to be phased out by January 1, 1980 through the construction of community sewerage systems.
- 5. Within those communities which have submitted a program of sewer construction that will phase out the drain holes by 1980, continued construction and use of drain holes has been permitted where no other more acceptable alternative was available. Bend has comitted itself to construction of a sewerage system before 1980 and is therefore a permit-authorized area. The Deschutes County Health Department has been authorized to issue permits for drain holes serving less than 25 families. The Department retains authority to take action on applications to serve more than 25 families or 100 people.

Evaluation

- 1. Although drain hole construction in the rural portions of Deschutes County has essentially been discontinued since the regulations have been in effect, drilling in the City of Bend has accelerated because of the present growth rate.
- 2. Sewer construction has not proceeded as rapidly as anticipated in Bend. The City completed its sewage treatment plant in September 1970. A small portion of the area has been on sewers for many years, and a few of the new developments close to existing sewers have been sewered and connected to the old system; however, much of the growth is taking place far from existing sewers. Although funding of the rock excavation research project has been the major bottleneck for sewer construction, Bend has been somewhat slow in expanding their present sewer system to serve the new development. This is primarily due to the fact that a sewer agreement district is required prior to the construction of sewer extensions. One single objection effectively prevents construction. The City is currently drafting bylaws for consideration which will amend the City Charter to authorize assessment districts.

Environmental Quality Commission Page 4 March 2, 1973

This will enable Bend to extend sewers without the 100 percent approval presently required; however, it will probably be several months before Bend can amend their charter.

- 3. The ground water table in Bend varies from approximately 300 feet below the ground surface in certain locations to greater than 400 feet.
- 4. In most areas of Bend, a functional waste disposal well for individual household units has been obtained by drilling to depths less than 100 feet from the ground surface. However, particularly troublesome problems have occured in an area west of the river bounded by College Way on the west, Saginaw Avenue on the north, West Seventh Street on the east, and Newport Avenue on the south. In this area, drain hole failure has resulted in surfacing of sewage. Most of the successful drain holes in that area are over 200 feet deep. In one instance, a disposal well was drilled 310 feet before adequate drainage was obtained: ground water was encountered. Fortunately the Department became aware of this and required its abandonment.
- 5. Because of the problems being encountered, the Department recommended to the Deschutes County Health Department that they restrict the following:
 - a. Construction of waste disposal wells of excessive depth.
 (100 feet was the recommended maximum.)
 - b. Construction of waste disposal wells within 500 feet of the Deschutes River.
 - c. Construction of a disposal well if applicant is within a reasonable distance from a city sewer.
- 6. In those areas where shallow fractured zones are not available and large volumes of water can be disposed of only by drilling excessively deep drain holes, the Department intends to

Environmental Quality Commission Page 5 March 2, 1973

- recommend to the County Health Department that multiple-unit housing in excess of four family units not be permitted on single drain holes.
- 7. Both of the community-type drain hole permits denied by the Director were to be located in the problem area. It is unlikely that drain holes could be drilled which would adequately handle the anticipated waste loads unless drilled to excessive depths. The drain hole which encountered ground water at 300 feet is just a short distance away from the two proposed multiple-unit housing projects.

Conclusions

- Proliferation of malfunctioning drain holes and drain holes of unreasonable depth is unacceptable and should not be allowed.
- 2. It is unlikely that the 36-unit Tworoger Apartment Complex or the 64-unit Forest Hills project could satisfactorily dispose of the large volumes of sewage to be generated without drilling to an excessive depth. Even if a shallow drain hole would work for a time, what corrective measures could be taken if a failure occured? The most common corrective measures taken in the area are deepening or dynamiting.
- 3. Unless the City of Bend starts construction on their general sewerage system soon, the phase out of drain holes by 1980 will be impossible to achieve.

Recommendations

1. It is the Director's recommendation that the Commission confirm the denial of a permit to Mr. P. A. Tworoger for disposal of sewage from a 36-unit multiple housing complex down a drain hole to be located in the aforementioned problem drain hole area, and that the Commission confirm the denial of a permit to the proposed Forest Hills multiple-unit housing complex for disposal of sewage down a drain hole in the same problem area.

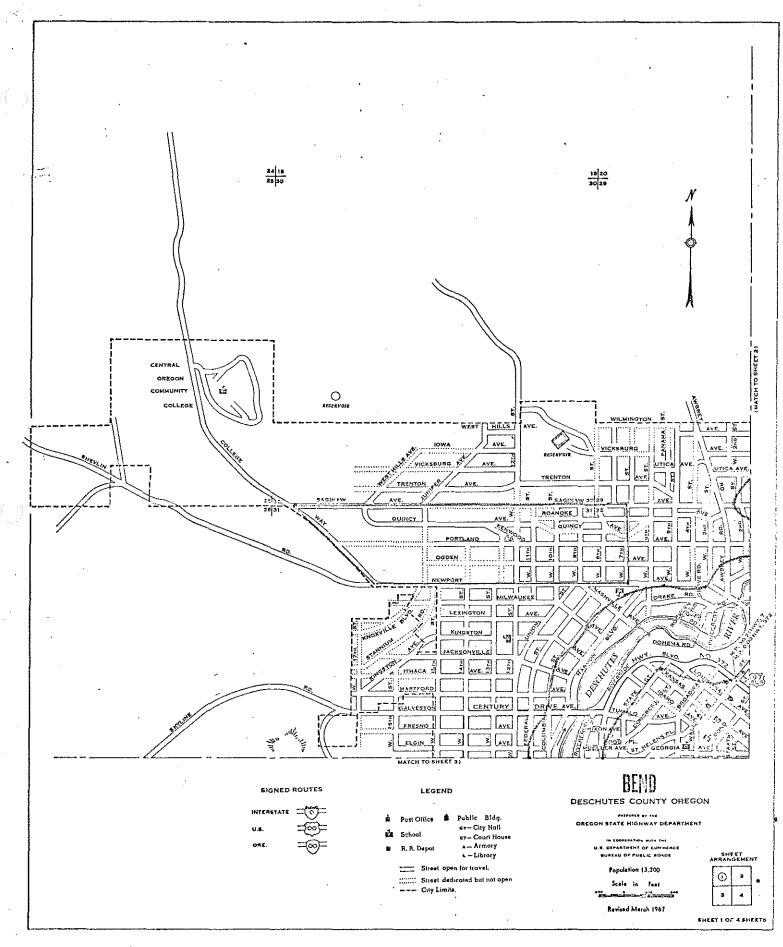
Environmental Quality Commission Page 6 March 2, 1973

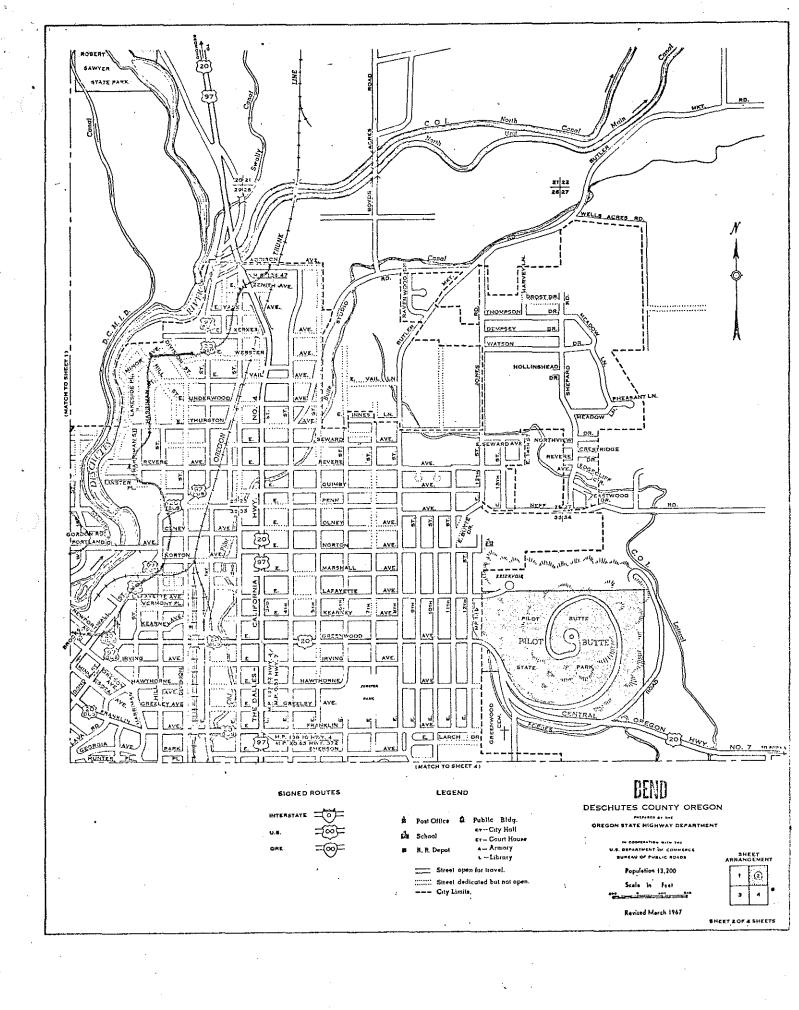
2. The Director further recommends that the Department staff work with the Deschutes County Health Department to establish reasonable restrictions on location of drain holes, depth of drain holes, and size of facility to be connected in problem areas; such restrictions to be established as conditions of designation of the Deschutes County Health Department as an authorized permit-issuing agency or as modifications to the existing waste disposal well regulations, in accordance with recommendations of the Department's legal staff.

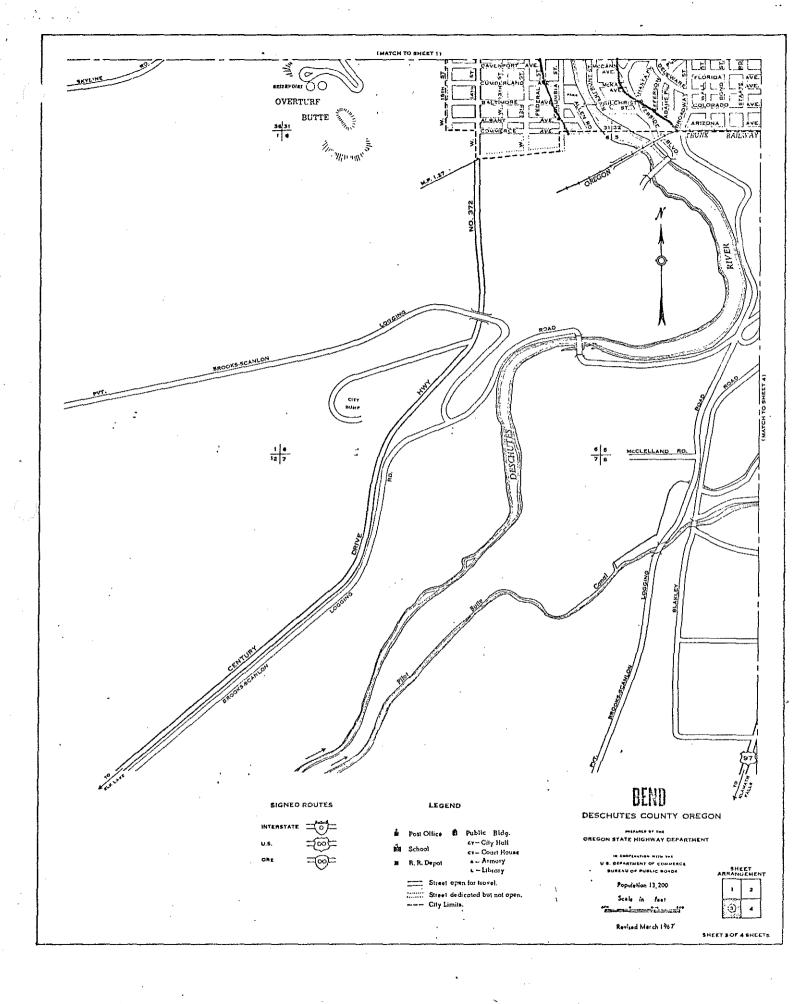
DIARMUID F. O'SCANNLAIN

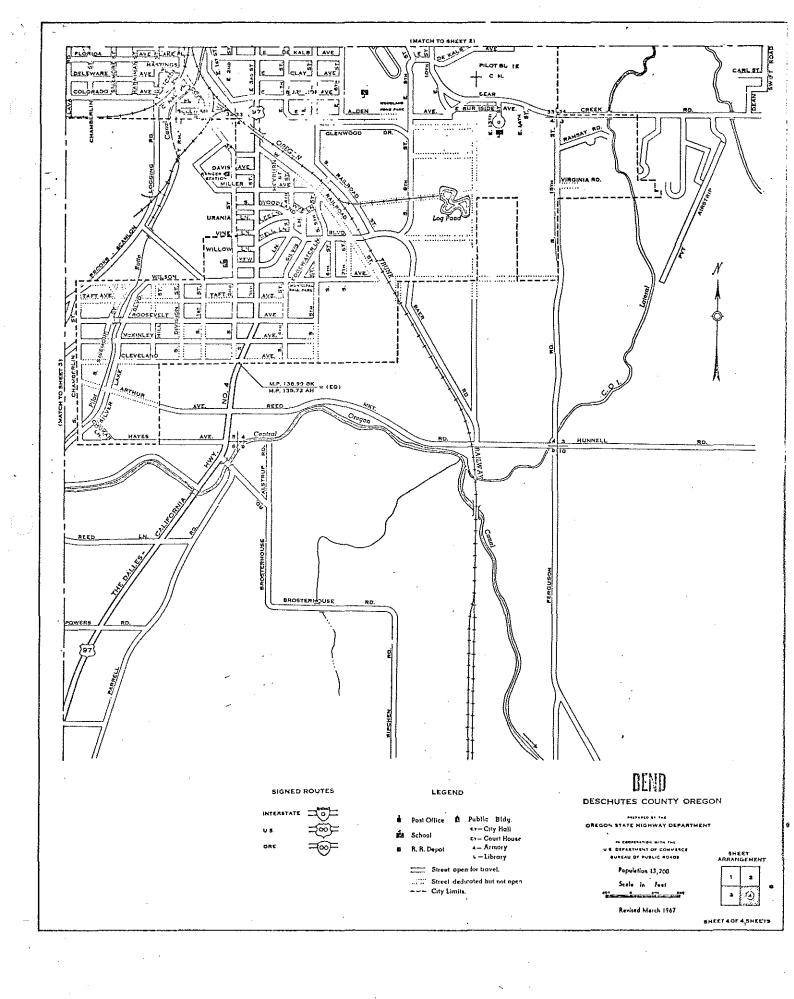
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February 21, 1973











DEPARTMENT OF **ENVIRONMENTAL QUALITY**

Director

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

TOM McCALL GOVERNOR

MEMORANDUM

Diarmuid F. O'Scannlain

ENVIRONMENTAL QUALITY COMMISSION

B. A. McPHILLIPS Chairman, McMinnville

FDWARD C. HARMS, JR.

STORRS S. WATERMAN **Portland**

Portland ARNOLD M. COGAN Portland

Springfield

Subject: Agenda Item No. F, March 2, 1973, EQC Meeting

GEORGE A. McMATH

To:

From:

National Metallurgical Co., Springfield, Oregon -

Transfer of Air Quality Control Jurisdiction to Lane Regional Air Pollution Authority.

Environmental Quality Commission

National Metallurgical Co., a Division of Kawecki Berylco Industries, Inc., produces silicon at its plant in Springfield, Oregon. The process involves reacting measured quantities of quartz, coke and hog-fuel at elevated temperatures in two submerged arc furnaces.

At the time when the Lane Regional Air Pollution Authority was formed, the Oregon State Sanitary Authority and National Metallurgical Co. were developing an air pollution control program. The OSSA retained jurisdiction of this facility because it was desirable to maintain continuity in the program development.

The company has completed the installation of a large baghouse to remove silica fume from the furnace gases. The baghouse exhaust is considered to be in compliance with applicable emission limitations during normal operating conditions. Upset conditions, such as torn bags, mechanical failures and by-passing are considered to be at a minimum at this time as a result of extensive company efforts.

A portion of the furnace gases is not collected by the hooding mechanism, and therefore escapes to the atmosphere untreated through roof monitor. The company is continuing efforts to improve hooding

TELEPHONE: (503) 229-5696

effectiveness and to adjust operating procedures which result in minimized roof losses.

The fume material collected by the baghouse is presently wetted, hauled away and buried. Commercial utilization of the as-collected, dry material by a manufacturer in California appears promising in the near future.

The National Metallurgical Co., Lane Regional Air Pollution Authority and the Department of Environmental Quality concur that the air pollution control program at National Metallurgical Co. has progressed to a point that it is now desirable to transfer jurisdiction. The Department will furnish copies of all pertinent file records to the Regional Authority.

Director's Recommendation

It is the Director's recommendation that the air quality jurisdiction for the National Metallurgical Co., at Springfield, Oregon be transferred effective April 1, 1973 by order from the Department of Environmental Quality to Lane Regional Air Pollution Authority.

DIARMUID F. O'SCANNLAIN

FAS:sb 2-21-73



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL

MEMORANDUM

Diarmuid F. O'Scannlain

ENVIRONMENTAL QUALITY
COMMISSION

B. A. McPHILLIPS Chairman, McMinnville

EDWARD C. HARMS, JR. Springfield

STORRS S. WATERMAN Portland

GEORGE A. McMATH

Portland
ARNOLD M. COGAN
Portland

To:

Environmental Quality Commission

From:

Director

Subject:

Agenda Item No. G , March 2, 1973, EQC Meeting

Regulation Pertaining to Motor Vehicle Inspection

Background

The Environmental Quality Commission at its meeting on October 25, 1972, reviewed a Department report on the proposed Motor Vehicle Emission Inspection Program. The conclusions section of that report are repeated herein as follows:

1. As stated in Oregon's Clean Air Implementation Plan, the Portland area is the only area in the state projected to exceed the national ambient air standards for automotive pollutants beyond 1975. In order to achieve compliance in Portland with these standards by 1975, traffic control measures and a motor vehicle emission inspection program will be necessary. The vehicle inspection program is projected to achieve an emission reduction of 20% for carbon monoxide and 25% for hydrocarbon gases beyond that resulting from the effects of federally required emission control systems on new vehicles.

- 2. A motor vehicle inspection program restricted to those vehicles registered in Clackamas, Columbia, Multnomah, and Washington counties would affect 90% of the Oregon registered vehicles operating in the Portland central area where the need for control of automotive pollutants is the most severe.
- 3. To have an effective vehicle inspection program in operation by January 1, 1975, vehicle testing should be initiated by January 1, 1974. As recommended by the Technical Advisory Committee, compliance with the emission control criteria should not be required until January 1, 1975, thus allowing a one-year period for the program to be properly sorted-out and to acclimate both the public and the service industry to the impact of the inspection program.
- 4. In order to implement the inspection program within the specified time period, a public hearing should be held during the first quarter of 1973 to designate Clackamas, Columbia, Multnomah, and Washington counties as counties in which, under the provisions of ORS 481.190, vehicles registered therein shall be required to obtain a certificate of approval prior to annual registration. Such requirements should be initiated by January 1, 1974.
- 5. To obtain a large scale data base for use in developing the emission control standards and testing procedures to be used in the inspection program, emission control testing should begin as soon as practical.

- 6. For the prototype testing phase discussed in 5, two mobile testing units should be immediately acquired together with four technicians to operate the test program. The mobile units would also be intended for use later in the inspection program.
- 7. A program utilizing special inspection stations equipped with sophisticated testing equipment and capable of loading the vehicle to simulate driving conditions offers the greatest potential for emission reduction and vehicle owner satisfaction.
- 8. The inspection stations should not perform repairs nor adjustments, but should provide the vehicle owner with a diagnosis of the emission control defects and the type of compliance action required to comply with the emission control and noise standards established by the Commission.
- 9. Based upon recommendation of the advisory committee, consultants report and other studies the most cost effective program and the one which should achieve the greatest public confidence is a state owned and operated program.
- 10. The option of allowing state owned inspection stations to be privately operated under strict state supervision, or to franchise inspection stations, should be further considered.

- 11. The fee for the required periodic inspection should be collected by the vehicle registration process rather than by the inspection station. The cost of an emission inspection for an automobile is estimated to be in the range of \$2.00 to \$2.50. The average range of repair cost for automobiles failing the emission control criteria would be approximately \$25 to \$35 based upon the Northrup study and the New Jersey experience and studies.
- 12. Vehicle safety inspection is projected to be incorporated with the emission regulation program, however, legislative action is understood to be required if more than a cursory safety inspection were to be made. The Department will work closely with the Motor Vehicle Division and with the Legislature in the development of legislative proposals. The projected capital and operating cost of a program including safety inspection could be significantly higher than that of an emission inspection program alone. An inspection cost of \$4 to \$6 may be a reasonable estimate for a combined program, however, the federal Department of Transportation is studying proposals costing \$10 to \$15.
- 13. Legislation may be necessary to provide specific authorization and funding means for the construction or acquisition of the inspection stations. Program operation can, however, be self-supporting through the inspection fee received.

Following public presentation of that report, the Environmental Quality Commission approved the basic concept of a vehicle emission and noise inspection program as outlined in the report and authorized the holding of a public hearing for the purpose of designating those counties in which motor vehicles registered therein shall be required to obtain a certificate of approval prior to annual registration.

Since the October meeting, the Department has participated in more detailed discussions with the Department of Motor Vehicles and with members of the Governor's Office regarding the Department's projected emission and noise inspection program and its relation to a proposed state-wide vehicle safety inspection program. These discussions have reaffirmed the Department's conclusion that the projected four county emission-noise inspection program is compatible with proposals for a state-wide vehicle inspection program.

In accordance with Commission action, the Department has prepared a regulation to designate counties for implementation of a motor vehicle emission testing program pursuant to ORS 481.190, and has served public notice of this hearing over 30 days prior to the date of this hearing. The proposed regulation was disseminated with the notice of public hearing to provide maximum opportunity for public comment.

Recommendations

It is the Director's recommendation that public testimony be heard concerning the proposed regulation to designate Clackamas, Columbia, Multnomah, and Washington counties as counties in which motor vehicles registered therein shall be subject to the emission inspection provisions of ORS 481.190, and that appropriate action be taken on this regulation after giving consideration to the testimony received.

DIARMUID F. O'SCANNLAIN

DF0'S:RCH:c 2/21/73

NOTICE OF PUBLIC HEARING

DEPARTMENT OF ENVIRONMENTAL QUALITY STATE OF OREGON

NOTICE IS HEREBY GIVEN that the Department of Environmental Quality is considering the adoption of a regulation and the determination of its effective date, pursuant to ORS 481.190, to designate those counties in which motor vehicles registered therein shall be equipped with a motor vehicle pollution control system or in which motor vehicles registered therein shall comply with motor vehicle emission standards adopted by the Environmental Quality Commission.

Copies of the proposed regulation may be obtained upon request from the Department of Environmental Quality, Office of the Director, Air Quality Control Division, 1234 S. W. Morrison Street, Portland, Oregon 97205.

Any interested person desiring to submit any written document, views or data on this matter may do so by forwarding them to the Office of the Director, Air Quality Control Division, 1234 S. W. Morrison Street, Portland, Oregon 97205, or may appear and submit his material, or be heard orally at 2 o'clock p.m. on the 2nd day of March, 1973 in the Auditorium of the Portland Water Bureau Building, 1800 S. W. Sixth Avenue, Portland, Oregon. The Environmental Quality Commission will sit as the Hearing Officer.

Meathersbee
Acting Director

DEPARTMENT OF ENVIRONMENTAL QUALITY

January, 1973

PROPOSED REGULATION PERTAINING TO MOTOR VEHICLE INSPECTION

(This proposed regulation designating counties for motor vehicle inspection is to be made a part of OAR Chapter 340, Subdivision 4)

COUNTY DESIGNATIONS:

- 1. Pursuant to the requirements of ORS 481.190, Clackamas, Columbia, Multnomah and Washington Counties are hereby designated by the Environmental Quality Commission as counties in which all motor vehicles registered therein, unless otherwise exempted by statute or by rules subsequently adopted by the Commission, shall be equipped with a motor vehicle pollution control system or shall comply with motor vehicle emission standards adopted by the Commission.
- 2. The effective date of this regulation is January 1, 1974.

APPENDIX D

COUNTY DESIGNATION



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

ARNOLD M. COGAN Portland **MEMORANDUM**

To:

Files

From:

William P. Jasper, Associate Engineer

Subject:

Motor Vehicle Inspection Program--County Designations

Date:

June 29, 1972

SUMMARY:

Adoption of a motor vehicle emission control program in the Portland area, affecting the Counties of Multnomah, Clackamus, and Washington will affect approximately 85% of the gasoline-powered motor vehicles which operate in the Portland central area. Over 500,000 vehicles could be affected, representing almost 40% of the registered passenger vehicles in the State of Oregon.

A major division of ORS 481.190 (HB 1067) affecting the Department and the Commission is the requirement for designation of counties in which a motor vehicle inspection program is to be established. The work outlined in the implementation plan indicates that the areas having the potential for exceeding ambient air standards due to excessive automotive emissions are areas of high vehicle density; and only greater control of CO than now in effect is needed in these areas.* These by their nature are the metropolitan areas. Table 1 lists the counties in the State, their populations, vehicle populations, vehicle densities, and annual

*As outlined in the Implementation Plan, auto exhaust emissions other than CO are "under control".

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vehicle miles. Tables II, III, IV and V give the same information, but only for the top 10 counties in each category.

Table VI has divided the state into its five air quality control regions, and within the state the only region with CO levels in excess of ambient standards is the Portland Interstate Region. The Portland region is divided into three regional authorities and in this region the only area with Carbon Monoxide levels above ambient levels is the CWAPA area, Figure 1, notably the Portland commercial area. Continuous monitoring data from LRAPA, Table VII, shows that in 1971 ambient levels for CO were not exceeded, and with Eugene (Lane County) being more populous with more registered passenger cars than Salem (Marion County), neither of these areas need be prime targets for CO emission control strategies. In addition, traffic count data indicate that traffic flows in comparable areas are larger for Eugene than Salem.*

Emissions from automobiles are declining as new car exhaust emission controls are implemented, therefore areas meeting federal ambient air standards should continue to comply with these standards, as far as automotive emissions are concerned. Control of automotive CO emissions should then center in the CWAPA region, since this area has the greatest population, vehicle registration, vehicle density, and a history of exceeding the federal CO ambient air standard. Portland, in the CWAPA region, is projected to continue to exceed these standards through 1978, even with the new car controls.

The Implementation Plan (Appendix 1) calls for a comprehensive auto control technique including emission control and traffic control strategies. Since it is necessary to meet established ambient levels by 1975, an area which exceeds a level

^{*}Eugene- Franklin Blvd. (20-003) 23,111 1970 ADT Salem-East Center St. (24-018) 12,622 1970 ADT

(CO) due to a specific source (motor vehicles) should not be left uncontrolled. ORS 481.190 requires a county wide designation of an emission control area.

Any program for control of CO emissions in the CWAPA area would require emission control of motor vehicles. The CWAPA area is formed from four counties in the Portland area, Clackamas, Columbia, Multnomah and Washington. In addition, the contigious counties on Multnomah (Portland) also include Hood River County and Clark County, Washington. In order to properly access an effective control area, the following criteria are set forth as being prime considerations for county designations (under ORS 481.190):

- 1. Counties where ambient levels exceeded.
- 2. Counties which contribute to excess CO levels.

From the first criteria, Multnomah County should be included since it is in this county that high CO levels are recorded. No data is available which indicates that any other county in the state exceeds the ambient standards on CO.

In applying the second criteria several considerations are involved:

- 1. Trans-county line traffic.
- Amount of other-county residents and their automobiles going to areas of high CO levels.
- 3. Purpose and times of trans-county traffic.

TRANS-COUNTY LINE TRAFFIC

To aid in this evaluation, Figure 2 was developed. This figure shows average daily traffic across county lines. This is two-way traffic and summarizing individual county contributions across the Multnomah line:

County	<pre>% of Trans-County Traffic</pre>
Clackamas County	23.5
Clark County, Wash.	25.7
Columbia County	2.9
Hood River County	3.7
Washington County	43.9

AREA CONTRIBUTIONS

Several methods are available for gaging the effect of one county on another. As a large percentage of traffic is commuter directed, records on employers and employees should give an indication of commuter potential. The following data was obtained from HRD, Employment Department, Portland:

County	No. People Working ¹ in Respective Counties in 1969	No. People Who Reside ² in Respective Counties Are Employed in 1970
Multnomah	307,900	228,000
Washington	49,200	64,800
Clackamas	44,100	63,800
Columbia	8,000	10,000
Clark	40,600	47,000

- 1. Source--HRD, Portland, Study 1969
- 2. Source--HRD, Portland, 1970 U. S. Census

This table indicates that Multnomah County is the prime area of employment opportunity and that at least 80,000 workers must cross county lines to go to their jobs in Multnomah County.

Tax records also give an indication of the employment in the Portland metro area:

1969 OREGON STATE INCOME TAX FILINGS

County	Number of Returns	Percent
Clark, Wash.	12,804	8.6
Multnomah	223,257	63.1
Clackamas	55,871	15.8
Washington	52,511	14.8
Columbia	9,247	2.6
TOTAL	353,690	

These figures give a good estimation of the total contribution of out-of-state (Clark County, Washington) workers on the greater Portland area employment picture, and thus on traffic.

Attached in Appendix II is data supplied by DeLeuw, Cather and Company from a downtown parking study survey conducted November, 1970. A summary of the data indicating county of origin of parked autos is shown in Table VIII.

TRAFFIC COUNTS

Traffic counts (Appendix III) and estimating the effect of out-of-state vehicles are tools that are used to determine the

effect of the non-Multnomah County traffic on the Portland commercial area, (and non-Oregon vehicles). Table IX shows the effect of out-of-state vehicles on various routes into the city. From these data, and the traffic tables an estimated 10,000 ADT in the Portland commercial area are due to out-of-state vehicles. These are also an estimated 3,500 ADT through the trips, or a total of 13,500 ADT. This is about 5% of the over-all traffic. The tax figures and the DeLeuw, Cather and Company study tend to confirm this figure.

Traffic contribution from trucks and buses account for another 3 1/2 - 5% of the traffic through the commercial area. Again these figures are from the traffic volume tables.

Traffic in the core area has been estimated as 469,000 ADT (1970), and assuming a fairly uniform distribution over the core and general commercial areas, this gives 445,000 ADT due to gasoline-powered vehicles. With the 13,500 vehicles classified as out-of-state and through vehicles this leaves 97% of the gasoline powered vehicles as Oregon registered vehicles.

The contribution from Columbia County is defined as 4,000 auto ADT to the commercial area, and Hood River as 5,000 auto ADT to the commercial area. Columbia County then accounts for less than 1% (.89%) and Hood River County just over 1% (1.12%) or a total of 2%. As the total contribution from these counties is less than the out-of-state vehicles, and these counties do not have a CO "problem", these vehicles can be omitted from a control program without a significant program impairment to a Portland area emission control program.

The following classes of vehicles represent about 15% of the gasoline-powered vehicles in the Portland commercial area which are omitted from a mandatory emission inspection program because of lack of authority or insignificance.

Out-of-state Vehicles (Passenger)	3-5%
Columbia & Hood River County (Passenger)	2%
Through Vehicles & Vehicles from	
Outside CWAPA Area*	8%

Then, 85% of the gasoline-powered vehicles in the area would be due to traffic originating in Multnomah, Clackamas, and Washington Counties. Essentially all Washington County traffic, crossing the Multnomah-Washington county line; passes through or to the Portland commercial area. This represents 25% of Portland commercial area traffic. Clackamas County contributes an estimated 6-14% to the Portland commercial districts. The 14% is arrived at by assuming all vehicles trips go through the Portland commercial area, and the six percent figure by assuming that of all Clackamas County originated ADT's only 30,000 (65% West side, 35% East side) go to and/or through the commercial area. The DeLeuw, Cather and Company study estimates total Clackamas County automobile contribution at greater than 12% for the CBD. And by balance, Multnomah County has the remaining ADT's (50%) Summarizing:

Out-of-state Cars	3-5%
Columbia & Hood River	2%
Through & Outside Area	8%
Clackamas	6-14%
Washington	20-25%
Multnomah	50%

BASE COUNTIES EMISSION INSPECTION

If Multnomah County alone were the only county designated as a controlled county under ORS 481.190, 50% of the vehicles contributing to the high levels of CO would be subject to regulation and control. If other combinations of counties were chosen the percent of vehicles affected are shown on Table X and Figure 3. For a tri-county program 85% of the vehicles in the Portland central area would be regulated.

For maximum control of CO from automobiles for the Portland area with the minimum number of designated counties; a three-county designation of Multnomah, Clackamas, and Washington County is preferred. As shown in Table X, increases in number of counties above this level does not appreciably affect the percentage and number of cars which can be considered to be contributing to the levels of CO in the Portland area.

The traffic count figures were used to estimate the non-Multnomah County traffic in the Portland commercial area, with the work from DeLeuw, Cather and Company tax and employment information being used to supplement and complement.

It is difficult, even with all these sources, to establish the exact location by county of origin of all other Oregon passenger vehicles. Lacking this information no other county in the state can be significantly established as contributing to levels of CO above the ambient in Portland.

NUMBER OF VEHICLES AFFECTED

A program requiring vehicle emission inspections could affect over 500,000 vehicles in the tri-county area or almost 40% of the registered passenger vehicles in the state. Such a comprehensive program, together with the traffic control measures outlined in the Implementation Plan, would continue in Oregon's effort to meet the ambient air standards by 1975.

TABLE I STATE AND COUNTY

Populations, Motor Vehicle Populations, and Vehicle Densities

County & District No.	Population (1970 Census)	Passenger Car Registration (1971)	Vehicle Density Vehicle/sq. mi.	1970 Annual Vehicle Miles in Millions
District 1 Clatsop Tillamook	28,473 18,034	16,561 11,219	33.8 10.0	181 165
District 2 Clackamas Columbia Multnomah Washington	166,088 28,790 554,668 157,920	95,223 17,590 331,488 100,673	50.3 42.5 725.4 140.6	807 141 2,683 703
District 3 Marion Polk Yamhill	151,309 35,349 40,213	92,183 19,555 25,502	78.5 27.6 35.7	951 239 233
District 4 Benton Lincoln Linn	53,776 25,755 71,914	28,244 16,287 44,102	42.3 16.3 19.2	238 232 657
<u>District 5</u> Lane	215,401	134,360	29.1	1,345
District 6 Douglas	71,743	47,768	9.4	862
District 7 Coos Curry	56,515 13,006	35,495 9,263	21.8 5.7	303 99
District 8 Jackson Josephine	94,533 35,746	64,717 26,624	23.0 16.4	610 300
District 9 Hood River Sherman Wasco	13,187 2,137 20,133	9,655 1,564 13,568	18.0 1.9 5.7	128 58 208
District 10 Crook Deschutes Jefferson	9,985 30,442 8,548	7,304 22,708 .6,522	2.4 7.4 366	69 217 102
<u>District 11</u> Klamath Lake	50,021 6,343	34,584 5,480	5.6 0.7	377 73
District 12 Gilliam Grant Morrow Umatilla Wheeler	2,342 6,996 4,465 44,923 1,849	1,435 4,438 3,000 29,885 1,164	1.1 1.0 1.5 9.2 0.7	70 75 73 324 21
District 13 Baker Union Wallowa	14,914 19,377 6,247	10,572 12,651 3,912	3.4 6.2 1.2	133 123 42
District 14 Harney Malheur	7,215 23,169	4,307 15,653	0.4 1.6	89 191
County Total Out-of-state Publicly Owned		1,305,256 4,885		
GRAND TOTAL	2,091,385	1,310,141	13.5	13,125

TABLE II
10 MOST POPULUS COUNTIES, POPULATION, VEHICLE DENSITIES

Count	: <u>y</u>	Population 1970 Cens	sus <u>Vehicle Density</u>	(vehicles/mi ²)
1. Multr 2. Lane 3. Clack 4. Washi 5. Maric 6. Jacks 7. Linn 8. Dougl 9. Coos 10. Bento	amas ngton n n oon as	554,668 215,401 166,088 157,920 151,309 94,533 71,914 71,743 56,515 53,776	725.4 29.1 50.3 140.6 78.5 23.0 19.2 9.4 21.8 42.3	,

TABLE III
10 COUNTIES WITH HIGHEST VEHICLE REGISTRATION, VEHICLE DENSITIES

•	County	1971 Passenger Car Registration	Vehicle Density (v/m²)
1.	Multnomah	331,488	725.4
2.	Lane	134,360	29.1
3.	Washington	100,673	140.6
4.	Clackamas	95,223	50.3
5.	Marion	92,183	78.5
6.	Jackson	64,717	23.0
7.	Douglas	47,768	9.4
8.	Linn	44,102	19.2
9.	Coos	35,495	21.8
10.	Klamath	34,584	5.6

TABLE IV
TOP TEN COUNTIES IN VEHICLE DENSITY

	County	Vehicle Density (v/m²)
١.	Multnomah	725.4
2.	Washington	140.6
3.	Marion	78.5
4.	Clackamas	50.3
5.	Columbia	42.5
6.	Benton	42.3
7.	Yamhill	35.7
8.	Clatsop	33,8
9.	Lane	29.1
10.	Polk	27.6

TABLE V
TOP TEN COUNTIES IN ANNUAL VEHICLE MILES

	County	Annual Vehicle Miles in Millions
1.	Multnomah	2,683
2.	Lane	1,345
3.	Marion	951
4.	Douglas	862
5.	C1ackamas	807
6.	Washington	703
7	Linn	657
8.	Jackson	610
9.	K1 ama th	377
10.	Umatilla	324

TABLE VI

AIR QUALITY CONTROL REGIONS - VEHICLE DENSITIES

Region (and Districts)	Population (1970)	Vehicle Popu- lation (1971)	Vehicle Density Vehicle/sq. mi.
Portland Interstate Air Quality Control Region (O	•	888,920	63.9
Columbia-Willamette Air Pollution Authority	907 , 466	544,974	145.6
Mid-Willamette Valley Air Pollution Authority	352,561	209,586	37.7
Lane Regional Air Pollu- tion Authority	215,401	134,360	29.1
Northwest Air Quality Control Region	72,262	44,067	14.9
Central Air Quality Con- trol Region	140,796	101,385	3.9
Eastern Air Quality Con- trol Region	131,497	87,017	2.1

TABLE VII

Continuous Air Monitoring from Lane Regional Air Pollution Authority

1971

CARBON MONOXIDE

Month	1 Hour	(mg/M^3)	8 Hour	⁷ (mg/M ³)	24 Hour	(mg/M ³)
	Max. Aver.	Monthly Aver.	Max. Aver.	Monthly Aver	.Max. Aver	Monthly Aver
(January	3.4	1.5	2.0	1.2	1.6	0.9
1 (February	4.6	1.3	3.3	1.0	2.3	0.8
(March	1.7	1.3	1.7	1.0	1.5	0.8
April						
(May	5.8	3.3	4.4	2.4	4.1	2.0
(June	5.8	2.7	3 . 2 ,	2.0	2.4	1.6
(July	5.2.	3.1 .	4.0	2.3	3.4	2.0
2 August	7.5	3.8	6.0	3.0	4.5	2.5
(September	9.2	5.1	5.0	3.2	4.1	2.6
(October	12.7	6.4	7.7	4.3	6.5	3.3
(November	16.1	7.8	9.9	4.8	5.7	3.5
(December	10.4	5.7	6.4	3.0	5.1	2.8

National Ambient Air Quality Standard

- 1 hour average (maximum) 40 mg/M³
- 8 hour average (maximum) 10 mg/M^3

- Continuous Air Monitoring Station Lane Regional Air Pollution Authority Bldg.
- Continuous Air Monitoring Station 11th at Willamette Street, Eugene

TABLE VIII ORIGIN OF TRIPS IN THE PORTLAND CENTRAL BUSINESS DISTRICT

Summary of Data from DeLeuw, Cather and Company (November 1970)

ALL TRIPS

Multnomah 59. Clackamas 12. Washington 16. Clark (Wash.) 2. Other 9.	35 53 57

WORK TRIPS (ONLY)

County of Origin	Percent
Multnomah	59.22
Clackamas	13.51
Washington	18.33
Clark (Wash.)	2.77
Other	6.17

TABLE IX
TRAFFIC COUNTS AS A MEASURE OF VEHICLE
IMPACT ON THE PORTLAND COMMERCIAL AREA

(Compiled from Traffic Volume Tables & Traffic Count Summary Sheets)

Location	<u>Total</u>	Oregon Vehicles	Out-of-State Passenger	Heavy Vehicles
Interstate Bridge	69200 ADT	29700 (43.2%)	33700 (48.7%)	5600 (8.1%)
One Mile After Bridge	48000 ADT	20700 (43%)	23000 (48.7%)	3900 (8.1%)
Minnesota Traf- fic Counter	67800 ADT	46000 (67.9%)	15600 (23%)	6200 (9.1%)
Morrison Bridge	36000 ADT	32000 (89.2%)	2000 (5.7%)	1980 (5.5%)
Banfield Traf- fic Counter	92000 ADT	84000 (91.4%)	4400 (4.8%)	4400 (4.8%)
Baldock Traffic Counter	69000 ADT	60000 (87.1%)	3500 (5.0%)	5500 (7.9%)
At Salem	22000 ADT	-	2000	-

TABLE X

VEHICLES AFFECTED FOR DIFFERENT
DESIGNATED COUNTIES OF EMISSION CONTROL

Designated Counties	Percent of Vehicles in Portland Commercial area affected	No. Passenger Ve- hicles Affected 1971
Multnomah Only	50%	331488
Multnomah and Clackamas	60%	426711
Multnomah and Washington	75%	432161
Multnomah, Clackamas and Washington	85%	527384
Multnomah, Clackamas, Washington and Columbia	86%	544974
Multnomah, Clackamas, Washington	87%	554629

Figure 1

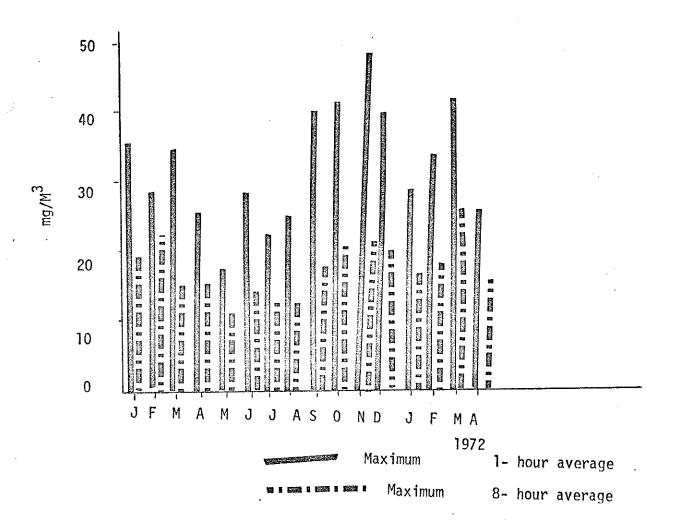
Continuous Air Monitoring Station 718 W. Burnside, Portland

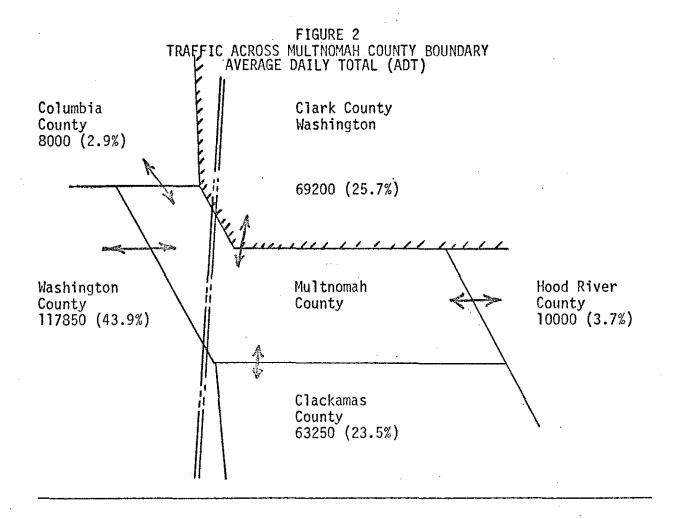
National Ambient Air Quality Standard

1 hour average (maximum) 40. mg/M^3

8 hour average (maximum) 10 mg/M^3

CARBON MONOXIDE





TRAFFIC COUNTS

Multnomah-Columbia 8000 ADT U.S. 30

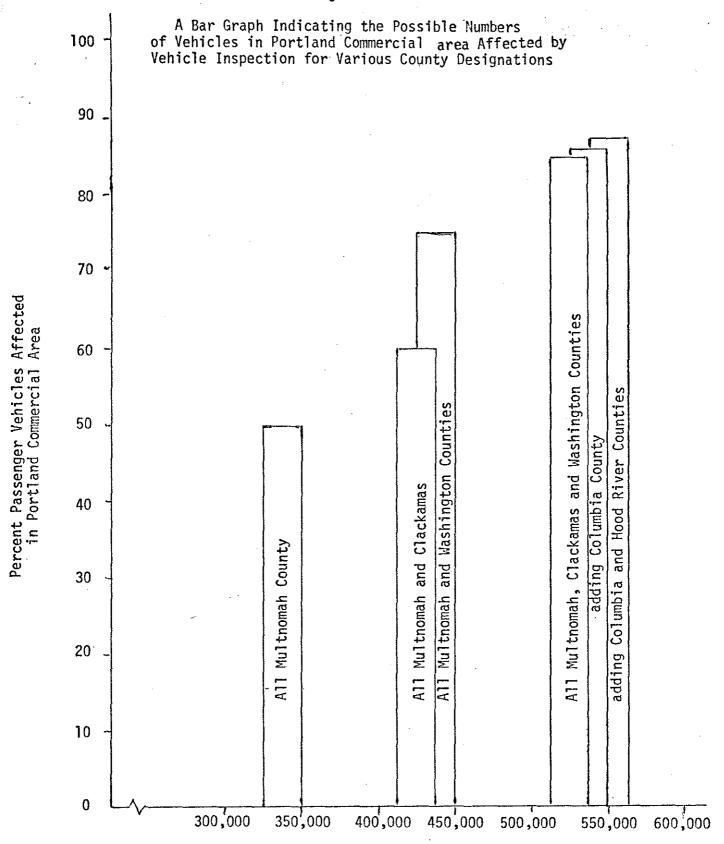
Hood River-Multnomah 10000 ADT I-80N

Washington-Multnomah
32800 ADT I-5
24000 ADT Barbur Boulevard
50200 ADT U. S. 26 & ORE 8
6100 ADT Barnes Road
47000 ADT Thompson Road

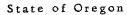
Clark-Multnomah 69200 ADT I-5

Clackamas-Multnomah 14000 ADT U. S. 26 30200 ADT U. S. 99E 2550 ADT ORE. 212 16500 ADT ORE. 34

Figure 3



Passenger Vehicle Registration Count







DEPARTMENT OF ENVIRONMENTAL QUALITY

To: H. M. Patterson

Date: February 4, 1971

From: Ron Householder

Subject: An Estimation of the Numbers of Oregon Automobiles Entering Regional Areas

The purpose of this study was to obtain an estimation of the numbers of Oregon automobiles which may be operated within certain counties of the State and yet not registered in those counties. This information is of value when proposals for setting emission control criteria on motor vehicles in specific geographic areas is being considered.

The technique used was to take the traffic count data of the Oregon State Highway Division - Traffic Volume Tables for 1969 - on major roads crossing the boundaries of the specified area. On roads with permanent recorder stations, trucks and out-of-state automobiles were excluded from the traffic count. Where a permanent recorder station location was some distance from the specified boundary, a traffic count figure near the boundary was used and adjusted to exclude trucks and out-of state automobiles. On those roads without a permanent recorder station location, the gross count near or at the boundary was used. It was assumed that equal numbers of vehicles entered the specified area as left, and thus the vehicle count is one-half the traffic count. The traffic count on the Interstate Bridge is not considered as it was assumed that the Oregon vehicles crossing the bridge had either come from within the specified area or were recorded in another traffic count as they entered the specified area. All vehicles crossing the boundary are assumed to be registered outside the specified area.

Administrative area #2 - Clackamas, Columbia, Multnomah and Washington Counties (CWAPA):

Number of passenger vehicles registered in area for period 1/1/69 to 12/31/69 -513,266

Number of passenger vehicles entering area:

Recorded Station	1969 ADT	% Oregon	Oregon passenger vehicles entering/day
36-004 24-001 24-019 03-013 26-012 26-001 05-006 34-001 34-004	10,348 5,677 21,014 1,198 501 9,636 3,367 2,963 2,210	87.1 84.3 76.2 89.1 74. 67.6 70.5 86.1 76.4	4,500 2,400 8,000 500 200 3,300 1,200 1,300 900
			22,300

Road	1969 ADT (Boundary)	Vehicles entering per day
#102 #29 #161 #140	170 1550 1500 510	90 800 800 260 1950 - say 2,000
#26	2900 ADT (Boundary) Station 26-003 - 89.7% Oregon:	1300

Therefore daily inflow of Oregon automobiles into Administrative Area #2 is approximately 25,000. This number represents about 5% of the number of passenger vehicles registered in the area. Note that this value may not be related to vehicle milage contribution.

Area covered by Regional Air Pollution Control Authorities (Lane, Benton, Linn, Marion, Polk, Yamhill, Clackamas, Columbia, Multnomah and Washington Counties).

Total number of passenger vehicles registered in area for period 1/1/69-12/31/69 -

Recorder Station Code ADT % Oregon Oregon passenger vehicles per day 3367 70.5 05-005 1,200 34-001 2963 86.1 1,300 76.4 34-004 2210 900 74. 26-012 510 200 26-001 9636 67.6 3,300 61.68 75.4 27-001 2,400 76.9 21-006 1568 600 20-107 1794 61. 600 09-014 2143 74.8 800 10-003 2148 72.5 800 10-007 300 2955 56. 14,400 Vehicles entering per day 1969 ADT (Boundary) Road #102 170 90 #180 550 110 #9 2100 1100 #9 2850 1400 #26 2900 ADT (Boundary) Station 26-003 - 89.7% Oregon 1300

Therefore daily inflow of Oregon automobiles into the area served by Regional Authorities is approximately 20,000. This number represents about 21% of the number of passenger vehicles registered in the area. Note that this value may not be related to vehicle milage contribution.

5000



DEPARTMENT OF **ENVIRONMENTAL QUALITY**

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

TOM McCALL GOVERNOR

Diarmuid F. O'Scannlain -i-- B.-DAY --Director

MEMORANDUM

ENVIRONMENTAL QUALITY COMMISSION

B. A. McPHILLIPS Chairman, McMinnville

EDWARD C. HARMS, JR. Springfield

STORRS S. WATERMAN Portland

GEORGE A. McMATH Portland

ARNOLD M. COGAN Portland

Environmental Quality Commission

From:

To:

Director

Subject: Agenda Item No. H , March 2, 1973, EQC Meeting

North Florence mandatory annexation

Background

An area north of Florence extending from 21st Avenue to 37th Avenue and roughly along Highway 101 about three blocks wide has been designated by the Oregon State Division of Health as an emergency health hazard area. The area was surveyed in 1971-72 and septic tank and drainfield failures have been documented.

Under ORS 222.905, the Board of Health is authorized to initiate studies, prepare plans and other documents required for the consideration of the proposal and the final determination of the proceedings. This the Board has done, and a preliminary set of plans and specifications together with a timetable for construction of sewers in the affected area have been submitted to the Department of Environmental Quality as required under ORS 222,860.

Evaluation

Preliminary plans were developed by John W. Cunningham & Associates, consulting engineers under contract with the Division of Health. Specifications submitted are the City of Florence standard sewer construction specifications. The Division of Health in conjunction with the city and the consulting engineer has prepared a timetable for construction.

All the documentation submitted appears to be acceptable for preliminary approval. The preliminary plans for sewers will adequately serve the area and, when constructed, the sewers will remove or alleviate the conditions dangerous to public health within the territory.

Director's Recommendation

The Commission should approve the proposal and certify its approval to the Board of Health.

DÍARMUID F. O'SCANNLAIN

DFO'S:PDC:ak February 13, 1973



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL

Diarmuid F. O'Scannlain
MXEXXX

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

T0:

Environmental Quality Commission

FROM:

Director

SUBJECT:

Agenda Item I, March 2, 1973, EQC Meeting

Solid Waste Management Action Plan Grant Application and

Grant Offer Status Report

BACKGROUND

At the January 26, 1973 meeting the EQC heard a Department report on the status of grant applications and grant offers to assist in development of the State Solid Waste Management Action Plan. It was reported that nine grant applications representing seventeen counties were ready to be approved by the Department for funds totalling up to \$638,815. The Department has subsequently approved and made grant offers based on the nine applications. These grant offers added to the interim \$50,000 grant offer previously made to the Chemeketa (Mid-Willamette) Region obligates up to \$688,815 of the \$1,129,630 of Action Plan grant funds available. Grants will be allocated in periodic payments subject to demonstration of satisfactory progress.

PRESENT STATUS

On February 23, 1973 the State Solid Waste Management Citizens'
Advisory Committee (CAC) will review the Department's Solid Waste
Management Division recommendations on the second group of completed grant applications. Seven applications which comprise this group and represent

twelve counties are for the Coos-Curry and Chemeketa Regions and Jackson, Malheur (supplement to EPA grant), Umatilla, Wallowa and Wheeler Counties.

The Department has to date accepted and written staff recommendations on sixteen grant applications for twenty-nine counties. Grant applications from Union, Josephine and Baker Counties are expected within a few days. Baker County's grant application to the Environmental Protection Agency (EPA) for funds to finance solid waste management planning has been denied, so the county will now apply for the state funds previously reserved for this contigency. Decisions on whether to seek state grant funds to finance solid waste planning are expected soon from the remaining counties of Klamath, Lake, Lincoln and Harney.

A supplemental report outlining the status as of March 1, 1973 of the grant applications and funding levels recommended by CAC, grant offers made by the Director and the itemized funding designations for allocation of the \$1,129,630 of statewide grant funds will be presented to the Commission at the March 2, 1973 meeting.

DIÁRMUID F. O'SCANNLAIN

RDJ:mm 2/21/73



TOM McCALL GOVERNOR

DIARMUID F. O'SCANNLAIN 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**

DEPARTMENT OF **ENVIRONMENTAL QUALITY**

1234 S.W. MORRISON STREET PORTLAND, ORE. 97205 Telephone (503) 229-

MEMORANDUM

T0:

Environmental Quality Commission

FROM:

Director

SUBJECT: Addendum to Agenda Item I. March 2, 1973 EQC Meeting

Solid Waste Management Action Plan Grant Applications and

Grant Offer Status - Supplemental Report

PRESENT STATUS

The State Solid Waste Management Citizens' Advisory Committee (CAC) on February 23, 1973 recommended approval for funding of six grant applications and deferred consideration of one application to the March 16, 1973 CAC meeting for review with additional applications now being processed by the Department. To date grant applications representing 32 counties have been approved or are undergoing Department review. Grants totaling \$818,190 have been recommended by the CAC and approved by the Department from the \$1,129,630 made available November 10, 1972 by the State Emergency Board. This leaves a current unobligated balance of \$311,440.

The following outlines the present status as of March 1, 1973 for Solid Waste Management action planning in Oregon.

Applicant or Area

Grant Funds Approved

Status

Chemeketa Region

(Marion, Polk, Linn,

Yamhill, and Benton

Counties)

\$50,000 (first advance)

Signed acceptance on interim offer received from COG, payment request being processed. Revised application anticipated to be reviewed by CAC March 16, 1973. Program under way.

Grant County	\$9,680	Signed acceptance received from County, payment request being processed for first quarter's advance. Program under way.
Gilliam County	\$5,000	Signed acceptance received from County and payment request being processed for first quarter's advance. Consultant's contract has been approved and program under way.
Morrow County	\$19,750	Signed acceptance received from County and payment request being processed for first quarter's advance. Consultant's contract has been approved and program under way.
Lane County (C O G)	\$154,000	Signed acceptance received from COG and consultant's contracts have been approved. Payment requests have not been received but program is under way.

	-3	
Douglas County	\$26,300	Signed acceptance received from County, and payment request being processed for first quarter's advance. Program is under way.
MSD-CRAG Region (Clackamas, Columbia, Multnomah and Washington Counties)	\$325,000	Signed acceptance received from MSD and payment request being processed. Consultant's contracts have been approved and program is under way.
Mid-Columbia Region (Hood River, Sherman, and Wasco Counties)	\$20,000	Signed acceptance received from COG and payment requests being processed for first quarter's advance. Program is under way.
Central Oregon Region (Crook, Deschutes and Jefferson Counties)	\$43,760	Signed acceptance received from COG. No payment requests received to date.
North Coast Region (Clatsop and Tillamook Counties)	\$49,500	Grant offer made February 13, 1973. No response to date.
Jackson County	\$21,300	CAC recommendation for approval February 23, 1973.

Grant Offer and acceptance

being prepared.

Wheeler County	\$7,500	CAC recommendation for approval February 23, 1973. Grant Offer and Acceptance being prepared.
Umatilla County	\$20,000	CAC recommendation for approval February 23, 1973. Grant Offer and Acceptance being prepared.
Coos-Curry Counties	\$47,000	CAC recommendation for approval February 23, 1973. Grant Offer and Acceptance being prepared.
Wallowa County	\$16,000	CAC recommendation for approval February 23, 1973. Grant Offer and Acceptance being prepared.
Malheur County	\$4,000	CAC recommendation for approval February 23, 1973. Grant Offer and Acceptance being prepared. These funds are to supplement an awarded EPA grant.
Subtotal	\$818,190	for Approved Applications

The items outlined below tentatively comprise the \$311,440 balance of the state action planning funds. Anticipated funding levels listed are based on initial estimates or applications currently under development or under Department review.

Applicant or area	Anticipated Funding Level	Status
Baker County	\$21,882	Application being processed by Department.
Union County	\$22,000	Application being processed by Department.
Josephine County	\$15,000	Incomplete rough draft application received. Completed application anticipated for Department presentation to CAC on March 16, 1973.
Klamath County	\$15,000	Letter of intent received by Department February 24, 1973 requesting con- sideration of potential application; County decision on submission pending.
Lincoln County	\$5,000	County considering sub- mission of application for monies to supplement current HUD grant.
Chemeketa Region	\$180,281 (balance)	Application to fund balance of full program scheduled for CAC review March 16, 1973.

Harney County		\$10,000	Application and/or intent to seek funds not yet received. Funds being held awaiting County response.
Lake County		\$6,000	Application and/or intent to seek funds not yet received. Funds being held awaiting County response
	Subtotal	\$275,163	for Anticipated Applications
	Balance	36,277	Contingency Reserve
	Total	\$1,129,630	

Regional coordination of the local solid waste planning is assured through actions which have been taken by the respective Councils of Governments (COG's) to either participate in the actual planning, act as grant coordinator or authorize individual counties to plan within their regions. Grant funds are being disbursed only to those applicants which coordinate with their COG in one of these manners.

If problems in coordination of counties and COG's develop they will be referred to the CAC for their recommendation and then to the Commission as requested by the Commission at the January 26, 1973 meeting.

DIARMUID F. O'SCANNLAIN

RDJ:mm 3/1/73



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL

Diarmuid F. O'Scannlain
Director

ENVIRONMENTAL QUALITY

COMMISSION

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Portland

MEMORANDUM

T0:

Environmental Quality Commission

FROM:

Director

SUBJECT:

Agenda Item J, March 2, 1973, EQC Meeting

Enclosed is a partial list of the Tax Credit Applications to be presented to the Commission at its March 2, 1973, meeting. Since additional applications are expected early next week, the Summary will be completed and sent to you as soon as all applications are processed.

DIARMUID F. O'SCANNLAIN

WEG:ahe

February 23, 1973

TAX CREDIT APPLICATIONS

Applicant	App1. No.	Facility	Claimed Cost	<pre>% Allocable to Pollution Control</pre>	Director's Recommendation
Tektronix, Incorporated	T-270	Conduit & wire from monitoring probes to control panel.	\$ 1,045	80% or more	Issue
Tektronix, Incorporated	T-271	Modification & moving of industrial waste treatment control panel	4,451	80% or more	Issue
Tektronix, Incorporated	T-272	Effluent piping installation	22,400	80% or more	Issue
Tektronix, Incorporated	T-273	4" poly propylene pipelines	12,720	80% or more	Issue
Tektronix, Incorporated	T-274	Fume Scrubbers	35,794	80% or more	Issue
Tektronix, Incorporated	T-275	Shelter house & relocation of of storage tanks	8,941	80% or more	Issue
Tektronix, Incorporated	T-276	Increase of pump size on cyanide destruction system	816	80% or more	Issue
Tektronix, Incorporated	T-277	Caustic storage tank	6,000	80% or more	Issue
Tektronix, Incorporated	T-278	Chlorine feed modification	1,022	80% or more	Issue
Tektronix, Incorporated	T-279	Load cell and scale	765	80% or more	Issue
Tektronix, Incorporated	T-280	Neutralization tank	26,060	80% or more	Issue
Tektronix, Incorporated	T-281	Effluent Parshall Flume	2,066	80% or more	Issue
Tektronix, Incorporated	T-284	Enlargement of flume	874	80% or more	Issue
Tektronix, Incorporated	T-285	Modification to accommodate larger control panel & test equipment	4,881	80% or more	Issue
Tektronix, Incorporated	T-286	Industrial waste sludge drying beds	942	80% or more	Issue

Applicant	Appl. No.	Facility	Claimed Cost	% Allocable to Pollution Control	Director's Recommendation
Tektronix, Incorporated	T-287	Dust collection system	10,453	80% or more	Issue
International Paper Company Gardiner Paper Mill - Northern Division	T-376	Automatic samplers for waste water	3,074.53	80% or more	Issue
John G. & Nicholas D. Sumich	T-391	Animal waste collection, storage, and land disposal facilities	11,628.76	80% or more	Issue
Timber Products Company	T-394	Handling & firing system for sanderdust disposal	57,999.60	80% or more	Issue
Weyerhaeuser Company Wood Products Group	T-397	Glue wastewater recirculation systems	63,722	80% or more	Issue
Weyerhaeuser Company Wood Products Group	T - 399	Shotgun oil separator	16,191	80% or more	Issue
Weyerhaeuser Company Wood Products Group	T-400	Settling pond	6,306	80% or more	Issue
The Hervin Company	T-405	Steel, plastic lined, aeration basin with Rex Chain Belt, 30HP surface aerator & associated electrical equipment	23,841.87	80% or more	Issue
Weyerhaeuser Company Paperboard	T-409	Laboratory water demineralizer & distillation apparatus	1,757		Denial
Boise Cascade Corporation Paper Division	T-416	Chemical recovery & secondary 6, treatment system	,908,837	80% or more of \$6,101,818	Issue

and T-284 through T-287

Date: 2-20-73

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

Tektronix, Inc.

1. Applicant

Tektronix, Inc.
P. O. Box 500
Beaverton, Oregon 97005

The applicant manufactures precision scientific measuring equipment at its plant located at 13500 S. W. Karl Braun Drive in Beaverton, Oregon, Washington County.

2. Description of Claimed Facilities

Claimed facilities from 16 separate but related applications are described in the attached table.

All costs were certified by an accountant.

3. Evaluation

The claimed facilities all result from new construction of production facilities and were installed to provide proper control of expanded waste quantities.

4. Recommendation

It is recommended that certificates be issued for all facilities described in the attached table.

•]	Date completed		% allocable	
Appl.			and operation	Claimed	to pollution	
No.	Facility Description	Function	commenced	cost	control	Recommende
T-278	Cyanide destruction system chlorine feed modification.	Increase capacity of chlorine feed.	1/68	\$ 1,022	80% or more	Issue
T-279	Load cell and scale for 2,000 lb. SO ₂ cylinders.	Relates to expansion of SO_2 feed for IW treatment	1/68	765	80% or more	Issue
T-280	14,000 gallon neutralization tank,	Relates to increased capacity of waste treatment and neutralizati system.		26,060	80% or more	Issue
T-281	Effluent Parshall Flume.	No flow measurement of effluent from ponds before installation (flow measured into pond only).	1/67	2,066	80% or more	Issue
T-284	Enlarge flume from neutrali- zation plant to lagoon.	To handle expanded waste flows.	3/68	874	80% or more	Issue
T-285	Modifications to building to accommodate larger control panel (moved from remote location) and test equipment.	(See T-271)	3/68	4,881	80% or more	Issue
T-286	Industrial waste sludge drying beds.	To dry sludge removed from lagoons.	1/69	942	80% or more	Issue
т-287	Dust collection system in electro chem building addition consisting of 4 cyclone type collectors with cloth bag filters to collect fiberglass dust.	Remove dust from fiberglass operations.	9/69	10,453	80% or more	Issue

HLS:ak February 20, 1973

Tektronix, Inc.

Tax Relief Applications T-270 through T-281 & T-284 through T-287

Appl.	Facility Description		Date completed and operation commenced	Claimed cost	% allocable to pollution control	Recommendation
T-270	Conduit and wire from monitoring probes to control panel.	Probes control chemical feed in IW treatment plant. Conduit and wiring was modified to improve reliability.	3/68	\$ 1,045	80% or more	Issue
т-271	Modification and moving of industrial waste treatment control panel from remote location to treatment plant site.	In conjunction with expansion, panel modified and moved to treatment plant for improved control.	3/68	4,451	80% or more	Issue
T-272	electro chem building to	Special piping in new building to facilitate separation and separation treatment of various industrial waste streams.		22,400	80% or more	Issue
T-273	Three 4" poly propylene pipe- line from components building to treatment plant.	New piping to carry wastes from a building to waste treatment facility.	new 1/70	12,720	80% or more	Issue
T-274	Two fume scrubbers on electro	Remove harmful gases from plating fumes.	9/69	35,794	80% or more	Issue
T-275	Shelter house for chlorine and SO ₂ cylinders, relocation of sulphuric and caustic storage tanks.	Part of expansion of IW treatment facilities and movement of control facilities.	3/68	8,941	80% or more	Issue
T-276	Increase pump size from 150 gpm to 500 gpm on cyanide destruction system.	Related to system capacity expansion.	1/68	816	80% or more	Issue
т-277	11,800 gallon caustic storage tank.	Related to expansion of capacity waste treatment system.	of 1/70	6,000	80% or more	Issue

1-3/6

2-20-73

Date

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT International Paper Company - Gardiner

1. Applicant

International Paper Company
Gardiner Paper Mill - Northern Division
P. O. Box 854
Gardiner, Oregon 97441

The applicant owns and operates a kraft pulp and paper mill north of Gardiner, Oregon, on Highway 101 in Douglas County.

2. Description of Claimed Facility

Two Sirco Model B/ST-VS/1-T Automatic Samplers for pulp mill and paper mill waste water sampling.

The claimed facilities were installed and placed in operation in December 1971.

Certification is claimed under the 1969 Act with 80% or more allocable to pollution Control

Claimed cost: \$3,074.53 (Documentation provided)

3. Evaluation

The claimed facilities are necessary to comply with Department of Environmental Quality issued Waste Discharge Permit monitoring requirements.

4. Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$3,074.53 with 80% or more allocable to pollution control be issued for the facilities claimed in Tax Application T-376.

State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

John G. and Nicholas D. Sumich Rt. 1, Box 6
Blachly, Oregon 97412

The applicants (partners) own and operate a 90 cow dairy located at the end of Sumich Road in Lane County (T16S, R7W, Sec. 16 W.M.).

2. Description of Claimed Facility

Animal waste collection, storage and land disposal facilities consisting of a 70,000 gallon (32 by 45 by 8 feet deep) covered, reinforced concrete liquid manure tank, a Vaughn non-clog manure chopper pump, MF Diesel Tractor (50%) and a Vaughn "Honey Wagon."

The claimed facility was placed in operation in November, 1971.

Certification is claimed under the 1969 Act with 80 to 100% of the cost allocated to pollution control.

Claimed cost: \$11,628.76 (Accountants Certification was provided)

3. Evaluation of Application

Prior to the installation of the claimed facilities, animal wastes were pushed off a concrete slab into a low lying area drained by a small, intermittent tributary of Lake Creek. In the summer, when the ditch dried up, the manure remaining (about 80%) was loaded out and spread on land. With the claimed facility, all animal wastes are collected on a year round basis and applied on 294 acres of cropland depending on soil and weather conditions.

The facilities, as installed, are meeting present requirements of the Department.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the facilities claimed in Application T-391, such certificate to bear the actual cost of \$11,628.76 with 80% or more of the cost allocable to pollution control.

Date	2-9-73	

T-394

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DEPARTMENT	OF	E	WII	RONMENTAL	QUALITY	

TAX RELIEF APPLICATION REVIEW REPORT

Applicant

Timber Products Co. P. O. Box 1669 Medford, OR 97501

The applicant operates a veneer, plywood and particleboard manufacturing plant in Medford, OR.

This application was received December 18, 1972.

2 Description of Facility

The claimed facility is a handling and firing system for sanderdust disposal and consists of the following:

- 1. A high pressure conveying system
- (1) 24 unit storage silo
- (1) 1% unit metering bin
- (1) Bumstead-Woolford sanderdust burner
- (2) 4'-6" Diameter WF filter units as replacements for (1) 54" diameter and (1) 72" diameter cyclones
- Modification of side-wall tubes in the hog fuel boiler
- Necessary foundations and electrical control systems

The facility was completed and placed in service on November 15, 1971.

Certification is claimed under the 1969 act and the percentage claimed for pollution control is 100%.

Facility Cost: \$57,999.60 (Accountant's certification was provided)

Evaluation of Application 3.

With the previously existing conveying and control system, the sanderdust from the plywood and the particleboard manufacturing operations was blown through a low pressure collection line from the emission sources to either a 72" diameter or a 54" diameter cyclone control unit. The cyclones collected larger particulates which were discharged into

Tax Relief Application T-394 February 9, 1973 Page 2

bins and disposed of at the Jackson County landfill site. The finer uncollected particulates were discharged into the atmosphere. The total amount of collected material that was disposed at the city dump amounted to approximately 20-25 units per day or approximately 5500-6500 tons per year. The amount of finer particulate discharged to the atmosphere from the two cyclones was approximately 31 lbs/hour or approximately 120 tons/year.

The new facility claimed in this application replaces the previously existing handling system. The sanderdust is collected and conveyed to a 24 unit storage bin. The sanderdust is then conveyed, as needed, to a smaller $1\frac{1}{2}$ unit metering bin and then fed to the sanderdust burner that has been mounted in the side of the existing hog fuel boiler. The burner was designed to fire approximately $1-1\frac{1}{2}$ units of sanderdust per hour. The 72" diameter cyclone and the 54" diameter cyclone have been replaced by 4'-6" diameter WF filter units.

4. Conclusions

The facility claimed in this application has reduced the amount of solid waste to be disposed of at the Jackson County landfill from approximately 5500-6500 tons/year to approximately 550-650 tons/year, a reduction of about 5-6000 tons per year. In addition, it is estimated that the amount of fine particulate previously emitted to the atmosphere from the two cyclones has been reduced from 117 tons per year to about 4 tons per year, a reduction of about 113 tons per year.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$57,999.60 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-394.

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TAX RELIEF APPLICATION REVIEW REPORT

Weyerhaeuser Company - Springfield
Wood Products Group

1. Applicant

Weyerhaeuser Company
Wood Products Group
P. O. Box 275
Springfield, Oregon 97477

Weyerhaeuser Company owns a wood processing complex in Springfield, Oregon, in Lane County which produces paperboard, lumber, plywood, particle board, ply-veneer and pres-to-logs.

2. Description of Claimed Facilities

The facilities consist of two separate glue wastewater recirculation systems, one for exterior glue and one for interior glue. Each recirculation system consists of a 1500-gallon concrete settling tank, a screen box for removing sticks and debris, a pump and motor, and related piping and controls. Glue wastewater is pumped from the settling tanks to the spreaders and the glue tower.

The claimed facility was placed in operation January 18, 1971.

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

Facility cost: \$63,722 (Accountant's certification was submitted.)

3. Evaluation

Prior to the construction of the facility all liquid drainage from the glue spreaders was discharged into sewers of the City of Springfield. With the claimed facility the glue wastewaters are recirculated, eliminating any discharge. The solids accumulated on the screens and in the concrete settling tanks are placed on the hog fuel which is burned. Investigation reveals the facility is well designed and well operated.

It is concluded that this facility was installed for pollution control.

4. Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$63,772 with 80% or more of the cost allocated to pollution control be issued for the facilities claimed in Tax Application T-397.

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Weyerhaeuser Company
Wood Products Group
P.O. Box 275
Springfield, Oregon 97477

The applicant owns and operates a large wood processing plant in Cottage Grove in Lane County. Wood products consist of lumber, studs, plywood, and laminated beams.

2. Description of Claimed Facility

The claimed facility is a shotgun oil separator which consists of a steel pipeline which collects waste steam from the shotgun, a heat exchanger for condensing steam, a steel pipeline which delivers cool pond water from the log pond to the heat exchanger, and a steel pipe which discharges the condensed steam and the cooling water back into the log pond. Also included is a cooling water pump. The purpose of the system, originally, was to discharge the oil-laden steam condensate into the log pond where the oil would be absorbed by the logs.

The claimed facility was placed in operation November 1971.

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

Facility cost: \$16,191 (Accountant's certification was submitted)

3. Evaluation of Application

Originally, the steam from the shotgun was discharged directly into the ditch which runs beneath the mill and discharges into the Coast Fork of the Willamette River. In addition to raising the temperature of the water in the ditch, the steam also discharged emulsified oil (used to lubricate the shotgun) into the ditch.

The claimed facility was designed to condense the steam and discharge the condensate into the log pond where the logs would absorb the emulsified oil. When the claimed facility was placed in operation it was found that much of the emulsified oil was trapped at a dip in the pipe from the shot-gun to the heat exchanger. Consequently, a small pipe was added to discharge the trapped oil onto a waste bark conveyor which transports hog

Tax Relief Application Review Report Application No. T-399 February 20, 1973 Page 2

fuel. The oil-removal capabilities of this system appear to be quite efficient as no oil was noticed at the point where the condensate is discharged into the log pond.

It is concluded that this facility was installed for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$16,191 with 80% or more of the cost allocated to pollution control be issued for the facilities claimed in Tax Application No. T-399.

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Weyerhaeuser Company Wood Products Division P. O. Box 275 Springfield, Oregon 97477

The applicant owns and operates a large wood processing complex in Cottage Grove in Lane County. The complex produces lumber, plywood, studs, and laminated wood products.

2. Description of Claimed Facility

The claimed facility consists of a settling pond (surface area: 15,000 square feet) which includes several sets of steel baffles, a dam used to contain the glue waste water, and related pumps and piping.

The claimed facility was placed in operation February, 1971.

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

Facility cost: \$6,306 (Accountant's certification was submitted)

3. Evaluation of Application

Prior to the implementation of the claimed facility, glue waste waters were discharged into the Coast Fork of the Willamette River. With the claimed facility, the glue waste water is completely contained resulting in no discharge to public waters. Excess waters are spray irrigated and settled solids are dredged annually and disposed of in an approved landfill. Investigation reveals the facility is well designed and well operated. No problems were observed.

It is concluded that this facility was installed for pollution control.

4. Directors Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost \$6,306 with 80% or more of the cost allocated to pollution control be issued for the facilities claimed in Tax Application No. T-293.

hhi: ______

Date 2-15-73

State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

The Hervin Company

1. Applicant

The Hervin Company
P. O. Box 168
Tualatin, Oregon 97062

The applicant owns and operates a pet food manufacturing plant in Tualatin in Washington County.

2. Description of Claimed Facility

The claimed facility consists of a 160,000 gallon steel, plastic lined, aeration basin with a Rex Chain Belt, 30 HP surface aerator and associated electrical equipment.

The claimed facility was placed in operation April 1, 1972.

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

Facility Cost: \$23,841.87 (Accountant's certification was submitted)

3. Evaluation of Application

Prior to the installation of the claimed facilities, waste waters were pretreated by a small aeration process to reduce the BOD before the wastewater was discharged into the Tualatin sewer system. This pretreatment system was not adequate and could not meet the waste water limitations as set by the City of Tualatin. The inadequately pretreated wastewater would at times upset the Tualatin plant.

With the addition of the claimed facility, the wastewaters are pretreated to an acceptable level before being discharged into the Tualatin system. As a result, the Tualatin system has been able to maintain a 5 mg/l BOD and suspended solids concentration in their effluent.

4. Recommendation

It is recommended that a Pollution Control Facility Certificate bearing
the cost of \$23,841.87 with 80% or more of the cost allocated to pollution
control be issued for the facilities claimed in Tax Application No. T-405.

Appl. T-409

Date 2-15-73

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

Weyerhaeuser Company - Paperboard - Springfield

1. Applicant

Weyerhaeuser Company
Paperboard
P. O. Box 275
Springfield, Oregon 97477

The applicant owns and operates a large wood processing complex at Springfield in Lane County. The complex produces paperboard, plywood, lumber, particleboard and Pres-to-Logs.

2. Description of Claimed Facility

The claimed facility consists of a laboratory water demineralizer and distillation apparatus which provides deionized water for the environmental laboratory.

The claimed facility was placed in operation August 1, 1971.

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

Facility Cost: \$1,757.00 (Cost documentation was provided)

3. Evaluation of Application

Distilled water is used extensively in analytical laboratory work. A supply of distilled or demineralized water is needed for pollution control monitoring analysis. The claimed facility replaces a similar facility which became inoperable because of corrosion within its boilers. The new facility does not appear to provide improved environmental monitoring capabilities.

It is concluded that the facility is a maintenance replacement item and provides no new or additional support for pollution control activities.

4. Recommendation

It is recommended that a Pollution Control Facility Certificate be denied for the facilities claimed in Tax Application No. T-409.

TAX RELIEF APPLICATION REVIEW REPORT Boise Cascade Corporation - Paper Division Salem

1. Applicant

Boise Cascade Corporation Paper Division P. O. Box 2089 Salem, Oregon 97308

The applicant owns and operates a sulfite pulp and paper mill at 315 Commercial Street S.E. in Salem, Oregon, Marion County.

2. Description of Claimed Facility

Chemical recovery and secondary treatment system consisting of blow pit stock washing system piping and modifications, waste liquor evaporator plant, recovery boiler plant, absorption system and aerated lagoon secondary treatment system together with necessary piping, electrical work and related facilities

Construction of the claimed facilities was started in October 1970 and first placed in operation in June 1972.

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

Claimed Cost: \$6,908,837.00 supported as follows:

Certified by accountant \$6,101,818
71.1 acres of land assessed
at \$678 per acre 48,206
Estimated additional costs
to be incurred 758,813

3. Evaluation

The claimed facilities were installed to meet Department requirements for installation of chemical recovery and secondary treatment by July 1, 1972.

The annual operating costs are estimated to greatly exceed the value of recovered materials.

The land claimed in the application was not certified by the accountant. The land involved was used for pollution control prior to 1967 and hence is not considered eligible for certification by the Department.

The applicant has claimed \$758,813 in other costs not certified by the accountant. The Department cannot recommend certification of these costs until the accountant's certification is received. Since the applicant

Tax Relief Application Review Report Application No. T-416 February 20, 1973 Page 2

desires to obtain certification prior to April 1 in order to obtain property tax relief, the Department concludes that certification should be granted for \$6,101,818 and the applicant should be advised to submit a supplemental application for the remainder of the costs when certified by the accountant.

4. Recommendation

It is recommended that a Pollution Control Facilities Certificate bearing the cost of \$6,101,818 with 80% or more allocable to pollution control be issued for the facilities claimed in Application T-416.



DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET PORTLAND, ORE. 97205 Telephone (503) 229-5383

TOM McCALL

DIARMUID F. O'SCANNLAIN Director

ENVIRONMENTAL QUALITY COMMISSION

B. A. McPHILLIPS Chairman, McMinnville

EDWARD C. HARMS, JR. Springfield

STORRS S. WATERMAN Portland

GEORGE A. McMATH Portland

ARNOLD M. COGAN Portland To:

Environmental Quality Commission

From:

Director

Subject:

Agenda Item J, March 2, 1973, EQC Meeting

Supplemental Tax Credit Applications

Attached are review reports on 16 additional Tax Credit Applications. These applications and the recommendations of the Director are summarized on the attached table.

DIARMUID F. O'SCANNLAIN

WEG:ahe

March 1, 1973

TAX CREDIT APPLICATIONS

Applicant	Appl. No.	Facility	Claimed Cost	% Allocable to Pollution Control	Director's Recommendation
Georgia-Pacific Corp. Junction City Division	T-207	Wigwam waste burner phase-out \$	70,624	80% or more	Issue
Georgia-Pacific Corp. Eugene-Springfield Division	T-208	Wigwam waste burner phase-out	63,451	80% or more	Issue
The Amalgamated Sugar Co. Nyssa, Oregon, Factory	T-240	Collection and control of particulates from three pulp driers	42,168.89	80% or more	Issue
Cascade Construction Co., Inc.	T-387	Housing or enclosure of screen for prevention of fugitive dust leaks from top of plant tower & dust collection ductwork	20,204.27	80% or more	Issue
Cascade Construction Co., Inc.	T-388	Housing or enclosure of weigh hoppers & pug-mill mixer for prevention of fugitive dust leaks from lower plant tower	6,123	80% or more	Issue
Cascade Construction Co.,Inc	T-389	"Blue-smoke" collector and incinerator	4,245	80% or more	Issue
Cascade Construction Co.,Inc	T-390	Pre-cleaning cyclone which collects larger particles in dryer exhaust gases	22,480 \	80% or more	Issue
Brooks-Scanlon, Inc. Bend Division	T-402	Complete steam and power generating installation	1,790,445	60% or more	Issue
Georgia-Pacific Corp. Toledo Division	T-403	Heavy black liquor oxidation units	104,713.36	80% or more	Issue
Menasha Corporation	T-404	a) 270 acre holding lagoon	50,000		Deny
Paperboard Division		b) Deep ocean outfall system	1,330,421.83	80% or more	Issue

		-			•
Applicant	Appl. No.	Facility	Claimed Cost	% Allocable to . Pollution Control	Director's Recommendation
Weyerhaeuser Company Paperboard	T-411	Piping and valves to use pre- existing black liquor oxidation equipment	\$ 3,179	80% or more	Issue
V. Robert Thomsen dba Thomsen Orchards	T-418	Pressurized-fuel orchard heating systems	16,132.16	80% or more	Issue
Martin Marietta Aluminum, Inc. Reduction Division	T-424	Wet electrostatic precipitators and attached spray-bubble chambers and ductwork	1,662,700.51	80% or more	lssue
W. C. Laraway dba Laraway Orchards	T-425	Pressurized-fuel orchard heating system	3,306.68	80% or more	Issue
Bickford Orchards, Inc.	T-429	Pressurized-fuel orchard heat- ing system	5,013.53	80% or more	Issue
M. S. Walton dba Pooley Orchards	T-430	Propane orchard heating system	16,056.47	80% or more	Issue
			March 2, 1973 TO	TALS	
			Air Quali	ty \$3,935,089.47	•
			Water Qua	lity <u>7,649,986.99</u>	
				\$11,585,076.46	
			Calendar Year TO	TALS	
	-	/	Air Quali	ty \$3,966,289.47	
WEG:ahe			Water Qua	lity 8,030,490.12	
March 1, 1973				\$1-1 996 779 59	

\$11,996,779.59

Date	2-28-73

TAX RELIEF APPLICATION REVIEW REPORT

Applicant

Georgia Pacific Corporation Junction City Division P. O. Box 789 Eugene, OR 97401

The applicant owns and operates a facility that manufactures decorative wall paneling in Junction City at this location. This application was received on March 24, 1971, and due to incomplete costing was not completed until January 24, 1972.

2. Description of Claimed Facility

The claimed facility is described to include the following equipment which resulted in the phase-out of the wigwam waste burner:

- a. Two (2) thirty (30) unit storage bins
- b. Knife hog
- c. Chip conveyor system
- d. Low pressure pneumatic conveyor system
- e. Labor
- f. Electrical supplies
- g. Miscellaneous materials and supplies

The facility was completed and put into operation in August, 1970. Certification was not claimed under either the 1967 nor the 1969 Act; however, because of the dates construction was completed, and the facility was put into service, certification must be claimed under the 1969 Act.

Facility cost: \$70,624.00 (Accountant's certification was provided).

3. Evaluation of Application

As a portion of the compliance program with the Lane Regional Air Polltuion Authority to abate the use of the wigwam waste burner, the company made the above installation. The original goal was to utilize the panel trim wastes as chips at the Toledo, Oregon, Pulp and Paper Division for pulp and paper manufacturing. Since sanderdust had no known value the company proposed to haul it to a disposal site.

In the data submitted in January, 1972, the company explained that the material originally sent to Toledo as chips was unsatisfactory, and therefore, only useful as hog fuel at a value of \$6.00 per unit instead

Tax Relief Application T-207 February 28, 1973 Page 2

of \$11.96 per unit as stated in the application as submitted in March, 1971. As a consequence, the return on investment, which was originally stated as 13.7%, is actually -30.2%, or an annual loss of \$21,354.00 before taxes. Sanderdust is hauled to a local disposal site with no known adverse effects at this time.

4. Directors Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$70,624.00, with 80% or more of the cost allocated to pollution control, be issued for the facility claimed in Tax Application T-207

H.H. Burkitt:sb

Appl	T-208
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Date 2-28-73

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Georgia Pacific Corporation Eugene-Springfield Division P. O. Box 789 Eugene, OR 97401

The applicant owns and operates a facility on Highway 99N at Irving Road in Eugene that manufactures decorative wall paneling. This application was received on March 24, 1971, and due to incomplete costing was not completed until January 24, 1972.

2. Description of Claimed Facility

The claimed facility is described to include the following equipment which resulted in the phase-out of the wigwam waste burner:

- a. Two (2) thirty (30) unit storage bins
- b. Knife hog
- c. Chip conveyor system
- d. Low pressure pneumatic conveyor system
- e. Labor
- f. Electrical supplies
- q. Miscellaneous materials and supplies

The facility was completed and put into operation in September, 1970. Certification was not claimed under the 1969 Act; however, because of the dates construction was completed, and the facility was put into service, certification must be claimed under the 1970 Act.

Facility cost: \$63,451.00 (Accountant's certification was provided).

3. Evaluation of Application

As a portion of the compliance program with the Lane Regional Air Pollution Authority to abate the use of the wigwam waste burner the company made the above installation. The original goal was to utilize the panel trim waste as chips at the Toledo, Oregon, Pulp and Paper Division for pulp and paper manufacturing. Since sanderdust had no known value the company proposed to haul it to a disposal site.

In the data submitted in January, 1972, the company explained that the material originally sent to Toledo as chips was unsatisfactory, and

Tax Relief Application T-208 February 28, 1973 Page 2

therefore, only useful as hog fuel at a value of \$6.00 per unit instead of \$11.96 per unit as stated in the application as submitted in March, 1971. As a consequence, the return on investment which was originally stated as 9.8%, is actually -31.6%, or an annual loss of \$20,081.00 before taxes. Sanderdust is hauled to a local disposal site with no known adverse effects at this time.

4. Directors Recommendations

It is recommended that a Pollution Control Facility Certificate bearing the cost of 63,451.00, with 80% of more of the cost allocated to pollution control, be issued for the facility claimed in Tax Application T-208

H.H. Burkitt:sb

Appl T-240

Date	2/28/73
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TAX RELIEF APPLICATION REVIEW REPORT

Applicant 1.

The Amalgamated Sugar Company Nyssa, Oregon Factory P. O. Box 1520 Ogden, Utah 84401

The applicant owns and operates a sugar extraction and refining facility in Nyssa, OR. This application was received on August 6, 1971.

Description of Claimed Facility

The claimed facility is described to include the following equipment to collect and control particulates from the three (3) pulp driers:

- No. 8JC18 Morris, Centrifugal Pump, with a capacity of 2,000 gpm at 125 ft. total dynamic head
- 252 ft. 8" Black Steel Pipe b.
- 500 ft. 12" Black Steel Pipe
- 10 ft. 14" Black Steel Pipe

- 70 ea.- $1\frac{1}{2}$ ", No. 1739, Spraco, cast iron spray nozzels 10 ea.-8", 150 lb Slip on welding flanges 4 ea.-8", 125 lb, No. $465\frac{1}{2}$, Crane wedge gate valves
- 1 ea.-100 H.P., 1800 rpm, 404T frame electric motor h.
- 2.120 ft. 12" O.D., 7 gauge wall, welded steel pipe, bare inside, asphalt coated outside and asbestos wrapped
- 1 ea.-8", 125 lb, 22R304, Fabri-Valve, Type 304 S.S. 1 ea-10", 125 lb, 22R304, Fabri-Valve, Type 304 S.S.
- 48 ft. 36" O.D., 4" wall, welded steel pipe asphalt coated and asbestos wrapped
- Labor m.
- n. Electrical Supplies
- o. Miscellaneous materials and supplies

The facility was completed and put into operation in October, 1970. Certification is claimed under the 1969 Act.

Facility cost: \$42,168.39 (Accountant's certification was provided).

Tax Relief Application T-240 February 28, 1973 Page 2

3. Evaluation of Application

Prior to the installation of these four (4) scrubbers particulate fallout of particles of dried beet escaped into the atmosphere exceeding the amount fixed by regulatory requirements. Only three (3) pulp driers exist, but since one pulp drier had two (2) cyclone separators it was necessary to also install two (2) individual scrubber hoods. The effluent gasses from these three (3) pulp driers are now scrubbed with water sprays removing the particulate matter. Scrubber water is returned to the waste water settling ponds along with silt in a closed flume system. All scrubber water is recycled after settling back to the scrubbers. Only make-up water is required. Current annual operating expendure for these four (4) scrubbers is \$18,605.00. Return on investment before taxes was -34.12% or a loss of \$14,388.16 annually.

4. Director's Recommendations

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$42,168.89, with 80% or more allocable to pollution control be issued for the facility claimed in Tax Application T-240.

H.H. Burkitt:sb

Appl	T-387	
Dato	2_22_72	

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Cascade Construction Company, Inc. P. O. Box 4267
Portland, OR 97208

The applicant operates a stationary hot-mix asphaltic concrete plant at the foot of S. W. Abernethy in Portland.

2. Description of Claimed Facility

The claimed facility is described to be a housing or enclosure of the screen for the prevention of fugitive dust leaks from the top of the plant tower and dust collection ductwork.

Construction of the facility began in March 1969 and was completed in May 1969.

Certification is claimed under the 1967 Act.

Facility cost: \$20,204.27 (Accountant's certification was provided).

3. Evaluation of Application

The Columbia-Willamette Air Pollution Authority has indicated that it required the installation of the claimed facility. According to CWAPA, the facility is functioning satisfactorily.

Without the claimed facility, rock dust was emitted from the plant tower approximately 100 feet above ground level.

It is concluded that the principle purpose for installing the claimed facility was to reduce fugitive dust emissions to the atmosphere and that 80% or more of the cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$20,204.27 with 80% or more of the cost allocated to pollution control, be issued for the facility claimed in Tax Application T-387.

F. A. Skirvin:sb

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Date	2-22-73	

T-388

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TAX RELIEF APPLICATION REVIEW REPORT

Applicant

Cascade Construction Company, Inc. P. O. Box 4267 Portland, OR 97208

The applicant operates a stationary hot-mix asphaltic concrete plant at the foot of S. W. Abernethy in Portland.

2. Description of Claimed Facility

The claimed facility is described to be a housing or enclosure of weigh hoppers and pug-mill mixer for the prevention of fugitive dust leaks from the lower part of the plant tower.

Construction at the facility began in March 1969 and was completed in March 1969.

Certification is claimed under the 1967 Act.

Facility cost: \$6,123.00 (Accountant's certification was provided).

Evaluation of Application

The Columbia-Willamette Air Pollution Authority has indicated that it required the installation of the claimed facility. According to CWAPA, the facility is functioning satisfactorily.

Without the claimed facility rock dust was emitted from the lower part of the plant tower.

It is concluded that the principle purpose for installing the claimed facility was to reduce fugitive dust emissions to the atmosphere and that 80% or more of the cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$6,123.00 with 80% or more of the cost allocated to pollution control, be issued for the facility claimed in Tax Application T-388.

F. A. Skirvin:sb

Appl	т-389

Date	2-22-73	

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant .

Cascade Construction Company, Inc. P. O. Box 4267
Portland, OR 97208

The applicant operates a stationary hot-mix asphaltic concrete plant at the foot of S. W. Abernethy in Portland.

2. Description of Claimed Facility

The claimed facility is described to be a "blue-smoke" collector and incinerator including a high volume exhauster fan, manifold ducting, and injection ring to feed collected smoke back into the aggregate dryer to be burned by the fire. The "blue-smoke" is condensed hydrocarbons which are released as each batch of asphalt is dropped from the mixer into a truck.

Construction of the facility began in March 1971 and was completed August 1971.

Certification is claimed under the 1969 Act for 100% of the cost.

Facility cost: \$4,245.00 (accountant's certification was provided).

3. Evaluation of Application

The Columbia Willamette Air Pollution Authority has indicated that it required the installation of the claimed facility. According to CWAPA, the facility is functioning satisfactorily.

Without the claimed facility "blue-smoke" was emitted as hot asphalt was dropped into the trucks.

It is concluded that the claimed facility was installed to reduce atmospheric emissions and that 80% or more of the cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$4,245.00 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-389.

Appl	T-390	
Dato	2-22-73	
Date	4-44-13	

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Cascade Construction Company, Inc. P. O. Box 4267
Portland, OR 97208

The applicant operates a stationary hot-mix asphaltic concrete plant at the foot of S. W. Abernethy in Portland.

2. Description of Claimed Facility

- The claimed facility is described to be a pre-cleaning cyclone which collects the larger particles in the dryer exhaust gases thus enabling the existing downstream high energy multiclone to perform more efficiently on a continuing basis.

Construction and operation of the facility began in March 1970.

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

Facility cost: \$22,480.00 (Accountant's certification was provided).

3. Evaluation of application

The claimed facility was not required by the Columbia Willamette Air Pollution Authority. The claimed facility was added to the asphalt plant about two years after the plant itself was constructed in an attempt to reduce the amount of large material entering the multiclone which is located downstream. The removal of the larger material before the multiclone resulted in improved performance of the multiclone and thereby lessened the dust emissions to the atmosphere.

The multiclone is not included in this application.

It is concluded that the claimed facility was installed to reduce atmospheric emissions and that 80% or more of the facility is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$22,480.00 with 80% or more of the cost allocated to pollution control, be issued for the facility claimed in Tax Application T-390.

F. A. Skirvin:sb

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Appl_	ı	T-402	

Date	2-26-7	3
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TAX RELIEF APPLICATION REVIEW REPORT

Applicant

Brooks-Scanlon, Inc. Bend Division P. O. Box 1111 Bend, OR 97701

The applicant operates a sawmill and planing mill for the manufacture of lumber at Bend, OR.

This application was received December 20, 1972.

2. Description of Claimed Facility

The claimed facility is a complete steam and power generating installation that utilized the wood waste residues generated by the manufacturing operations for fuel. The facility is described to consist of the following:

- a. Power house
- b. (2) Babcock and Wilcox Sterling Boilers (wood fired)
- c. (1) Worthington (300 gpm) feed pump
- d. (1) 3500 KW Westinghouse turbine-generator
- e. (2) Worthington boiler feed-pumps
- f. Auxiliary fuel handling and distribution system
- g. Steam piping system
 - h. Boiler combustion controls
 - i. (2) Multicone Flyash collector systems

The facility was completed in June, 1969. Certification is claimed under the 1969 Act and the percentage claimed for pollution control is 79%.

Facilty costs: \$1,790,445 (accountant's certification was provided).

3. Evaluation of Application

In 1965, Brooks-Scanlon, Inc. was operating a total of six (6) hog fuel boilers to generate the steam and power required to operate the manufacturing facility. The wood fuel for the boilers consisted entirely of green hogged chips from the sawmill and dry shavings from the planing operations. Wood waste residues of bark, sawdust and waste wood scraps, at that time, were not suitable for firing in the boilers as they were then set-up. All six (6) of the boilers and the old Allis-Chambers turbine-generator were in need of extensive repair and

modification work in order to bring them up to a sufficiently good operating condition so that both visible and particulate emissions to the atmosphere could be reduced to the emission limitations set by regulations. From Department reports and observations at that time, the visible emissions were generally of 100% opacity and it is estimated that the particulate emissions, with each boiler generating about 26,000 lb/hour of steam, were on the order of 0.5-0.6 gr/SCF or approximately 140-160 lb/hour or 550-650 tons/year from each boiler. This would indicate a total particulate emission into the atmosphere of approximately 3,600 tons/year from the power plant facilities. The company employed outside engineering consultants to study means to attain compliance and, as a result of these studies, ultimately awarded contracts for construction of the facility covered by this tax relief application.

Construction of this facility was started in August of 1966 and it was completed in June of 1969. It was immediately apparent that, for various reasons, the two new boilers were not able to produce the 150,000 lb/hour steam load that had previously been generated by the six old boilers without greatly exceeding the emission limitation. This failure of the boilers to perform, as contracted, was the subject of a lawsuit by the company against the contractor and also necessitated another company expenditure of about \$620,000 for further repair and modification work in a continued attempt to attain compliance in the operation of the new boilers.

In May, 1971, the boiler stack emissions were tested by an independent agency and in accordance with Department approved testing procedures. Particulate emissions were found to average about .31 gr/SCF for the two (2) stacks or a total of approximately 122 lb/hour or 512 tons/year from both boilers. Thus with a total net expenditure by the company of \$1,790,445 (Actual expenditures less the amount recovered from settlement of the lawsuit) the company reduced the total particulate emissions to the atmosphere from an originally estimated 3,600 tons/year to approximately 512 tons/year, a reduction of about 3088 tons/year when the boilers were operated to produce about 120,000 lbs. of steam/hour.

The steam and power generating facility, at this point in time, allowed for operation of the power plant under the following conditions:

- a. Steam production while operating the boilers within emission limits was only 100,000 lb/hour rather than the 150,000 lb/hour required for plant operation and as had been produced by the old power plant.
- b. The boilers were capable of burning all types of wood waste residues produced by the manufacturing operations rather than just the green chips and shavings:utilized in the old facility.
- c. The company was now able to sell the planer shavings rather than burn them and in 1972 these sales amounted to an income of \$30,332 (annualized).

- d. The two (2) boiler stack emissions had an average particulate loading of .31 gr/SCF at steaming rates of about 60,000 lb/hour. This, of course, was greater than the .2 gr/SCF maximum allowable by regulations.
- e. Operation of the six (6) old boilers was required at various times to make up the steam load that could not be supplied by the new boilers or to supply the full steam load when the new boilers had to be shut down for further repair or modification work.
- f. The company was still faced with the problem of what to do to obtain the previous steam production rate of about 150,000 lb/hour while limiting the boiler stack particulate emission load levels to 0.2 gr/SCF or less.

The facility covered by this application is the time period from August, 1966 through June, 1970, a period beset with serious problems from its inception

The financial costs to the company were as follows:

Initial installation costs of the faciltiy (1969) Further repair and modification costs (1970)	\$1,560,180 619,848
Subtotal	\$2,180,445
Less: Lawsuit recovery (\$500,000) Legal expenses \$110,417 Net Total Costs:	(389,583) \$1,790,445

The company has furnished an accountant's certification for the above costs. In addition to the costs listed, the certification credits the additional revenue of \$100,000 from planer shaving sales made possible by this facility and assigns a capitalized earnings of \$370,000 as a net economic effect of these sales.

The application, because of these capitalized earnings, indicates a cost relevant to allocation for pollution control as follows:

Total costs for faciltiy:	\$1,790,445
Less capitalized earnings	(370,000)
Net allocated costs	\$1,420,445

This capitalization of earnings because of sales of the planer shavings and the credit against the facility costs is unique in a tax relief credit application.

The installation of this facility, despite its problems and its less than desired operational levels, had enabled the company to significantly reduce the particulate emissions to the atmosphere by an estimated 2,000-3,000 tons per year by the end of 1970. The exact amount of

Tax Relief Application T-402 February 26, 1973 Page 4

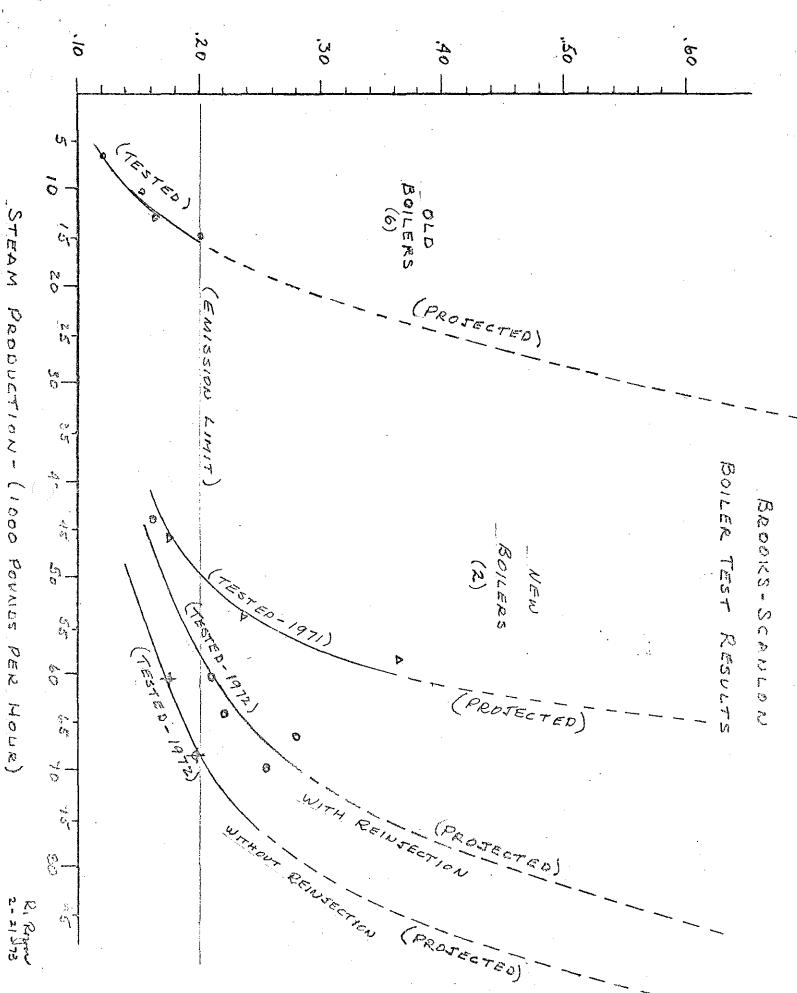
reduction accomplished is not possible to determine since the old boilers still had to be operated, albeit at reduced steam production levels, to generate sufficient steam and power for the plant operation. Test results had been submitted to the Department by the company in May, 1971, to demonstrate that, when the two new boilers were operated at steam production rates of not more than 50,000 lb/hour from each boiler and when any of the old boilers were operate at steam production rates of not more than 15,000 lb/hour from each boiler, the boiler stack particulate emissions rates could be controlled within the emission limitation of 0.2 gr/SCF as prescribed in OAR, Chapter 340, Section 21-020.

Nevertheless, at the point of time covered by this application (1970), the company still was far short of attaining the goals and objectives they had originally established for this facility, namely, (1) steam production rates of 150,000 lb/hour or more from the new boiler facility while maintaining boiler stack emissions within limitations set by regulations and (2) the complete phase-out of all operation of the old boiler facility.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$1,790,445 with 60% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-402.

R. A. Royer:sb



CALCULATIONS

1. Particulate emissions from old boilers

estimated grain loading gas flow

.50 gr/SCF 33,000 CFM @ 26,000 lb/hr steam production

 $\frac{150 \text{ gr/SCF} \times 33,000 \text{ SCF/min} \times 60 \text{ min/hr}}{7000 \text{ gr/lb}} = 141 \text{ lbs/hr each boiler}$

 $\frac{141 \text{ lb/hr x } 24 \text{ hr/day x } 550 \text{ days/year}}{2000 \text{ lb/Ton}} = 595 \text{ Tons/year each boiler}$

595 Tons/yr x 6 boilers = 3570 Tons/year Total particulate emissions from six (6) boilers

2. Particulate emissions from new boilers

grain loading (one test results) .31 gr/SCF
gas flow 23,000 SCF @ 57,000 lb/hr
steam production

 $\frac{.31 \text{ gr/SCF} \times 23,000 \text{ SCF/min} \times 60 \text{ min/hr}}{7000 \text{ gr/lb}} = 61.3 \text{ lb/hr each boiler}$

 $\frac{61.3 \text{ lb/hr x } 24 \text{ hr/day x } 350 \text{ days/year}}{2000 \text{ lb/Ton}} = 256 \text{ Tons/year each boiler}$

256 Tons/year x 2 boilers = 512 Tons/year Total particulate emissions from two (2) boilers

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Date 2/	28/73	
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TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Georgia-Pacific Corporation Toledo Division P. O. Box 580 Toledo, OR

The applicant makes kraft pulp and linerboard at its kraft mill in Toledo, Oregon.

The application was received on December 29, 1972.

2. Description of Facility

The facility is described to be heavy black liquor oxidation units, consisting of 12 Penberthy Eductors and one Ashbrook Bloxidizer, plus associated pumps, blowers, pipes and controls.

Facility cost: \$104,713.36 (Accountant's certification was provided).

The facility was completed and placed in operation on June 27, 1971.

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

3. Evaluation of Application

This facility was installed in response to the Kraft Mill Emissions Regulation, specifically to comply with the limits on recovery furnace TRS (OAR, Chapter 340, Section 25-170 (1) (a) and (b)). The company has stated its intention of using the same facilities for complying with the recently adopted amended Kraft Mill Emission REgulation.

The facility prevents the formation and release of reduced sulfur (TRS) compounds (odorous gases) from the recovery furnace stack. The facility has reduced the emissions of TRS from 60 parts per million (ppm) to 11 ppm. The additional sulfur reclaimed is not sufficient to pay for the facilities. Because the facility was installed in response to an emission regulation and is not economic, it is concluded that the facility was installed solely for pollution control purposes.

Tax Relief Application T-403 February 28, 1973 Page 2

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$104,713.36 be issued for the facility claimed in Tax Application T-403 with more than 80% allocated to pollution control.

C. A. Ayer:sb

ppl. T-404

Date

1-28-73

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Menasha Corporation
Paperboard Division
P. O. Box 329
North Bend, Oregon 97459

The applicant owns and operates a neutral sulfite semi chemical pulp and corrugating medium manufacturing plant located north of North Bend in Coos County.

2. Description of Claimed Facility

- a. 270 acre holding lagoon on land leased from the U. S. Army Corps of Engineers. (Completed and placed in operation June 1961).
- b. Deep Ocean Outfall System leased from the Port of Coos Bay. (Completed November 1972 and placed in operation January 1973).

Claimed Cost: \$1.7 Million for outfall, \$50,000 for lagoon with 100% of the cost claimed allocable to pollution control.

3. Evaluation

The 270 acre holding lagoon is not eligible since it was constructed and in use for pollution control purposes prior to 1967. Also, costs claimed were not documented.

The Ocean Outfall is considered eligible for certification. Installation was required by the Department. The Outfall is jointly leased by Menasha and Roseburg Lumber Co. However, only Menasha is using the facility for pollution control purposes at this time. The lessee's are responsible for paying property taxes on the Outfall System. Although the applicant indicated a cost of \$1.7 Million for the Outfall on his application, cost documentation submitted (record of amount earned by the contractor) shows a current actual cost of \$1,330,421.83.

4. Recommendation

It is recommended that the Ocean Outfall be certified as a pollution control facility with a total cost of \$1,330,421.83 with 80% or more of that cost allocated to pollution control and that such certificate be issued to Menasha Corporation as lessee.

It is further recommended that certification of the holding lagoon be denied based on a lack of information to support its eligibility.

Appl	T-411	
Date	1-23-73	

TAX RELIEF APPLICATION REVIEW REPORT

Applicant

Weyerhaeuser Company P. O. Box 275 Springfield, Oregon

The applicant manufactures kraft pulp and paperboard at its plant in Springfield.

The application was submitted on January 15, 1973.

2. Description of Facility

The facility is described to be piping and valves to allow using pre-existing black liquor oxidation equipment in series instead of parallel operation.

Facility Cost: \$3179.00 (Invoices were submitted)

The facility was completed and placed in operation in May, 1971.

Certification is claimed under the 1969 act.

The percentage claimed is 100%.

Evaluation of Application

The purpose of this facility is to alter the flow of black liquor through black liquor oxidation facilities previously used for No.'s 1 and 2 and a parallel system for No. 3 recovery furnaces so that the oxidation units may be operated in series and use all the facilities formerly treating liquor for three furnaces for just No. 3. No.'s 1 and 2 furnaces were retired from service in May, 1971.

Installation of a facility to serve this function was a part of the company's program for complying with the Kraft Mill Emission Regulation, and was approved in May, 1969.

The facility serves no purpose other than pollution control.

Tax Relief Application T-411 January 23, 1973 Page 2

4. <u>Director's Recommendation</u>

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$3179.00 be issued for the facility claimed in Tax Application T-411, with more than 80% allocated to pollution control.

C. A. Ayer/sb

Date	2/23/73	

T-418

Appl

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DEPARTMENT	OF	ΕN	VI	RONMENTAL	OUALITY

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

V. Robert Thomsen dba Thomsen Orchards Route 1, Box 125 Hood River, OR 97031

The applicant operates pear and apple orchards about 3 miles S. E. of Hood River.

2. <u>Description of Claimed Facility</u>

The claimed facility is described to be three pressurized-fuel orchard heating systems consisting of three diesel storage tanks, three pumps with electric motors, approximately 1340 heaters and approximately 40,000 feet of plastic pipe and tubing. A total of 39 acres of fruit trees is heated by these systems.

The three systems were phased into operation in March 1969, March 1970 and March 1972.

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

Facility cost: \$16,132.16 (Purchase orders and an accountant's certification were provided).

3. Evaluation of Application

The claimed facility replaced an existing orchard heating system consisting of about 1340 smudge pots (open buckets fueled with diesel and presto logs). The new systems emit very little smoke compared to the smudge pots. (Photographs were provided to illustrate the reduction in smoke emissions.) The claimed facility is not used for any purpose other than orchard heating.

Since the claimed facility replaces an existing orchard heating system, operates at much lower emissions than the previous method and serves no function other than orchard heating, it is concluded that the claimed facility was installed and is operated to a substantial extent for reducing atmospheric emissions and that the portion of the cost allocable to pollution control is 80% or more.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$16,132.16, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-418.

F. A. Skirvin:sb

App.	L 1-424
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Date 4/26/73

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Martin Marietta Aluminum, Inc. Reduction Division P. O. Box 711 The Dalles, OR 97058

The applicant produces primary aluminum metal at The Dalles Plant by fused salt electrolysis of aluminum oxide in vertical stud Soderberg reduction cells.

2. Description of Claimed Facility

The claimed facility is described to be twelve wet electrostatic precipitators and attached spray-bubble chambers and ductwork which provide treatment of reduction cell exhaust gases.

The claimed facility was completed and placed in operation during January and February 1972.

Certification is claimed under the 1969 Act.

Facility cost: \$1,662,700.51 (An accountant's certification was provided).

3. Evaluation of Application

The claimed facility was installed to provide primary treatment of the reduction cell exhaust gases and replace the existing scrubber towers. The claimed facility is much more efficient with regard to removing particulates and of equal efficiency with regard to gases when compared to the scrubber towers which remain as a back-up system. (The scrubber towers are used when the new system is down for maintenance or repairs.)

A major reason for installing the claimed facility was to achieve compliance with the DEQ Primary Aluminum Plant Regulation which requires that the opacity of all emissions be 20% or less by no later than January 1, 1975. The claimed facility was installed in accordance with plans which were reviewed and approved by the Department. Emission tests results and Department inspections indicate that the claimed facility is operating in compliance with the Primary Aluminum Plant Regulation.

The liquid discharge from the claimed facility is treated to control pH and remove settleable solids. (The water treatment facilities are not included in this application.) No economic return is derived from the claimed facility.

It is concluded that the claimed facility was installed and is operated to reduce air pollution and that 80% or more of its cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the actual cost of \$1,662,700.51 with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-424.

F. A. Skirvin:sb

F. E	 	 	 	

Date		4,	/	2	6/	7	3

State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

W. C. Laraway dba Laraway Orchards Route 1, Box 165 Hood River, OR 97031

The applicant operates pear and apple orchards about 3 miles S. E. of Hood River (or 1/8 mile S. of the junction of East Side Road and Whiskey Creek Road).

2. Description of Claimed Facility

The claimed facility is described to be a pressurized-fuel orchard heating system consisting of one diesel storage tank, one pump with motor, approximately 250 heaters and approximately 11,000 feet of plastic pipe and tubing. About 10 acres of fruit trees are heated by this system.

The claimed facility was placed in operation in March 1970.

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

Facility cost: \$3,306.68 (Purchase order was provided).

3. Evaluation of Application

The claimed facility replaced an existing orchard heating system consisting of about 250 smudge pots (open buckets fueled with diesel and presto logs). The new system emits very little smoke compared to the smudge pots. (Photographs were provided to illustrate the reduction in smoke emissions.) The claimed facility is not used for any purpose other than orchard heating.

Since the claimed facility replaces an existing orchard heating system, operates at much lower emissions than the previous method and serves no function other than orchard heating, it is concluded that the claimed facility was installed and is operated to a substantial extent for reducing atmospheric emissions and that the portion of the cost allocable to pollution control is 80% or more.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$3,306.68, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-425.

F. A. Skirvin:sb

Date 4.	-'26	-73
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State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Bickford Orchards, Inc. Route 1, Box 355 Hood River, OR 97031

The applicant operates pear and apple orchards about 4 miles S. of Hood River and E. of the Pine Grove Store.

2. Description of Claimed Facility

The claimed facility is described to be a pressurized-fuel orchard heating system consisting of one diesel storage tank, one pump, approximately 310 heaters and approximately 16,000 feet of plastic pipe and tubing. About 14 acres of fruit trees is heated by this system.

The claimed facility was initially operated on March 30, 1970.

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

Facility cost: \$5,013.53 (Copies of purchase orders were provided).

3. Evaluation of Application

The claimed facility replaced an existing orchard heating system which consisted of about 340 smudge pots (open buckets fueled with diesel and presto logs). The new system emits very little smoke compared to the smudge pots. (Photographs were provided to illustrate the reduction in smoke emissions.) The claimed facility is not used for any purpose other than orchard heating.

Since the claimed facility replaces an existing orchard heating system, operates at much lower emissions than the previous method and serves no function other than orchard heating, it is concluded that the claimed facility was installed and is operated to a substantial extent for reducing atmospheric emissions and that the portion of the cost allocable to pollution control is 80% or more.

Tax Application T-429 April 26, 1973 Page 2

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost at \$5,013.53, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-429.

F. A. Skirvin:sb

T-430

Stat	ie.	of	Oregon	
DEPARTMENT, OF	EN	VII	COMMENTAL	QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

Date 2/26/73

App1

1. Applicant

M. S. Walton dba Pooley Orchards Route 1, Box 390 Hood River, OR 97031

The applicant operates pear, cherry and apple orchards 5 miles S. of Hood River W. of the Pine Grove Store.

2. Description of Claimed Facility

The claimed facility is described to be a propane orchard heating system consisting of a 9,000 gallon propane storage tank, approximately 1250 burners, PVC pipe lines, and appropriate regulators and controls. About 41 acres of fruit trees are heated by this system.

The claimed facility was initially operated in April 1971.

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

Facility cost: \$16,056.47 (An accountant's certification was provided).

3. Evaluation of Application

The claimed facility replaced an existing orchard heating system consisting of about 1250 smudge pots (open buckets fueled with diesel and presto logs). The new system emits very little smoke compared to the smudge pots. (Photographs were provided to illustrate both the claimed facility and smudge pots.) The claimed facility is not used for any purpose than orchard heating.

Since the claimed facility replaces an existing orchard heating system, operates at much lower emissions than the previous method and serves no function than orchard heating, it is concluded that the claimed facility was installed and is operated to a substantial extent for reducing atmospheric emissions and that the portion of the cost allocable to pollution control is 80% or more.

Tax Relief Application T-430 February 26, 1973 Page 2

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$16,056.47 with 80% or more allocable to pollution control be issued for the facility claimed in Tax Application T-430.

F. A. Skirvin:sb



DEPARTMENT OF ENVIRONMENTAL QUALITY

TOM McCALL

DIARMUID F. O'SCANNLAIN 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 1234 S.W. MORRISON STREET ● PORTLAND, ORE. 97205 ● Telephone (503) 229-5383

To:

Environmental Quality Commission

From:

Director

Subject:

Agenda Item J, March 2, 1973, EQC Meeting

Supplemental Tax Credit Applications

Attached are review reports on 16 additional Tax Credit Applications. These applications and the recommendations of the Director are summarized on the attached table.

DIARMUID F. O'SCANNLAIN

WEG:ahe

March 1, 1973

TAX CREDIT APPLICATIONS

Applicant	Appl. No.	Facility	Claimed Cost	% Allocable to Pollution Control	Director's Recommendation
Georgia-Pacific Corp. Junction City Division	T-207	Wigwam waste burner phase-out \$	70,624	80% or more	Issue
Georgia-Pacific Corp. Eugene-Springfield Division	T-208	Wigwam waste burner phase-out	63,451	80% or more	Issue
The Amalgamated Sugar Co. Nyssa, Oregon, Factory	T-240	Collection and control of particulates from three pulp driers	42,168.89	80% or more	Issue
Cascade Construction Co., Inc.	T-387	Housing or enclosure of screen for prevention of fugitive dust leaks from top of plant tower & dust collection ductwork	20,204.27	80% or more	Issue
Cascade Construction Co., Inc.	T-388	Housing or enclosure of weigh hoppers & pug-mill mixer for prevention of fugitive dust leaks from lower plant tower	6,123	80% or more	Issue
Cascade Construction Co., Inc	T-389	"Blue-smoke" collector and incinerator	4,245	80% or more	Issue
Cascade Construction Co.,Inc	T-390	Pre-cleaning cyclone which collects larger particles in dryer exhaust gases	22,480	80% or more	Issue
Brooks-Scanlon, Inc. Bend Division	T-402	Complete steam and power generating installation	1,790,445	60% or more	Issue
Georgia-Pacific Corp. Toledo Division	T-403	Heavy black liquor oxidation units	104,713.36	80% or more	Issue
Menasha Corporation	T-404	a) 270 acre holding lagoon	50,000		Deny
Paperboard Division		b) Deep ocean outfall system	1,330,421.83	80% or more	Issue

Applicant	Appl. No.	Facility	Claimed Cost	% Allocable to Pollution Control	Director's Recommendation
Weyerhaeuser Company Paperboard	T-411	Piping and valves to use pre- \$ existing black liquor oxidation equipment	3,179	80% or more	Issue
V. Robert Thomsen dba Thomsen Orchards	T-418	Pressurized-fuel orchard heating systems	16,132.16	80% or more	Issue
Martin Marietta Aluminum,Inc. Reduction Division	T-424	Wet electrostatic precipitators and attached spray-bubble chambers and ductwork	1,662,700.51	80% or more	Issue
W. C. Laraway dba Laraway Orchards	T-425	Pressurized-fuel orchard heating system	3,306.68	80% or more	Issue
Bickford Orchards, Inc.	T-429	Pressurized-fuel orchard heat- ing system	5,013.53	80% or more	Issue
M. S. Walton dba Pooley Orchards	T-430	Propane orchard heating system	16,056.47	80% or more	Issue
		<u>M</u>	March 2, 1973 TOT	ALS	
			Air Qualit	sy \$3,935,089.47	
			Water Qual	ity <u>7,649,986.99</u>	
				\$11,585,076.46	
		<u>c</u>	alendar Year TOT	ALS	

WEG:ahe March 1, 1973 Water Quality 8,030,490.12

Air Quality

\$11,996,779.59

\$3,966,289.47



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL

MEMORANDUM

Diarmuid F. O'Scannlain

Director

ENVIRONMENTAL QUALITY
COMMISSION

B. A. McPHILLIPS
Chairman, McMinnville

EDWARD C. HARMS, JR. Springfield

STORRS S. WATERMAN Portland

GEORGE A. McMATH

ARNOLD M. COGAN Portland To:

Environmental Quality Commission

From:

Director

Subject:

Agenda Item No. K, March 2, 1973, EQC Meeting

Proposed Terminal Sales Building 152-Space, Two-Level

Parking Structure

Background:

On January 26, 1973, the Department received a letter from the Columbia Willamette Air Pollution Authority delineating their air quality analysis of and recommendation for the proposed Terminal Sales Building 152-space parking structure. A copy of the CWAPA letter and supporting information is attached.

The proposed parking structure is to be located on the south half of the block bounded by S. W. Twelfth, S. W. Thirteenth, S. W. Morrison and S. W. Yamhill Streets in downtown Portland near the Stadium Freeway (I-405).

The project site is presently occupied by a surface parking lot with a rated capacity of 70 motor vehicles. The proposed parking structure would provide 152 spaces of mixed long-term and short-term parking in two levels. It is intended in part to provide addi-

tional short-term parking capacity for the recently renovated Terminal Sales Building and a new office building (16,000 square feet) to be constructed above the parking structure.

Construction of the proposed parking structure would result in an increase of 82 parking spaces (70 + 82 = 152) on the project site.

At the July 27, 1972, EQC meeting, the Commission considered the application of Ralph Schlesinger to construct a 152-space parking structure at this same location without the third level of offices. The Commission denied approval for construction of this facility. However, the Commission indicated that upon receipt, from the City of Portland, of an effective and acceptable transportation control strategy for achieving compliance with national air quality standards in downtown Portland, the proposed parking structure could be resubmitted for further consideration.

Analysis:

The CWAPA review and analysis of the proposed parking structure indicates substantial concern about the consistency of this project with the Downtown Parking Plan and "Transportation Control Strategy to Achieve Air Quality Standards in Downtown Portland".

CWAPA's recommendation for approval is contingent upon DEQ determination that the proposed facility is compatible with these plans.

The Department believes that the City of Portland is the most suitable agency to determine the consistency of the proposed parking facility with the Downtown Plan and transportation control strategy since it is the agency ultimately responsible for the development and implementation of these plans. Thus, on February 16, 1973, the Department addressed a letter to Mayor Goldschmidt requesting that the City of Portland review the Terminal Sales Building parking structure and comment in writing to the Department upon its consistency with the Portland Downtown Plan, Parking Plan and transportation control strategy. A copy of this letter is attached.

Director's Recommendation:

The Director recommends that the Commission defer action upon the proposed Terminal Sales Building parking structure until such time as the City of Portland provides an indication of the compatibility of this facility with the Portland Downtown Plan, Parking Plan and "Transportation Control Strategy to Achieve Air Quality Standards in Downtown Portland".

PÍARMUID F O'SCANNLAIN

Director

DF0'S:MJD:c 2/20/73

Diarmuid F. O'Scanlain

Hon. Neil Goldschmidt Mayor, City of Portland City Hall Portland, Oregon 97204

> Re: Proposed Terminal Sales Building 152-space parking structure

Dear Mayor Goldschmidt:

On January 26, 1973, the Department received a letter from the Columbia-Willamette Air Pollution Authority delineating their air quality analysis of and recommendation for the proposed Terminal Sales Building 152-space parking structure. A copy of this letter and supporting information is enclosed.

As expressed at the January 28, 1973 meeting of the Environmental Quality Commission, it is the policy of the Commission to await City approval, indicating that parking facilities proposed for construction in downtown Portland are consistent with the Downtown Plan and Portland Transportation Control Strategy, prior to taking action upon applications for construction of parking facilities.

The enclosed letter from CWAPA indicates substantial concern about the consistency of the proposed Terminal Sales Building parking facility with the Downtown Parking Plan and the Transportation Control Strategy. However, to the best of our knowledge, this project, as it is presently conceived, has not been reviewed by the City of Portland for consistency with its' proposed parking plan and air quality implementation plan.

Mayor Neil Goldschmidt February 16, 1973 Page 2

Therefore, the Department is requesting that the City review the Terminal Sales Building parking facility and comment in writing to the Department upon its' consistency with the Portland Downtown Plan, Parking Plan and the "Transportation Control Strategy to Achieve Air Quality Standards in Downtown Portland".

Your early attention to this matter will be appreciated.

Very truly yours,

DIARMUID F. O'SCANNLAIN Director

DFO'S:MJD:h

ce: CWAPA

Ralph Schlesinger

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

AIR QUALITY CONTROL

3/3/13

23 January 1973

BOARD OF DIRECTORS

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Multnomah County A.J. Ahlborn Columbia County

Richard E. Hatchard Program Director

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

Dear Mr. Patterson;

On 14 November 1972 Mr. Ralph Schlesinger filed a notice to construct a 152 space, two story parking facility adjacent to the Terminal Sales Building. This facility is to replace an existing 70 space surface parking facility.

You will recall that at their 27 July 1972 meeting, the E.Q.C. denied construction of this same facility on the basis it was not in accordance with OAR Chapter 340, Section 20-050 through 20-070.

It is CWAPA's understanding that Mr. Schlesinger has resubmitted his notice to construct the aforementioned facility because of changing conditions since 27 July 1972; namely, 1) adoption of a city transportation control strategy designed to meet national carbon monoxide air quality standards in the downtown area by 1975 and 2) Mr. Schlesinger now plans to construct a new office facility above the proposed parking structure which would have space for an estimated 100 occupants.

On 30 November 1972, CWAPA requested certain information from Mr. Schlesinger regarding the proposed facility in order to evaluate whether it is now compatible with applicable D.E.Q. rules, regulations and policy:

The two most important questions posed by CWAPA were:

- 1. Will the area in the vicinity of the TSB be in compliance with carbon monoxide standards in 1975, assuming all aspects of the adopted city transportation control strategy are implemented.
- 2. Is the proposed additional TSB parking specifically included as part of the 800 space parking facility near 10th avenue recommended in the proposed downtown parking plan and further made a part of the city transportation control strategy.

Department of Environmental Quality 23 January 1973 Page 2

Mr. Schlesigner's consultant replied to CWAPA's information request on 2 January 1973. This reply included the following:

- 1. Revised calculations utilizing the city transportation control strategy indicated a CO emission rate of 293 tons per year in CWAPA grid #25 in 1975. The proposed parking facility would add about 2 tons per year of carbon monoxide. This would still be well below the 325 tons per year emission rate at which compliance with CO standards would be expected.
- 2. The downtown parking plan includes the TSB location for parking at least through 1980.

CWAPA has evaluated the reply to it's questions and if Mr. Schlesinger's consultant's reply was taken literally, it would appear the proposed facility is compatible with applicable D.E.Q. policy. CWAPA, however, still has some reservations about the strict compatability of the proposed project in regard to air quality and downtown parking plans.

In regard to air quality, it is our understanding that in the transportation control strategy memo from W.S. Dirker to the citizens review committee dated 16 October 1972, grid #25 had 370 tons per year of CO emissions in 1975 (40% from I-405 freeway), assuming state vehicle inspection program, the 1975 bus improvement plan, Fremont Bridge open (70,000 ADT on I-405) and Harbor Drive closed. The 370 ton per year emission rate was subsquently reduced by 20% to 292 tons per year due to the following:

- -7% from traffic signal speed increase (16 to 18 mph)
- -2% from Tri-Met shop and ride
- -1% parking meter rate increase
- -10% Dirker mass transit plan

for a total of -20%.

CWAPA is not certain that these reductions due to the transportation control strategy, specifically the last three, will have the same impact in all areas of the CBD, especially those near and influenced by the freeway loop. D.E.Q. acknowledged this fact in your staff report to the E.Q.C. of 25 October 1972 regarding the City's transportation control strategy (page 9, item 3). Also, some estimates of traffic on I-405 in 1975 are as high as 90,000 ADT versus the estimate of 70,000 ADT used in the transportation control strategy which would even further complicate the problem in the vicinity of the TSB. A true assessment of air quality in the vicinity of the TSB would undoubtedly require a comprehensive diffusion analysis in the area which is considered beyond the magnitude of the project involved. With certainty, compliance with air quality standards in the vicinity of the TSB will be marginal and the impact of the added vehicle emissions from the proposed TSB parking facility would be on the order of about 1%. The D.E.O. may have other information or facilities within their reach which may allow a more precise assessment of air quality in the project vicinity.

In regard to the compatability of the proposed TSB parking with the downtown parking plan and transportation control strategy, we still see no definite commitment that the proposed facility is part of the 800 new spaces proposed for the S.W. 10th Avenue area. The latest draft of the DeLeuw Cather parking plan for downtown recommends for the 10th Avenue parking to be on blocks 5, 6, 7 or 9 (Figure 21) which is about two blocks east of the TSB. This specific question will most likely remain unanswered until the downtown parking plan is finally adopted in detail.

In summary, CWAPA would recommend approval of the proposed facility providing:

- 1. D.E.Q. concurs that the carbon monoxide emission density in grid #25 in 1975 will be less than 325 tons per year and that CO air quality standards will be achieved in 1975 in all parts of this grid.
- 2. D.E.Q. believes the 82 space increase in the TSB parking will be considered part of the new parking allotment recommended for the S.W. 10th Avenue area in the transportation control strategy and downtown plan.
- 3. Restrictions on use of the parking facility will be imposed in 1975 if CO air quality standards are not met and will continue to be imposed until such time as standards are achieved.

If any of the above requirements are not satisfied, it would appear that a substantial part of the proposed facility would still meet the transportation control strategy guidelines in light of the proposed new office space considered for inclusion above the parking structure. Interim parking guidelines adopted by the E.Q.C. at their 25 October 1972 meeting (Minutes, page 8, #1) would allow parking for new office facilities to be constructed to provide parking for 50% of the new occupants using an auto occupancy factor of 1.5 persons per car. For the TSB proposed office facility this would equal approximately 33 new spaces for the 100 new occupants. We would interpret this to mean 33 new spaces plus the existing spaces for a total of 103 space parking structure to be built in accordance with the new office facility.

Therefore, if conditions as previously stated for the entire proposed facility are not satisfied, CWAPA would recommend that a 103 space parking structure should be approved for construction with a condition that the proposed new office facility for 100 new occupants be constructed concurrently.

Very truly yours,

R. E. Hatchard Program Director

REH: jks cc: R. Schlesinger Attention:

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

PARKING FACILITY NOTICE OF CONSTRUCTION AND APPLICATION FOR APPROVAL

To Construct or Modify an Air Contaminant Source

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

	Taraniani Calan Du	ildina	001	2 4100
Business Name:	Terminal Sales Bu	riding	Phone: 223	5-4120
Address of Premises:	1220 S.W. Morriso	on St. City:	Portland	Zip: 97205
Nature of Business:	Office Building			
Responsible Person to	Contact: Ralph Sch	lesinger 1	litle: Owner	· · · · · · · · · · · · · · · · · · ·
Other Person Who May B	e Contacted: Evelyn	Westrom 1	litle: Secreta	ary
Corporation P	artnership 🔀	Individual	Government A	gency
Legal Owner's Address:	610 S.W. Alder S	treet City:	Portland	Zip: 97205
Description of Parking Plot Plan showing park story facility construc- intended to absorb exc	ing space location a cted on south end of	nd access to st property knowr	reets or roadw nas Terminal	ays): A two
Estimated Cost: Parki	ng Facility Only:	\$	100,000.00	
Estimated Construction	Date: 3/1/73	Estimated	Operation Date	5/1/73
Name of Applicant or O	wner of Business:	Ralph Schle	singer	
Title:	Owner		Phone: 2	23-4128
Signature:	Iffe to Soll	, 	Date: Nov	vember 13, 197
Applicability: This N	otice of Constructio	n Requirement P	ertains	
of 2. Any or	areas within five mi any city having a po parking facility us more motor vehicles king for motor vehic	pulation of 50, ed for temporar or having two o	000 or greater y storage of 5	0
DIACTELLY A DIACTED TO THE PARTY RECEIVED		Grid	N	1c P-44

30 November 1972

Ralph D. Schlesinger Co. 1221 Oregon National Bldg. 610 S.W. Alder Street Portland, Oregon 97205 WH WH

Dear Mr. Schlesinger:

We have reviewed your resubmitted notice to construct a two story parking facility adjacent to the Terminal Sales Building. There are many changed conditions since you submitted the environmental impact statement in June of 1972; such as the parking supply and demands, adoption of a transportation control strategy by the City Council and the near completion of a parking and traffic circulation study as part of the Downtown Plan.

In order to reevaluate your proposed facility in respect to the Department of Environmental Quality parking facility regulation and assess the impact of the facility considering the significant changes that have occurred since June of 1972, we do need certain new information which could be submitted in the form of amendments to the impact statement you have already had prepared.

We are requesting you to submit:

- 1. A statement whether the proposed facility indicated in the Notice of Construction dated November 13, 1972 is identical in size and design to that proposed in the Notice of Construction dated May 15, 1972. Please explain any significant differences in detail.
- 2. A revised estimate for present and future total parking supply and demand with five blocks of the Terminal Sales Building.
- 3. The specific relationship of the proposed facility to the final parking and traffic circulation study for the Downtowd Plan which is expected to be forwarded to the City Council on or before November 30, 1972.

Page 2 30 November 1972 Ralph D. Schlesinger Co.

Initial draft of this study indicated a need for an additional 800 spaces on a two block area in the vicinity of tenth street. If this is still a recommendation of the study is the Terminal Sales Building proposed parking specifically included in this 800 space allotment?

- 4. Clarification of the intended use of the proposed facility. Will it be strictly used to support inhabitants of the Terminal Sales Building or will it also be used to supply parking for other commuters in the area. If the latter is true what is the percent use by TSB inhabitants. How much of the parking will be long term and how much short term?
- 5. How will the proposed parking facility affect the implicit goal of the City of Portland's transportation control strategy which is to have 45-50% of the commuter person trips to downtown Portland be by transit in 1975. If the proposed parking is going to be primarily used to support inhabitants of the TSB then an estimate of transit rider ship versus private vehicles could be made using present and projected inhabitants of the TSB, present and projected parking supply of the TSB, and an auto occupancy factor of 1.6.
- 6. Will the area in the vicinity of the TSB be in compliance with carbon monoxide arr quality standards by 1975 assuming implementation of all aspects of the adopted City Transportation Control Strategy. The CWAPA grid system may be used to analyze the area. DEQ's street analysis procedure according to limitations they placed on its use would not appear to be applicable to the TSB due to the close promity of the freeway (and its associated large increase in traffic by 1975) and relative low density development along the freeway.

Very truly yours,

John F. Kowalczyk Technical Director

JFK:js

STORCH CORPORATION / ENGINEERS

December 28, 1972

ROUTING

To

WH

From:

Noted by

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

Attention: John Kowalczyk

Subject: Terminal Sales Building Parking

Dear Mr. Kowalczyk:

This letter revises and therefore supersedes one dated December 26, 1972.

In reply to your letter of November 30, 1972, to Ralph Schlesinger (copy attached), we respectfully submit the following to amend the Impact Statement previously prepared by Glen Odell.

- 1. The proposed facility shown in the Notice dated November 13, 1972, is identical in size and design to that proposed in the Notice dated May 15, 1972, except that an additional story of office space is now proposed above the two levels of parking. The additional space now in design will add 16,000 square feet with an estimated occupant increase of at least 100, making a total of 600 plus Terminal Sales Building inhabitants.
- 2. The Downtown Portland Parking Plan estimates within five blocks of the proposed facility, the 1972 parking supply and demand to be 7534 and 8572 respectively. The estimated 1980 totals are 7496 and 9347; and for 1990 they are 5804 and 6401.
- 3. The Downtown Plan now projects 800 to 1000 additional parking spaces needed at Morrison and Tenth Street. The Plan includes the Terminal Sales Building location for parking at least through 1980; with the possibility that hoped-for increased use of Mass Transit by 1990 would reduce the need. The Deleuw, Cather Study, however, does not recognize the impact of I-405 on demand for additional office space along its proximity. Already this trend is growing and can only accelerate

as the Freeway comes into full use. To conclude, that demand for parking in this vicinity is going to decrease is not realistic.

COLUMBIA - WILLAMETTE

- 4. The proposed facility will not be used strictly to support inhabitants of the Terminal Sales Building. At the present time, the parking spaces are 90% Terminal Sales Building long-term users and it is estimated that the proposed increase will revise that to 75% long term.
- 5. If the proposed 176 off-street total parking capacity of cars in the Terminal Sales Building block were to serve only its 600 inhabitants, with none at all for short-term use, an auto occupancy factor of 1.5 would provide transport for 264 persons, or 44% leaving 56% to come by Mass Transit.
- 6. Using the CWAPA grid system, the Downtown Portland Transportation Control Strategy estimates the 1975 carbon monoxide emissions for area #25 the vicinity of the Terminal Sales Building at 293 tons (revised 11/16/72). From the Impact Statement prepared by Glen Odell, the increase resulting from this proposed facility was estimated to be 3.1 tons for 1972, and 1.8 tons per year by 1975, a total of 295 tons which is in compliance with the Department of Environmental Quality Air Quality Standards.

It should also be noted that the total proposed parking capacity of 176 is an increase of only 43 cars to the present supply of 133 spaces. (Deleuw, Cather)

It is hoped that our efforts to be concise in these statements have not resulted in less treatment than you desired.

Sincerely,

STORCH CORPORATION

Jay Avery Davis, A.I.A.

JAD/km attach.

cc: H. Patterson

R. Schlesinger

STORCH CORPORATION/ENGINEERS

February 26, 1973

Mr. D. Cannady City Planning Commission Director City Hall Portland, Oregon

RE: Terminal Sales Building Parking

Dear Mr. Cannady:

In June, 1972, the Planning Commission approved the subject parking structure to be located on an existing parking lot, subject to approval by the Department of Environmental Quality.

Enclosed are copies of pertinent correspondence representing considerable cost and time endeavoring to gain this approval.

This application is scheduled for review at a Department of Environmental Quality Commission hearing March 2, 1973. In an effort to finally resolve this stalemate we would appreciate a letter from the Planning Staff to strengthen our efforts at this hearing; stating that this facility does in fact come within the guidelines of the Transportation control strategy and Downtown Plan for Portland's future.

The original application requested parking for 152 cars. This has been revised as shown on the accompanying drawing to a total of 135 cars with the addition of at least two and Probably three floors of offices above, at a gross of 16,000 Sq. Ft. per floor, or a total of 48,000 sq. ft.

According to the National average this will house 204 occupants requiring parking for 68 cars based on 50% transported by car with 1.5 per car.

We are convinced this endorsement will be vital to our presentation at the hearing. Your help will be greatly appreciated.

Sincerely,

STORCH CONPORATION

A. Davis, A.I.A.

JAD/km

encl.

cc: Ralph Schlesinger

EINTER CIPPORATION CHENES

February 27, 1973

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

Attention: Director D. F. O'Scannlain

Dear Mr. O'Scannlain:

Enclosed is Pertinent correspondence relative to application for approval of a parking structure at the Terminal Sales Building, scheduled for review March 2, 1973.

The application dated November 13, 1972, requested parking for 152 cars. This has been revised as shown on the accompanying drawings to a total of 135 cars with the addition of at least two and probably three floors of offices above, at a gross of 16,000 sq. ft. per floor, or a total of 48,000 sq. ft.

According to the national average this will house 204 occupants requiring parking for 68 cars based on 50% transported by car with 1.5 occupants per car.

We request that this be considered in your review of this application.

Sincerely,

STORCH CORPORATION

Jay A. Davis, A.I.A.

JAD/km

cc: Ralph Schlesinger