

**4/2/1973**

**OREGON  
ENVIRONMENTAL QUALITY  
COMMISSION MEETING  
MATERIALS**



**State of Oregon  
Department of  
Environmental  
Quality**

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

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

AGENDA

Environmental Quality Commission Meeting

April 2, 1973

Public Service Building Second Floor Auditorium

920 S.W. Sixth Avenue, Portland

9:00 a.m.

- A. Minutes of March 2, 1973 Meeting
- B. Project Plans for February 1973
- C. CWAPA (Participation by Washington County)
- D. Statewide Solid Waste Management Action Plan (Status Report)
- E. Veneer Drier Emissions (Proposed Adoption of Revised Regulation)
- F. Variances Granted by Regional Air Quality Authorities
  - a) Union Carbide, Portland
  - b) Cedar Lumber Co., Inc., Mill City-Lyons
- G. Medford Corporation, Medford, Oregon (Hearings Officer's Report re: Issuance of Air Contaminant Discharge Permit)

2:00 p.m.

- H. PUBLIC HEARING for Adoption of Compliance Schedules Previously Adopted by CWAPA
  - a) Linnton Plywood, Portland
  - b) Oregon Ready-Mix, Oregon City
  - c) Rich Manufacturing Co., Portland
- I. PUBLIC HEARING - Proposed Issuance of Air Contaminant Discharge Permits to:
  - a) Umpqua Excavation and Paving, Roseburg
  - b) J.C. Compton Co., McMinnville
  - c) Road & Driveway Co., Newport
  - d) Amalgamated Sugar Co., Nyssa
  - e) Publishers Paper Co., Newberg Division
  - f) Publishers Paper Co., Oregon City Division
  - g) Menasha Corporation, North Bend
  - h) Boise Cascade Corp., Salem
- J. Dillard Veneer Co. (Hearings Officer's Report)
- K. Natural, Scenic and Recreational Areas (Status Report)
- L. Tax Credit Applications

Public Hearing for Air Contaminant Discharge Permits

ATTENDANCE LIST

Date: April 2, 1973

Public Hearing for: Air Contaminant Discharge Permits

Location: Public Services Building, Portland, Oregon

NAME

REPRESENTING

Mike Huddleston

A.P.A. of Oregon

Mr + Mrs Don M. Parker

Unypac Exca & Paving, Reby

Thomas J. Wilton

Newsday Corp

PETER SCHNELL

PUBLISHERS PAPER CO.

John P. Blessee

---

C. Mayer

" " " "

Jim Crump

Boise Cascade

Jim Fahlstrom

" "

Phil Smith

" "

Joe Kelling

" "

Tom Dearing

Boise Cascade

Tim Walker

Crown Zellerbach

J.R. Corsberg

Amalgamated Sugar Co.

ATTENDANCE LIST

Date: April 2, 1973

Environmental Quality Commission Meeting

Location: Public Service Building, 920 SW 6th Avenue, Portland, Oregon

NAME

REPRESENTING

John W. Lister

EPA/OREGON

Harry Bartels

Champion International Corp.

Dave Baker

IRAPA

Mike Waddleton

Asphalt Paving Assoc.

Mr & Mrs Don M. Parker

Umpqua Exca & Paving, Redg.

C. J. Dahlstrom

Boise Cascade Salem Or.

Joe Kolby

" " (Village)

I wish to make a statement before the Environmental Quality Commission

regarding Boise Cascade - Salem Ore.

C. J. Jablstrom  
Name

Boise Cascade  
Representing

I wish to make a statement before the Environmental Quality Commission

regarding AIR CONTAMINANT DISCHARGE PERMITS  
(ASPHALT PLANTS)

Mike Huddleston  
Name

Asphalt Pavement  
Representing  
Assoc. of Oregon

I wish to make a statement before the Environmental Quality Commission

regarding CEDAR LUMBER INC

MIKE ROALH  
Name

MID WILLAMETTE VALLEY  
Representing  
AIR POLLUTION AUTHORITY

MINUTES OF THE FORTY-FOURTH MEETING  
of the  
Oregon Environmental Quality Commission  
April 2, 1973

The forty-fourth meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 9:00 a.m., Monday, April 2, 1973, in the Second Floor Auditorium of the Public Service Building, 920 S.W. 6th Avenue, Portland, Oregon.

The Honorable Shirley Field, Multnomah County District Court Judge, presided at the swearing in ceremonies for Mrs. Grace S. Phinney of Corvallis, Dr. Morris K. Crothers of Salem and Mr. Paul E. Bragdon of Portland who had been appointed by Governor McCall as new members of the Commission to fill the vacancies created by the resignations of George McMath, Edward C. Harms, Jr. and Storrs S. Waterman, respectively.

The terms of the new members are as follows: Mrs. Phinney June 30, 1975; Dr. Crothers June 30, 1973, Mr. Bragdon, June 30, 1976.

Chairman B.A. McPhillips, Arnold M. Cogan and the three new members were in attendance at the meeting.

Participating staff members were Diarmuid F. O'Scannlain, Director; E.J. Weathersbee and K.H. Spies, Deputy Directors; Harold M. Patterson and Harold L. Sawyer, Division Administrators; Harold H. Burkitt and R.A. Royer, Air Quality Control Engineers; L.D. Brannock, Meteorologist; Ray M. Johnson of AQC Technical Services Section; Robert D. Jackman, Solid Wastes Management Regional Program Supervisor; and Ray P. Underwood and A.B. Silver, Legal Counsel.

MINUTES OF THE MARCH 2, 1973 COMMISSION MEETING

It was MOVED by Dr. Crothers, seconded by Mr. Cogan and carried that the minutes of the forty-third meeting of the Commission held in Portland on March 2, 1973 be approved as prepared and distributed.

PROJECT PLANS FOR FEBRUARY 1973

It was MOVED by Mr. McPhillips, seconded by Mr. Cogan and carried that the actions taken by the Department during the month of February 1973 as reported by Mr. Weathersbee regarding the following 50 domestic sewerage, 5 industrial waste, 6 air quality control, and 7 solid waste disposal projects be approved:

Water Quality Division

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (50)</u>			
2-2-73	Wallowa	Change Order #B-2, lagoon project	Approved
2-12-73	USA (Aloha)	Tee Jay Subd. sewers	Prov. app.
2-12-73	Gresham	Eagle Estates Condominium sewers	Prov. app.
2-12-73	Gresham	Lone Pine Acres Subd. sewers	Prov. app.
2-12-73	Tualatin	Boones Ferry lateral sewer	Prov. app.
2-12-73	USA (Forest Grove)	Forest Grove-Cornelius sewer intertie	Prov. app.
2-12-73	North Roseburg SD	Darely Ware Hughes sewer	Prov. app.
2-14-73	Portland	Change Order #2, Portland sewage treatment plant	Approved
2-14-73	Multnomah County	Change Order #3, Inverness interceptor	Approved
2-14-73	Eugene	Two sewer projects	Prov. app.
2-15-73	Salem (Willow Lake)	Seeger Lane sewer	Prov. app.
2-15-73	Ashland	Frontage Road sewer	Prov. app.
2-16-73	Portland	S.W. 63rd & Boundary sewer	Prov. app.
2-16-73	Wilsonville	Five change orders, sewage treatment plant and interceptor	Approved
2-16-73	USA (Aloha)	Revised plans Tee Jay Subdivision sewer	Prov. app.
2-16-73	Albany	Five change orders, Southeast interceptor	Prov. app.
2-16-73	Dallas	Bridlewood Estates Subd. sewers	Prov. app.
2-20-73	Rivergate	Port of Portland-Areas 2 and 5 sewers	Prov. app.
2-20-73	USA (Aloha)	Bronson-Willow Creek sewer intertie	Prov. app.
2-20-73	Primate Center	Sewage treatment plant up-grading and irrigation system	Prov. app.
2-21-73	USA (Tigard)	S.W. 68th Avenue sewer	Prov. app.
2-21-73	USA (Aloha)	Stoddard Subd. sewers	Prov. app.
2-21-73	Myrtle Point	Change Order #3, sewage treatment plant contract	Approved
2-21-73	Oak Lodge San. D.	Oakridge Subd. sewers	Prov. app.
2-21-73	Toledo	Addenda Nos. 1 and 2, Change Order 1-4, sewage treatment plant contract	Approved
2-21-73	Portland	S.W. Galeburn & S.W. 43rd sewers	Prov. app.
2-21-73	Scappoose	Westcliff Subd. sewers	Prov. app.
2-22-73	Multnomah County	Three change orders, Inverness interceptor	Approved
2-23-73	Oregon City	Morton Road sewers	Prov. app.
2-26-73	USA (Sunset)	Pollock-Weigel Subd. sewers	Prov. app.
2-27-73	Maupin	Mt. Fir Company sewer	Prov. app.
2-27-73	North Bend	Field change orders to sewage treatment plant contract	Approved

Water Quality Division

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (50) - continued</u>			
2-27-73	Portland	Change Order #3, Columbia Blvd. sewage treatment plant contract	Approved
2-27-73	Brookings	Change Order #3, 4, and 5 sewage treatment plant contract	Approved
2-27-73	West Linn (Will.)	Timothy Lane sewer	Prov. app.
2-27-73	USA (Metzger)	Glencreek Park Subd. sewers	Prov. app.
2-27-73	Myrtle Point	18th Street sewer extension	Prov. app.

Industrial Projects (5)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
2-7-73	Astoria	Dave Sutter Dairy, animal waste facilities	Prov. app.
2-12-73	Stayton	Paris Woolen Mills, Inc., industrial waste pretreatment	Prov. app.
2-13-73	Donald	Raymond Churchill Dairy, animal waste facilities	Prov. app.
2-14-73	Corvallis	Oregon Aqua-Foods, Inc., wastewater treatment facilities	Prov. app.
2-21-73	Corvallis	OSU, Agricultural Experiment Station, animal waste facilities	Prov. app.

Air Quality Control Division

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
2-15-73	Coos County	Menasha Corp. Proposal for spent liquor incinerator	Preliminary
2-20-73	Multnomah County	Terminal Sales Bldg. 135-space parking facility	Approved with specific conditions
2-21-73	Marion County	Oregon Employment Division 140-space parking facility	Approved
2-21-73	Lane County	National Guard Armory 144-space parking facility	Approved
2-22-73	Coos County	Weyerhaeuser Company. Plans and specifications for installation of sanderdust handling and firing systems for boilers	Approved
2-28-73	Jackson County	Timber Products Company Plans and specifications for installation of Aero-Vac bag filter system to control particulate emissions from the #4 particleboard plant cyclone.	Approved



Solid Waste Division

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
2-9-73	Lane County	London Disposal Site closure plan (existing garbage)	Prov. app.
2-15-73	Washington Co.	Hillsboro Landfill (existing demolition)	Prov. app.
2-15-73	Wasco County	Wamic Disposal Site (existing garbage) for closure	Prov. app.
2-15-73	Clackamas County	Sandy Transfer Station (new)	Prov. app.
2-16-73	Lane County	Vida-Leaberg Transfer Station (new)	Prov. app.
2-23-73	Yamhill County	Sheridan Willamina Disposal Site (existing garbage) for closure	Prov. app.
2-27-73	Umatilla County	Rahn's Refuse Removal (new garbage) Sanitary Landfill	Prov. app.

CWAPA (Participation by Washington County)

Mr. Patterson presented the Department's memorandum report and the Director's recommendations regarding the problem created by the decision of Washington County not to participate as a full and paying member of the Columbia Willamette Air Pollution Authority (CWAPA). Reference was made to the resolution which had been adopted by the Commission on October 29, 1971 regarding this matter.

Mr. O'Scannlain discussed and emphasized the efforts which had been made by the Department but without success to persuade Washington County to resume active participation in CWAPA. He emphasized also the damage which is being caused to the administration of air quality control by this decision of Washington County.

Mr. Max F. Rolih, Washington County Administrative Officer, was the only Washington County representative present but he had no specific comments to make regarding this matter.

Clackamas County Commissioner Fred Stefani, Chairman of CWAPA, introduced Portland City Commissioner Mildred Schwab who made a formal statement for CWAPA. She said that the CWAPA Board of Directors appreciates EQC's holding of this informal hearing concerning the Washington County problem, that they consider this is a serious matter requiring resolution as soon as possible, and that in order to provide more time for resolution of the problem CWAPA will be willing to extend full program services to Washington County until May 1, 1973. The previous deadline was April 1, 1973.

She went on to say that the city of Portland and county of Multnomah do not consider acceptable any of the alternative solutions proposed in the DEQ report, except No. 1, namely, resumption of full participation by Washington County.

She proposed two other alternatives, Nos. 5 and 6. No. 5 was that DEQ serve as the promoter or agent to convince Washington County to produce full participation and for this purpose arrange a meeting with the Washington County Commissioners in Washington County. Under alternative No. 6 DEQ and EQC would give their vigorous support to the passage of HB2203 by the 1973 Oregon Legislature which would amend ORS 449.855 to require each regional participant to pay its share of the region's operating expenses.

She pointed out that CWAPA has given almost two years of service to Washington County without receiving any local financial support from that entity.

Mr. Cogan commented that the amount of contribution required of Washington County was not large and therefore he wondered what the real reason was for the county's refusal to participate. Mr. Rolih replied that the county believes the state should be the agency to exercise control over air quality.

Commissioner Stefani said Clackamas County supports CWAPA and the statement presented by Commissioner Schwab. He expressed great concern about the region's ability to reform without Washington County's participation. He said if Washington County is permitted to drop out some of the other counties might want to do the same thing.

Mr. O'Scannlain commented on the two alternatives proposed by Commissioner Schwab, pointing out that everything possible had already been done to get Washington County to change its mind. He said also that DEQ had already testified in support of HB2203. Dr. Crothers asked how anyone could get the county to cooperate when it does not want to cooperate.

Mr. Richard E. Hatchard, CWAPA Program Director, expressed the belief that DEQ and EQC should somehow be able to convince Washington County to participate.

Emory Crofoot, Attorney for CWAPA, claimed that if CWAPA had to dissolve and then reform all of the regulations, standards and past actions would no longer be in effect and that consequently a lot of lost time and effort would be involved. Mr. O'Scannlain expressed the opinion that the reorganization could be greatly simplified.

Commissioner Stefani again expressed concern about their ability to get the voters to approve reforming the region without Washington County.

After further discussion it was MOVED by Mr. Cogan, seconded by Mr. McPhillips and carried that unless in the meantime some other alternative solution is found to maintain CWAPA on its present basis, CWAPA be directed to dissolve and reform on a 3-county basis without Washington County within 60 days from the date of this meeting and that in such case responsibility for air pollution control in Washington County be taken over by DEQ.

#### STATEWIDE SOLID WASTE MANAGEMENT ACTION PLAN (Status Report)

Mr. Jackman presented a status report dated March 21, 1973 concerning the grants and programs under the Statewide Solid Waste Management Action Plan. He said 20 applicants covering 33 counties have now received grant offers from DEQ. Mr. Cogan said he is still concerned that a single county might be able to plan and go ahead without being included in a regional plan. Mr. Jackman assured him that DEQ can intercede at any time if it appears that a single county which should be in a regional plan is proceeding on its own to do otherwise.

#### VENEER DRIER EMISSIONS REGULATIONS

Mr. Burkitt presented the department's memorandum report and the director's recommendations dated March 21, 1973 pertaining to the proposed adoption of a modified veneer drier regulation. The report contained a staff evaluation of the testimony which had been submitted by two regional air pollution authorities and by industry at the public hearing held on January 26, 1973. Following that hearing the record had been kept open for an additional 20 days and at the request of industry a further meeting with representatives of industry and all three regional authorities to discuss the regulations was held by DEQ on March 12, 1973.

Mr. Burkitt said it had been concluded that the proposed veneer drier regulation is enforceable and that if the blue-haze problem is solved the particulate problem is also solved.

Mr. Harry Bartels of Champion International Corp. (U.S. Plywood), Mr. Vince Tretter and Mr. Matt Gould of Georgia Pacific Corp., and Mr. David Young of Weyerhaeuser Company each presented brief statements at this Commission meeting

regarding this matter. Mr. Gould pointed out again that there is no established hardware that can be purchased off the shelf to solve this pollution problem and that consequently the industry is trying to design equipment "on the run."

After considerable discussion it was MOVED by Mr. Cogan, seconded by Dr. Crothers and carried that as recommended by the Director the modifications to the proposed veneer drier regulation as shown in the department's latest draft dated March 16, 1973 be made and that with these modifications the amended veneer drier regulation be adopted.

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

#### VARIANCES GRANTED BY REGIONS

Mr. Brannock reviewed the staff evaluation of Variance 73-1 granted by CWAPA to Union Carbide Corporation as set forth in the department's memorandum report dated March 15, 1973.

It was MOVED by Mr. Cogan, seconded by Mr. McPhillips and carried that as recommended by the Director CWAPA Variance 73-1 to Union Carbide Corporation be approved as submitted.

The department's memorandum report regarding the variance granted February 28, 1973 by the Mid-Willamette Valley Air Pollution Authority (MWVAPA) to Cedar Lumber, Inc. in Linn County was reviewed.

Mr. Mike Roach, Director of MWVAPA, presented a statement which contended that the variance as granted was proper and should be approved by EQC. He disagreed with several points contained in the department's report, namely that there are no early prospects for increased demand for hog fuel, that a modified wigwam burner would give better air quality control, that the proposed variance is contrary to past EQC actions, and that if approved other similar requests can be expected. He contended further that the wigwam burner in question cannot be classified as strictly unmodified. (It was brought out in other testimony at this meeting that the burner is actually partially modified.) Mr. Roach expressed concern about the August 1, 1973 date contained in the DEQ Director's recommendation.

Mr. Roach then asked permission for Dr. Richard Boubel of Oregon State University to make a statement in this matter. Dr. Boubel proceeded to explain the importance of the various features of burner modification. He stated that even a fully modified burner will not always meet emission standards on operation start-up. He questioned the staff's statements that the burning of hog fuel

appears to produce a smokier fire than unhogged mill waste, that hemlock waste normally has a high moisture content and produces heavy smoke, and that if both the wigwam waste burner modifications and storage facilities cannot for economic reasons be completed the wigwam burner modifications should be completed first. He expressed the opinion that in this case the use of auxiliary fuel may not be necessary.

Mr. Roach stated that the present burner already has under and over fire air facilities and that MWVAPA would recommend a damper installation.

It was MOVED by Dr. Crothers, seconded by Mr. Cogan and carried that the Director's recommendation in this matter be amended and adopted as follows: "That the MWVAPA variance to Cedar Lumber, Inc. dated February 28, 1973 be approved subject to the following conditions: (1) The wigwam waste burner shall be modified to comply with the Commission's rules as soon as practicable but not later than August 1, 1973, and (2) until the wigwam waste burner is modified, the petitioner shall cease operation of the burner when notified that an Air Pollution Alert, Warning or Emergency exists within the Willamette Valley, and shall not operate the burner for the duration of such Air Pollution Alert, Warning or Emergency."

MEDFORD CORPORATION, Medford, Oregon (Hearings Officer's Report)

A public hearing having been held at the Jackson County Court House, Medford, Oregon, on March 15, 1973, beginning at 7:30 p.m. regarding the Department's proposed Air Contaminant Discharge Permit for the Medford Corp., the hearings officer's report in such matter was reviewed for the Commission members by Mr. Royer. The report is dated March 21, 1973 and was prepared by Mr. A.B. Silver, hearings officer.

The proposed permit includes conditions for the operation of (1) an existing sawmill and planing mill, including 3 hog fuel boilers and 11 cyclones, (2) an existing plywood plant including 4 veneer driers and 11 cyclones, and (3) a proposed new medium density hardboard plant including 3 Heil driers, 27 cyclones and 6 bag filters to be constructed and operated on the same general site by December 31, 1974.

Mr. Royer reported that it is the Director's recommendation that based on the hearings officer's report the proposed Air Contaminant Discharge Permit for the Medford Corporation as prepared by the Department be amended by deleting Item No. 5 and adding a new Item 5 as follows:

"5. Maintenance and operation of hog fuel boiler #3 shall be such that the steam production shall be limited so that particulate loading of the stack emissions will not exceed 0.2 grain/standard cubic foot."

and that with such amendment the proposed Air Contaminant Discharge Permit be approved

It was MOVED by Dr. Crothers, seconded by Mr. McPhillips and carried that the Director's recommendation in this matter be approved.

Hearings Officer's Report)

An order executed on March 24, 1973 by Hearings Officer L.B. Day in the matter of atmospheric emissions from the Dillard Veneer Co. plant's wigwam burner located at Dillard, Douglas County, Oregon was reviewed by Mr. Burkitt and submitted by the Director for adoption by the Commission.

It was MOVED by Dr. Crothers, seconded by Mrs. Phinney and carried that the order dated March 24, 1973 and signed by L.B. Day, Hearings Officer, in the matter of Dillard Veneer Company, an Oregon Corporation, be adopted by the Commission.

NATURAL, SCENIC AND RECREATIONAL AREAS (Status Report)

Mr. Patterson presented a brief staff report on the matter of environmental control in Natural, Scenic and Recreational Areas which had been the subject of a study last year by a special advisory committee to DEQ chaired by State Representative Norma Paulus. He pointed out that the legislature currently has under consideration several bills that would materially affect or influence any program or regulation that the Department might propose at this time regarding this matter.

Because of that fact and also the fact that no noise emission standards or measurement procedures have yet been adopted by EQC it was recommended by the Director that the Department defer any specific plan of action in this matter until the legislature completes its action and the Department promulgates noise standards.

It was MOVED by Mr. McPhillips, seconded by Mr. Cogan and carried that the Department defer any plan of action until the Legislature completes its deliberations and noise standards are adopted by the Commission.

TAX CREDIT APPLICATIONS

For the benefit of the new Commission members Mr. Sawyer reviewed the tax credit law and program. He also presented the Department's evaluations and recommendations regarding the tax credit applications covered by the following motion:

It was MOVED by Mr. McPhillips seconded by Mr. Cogan 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:

<u>Appl. No.</u>	<u>Applicant</u>	<u>Cost</u>
T-414	Donald H. Scott, Gaston	\$ 4,610.50
T-415	S & S Farms, Forest Grove	5,309.00
T-421	Boise Cascade Corp., Elgin	10,109.00
T-426	Miami Shingle & Shake Co., Nehalem	22,500.00
T-431	Boise Cascade Corp., Elgin	38,100.45

PUBLIC HEARING RE: COMPLIANCE SCHEDULES ADOPTED BY CWAPA

Proper notice having been given as required by state law and administrative rules the public hearing for adoption of certain compliance schedules previously adopted by CWAPA was called to order by the Chairman at 2:00 p.m. Monday, April 2, 1973 in the Second Floor Auditorium of the Public Service Building, 920 S.W. 6th Avenue, Portland, Oregon. All members of the Commission were present for the hearing.

Mr. Ray Johnson presented the Department's reports containing the staff's evaluations and the Director's recommendations regarding the compliance schedules previously adopted by the Columbia Willamette Air Pollution Authority for the Linnton Plywood Company, Portland; Oregon Ready-Mix Co., Oregon City and Rich Manufacturing Co., Portland.

There was no one else present who wished to be heard regarding this matter.

It was MOVED by Dr. Crothers, seconded by Mr. McPhillips and carried that as recommended by the Director the compliance schedules for Linnton Plywood, Oregon Ready-Mix, and Rich Manufacturing be approved and that an order be adopted making them a part of Oregon's Clean Air Act Implementation Plan.

PUBLIC HEARING RE: PROPOSED AIR CONTAMINANT DISCHARGE PERMITS

Proper notice having been given as required by state law and administrative rules the public hearing for proposed issuance of air contaminant discharge permits for eight industrial air contamination sources was called to order by the Chairman at 2:15 p.m. Monday, April 2, 1973 in the Second Floor Auditorium of the Public Service Building, 920 S.W. 6th Avenue, Portland, Oregon. All five members of the Commission were present for the hearing.

The industries covered by the proposed permits are as follows:

1. Umpqua Excavation and Paving, a stationary asphalt plant located at 1940 N.E. Newton Creek, Roseburg, Oregon.
2. J.C. Compton Co., a portable asphalt plant which could operate in any county under DEQ jurisdiction.
3. Road and Driveway Co., a stationary asphalt plant located in Newport, Oregon.
4. Amalgamated Sugar Co., a sugar refining mill located in Nyssa, Oregon.
5. Publishers Paper Co., a sulfite pulp and paper mill located in Newberg, Oregon.
6. Publishers Paper Co., a sulfite pulp and paper mill located in Oregon City, Oregon.
7. Menasha Corp., a neutral sulfite pulp and corrugated medium mill located at North Bend, Oregon.
8. Boise Cascade Corp., a sulfite pulp and paper mill located in Salem, Oregon.

Following distribution of the public notice and prior to the hearing comments had been received by the Department from each of the companies except Menasha Corporation and from the general public relative to the three asphalt plants and the Boise Cascade Corporation pulp and paper mill.

The Department's report regarding the proposed permits was presented by Mr. Burkitt.

Mr. Mike Huddleston, Manager of the Asphalt Paving Association of Oregon, was present and discussed the items contained in his letter of March 20, 1973 and referred to in the Department report. He said his comments pertained generally to the proposed permits for all three of the asphalt plants.



There being no other statements submitted regarding the asphalt plant permit it was MOVED by Mr. Cogan, seconded by Dr. Crothers and carried that the proposed permit for the Umpqua Excavation and Paving Company asphalt plant at Roseburg be approved and issued with the following changes: (1) In item No. 1 add a subsection c. which reads "A period or periods aggregating three (3) minutes in any one (1) hour equal to or greater than twenty percent (20%) opacity in the exhaust gases." (2) In item No. 3 after the words "plant site" insert the words "under control of the permittee." (3) In item No. 4 change the date "June 1, 1973" to "July 1, 1973" and in item No. 5 change the date "June 15, 1973" to "August 1, 1973." (4) Under the heading "Prohibited Activities" add a new item No. 11 which reads "The permittee is prohibited from causing or allowing discharges of air contaminants from sources not covered by this permit so as to cause the plant site to exceed the standards fixed by this permit or rules of the Department of Environmental Quality."

It was MOVED by Mr. Cogan, seconded by Mr. McPhillips and carried that the proposed permit for the J.C. Compton Company portable asphalt plant be approved and issued with the following changes: (1) In item No. 2 add a subsection c. which reads "A period or periods aggregating three (3) minutes in any one (1) hour equal to or greater than twenty percent (20%) opacity in the exhaust gases." (2) In item No. 5 after the words "plant site" insert the words "under control of the permittee." (3) Under the heading "Prohibited Activities" add a new item which reads "The permittee is prohibited from causing or allowing discharges of air contaminants from sources not covered by this permit so as to cause the plant site to exceed the standards fixed by this permit or rules of the Department of Environmental Quality."

It was MOVED by Mr. Cogan, seconded by Mr. McPhillips and carried that the proposed permit for the Road and Driveway Company asphalt plant at Newport be approved and issued with the following changes: (1) In item No. 1 add a subsection c. which reads "A period or periods aggregating three (3) minutes in any one (1) hour equal to or greater than twenty percent (20%) opacity in the exhaust gases." (2) In item No. 3 after the words "plant site" insert the words "under control of the permittee." (3) Under the heading "Prohibited Activities" add a new item No. 11 which reads "The permittee is prohibited

from causing or allowing discharges of air contaminants from sources not covered by this permit so as to cause the plant site to exceed the standards fixed by this permit or rules of the Department of Environmental Quality."

There being no further testimony regarding the Amalgamated Sugar Co. plant at Nyssa, it was MOVED by Mr. Cogan, seconded by Mr. McPhillips and carried that the proposed permit for the Amalgamated Sugar Co. plant at Nyssa be approved and issued with the following changes: (1) Delete subsection 4(a). Under the heading "Prohibited Activities" add a new item which reads "The permittee is prohibited from causing or allowing discharges of air contaminants from sources not covered by this permit so as to cause the plant site to exceed the standards fixed by this permit or rules of the Department of Environmental Quality."

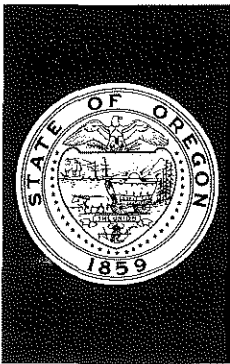
Mr. Pete Schnell was present to represent Publishers Paper Company relative to the proposed permits for the pulp and paper mills located at Newberg and Oregon City. He commented in detail regarding the points raised in the March 9, 1973 letter from S.W. Forstrom, General Manager of the Company.

After further discussion it was MOVED by Mr. McPhillips, seconded by Mr. Cogan and carried that action on the proposed permits for the Publishers Paper Company mills at Newberg and Oregon City be deferred until the next Commission meeting at which time the staff will be requested to furnish an evaluation and analysis of the objections raised by the company.

There being no further testimony it was MOVED by Mr. Cogan, seconded by Mr. McPhillips and carried that as recommended by the Director the proposed permit for the Menasha Corporation pulp mill at North Bend be amended and issued.

It was MOVED by Mr. McPhillips, seconded by Mr. Cogan and carried that action on the proposed permit for the Boise Cascade Corporation pulp mill at Salem be deferred until the next Commission meeting which is scheduled to be held on April 30, 1973 in Salem.

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



## DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5301

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. B, April 2, 1973 EQC Meeting

### Project Plans for February, 1973

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

#### Water Quality Control

1. Fifty (50) domestic sewage projects were reviewed:
  - a) Provisional approval was given to:
    - 25 plans for sewer extensions
    - 1 plan for sewage treatment works improvement
    - 5 contract modifications
  - b) Approval without conditions given to contract modifications for:
    - 17 Treatment facilities
    - 2 interceptor sewers
2. Five (5) project plans for industrial waste facilities were given provisional approval.
  - 3 animal waste treatment facilities
  - 2 industrial waste facilities (1 wastewater treatment; 1 pretreat.)

#### Air Quality Control

1. Six (6) project plans, reports or proposals were received and reviewed:
  - a) Conditional approval given to:
    - 1 Parking facility (135-space, Terminal Sales Bldg.)
  - b) Preliminary approval given to:
    - 1 Proposal for spent liquor incineration (Menasha, Coos Bay)
  - c) Approval without conditions given to:
    - 2 parking facilities (140-space, Marion Co.; 144-space, Lane Co.)

Air Quality Control (Continued)

- d) Approval for industrial AQC proposals given to:
  - 2 projects (Sanderdust handling system, Weyco, Coos Co.;
  - Aero-Vac Bag filter system, Timber Products, Jackson Co.)

Solid Waste Disposal

- 1. Seven (7) project plans were reviewed:
  - a) Provisional approval given to:
    - 2 Transfer stations (Sandy, Clack. Co.; Vida-Leaberg, Lane Co.)
    - 1 Sanitary Landfill (Rahn's, Umatilla County)
    - 1 Demolition Landfill (Hillsboro, Washington County)
    - 1 Disposal site closure plan (garbage) (London, Lane County)
    - 2 Disposal sites closure permits (garbage) (Wamic, Wasco Co.;
    - Sheridan, Yamhill County)

Director's Recommendation

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



DIARMUID F. O'SCANNLAIN

PROJECT PLANS

Water Quality Division

During the month of February, 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.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (50)</u>			
2-2-73	Wallowa	Change Order #B-2, lagoon project	Approved
2-12-73	USA (Aloha)	Tee Jay Subd. sewers	Prov. approval
2-12-73	Gresham	Eagle Estates Condominium sewers	Prov. approval
2-12-73	Gresham	Lone Pine Acres Subd. sewers	Prov. approval
2-12-73	Tualatin	Boones Ferry lateral sewer	Prov. approval
2-12-73	USA (Forest Grove)	Forest Grove-Cornelius sewer intertie	Prov. approval
2-12-73	North Roseburg SD	Darely Ware Hughes sewer	Prov. approval
2-14-73	Portland	Change Order #2, Portland sewage treatment plant	Approved
2-14-73	Multnomah County	Change Order #3, Inverness interceptor	Approved
2-14-73	Eugene	Two sewer projects	Prov. approval
2-15-73	Salem (Willow Lake)	Seeger Lane sewer	Prov. approval
2-15-73	Ashland	Frontage Road sewer	Prov. approval
2-16-73	Portland	S.W. 63rd & Boundary sewer	Prov. approval
2-16-73	Wilsonville	Five change orders, sewage treatment plant and interceptor	Approved

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
2-16-73	USA (Aloha)	Revised plans Tee Jay Subdivision sewer	Prov. approval
2-16-73	Albany	Five change orders, Southeast interceptor	Prov. approval
2-16-73	Dallas	Bridlewood Estates Subd. sewers	Prov. approval
2-20-73	Rivergate	Port of Portland-Areas 2 and 5 sewers	Prov. approval
2-20-73	USA (Aloha)	Bronson-Willow Creek sewer intertie	Prov. approval
2-20-73	Primate Center	Sewage treatment plant up-grading and irrigation system	Prov. approval
2-21-73	USA (Tigard)	S.W. 68th Avenue sewer	Prov. approval
2-21-73	USA (Aloha)	Stoddard Subd. sewers	Prov. approval
2-21-73	Myrtle Point	Change Order #3, sewage treatment plant contract	Approved
2-21-73	Oak Lodge San. D.	Oakridge Subd. sewers	Prov. approval
2-21-73	Toledo	Addenda Nos. 1 and 2, Change Order 1-4, sewage treatment plant contract	Approved ✓
2-21-73	Portland	S.W. Galeburn & S.W. 43rd sewers	Prov. approval
2-21-73	Scappoose	Westcliff Subd. sewers	Prov. approval
2-22-73	Multnomah County	Three change orders, Inverness interceptor	Approved
2-23-73	Oregon City	Morton Road sewers	Prov. approval
2-26-73	USA (Sunset)	Pollock-Weigel Subd. sewers	Prov. approval
2-27-73	Maupin	Mt. Fir Company sewer	Prov. approval
2-27-73	North Bend	Field change orders to sewage treatment plant contract	Approved

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
2-27-73	Portland	Change Order #3, Columbia Blvd. sewage treatment plant contract	Approved
2-27-73	Brookings	Change Order #3, 4, and 5 sewage treatment plant contract	Approved
2-27-73	West Linn (Will.)	Timothy Lane sewer	Prov. approval
2-27-73	USA (Metzger)	Glencreek Park Subd. sewers	Prov. approval
2-27-73	Myrtle Point	18th Street sewer extension	Prov. approval

Water Pollution Control

Industrial Projects (5)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
2/7/73	Astoria	Dave Sutter Dairy, animal waste facilities	Prov. Approval
2/12/73	Stayton	Paris Woolen Mills, Inc., industrial waste pretreatment	Prov. Approval
2/13/73	Donald	Raymond Churchill Dairy, animal waste facilities	Prov. Approval
2/14/73	Corvallis	Oregon Aqua-Foods, Inc., wastewater treatment facilities	Prov. Approval
2/21/73	Corvallis	OSU, Agricultural Experiment Station, animal waste facilities	Prov. Approval



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

<u>DATE</u>	<u>LOCATION</u>	<u>PROJECT</u>	<u>ACTION</u>
15	Coos	<u>Menasha Corporation</u> Proposal for spent liquor incinerator.	Preliminary
20	Multnomah	<u>Terminal Sales Building</u> 135-space parking facility	Approved with specific conditions
21	Marion	<u>Oregon Employment Division</u> 140-space parking facility.	Approved
21	Lane	<u>National Guard Armory</u> 144-space parking facility.	Approved
22	Coos	<u>Weyerhaeuser Company</u> Plans and specifications for installation of sanderdust handling and firing systems for boilers.	Approved
28	Jackson	<u>Timber Products Company</u> Plans and specifications for installation of Aero-Vac bag filter system to control particulate emissions from the #4 particleboard plant cyclone.	Approved

PROJECT PLANS  
SOLID WASTE MANAGEMENT DIVISION

During the month of February, 1973, the following project plans and specifications and/or reports were reviewed by the staff. The disposition of each project is shown, pending confirmation by the Environmental Quality Commission.

<u>DATE</u>	<u>LOCATION</u>	<u>PROJECT</u>	<u>ACTION</u>
9	Lane County	London Disposal Site closure plan (existing garbage)	Prov. approval
15	Washington Co.	Hillsboro Landfill (existing demolition)	Prov. approval
15	Wasco County	Wamic Disposal Site (existing garbage) for closure	Prov. approval
15	Clackamas County	Sandy Transfer Station (new)	Prov. approval
16	Lane County	Vida-Leaberg Transfer Station (new)	Prov. approval
23	Yamhill County	Sheridan Willamina Disposal Site (existing garbage) for closure	Prov. approval
27	Umatilla County	Rahn's Refuse Removal (new garbage) Sanitary Landfill	Prov. approval



# DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5301

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 C , for April 2, 1973, EQC Meeting  
Columbia Willamette Air Pollution Authority -  
Discontinuance of Air Pollution Control Services  
to Washington County.

## Problem

Columbia Willamette Air Pollution Authority (CWAPA) has notified the Department of Environmental Quality that it will discontinue its services to Washington County on April 1, 1973, unless Washington County pays its share of air pollution control costs for the past two years.

Because DEQ has ultimate responsibility by law for statewide control of air pollution, and for assuring that regional authorities maintain uniform programs, an informal hearing on the problem has been scheduled. If the matter cannot be resolved informally, EQC may need to decide how air pollution controls in Washington County are to be enforced.

## Alternatives for Solution

1. Washington County could resolve the problem by accepting

responsibility for payment of its share of CWAPA costs.

2. CWAPA could continue to serve Washington County without payment.

3. CWAPA could dissolve and reform without Washington County per ORS 449.900, leaving DEQ responsible for air quality control services in Washington County.

4. If none of the above occurs, EQC could conclude that the air quality control program in the Columbia Willamette Region was "being administered in a manner lacking uniformity throughout the territory of the regional authority." Under ORS 449.905, EQC would then be required to conduct a formal hearing on the matter after 30 days notice to CWAPA, and "require that necessary corrective measures be undertaken within a reasonable period of time." If CWAPA failed to take the necessary corrective measures within the time required, EQC would become the administrative and enforcement body for the region, superseding the regional authority.

#### Background

Under Oregon Law (ORS 449.850 to 449.920) Regional Air Pollution Authorities are authorized to operate when formed of contiguous territory, having a population of 130,000 and consisting of two or more units of local government, if the Environmental Quality Commission finds that:

1. Adequate financing is planned and,
2. The boundaries are reasonable for air quality control purposes.

When authorized by the EQC, the region formed exercises the air quality control functions in the same manner that the DEQ would if no regional authority was formed. The statutes provide that the regional rules and standards must be as strict (or more strict) than those of the EQC and further that the EQC and a regional authority shall not exercise the same functions in the same territory.

Three regional authorities have been authorized under these statutes since 1967 and are now operating in Oregon. These are:

Columbia Willamette Air Pollution Authority (CWAPA)

Mid-Willamette Air Pollution Authority (MWVAPA)

Lane Regional Air Pollution Authority (LRAPA)

The Columbia Willamette Air Pollution Authority is composed of the territories of Clackamas, Columbia, Multnomah, and Washington Counties.

The original agreement between members for formation of the CWAPA was signed on November 15, 1967 by Clackamas, Columbia and Multnomah Counties and the City of Portland and authorization was granted by the EQC at its December 28, 1967 meeting. Washington County joined CWAPA approximately two years later and signed a similar agreement executed by all members and dated December 30, 1969, with authorization granted by the EQC at its January 30, 1970 meeting.

The attached directory shows the regional boundaries, Board Members, Advisory Councils, and staffs of Regional and State Air Quality Control programs.

Actions to Date

A resolution adopted by the EQC October 29, 1971, urged Washington County to continue participation in the region. A copy of that resolution is attached.

In a letter to the Director on February 12, 1973, CWAPA reviewed its status with Washington County and efforts to resolve the issue of Washington County's participation in CWAPA. The CWAPA letter requested the EQC to carry out its responsibility under ORS 449.765(1)(c) "to facilitate cooperation among units of local governments in establishing and supporting Air Quality Control programs." The letter further advised DEQ that after April 1, 1973 "air pollution services provided to Washington County will be discontinued by CWAPA unless payment is received for at least the first one-half of the current contribution of \$18,440 (\$9,220)." A copy of that letter is attached.

A copy of DEQ's letter scheduling the informal hearing for April 2, 1973 (attached) was sent to the Honorable Burton Wilson, Washington County Commissioner who represents the county on the CWAPA Board of Directors. The county, through a telephone call to the Department, (memo attached) advised DEQ on March 20, 1973, that it would not be represented at the informal hearing on April 2, 1973.

During February and March of 1973, the Director has had numerous telephone conversations and some informal visits with members of CWAPA relative to the Washington County matter. These contacts were efforts to resolve the issue and avoid formal, including legal, action.

Recommendation

Because many efforts over many months have exhausted the alternatives for settling the Washington County issue, and because CWAPA has had to provide services to Washington County for which it has not been paid by the county, it is the Director's recommendation that this matter now be promptly resolved. Assuming Washington County is not about to accept responsibility for its share of CWAPA's costs, and assuming CWAPA does not intend to continue to serve Washington County without payment, action by the EQC under the appropriate Oregon statutes is now appropriate.

It is the Director's recommendation that CWAPA take the necessary steps to dissolve and reform without Washington County per ORS 449.900. DEQ, then and thereafter, would be responsible for air quality control services in Washington County.

The Director is of the opinion that this recommendation, rather than a formal hearing to establish that the region is "being administered in a manner lacking uniformity throughout the territory of the regional authority," is the least detrimental to the well being of the Regional Air Pollution Authority Program.

Finally, the Director wishes to reiterate a point made many times: it has not been nor is it now the Director's or the Department's desire to administer directly the air quality control services for Washington County. With CWAPA reformed as a three county authority, and Washington County removed from participation in CWAPA, DEQ will have no alternative under Oregon statutes but to enforce air quality controls directly

in the Washington County area.



DIARMUID F. O'SCANNLAIN

Attachments

1. Resolution adopted by the EQC at its October 29, 1971 meeting.
2. Letter dated February 12, 1973 from Honorable Fred Stefani, Chairman of CWAPA, to D. F. O'Scannlain.
3. Letter dated March 7, 1973 from D. F. O'Scannlain to Commissioner Stefani.
4. DEQ memo on call from Washington County on March 20, 1973.



## RESOLUTION

The Environmental Quality Commission expresses grave concern over the decision of Washington County to withdraw from the Columbia Willamette Air Pollution Authority. Pertinent facts are as follows:

1. Washington County faces financial difficulties; the amount required for continued membership in CWAPA is \$13,581 (about 8.8 cents per capita);
2. A loss in program funding, amounting to \$80,000, appears imminent if Washington County's action stands;
3. Air pollution is a regional problem requiring coordinated efforts in local planning, zoning and public works as well as air pollution control. Service facilities such as freeways, mass transit and solid waste, as well as location of residential and industrial areas, directly affect air pollution. Therefore, the only meaningful way to maintain local control of air quality programs is through a regional approach involving the various elements which have impact on air quality. Federal, state and county officials have strongly supported this regional approach.
4. The Portland Metropolitan Region's program is an essential element in the state's environmental improvement program.

On the basis of the overall loss to environmental quality in Oregon which can be expected to result from Washington County's withdrawal from CWAPA, and the relatively small cost Washington County would incur in order to continue participation, the Environmental Quality Commission strongly urges Washington County officials and citizens to examine alternatives which might permit them to resume strong participating membership in the Columbia Willamette Air Pollution Authority, and offers its support toward achieving that objective.

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

12 February 1973

Diarmuid F. O'Scannlain, Director  
Department of Environmental Quality  
1234 S.W. Morrison Street  
Portland, Oregon 97232

## BOARD OF DIRECTORS

Mildred Schwab  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

Dear Mr. O'Scannlain:

During the 19 January meeting, the Board of Directors of Columbia-Willamette Air Pollution Authority reviewed the status of its efforts to resolve the conflict about participation of Washington County in the regional air pollution prevention and control program.

In December of 1972 the CWAPA Board of Directors had withdrawn its suit to encourage solution of the controversy. On 16 January the Board of Directors met informally with members of the Washington County Board of Commissioners. The purpose of this meeting was; (1) to find some rational compromise regarding the funds that Washington County has not contributed during the last two years and; (2) to give firm backing to a concept that would allow a legislative change with regard to the ability of counties to opt out of this authority or other authorities. The CWAPA Board had earlier offered to cancel the \$13,581 owed by Washington County for fiscal year 1 July 1971 through 30 June 1972 providing Washington County paid its current contribution. These offers were not acceptable to the commissioners of Washington County; in fact, the chairman of the Washington County Board of Commissioners made it abundantly clear that Washington County did not intend to contribute any money and apparently has no real interest in attempting to deal with the problem of pollution in their area. There has been apparently no attempt on the part of Washington County Board of Commissioners to seek a rational compromise with this authority.

Therefore, the CWAPA Board of Directors finds it must advise you that on 1 April 1973, the air pollution control services provided to Washington County will be discontinued by CWAPA unless payment is received for at least the first one-half the current contribution of \$18,440 (\$9,220). CWAPA Board believes that the Department of Environmental Quality has a responsibility to participate in resolving the Washington County problem in accordance with the provisions of Chapter 449.765(1)(c) "To facilitate cooperation among units of local governments in establishing and supporting air quality control programs."

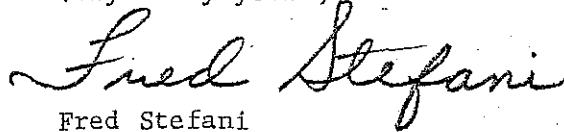
Diarmuid F. O'Scannlain

Page 2

12 February 1973

The Board of Directors look forward to your participation in the resolution of this problem.

Very truly yours,



Fred Stefani  
Acting Chairman

FS:rhs

cc: B. A. McPhillips, Chairman  
Environmental Quality Commission

wg:DKS:ee  
SPS

copy to: Bob Loshoff 2-14-73

KCS

Lamy Williams

March 7, 1973

Commissioner Fred Stefani  
Chairman  
Columbia-Willamette Air  
Pollution Authority  
Clackamas County Courthouse  
Oregon City, Oregon

Dear Commissioner Stefani:

Thank you for your letter of February 12, 1973, advising the Department of the intent of the Columbia-Willamette Air Pollution Authority that effective April 1, 1973, "the air pollution control services provided to Washington County will be discontinued by CWAPA". Your letter also requests us to participate and assist in the resolution of this problem, implying, I assume, that DEQ be prepared to serve Washington County directly.

The Department and Commission have supported the concept of regional air pollution control, and have made numerous specific efforts to assist in encouraging Washington County to remain a participating member of the CWAPA.

In reviewing the alternatives now available, it appears that ORS 449.905 would not permit the DEQ to assume the responsibility for providing air quality control services to Washington County while it remains a part of CWAPA. This statute charges the Environmental Quality Commission with the responsibility of assuring that regional authorities maintain adequate and uniform programs throughout the territories of the regional authorities. Further, this statute provides that if the Commission has any reason to believe that a program is not adequate or uniform throughout a region, a hearing on the matter must be held.

I do agree, however, that we have responsibilities to help resolve this problem. Therefore I propose that the matter be informally scheduled on the agenda of our next Commission meeting.

Commissioner Fred Stefani  
March 7, 1973  
Page Two

April 2, 1973, for full discussion. If a solution cannot be found in this manner, it would be my intention to then schedule a formal hearing pursuant to ORS 449.905.

May I respectfully request that CWAPA continue to provide air pollution control services to Washington County at least until this matter can be fully considered at the April 2, 1973, EQC meeting.

I would appreciate your comments regarding this proposed course of action.

Sincerely,

DIARMUID F. O'SCANLAIN  
Director

DFO'S:cm

cc: Honorable Mildred Schwab  
Honorable Burton C. Wilson, Jr.  
Honorable Ben Padrow  
Honorable A. J. Ahlborn  
Mr. R. E. Hatchard

bcc: Kessler R. Cannon  
Robert Logan  
Larry Williams



State of Oregon

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

To: Diarmuid F. O'Scamlain

Date: March 20, 1973

From: H. M. Patterson

Subject: EQC Meeting  
Washington County

Max F. Rolin, Jr., Administrator for Washington County called me on the morning of March 20 to advise that the Board of Commissioners of Washington County had considered the EQC meeting schedule for April 2 and found that the time was not appropriate for the Board members, and that all of them had previous commitments and would be unable to attend.

Mr. Rolin also related that the Board had recommended that the informal hearing be held at another time and in Washington County.

I inquired of Mr. Rolin as to whether he could represent the Board of County Commissioners at the EQC meeting, and he advised that he presumed he could; however he had not yet been authorized to do so.

cc; EJW

A handwritten signature in dark ink, appearing to be "HMP", located to the right of the "cc; EJW" text.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL  
GOVERNOR

### MEMORANDUM

DIARMUID F. O'SCANNLAIN  
Director

To: Environmental Quality Commission

ENVIRONMENTAL QUALITY  
COMMISSION

From: Director

B. A. McPHILLIPS  
Chairman, McMinnville

Subject: Agenda Item D, April 2, 1973 EQC Meeting

EDWARD C. HARMS, JR.  
Springfield

Grant and Program Status: Statewide Solid Waste Management  
Action Plan

STORRS S. WATERMAN  
Portland

### Background

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

At the March 2, 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 sixteen grant applications representing twenty nine counties for funds totaling up to \$818,190 had been recommended for approval by the State Solid Waste Management Citizens' Advisory Committee (CAC) and subsequently approved by the Department. Grant offers to these sixteen applicants had been made, twelve had accepted and nine had received the first advance of the grant as of March 20, 1973.

On March 16, 1973 the CAC recommended approval of the planning grant application for the Chemeketa (Mid-Willamette) Region to fund the full project, and of four new applications for funding. Additionally, the Committee recommended funding limits for the three counties yet to apply and for the proposal of the Bureau of Governmental Research and Service of the University of Oregon to aid the Department in its program of statewide technical assistance to local solid waste management planning projects, leaving it to the Department to work out the details.

Grants totaling up to \$1,109,353 have been recommended by the CAC for approval by the Department from the \$1,129,630 statewide planning grant fund, leaving \$20,277 (1.8%) as the unobligated balance available for contingencies.

Present Status

The following table presents the funding breakdown for twenty projects representing thirty three counties in carrying out solid waste management action planning in Oregon during 1973.

<u>Applicant or Area</u>	<u>State Grant (up to)</u>	<u>In-Kind</u>	<u>Total Project</u>
Clatsop-Tillamook Region	\$ 49,500	\$ 2,300	\$ 51,800
MSD-CRAG Region	325,000	126,830	451,830
Chemeketa Region	230,281	50,500	280,781
Lane Region	154,000	15,000	169,000
Douglas Region	26,300	9,700	36,000
Coos-Curry Region	47,000	25,900	72,900
Jackson County	21,300	3,200	24,500
Josephine County	15,000	4,076	19,076
Mid-Columbia Region	20,000	10,000	30,000
Central Oregon Region	43,160	35,421	78,581
Klamath County	15,000	4,500	19,500
Gilliam County	5,000	3,000	8,000
Grant County	9,680	2,800	12,480
Morrow County	19,750	4,000	23,750
Umatilla County	20,000	10,202	30,202
Wheeler County	7,500	4,750	12,250
Baker County	21,882	11,446	33,328
Union County	22,000	10,202	32,202
Wallowa County	16,000	4,500	20,500
Malheur County	4,000	1,373	5,373
Totals	<u>\$1,072,353</u>	<u>\$339,700</u>	<u>\$1,412,053</u>

The Malheur County solid waste management planning project is being funded in major portion by a \$39,778 grant from the Environmental Protection Agency.



The In-Kind effort amounts to 24% of total project costs for the thirty three counties represented in this outline.

Regarding the three remaining counties for which the Department has set aside \$21,000 based on a CAC recommendation: Lincoln County's letter of preliminary application for a \$5000 state supplement to a current Federal HUD grant is being processed; Lake County intends to bear the cost of its planning program, but \$6000 is being held in reserve for the county; and the Department is currently assisting Harney County in development of its planning project for which up to \$10,000 of grant funds are available.

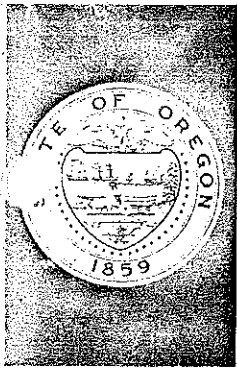
The development of the Statewide Solid Waste Management Action Plan is essentially underway in twenty three local-regional projects representing all Oregon counties as of April 1, 1973. Plans developed by these projects will be basically complete by December 31, 1973, with public hearings on and adoption of the individual plans carrying well into 1974 concurrent with plan implementation. A working preliminary draft of the basic elements of the statewide plan should be available for use in January 1974. Final draft and adoption of the Statewide Action Plan is estimated for the fall of 1974, after adoption of the local plans and essentially much of the implementation of short range programs has occurred.



DIARMUID F. O'SCANNLAIN

RDJ:mm

3/21/73



## DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5301

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 # E, April 2, 1973, EQC Meeting  
Veneer Drier Regulation

### Background

The public hearing conducted by the Commission on January 26, 1973, received testimony regarding the proposed changes in the Veneer Drier regulation and the staff was instructed by the Commission to review the testimony and report back to the next meeting.

The testimony presented at the January 26, 1973, meeting was from two regional air pollution agencies and from industry. The basic regional agency testimony was opposed to the proposed regulation and the industry testimony, with reservations, supported the proposed regulation.

To further evaluate the testimony of the regional authorities, the Department on February 8, 1973, requested information from each of the regional authorities relative to their requirement for veneer driers to comply with their rules.

The industry also requested a further meeting to discuss the regulation and this was held on March 12, 1973, with all the regional authority representatives also in attendance.

### Discussion

At the public hearing a number of questions were raised relative to the applicability of visible emissions to this source, the stringency of the regulation, the enforceability of the regulation and the modification of the compliance date.

As indicated, each of the issues raised has been evaluated and considered by the Department. This testimony and other comments suggest a review of the history of the proposed rule development may be helpful.

During the drafting of regulations for Board Products Industries, one of the source categories considered was Veneer Dryers. At that time essentially no mass emission data was available (data in terms of grains per standard cubic feet or pounds per hour of particulate emissions). The regulation as adopted on March 5, 1971, and currently in effect contains only a visible emission "opacity" limitation. During this same period of time, research work was being conducted by Washington State University under joint sponsorship of and grant from EPA and the American Plywood Association to identify and characterize the emissions from veneer dryers which would assist in developing control methods.

Emissions were found to consist of small quantities of solid particulate matter (generally under 0.002 grains per stand cubic foot) and hydrocarbons. There were basically two categories of hydrocarbons - hemiterpene hydrocarbons (volatile) and diterpenes (condensable). The quantity of hydrocarbons emitted varied, depending of species, dryer type and the way it was operated, and on other factors. The total emission of hydrocarbons from the dryer stacks averaged 12.8 lbs. per 10,000 square feet of veneer dried (3/8" basis). Of this total 10.7 lbs. represented the condensable fraction. The other fraction (2.1 lbs.) was the volatile hydrocarbons.

Studies and evaluations continued in 1971. After adoption of the regulation in 1971, the Department, through observations of visible emissions from veneer dryers made by certified observers, attempted to determine whether or not veneer dryers at selected locations were capable of operating within the visible emission limitation set forth in the rule. It soon became apparent that readings of visible emissions from veneer dryer stacks could not, in many cases, be obtained under acceptable conditions and a search for further possible control methods was initiated.

In September, 1971, the Department presented a report to the EQC reviewing the research and test results reported by Washington State University. The addition of a mass emission limitation was suggested.

Public Hearings were conducted in Portland, Medford, and Eugene on January 5th and January 7th, 1972, pertaining to Oregon's Clean Air Act Implementation Plan. In this plan was a proposed amendment to the veneer dryer rate to limit veneer dryer emissions on a mass basis. As a result of adverse testimony and at the request of the plywood industry, the proposed rule was not adopted and a nine month extension was granted to the industry to complete pilot test work and to evaluate control hardware. Quarterly reports were to be submitted to the Department. A copy of the final report is attached to this report. Some of the conclusions at the end of this project and the results of discussions carried out with the Department were:

1. Not enough reliable data was available to establish a mass emission limit.
2. Industry would like a review date established in the regulation for any limit established by a new rule.
3. Dual weight standards for old and new equipment did not appear justified.

Industry also objected to enforcement of a mass emission limitation that would cost \$1200-\$1600 per source test and could approach a cost of two million dollars annually for Oregon's plywood industry. Further, at this time and through following discussions with an industry committee, it was agreed by that committee and most control officials that at this point in time, in the air pollution control process, that the essential problem associated with the operation of veneer dryers was that emission which caused the "blue haze" over plants and adjacent areas. A regulation which would require elimination of the blue haze would be acceptable from an air quality and industrial control standpoint.

On October 4, 1972, the Department presented to the Environmental Quality Commission a report reviewing the various alternatives available and requested authority for conducting a public hearing for the purpose of receiving public testimony relative to amending the veneer dryer regulation

OAR, Chapter 340, Section 25-315 (1). The hearing was authorized for the January 26, 1973, EQC meeting.

Much of the testimony at the public hearing was in direct contrast to the precepts and conclusions drawn from the industry evaluations and conferences with control agency staffs over the past year.

The Department has reviewed and considered oral and written testimony. The written testimony is attached to this report. The Attorney General's office has recommended certain word changes which have been incorporated and further in response to testimony given an opinion that the proposed rule is enforceable. Attached are copies of that correspondence which pertains to these matters.

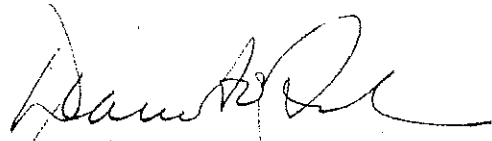
The meeting requested by the industry and held on March 12, 1973, was requested primarily to advise the control agencies of industry progress relative to control devices and tests. The result of this conference was that those industrial representatives present believed that section (1) (a) was more restrictive and that industry was concerned that compliance could not be attained with the types of control equipment currently being considered.

### Conclusions

1. The proposed veneer drier regulation is an enforceable regulation and will require a substantial reduction in the visible emissions from veneer driers.
2. The proposed regulation may make it impractical to attempt to achieve compliance with low energy scrubber systems and will have an impact on and require control of veneer drier leakage that occurs at many installations.
3. The enforcement of the "limitations on visible emissions" are concluded to be a sufficient control requirement and neither process weight nor grain loading requirements need be applicable at this time.
4. Several word changes were recommended and are incorporated in the attached draft regulation dated March 16, 1973.
5. The emission measurements required in the regulation will result in data which will provide a basis for emission inventory purposes and decisions regarding the emission control accomplished.

Director's Recommendation

It is the recommendation of the Director that modifications to the proposed veneer drier regulation as shown in the attached draft dated March 16, 1973 be made to the proposed veneer drier regulation and that the veneer drier regulation as amended be adopted.

A handwritten signature in dark ink, appearing to read "Diarmuid F. O'Scannlain", written in a cursive style.

DIARMUID F. O'SCANNLAIN

TMP:sb  
3/21/73

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY CONTROL DIVISION

March 16, 1973

OAR, Chapter 340, Division 2, Section 25-315, Veneer and Plywood Manufacturing Operations. Subsection (1) Veneer Driers is proposed to be amended to read as follows:

25-315 VENEER AND PLYWOOD MANUFACTURING OPERATIONS

(1) Veneer Driers

- (a) As soon as practicable, but no later than December 31, 1974, no person shall operate any veneer drier, or ~~[veneer]~~ driers, such that visible air contaminants, including condensible hydrocarbons, ~~[and the characteristic "blue haze"]~~ are emitted in such quantities ~~[that]~~ so as to create any characteristic "blue haze" [to be observed] which is observable at any point beyond the [edge] exterior wall of the building [or at any distance greater] housing the veneer drier or driers or at any point further than 50 feet in any direction from the veneer drier, whichever is greater.
- (b) As soon as practicable, but no later than December 31, 1974, no person shall operate any veneer drier, such that visible air contaminants emitted therefrom at any time exceed 20% opacity, opacity as defined by section 21-005 (4), from any one stack or an arithmetic average of 10% opacity~~[, as so defined,]~~ from all stacks of that veneer drier. Where the presence of uncombined water is the only reason for failure of an emission to meet these requirements, said requirements shall not apply.

- (c) As soon as practicable, but not later than [~~May 1, 1973,~~]  
July 1, 1973, every person operating a veneer drier shall  
submit to the Department of Environmental Quality:
- i. Written information, reports, or analysis which  
demonstrates compliance with the emission limita-  
tions contained in subsections (1)(a) and (1)(b),  
of this section, or
  - ii. A specific written compliance schedule for com-  
plying with the emission limitations contained  
in subsections (1)(a) and (1)(b), of this section,  
or
  - iii. Written notice that the person is participating  
in a study approved by the Department as sufficient  
to identify the emissions from said veneer drier  
or similar veneer drier, and to design an "air  
cleaning device", as defined by ORS 449.760(6),  
which will achieve compliance by said veneer drier  
or similar veneer drier with the emission limitations  
contained in subsections (1)(a) and (1)(b) of this  
section.
- (d) Any veneer drier complying with the emission limitations  
contained in subsections (1)(a) and (1)(b) of this section  
shall be exempt from compliance with section 21-030, (per-  
taining to particulate emission limitations).



- (e) Any veneer drier, the construction of which is completed subsequent to the effective date of this rule, shall [ ] from time of initial operation [ ] comply with the emission limitations contained in subsections (1) (a) and (1) (b) of this section.
- (f) No person shall attempt to comply with the emission limitations of subsection (1) (a) or (1) (b) of this section by diluting the emissions from the drying process with outside air or other gases. Emissions which are so diluted shall be deemed to be in violation of subsections (1) (a) and (1) (b) of this section.
- (g) Unless otherwise agreed to by the Department in writing, any person operating one or more veneer driers in compliance with subsection (1) (a) and (1) (b) shall test at least one (1) representative veneer drier in such manner as specified by the Department in its published standard test method, as it may be amended from time to time, copies of which are on file and available at the main office of the Department. A written report of the results of the test or tests shall be filed with the Department within 90 days of the earliest to occur of the following:

- i. The date compliance with the emission limitations contained in subsections (1)(a) and (1)(b) of this section is reported to the Department, or
  - ii. The date the "air cleaning device", as defined by ORS 449.760(6), designed to achieve compliance with the emission limitations contained in subsections (1)(a) and (1)(b) of this section is put into operation, or
  - iii. The date agreed to by the Department and established in the compliance schedule.
- (h) A Public Hearing shall be held by the Department no later than January 1, 1975, to review current technology and the adequacy of these regulations and the necessity and practicability of adopting a mass emission limitation.

Board Products Industries  
(Veneer, Plywood,  
Particleboard, Hardboard)

[ED. NOTE: Unless otherwise specified, sections 25-305 through 25-325 of this chapter of the Oregon Administrative Rules Compilation were adopted by the Department of Environmental Quality March 5, 1971 and filed with the Secretary of State March 31, 1971 as Administrative Order DEQ 26].

25-305 DEFINITIONS. (1) "Department" means Department of Environmental Quality.

(2) "Emission" means a release into the outdoor atmosphere of air contaminants.

(3) "Hardboard" means a flat panel made from wood that has been reduced to basic wood fibers and bonded by adhesive properties under pressure.

(4) "Operations" includes plant, mill or facility.

(5) "Particleboard" means mat formed flat panels consisting of wood particles bonded together with synthetic resin or other suitable binder.

(6) "Person" means the same as ORS 449.760 (1).

(7) "Plywood" means a flat panel built generally of an odd number of thin sheets of veneers of wood in which the grain direction of each ply or layer is at right angles to the one adjacent to it.

(8) "Tempering oven" means any facility used to bake hardboard following an oil treatment process.

(9) "Veneer" means a single flat panel of wood not exceeding 1/4 inch in thickness formed by slicing or peeling from a log.

25-310 GENERAL PROVISIONS. (1) These regulations establish minimum performance and emission standards for veneer, plywood, particleboard and hardboard manufacturing operations.

(2) Emission limitations established herein are in addition to, and not in lieu of, general emission standards for visible emissions, fuel burning equipment, and

refuse burning equipment.

(3) Emission limitations established herein and stated in terms of pounds per 1000 square feet of production shall be computed on an hourly basis using the maximum 8 hour production capacity of the plant.

(4) Upon adoption of these regulations, each affected veneer, plywood, particleboard, and hardboard plant shall proceed with a progressive and timely program of air pollution control, applying the highest and best practicable treatment and control currently available. Each plant shall at the request of the Department submit periodic reports in such form and frequency as directed to demonstrate the progress being made toward full compliance with these regulations.

25-315 VENEER AND PLYWOOD MANUFACTURING OPERATIONS. (1) Veneer Driers.

(a) No person shall cause to be emitted from any veneer drier, visible air contaminants of an opacity equal to or greater than 20% for a period or periods aggregating more than 3 minutes in any one hour. Where the presence of uncombined water is the only reason for failure of an emission to meet this requirement, said requirement shall not apply.

(b) No person shall cause to be emitted from any veneer drier constructed or installed after March 1, 1972, visible air contaminants of an opacity exceeding 10% for a period or periods aggregating more than 3 minutes in any one hour. Where the presence of uncombined water is the only reason for failure of an emission to meet this requirement, said requirement shall not apply.

(c) No person shall attempt to comply with the requirements of (1) (a) or (1) (b) of this subsection by dilution with outside air or by otherwise increasing the exhaust gas volume above that generally occurring under normal operating conditions.

(d) No later than September 30, 1972, every person operating a veneer drier shall submit to the Department of Environmental Quality, a specific proposal for complying with this subsection, and by no later than March 30, 1973, a spe-

This section is being considered for amendment

cific detailed schedule of compliance. The schedule shall provide for compliance with the applicable provisions at the earliest practicable date, consistent with local air quality conditions and the difficulty and complexity of compliance, and shall employ the highest and best practicable treatment and control. In no case shall final compliance be achieved by later than December 31, 1974.

(2) Other Emission Sources.

(a) No person shall cause to be emitted particulate matter from veneer and plywood mill sources, including but not limited to, sanding machines, saws, presses, barkers, hogs, chippers and other material size reduction equipment, process or space ventilation systems, and truck loading and unloading facilities in excess of a total from all sources within the plant site of one (1.0) pound per 1000 square feet of plywood or veneer production on a 3/8 inch basis of finished product equivalent.

(b) Excepted from subsection (a) are veneer dryers, fuel burning equipment and refuse burning equipment.

(c) Compliance Schedule. No later than September 5, 1971, every person operating a plywood or veneer manufacturing plant shall submit to the Department of Environmental Quality a proposed schedule for compliance with this section. The schedule shall provide for compliance with the applicable provisions at the earliest practicable date, but in no case shall final compliance be achieved by later than December 31, 1973.

(3) Open Burning. Upon the effective date of these regulations, no person shall cause or permit the open burning of wood residues or other refuse in conjunction with the operation of any veneer or plywood manufacturing mill and such acts are hereby prohibited.

Hist: Amended 2-15-72 by DEQ 37

25-320 PARTICLEBOARD MANUFACTURING OPERATIONS. (1) Truck Dump and Storage Areas.

(a) Every person operating or intending to operate a particleboard manufacturing plant shall cause all truck dump and storage areas holding or intended to hold raw

materials to be enclosed to prevent wind-blown particle emissions from these areas from being deposited upon property not under the ownership of said person.

(b) The temporary storage of raw materials outside the regularly used areas of the plant site is prohibited unless the person who desires to temporarily store such raw materials first notifies the Department of Environmental Quality and receives written approval for said storage.

(A) When authorized by the Department of Environmental Quality, temporary storage areas shall be operated to prevent windblown particulate emissions from being deposited upon property not under the ownership of the person storing the raw materials.

(B) Any temporary storage areas authorized by the Department shall not be operated in excess of six (6) months from the date they are first authorized.

(c) Any person who proposes to control windblown particulate emissions from truck dump and storage areas other than by enclosure shall apply to the Department for authorization to utilize alternative controls. The application shall be submitted pursuant to Section 20-020 to 20-030, Ch. 340, OAR, and shall describe in detail the plan proposed to control windblown particulate emissions and indicate on a plot plan the nearest location of property not under ownership of the applicant.

(2) Other Emission Sources.

(a) No person shall cause to be emitted particulate matter from particleboard plant sources including, but not limited to, hogs, chippers and other material size reduction equipment, process or space ventilation systems, particle dryers, classifiers, presses, sanding machines and materials handling systems, in excess of a total from all sources within the plant site of three (3.0) pounds per 1000 square feet of particleboard produced on a 3/4 inch basis of finished product equivalent.

(b) Excepted from subsection (a) are truck dump and storage areas, fuel burning equipment and refuse burning equipment.

(3) Compliance Schedule. Not later than September 5, 1971, every person operating a particleboard manufacturing plant shall



**Plywood Research Foundation**  
1119 A Street  
Tacoma, Washington 98401/206-272-2283

HMP

October 19, 1972

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

Dear Mr. Day:

Thank you for your recent letter and your kind remarks regarding the results of the work of the Veneer Dryer Study Committee. We agree that these discussions have been fruitful and should make a significant contribution toward the kind of air quality we all want.

The final report of the series agreed on in your meetings with our industry last January is attached. As I have reviewed the information in this report, I am encouraged that we seem to be on the threshold of finding some important answers on dryer emission control. With the answers that should be forthcoming sound decisions can be made by both industry and government on future action needed.

Very truly yours,

W. D. PAGE  
Staff Executive

WDP/ap  
Enc.

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**RECEIVED**  
OCT 25 1972

AIR QUALITY CONTROL



**Plywood Research Foundation**  
1119 A Street  
Tacoma, Washington 98401/206-272-2283

October 12, 1972

FINAL REPORT TO OREGON DEQ ON VENEER DRYER EMISSION CONTROL PROGRESS

BACKGROUND

During January 1972, hearings were held by the Environmental Quality Commission of the Oregon Department of Environmental Quality to consider an emission standard for veneer dryers. During and after that hearing, the DEQ indicated interest in periodic reports on activity within the plywood industry relative to the control of veneer dryers. Since that time, two quarterly reports have been prepared covering intermediate progress made and a series of three joint industry-DEQ meetings have been held, at the invitation of DEQ, to discuss the progress made in dryer emission control and its relation to future control regulations. This report is the final in the series and will summarize the ground covered in the three meetings as well as update information on emission control equipment that has been tried, is in operation or is planned for future-trial or installation. Minutes of the three meetings are appended.

JOINT INDUSTRY-DEQ MEETINGS

Meetings were held at the DEQ offices at 1234 S.W. Morrison - Terminal Sales Building, Portland, Oregon at 10:00 a.m. on August 3, August 24 and September 14, 1972. During the first meeting, the current status of control equipment trials was presented by industry representatives. This will be covered later in the report when the status of control equipment is discussed.

The subject of testing of veneer dryers was discussed and it was pointed out that, if the recommendations of the S-8 Source Test Committee for testing of veneer dryers were followed, the cost of testing dryers could be prohibitive depending on the dryer configuration and frequency of testing required. It was estimated that testing would cost from \$1,200 to \$1,600 per emission point per test. It was reported that this cost could approach 2 million dollars annually for the Oregon segment of the plywood industry. It was pointed out that this cost to the industry would be unproductive and would not result in any improvement in air quality. DEQ representatives indicated it was not the wish of DEQ that industry spend large amounts of money on testing. Although the permit program which has been introduced for registration of sources of air pollutants will involve some testing, DEQ representatives indicated that permits may run for up to five years and that the testing would only be required if there was an obvious visible problem or when changes were made in the emission source.

When questioned regarding the industry coverage of possible means of controlling the emissions from veneer dryers, DEQ representatives stated that there appeared to be no possibilities that remain to be investigated. In other words, those areas that should be looked at either have been, or are being, studied now.

There was some discussion of employing a process weight standard to limit total weight of particulate matter emitted. One manufacturer was in favor of this approach on the basis that it does give some latitude in selecting which emission sources in a plant to control. However, other manufacturers expressed the view that not enough data are available to make any decision on a total emission requirement at this time.

The subject of sampling and testing of the emissions was discussed at each of the meetings. The establishment of a standard procedure was also discussed and it was pointed out that the S-8 Committee of PNWIS APCA was in the process of developing such a test procedure which would be recommended to all Pacific Northwest air pollution control authorities. At the second meeting, Mr. Phillips of DEQ discussed the subject in depth and stated that they would prepare a standard method for review prior to the next meeting. The procedure was distributed at the third meeting and was found to vary somewhat from the method under study by the S-8 Committee. There was considerable concern voiced by industry that the test procedure adopted by the various local and state air pollution control agencies should be the same. Otherwise, comparison of test results could be confusing.

The subject of an emission weight limit was discussed at the second and third meetings. The position of DEQ was that a measurable number is needed to apply to veneer dryer control for the times when opacities cannot be read due to darkness or weather conditions. At the third meeting, a proposed standard was distributed which set forth limitations of 0.5 lb./1,000 sq. ft. 3/8" production for existing dryers and 0.3 lb./1,000 sq. ft. 3/8" for new dryers. There was considerable discussion with questions raised by industry representatives as to the validity of the dual standard for new and existing dryers as well as the fact that the 0.5 lb. figure is based on measurements of uncontrolled dryers while the standard is to apply to controlled dryers, other than incinerator controlled, to determine compliance. It was suggested that since the standard would, if adopted, apply to controlled dryers, of which there are none at the present time, there is really no urgency in incorporating a mass emission limitation in the standard as the opacity limitation is in the current standard.

It was pointed out that a provision for a review date which had been discussed previously was not included in the standard which was distributed September 14. Mr. Phillips indicated that it was the feeling of the DEQ that if a review of data were indicated for any reason, the Department would call for the review.

Near the close of the third meeting, Mr. Patterson summarized the following points which had been presented by Industry representatives to date:

1. Not enough reliable data has been collected to set a standard.
2. Industry would like a review date for the emission limits if a standard is proposed at this time.
3. The dual weight standard for new and old equipment does not appear justified.

A more detailed account of the information covered at the three meetings can be had by referring to the complete minutes which are attached.

### STATUS OF CONTROL EQUIPMENT TRIALS

At the first of the three meetings, each participant whose company had been involved in testing of veneer dryer emission control equipment gave a brief report on the current status and progress. Their reports follow with added information included where updating is appropriate.

Glen King and Dave Rice of Carolina-Pacific reported on the Mill Conversion Contractors, Inc. burner now in operation at their Grants Pass mill as reported in the August 3 minutes. This burner is a suspension burner that can be fired with wood waste which has been dried and finely ground. At the current time, the burner is being fired on sanderdust but additional storage capacity is being constructed to allow mixing and storing of ground plywood trim with the sanderdust to increase the firing capacity of the burner. Mr. Case of Mill Conversion reports a gas saving at Carolina-Pacific amounting to \$5,500 per month as a result of the use of the burner on one dryer. He also reported that the burner has the capacity and flexibility in ducting to fire six zones of drying space whether it be all in one dryer or separated into two or three dryers.

John Vranizan of Moore Oregon reported on the burner they have constructed at Lane Plywood. This burner is currently being fired with sanderdust and is being utilized to heat the green zone of the dryer. In the current application, it is not being used to incinerate the dryer emissions directly from the stack however, since a portion of the circulating air within the dryer is ducted from the dryer to the burner and blended with 2400°F. gases in the burner and then ducted back to the dryer to supply heat, a portion of the organics in the dryer are burned. The result is that the exhaust stack from the green zone of the dryer, although not treated directly, does not emit a visible plume.

Wally Cory reported on the experiences with the first of the sanderdust fired burners which was installed at their Albany plant by Wasteco of Portland. This burner is incinerating all of the emissions from one of two dryers in the mill and burning all of the mill's sanderdust. Heat is ducted back to the dryer from the burner to supply a portion of the heat to the dryer. It has been reported that during short test periods, the usage of natural gas has been reduced by as much as 35%. However, on a monthly basis, apparent gas savings have been negligible due to inadequate supplies of sanderdust.

In all three cases of the wood waste fired incinerators, sanderdust has been used as the fuel. In the case of the Mill Conversion unit, equipment is being installed to enable other wood waste to be used as supplementary fuel. The concept of the suspension burner is not limited to burning sanderdust although sanderdust is the only fuel available in a plywood plant without additional treatment. Any type of wood waste can be burned in a suspension burner provided it is first dried and ground. This additional treatment would add considerably to the cost of the installation and the need to dry the fuel prior to burning would reduce the amount of heat available for incineration and veneer drying.

As an example of the cost involved in the use of a suspension burner system designed to dry, grind and burn general plywood mill wood waste, Bill Swindells of Willamette Industries, reported quotes from two manufacturers in the range of \$600,000 and up to treat emissions from two veneer dryers. That is more than the initial cost of the dryers. Willamette Industries has also conducted studies to maximize dryer efficiency and minimize stack exhaust volumes as well as make necessary repairs on the dryers in preparation for design work for construction of control equipment, regardless of the type of control equipment which will ultimately be used.



Willamette Industries has indicated recently that they will be trying a medium energy scrubber manufactured by American Air Filter Co. This scrubber will be a pilot model that will treat 4,000 CFM and will be supplied with the exhaust from one dryer stack. The order has been placed with completion of construction and installation anticipated by the end of November. Testing and evaluation will follow with preliminary results expected by years end.

Harry Bartels of U.S. Plywood reported on the status of the Wheelabrator high velocity filter at their Willamina plant and the proposed Leckenby scrubber at their Seattle plant. The Wheelabrator unit at Willamina will treat the emissions from one dryer. Due to delays in shipment from the manufacturer, startup has been delayed. It is now anticipated that the unit will be operational by the second or third week in October.

The Leckenby scrubber is of the low energy type. A small 500 CFM unit has been tried at the Seattle plant with promising results. Based on these results, an order has been placed with Leckenby for construction of a scrubber that will treat the emissions from a single stack. It is anticipated that fabrication of the scrubber will be completed by November 1 with the unit to be set in place on the roof of the mill on November 5 with completion of the installation taking about two weeks for the unit to be operational by November 17. A period of intensive evaluation and testing will follow the installation of these two units.

In addition to the testing of the Leckenby and Wheelabrator pilot plant units, U.S. Plywood has also evaluated the Electroprecipitrol made by the Electronatom Corp., a wet electrostatic precipitator, and an air cooled condenser which was constructed and tested by a University of Washington student working toward his Master's Degree.

Dave Junge of Weyerhaeuser Co. reported on the work they had done on in-line jet dryers toward control of emission opacity by changing operating conditions; mainly lowering drying temperatures. After several months of testing and evaluation, they reached the following conclusions:

1. Lower opacity readings were achieved with reduced drying temperatures. However, even under extreme temperature reduction conditions, they were unable to consistently meet an opacity limitation of 20%. The control of the blue haze through temperature reduction would be possible if the limitation was greater than 20%.
2. Dryer temperature reduction will mean a substantial productivity loss, depending on the magnitude of the temperature drop employed. For a specific situation at Coos Bay, an average temperature reduction through the dryer of 27 to 29°F. showed a productivity loss of 10 to 12%. These amounts will vary, depending on specific dryers and drying conditions.
3. Control of drying conditions to achieve increased moisture content of 5% or more at normal temperature settings had little impact on blue haze control.

During the past six months, Georgia-Pacific has been operating and evaluating a wet scrubber at their Eugene plant on a pilot scale. The results of testing of this pilot model have been promising enough that they are currently constructing a larger unit that will treat the exhaust from one stack. It is estimated that the construction of this larger unit will be completed by about the middle of November. Assuming that construction is completed on schedule, testing and evaluation will follow and will be completed by the end of the year.

Simpson Timber Company reports no changes in the schedule for completion of their system for ducting the exhaust from their two dryers at Albany to their boiler and injecting the exhaust gases as overfire air. They report that the engineering is nearly completed and they anticipate completion of construction by or shortly after the first of the year.

Another system is being offered for the control of veneer dryer emissions and heating of veneer dryers although it has not actually been tried on a veneer dryer. This system is available from Automated Combustion Division of Michel Lumber Co. At this time, a mill in Southern Oregon is negotiating with Automated Combustion for installation of a unit to eliminate the dryer emissions and supply heat for their veneer drying.

The Automated Combustion burner is of the wood-gas generator type. This type of burner has the advantage over suspension burners in that it does not require any fuel pre-treatment. Any wood waste fuel that can be fed through a 12 inch auger can be burned. All combustion controls are automatic. The wood-gas generator concept can be applied to the heating of veneer dryers, firing boilers, etc.

In the application to veneer dryer, the exhaust from the dryers would be ducted to the burner and injected as primary or secondary combustion air. A portion of the hot gases from the burner would, in turn, be ducted back to the dryers to supply the heat required. Any plywood mill wood waste can be used for fuel without drying or grinding. It is only necessary that the wood waste be hogged to the point that it can be fed through the auger.

The burner has been demonstrated in static firing using a wide variety of fuels from hydraulic barker residue to sanderdust. Emission testing was conducted on a number of different fuels and the only combustible that did not meet all existing air pollution control standards was rubber tires. All wood waste products were well within the emission limitations.

Mt. Jefferson Plywood has constructed a condensing system for the control of veneer dryer emissions. The system consists of ducting which connects the two stacks together and carries the dryer exhaust to ground level where it is introduced into condensing chambers. Cooling can be accomplished either by air or water or both. The system employs a fan to insure that there is no back pressure against the dryer. It is estimated, on the basis of visual observations, that the system, in its present configuration, has a removal efficiency of about 50%. Mt. Jefferson plans modification and continued evaluation of the system over the remainder of the year.

In addition to the air pollution control equipment mentioned above as having been tried or planned, equipment manufacturers are working on new concepts in the control of veneer dryers. The proprietary nature of this work precludes mention of the equipment and concepts at this time.

LEE JOHNSON  
ATTORNEY GENERAL

JAMES W. DURHAM, JR.  
DEPUTY ATTORNEY GENERAL



DEPARTMENT OF JUSTICE  
STATE OFFICE BUILDING  
PORTLAND, OREGON 97201  
TELEPHONE: (503) 229-5725

February 2, 1973

Ted Phillips, Chief  
Technical Services Section  
Air Quality Control Division  
Department of Environmental Quality  
Portland, Oregon 97205

Re: Proposed amendments to OAR ch. 340  
§25-315(1)(a) (veneer driers)

Dear Ted:

Pursuant to our telephone conversation of February 1, 1973, in order to further clarify §25-315(1)(a), I suggest that it read as follows (additions to the latest draft (January 26, 1973) are shown by underlining, deletions by lining through and brackets):

"As soon as practicable, but no later than December 31, 1974, no person shall operate any veneer drier, or [~~veneer~~] driers, such that visible air contaminants, including condensible hydrocarbons, [~~and the character-istic "blue-haze"~~] are emitted in such quantities [~~that~~] so as to create any characteristic "blue haze" [to be observed] which is observable at any point beyond the [edge] exterior wall of the building [or at any distance greater] housing the veneer drier or driers or at any point further than 50 feet from any veneer drier, which- ever is greater."

If you have any questions, please do not hesitate to contact us.

Very truly yours

LEE JOHNSON  
Attorney General

*Robert L. Haskins*  
Robert L. Haskins  
Assistant Attorney General

RLH:bp

PORTLAND OFFICE

RAYMOND P. UNDERWOOD  
CHIEF COUNSEL

LEONARD W. PEARLMAN      ARNOLD B. SILVER  
THOMAS N. TROTTA  
ASSISTANT ATTORNEYS GENERAL AND COUNSEL

ROBERT L. HASKINS      VICTOR LEVY  
CLAYTON R. HESS      ALBERT L. MENAGHS  
KENNETH L. KLEINSMITH      ALLEN G. OWEN  
THOMAS E. TWIST  
ASSISTANT ATTORNEYS GENERAL

VIRGIL D. MILLS

REGISTRAR OF CHARITABLE TRUSTS

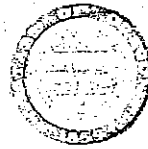
State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED  
FEB 7 1973

AIR QUALITY CONTROL

LEE JOHNSON  
ATTORNEY GENERAL

JAMES W. DURHAM, JR.  
DEPUTY ATTORNEY GENERAL



DEPARTMENT OF JUSTICE  
STATE OFFICE BUILDING  
PORTLAND, OREGON 97201  
TELEPHONE: (503) 229-5725

PORTLAND OFFICE

RAYMOND P. UNDERWOOD  
CHIEF COUNSEL

LEONARD W. PEARLMAN      ARNOLD B. SILVER  
THOMAS N. TROTTA  
ASSISTANT ATTORNEYS GENERAL AND COUNSEL

ROBERT L. HASKINS      VICTOR LEVY  
CLAYTON R. HESS      ALBERT L. MENASHE  
KENNETH L. KLEINSMITH      ALLEN G. OWEN  
THOMAS E. TWIST  
ASSISTANT ATTORNEYS GENERAL

February 20, 1973

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

Re: Proposed veneer  
drier rules

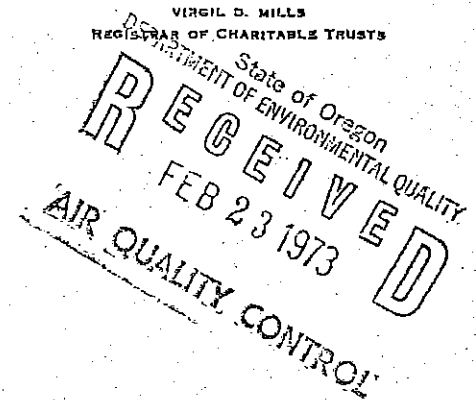
Dear Pat:

You asked whether the following language regarding "blue haze" in the proposed amendment to OAR ch. 340, §25-315(1)(a) regarding veneer driers would be enforceable:

"as soon as practicable, but no later than December 31, 1974, no person shall operate any veneer drier or veneer driers, such that visible air contaminants, including condensible hydrocarbons, and the characteristic "blue haze" are emitted in such quantities that create any "blue haze" to be observed beyond the edge of the building or at any distance greater than 50 feet from any veneer drier, whichever is greater."

Based on the information provided us by Ted Phillips, Chief, Technical Services Section of the DEQ the answer is yes.

We have been informed by Mr. Phillips that while in operation existing veneer driers emit visible air contaminants, including condensible hydrocarbons, in such quantities as to create a visible "blue haze." Mr. Phillips indicated that "blue haze" is a well understood term in the industry which describes a readily discernible and peculiar characteristic of an operating veneer drier. He informed us that "blue haze" is made up of a large number of organic compounds which are not readily measurable at a reasonable cost so as to allow the establishment of a meaningful numerical standard. He indicated that a grain loading standard, such as is present in OAR ch. 340, §21-030 (Apr. 1, 1972), would not appropriately be applied to



H. M. Patterson

-2-

February 20, 1973

Re: Proposed veneer  
drier rules

veneer driers because at present there is insufficient data upon which to base any standard, and therefore the achievement of any such arbitrary standard would not necessarily assure the elimination of "blue haze." He also informed us that there is no way to more precisely define "blue haze." In other words, the only standard available is the visibility standard which is proposed.

It should be pointed out that in any enforcement proceeding, if the matter were put in issue, the agency or prosecutor would have the burden of proving that the "blue haze" which was observed was created by visible air contaminant emissions from a veneer drier or driers. Furthermore, the defense that controls are not yet "practicable" remains valid until December 31, 1974.

Many courts have enforced prohibitions against emitting visible air contaminants. Some of the prohibitions have been in terms of limiting certain degrees of opacity of smoke. E.g., State v. Fry Roofing Company, 94 Or. Adv. Sh. 1033, 495 P.2d 751 (Ct. App. 1972) remanded on other grounds, 94 Or. Adv. Sh. 1530, P.2d (1972), original opinion adhered to on remand, 95 Or. Adv. Sh. 1927, P.2d (Ct. App. 1972); OAR ch. 340, §21-015 (Apr. 1, 1972). Others have been outright prohibitions against all emissions of visible air contaminants. These have usually taken the form of a ban on almost all open burning. E.g. Houston Compressed Steel Corp. v. State, 456 S.W.2d 768, 1 BNA Environment Rep. Cases 1416 (Tex. Civ. App. 1970); OAR, ch. 340 §23-010 (Sept. 1, 1972). The DEQ has also adopted rules which prohibit the discharge of "any visible emissions" from certain motor vehicles. OAR ch. 340, §24-010 (Sept. 15, 1970). If the DEQ may prohibit "any visible emissions" it may certainly be less restrictive and prohibit one specific category of visible emissions, i.e., "blue haze." Although a precise definition of "blue haze" would be desirable, nevertheless:

"An air polluter should not escape the consequences of his act merely because he is able to make his contaminants difficult to measure or control." Houston Compressed Steel Corp. v. State, 456 S.W.2d 768, 775, 1 BNA Environment Rep. Cases 1416, 1420 (Tex. Civ. App. 1970).

Based upon the foregoing it is our opinion that the "blue

H. M. Patterson

-3-

February 20, 1973

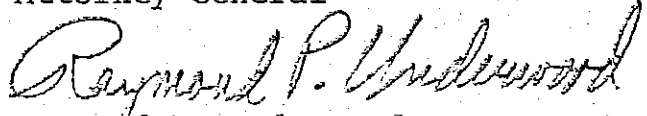
Re: Proposed veneer  
drier rules

haze" visibility standard is reasonable and would be enforceable.

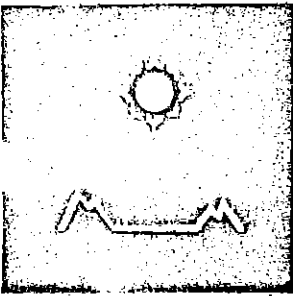
If you have any questions please do not hesitate to contact  
us.

Very truly yours

LEE JOHNSON  
Attorney General

  
Raymond P. Underwood  
Chief Counsel

RPU:RLH:bp



# MID WILLAMETTE VALLEY AIR POLLUTION AUTHORITY

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

TO : ENVIRONMENTAL QUALITY COMMISSION  
FROM : MID-WILLAMETTE VALLEY AIR POLLUTION AUTHORITY  
DATE : January 26, 1973  
SUBJ : PROPOSED REVISION OF OAR 25-315 CONCERNING VENEER  
DRYERS

The Authority would recommend that the Commission retain the present visible emission and particulate emission standards for plywood veneer dryers as specified in OAR 25-310 and 25-315.

The proposed special industry regulation provides loopholes and exemptions not available to other industries nor to this source class at the present time. The proposed amendments would do the following:

- (1) Exempt veneer dryers from any visible emission standard until December 31, 1974,
- (2) Exempt veneer dryers from compliance with OAR 21-030, Particulate Emission Limitations (grain loading standards),
- (3) Delete the requirement for dryers installed after March 1, 1972, to meet a 10% opacity standard (OAR 25-315(b)).

The proposed changes to the existing visible emission standards while appearing to be more strict are in fact vague, confusing and probably unenforceable. There is no

legal definition of "blue haze" and the determination of 50 feet out into space is open to serious question. The "average of 10% opacity" standard also appears to be unenforceable with no definition on how the average is arrived at.

The proposal to eliminate the grain loading standard for veneer dryers has not been substantiated. Most dryers can comply with the 0.2 grain standard and with a reasonable degree of control can be expected to comply with the 0.1 grain standard. Mass emission standards are being applied to dryers under the Authority's jurisdiction and even for the largest plants only a reasonable degree of control is required.

In our area of jurisdiction we have negotiated schedules on 48 dryers under existing rules. We are satisfied that adequate control of air contaminant emissions will result under present emission standards.

Again, we recommend that the present rules be retained and that the amendments not be adopted.



# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

24 January 1973

Environmental Quality Commission  
1234 Southwest Morrison Street  
Portland, Oregon 97205

Re: Oregon Administrative Rules, Chapter 340,  
Section 25-315(1), Veneer Dryers

## BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

Fred Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

Gentlemen:

The Columbia-Willamette Air Pollution Authority has reviewed the proposed modification to OAR, Chapter 340, Section 25-315(1), Veneer Dryers, and the Board of Directors offers the following comments and recommendations for your consideration.

1. The existing regulation in Section 25-315(1) appears preferable to the proposal; we do not know why it is necessary or desirable to make amendments.

### 2. Section 25-315(1)(b)

This proposed section introduces unnecessary confusion concerning visible emissions. While the intent to have zero emissions may be desirable, we are not aware that this is achievable and do believe the existing opacity standard presently in effect for veneer dryers is reasonable, equitable and achievable. We believe the existing regulation needs clarification only for the occurrence of a combined plume and the resulting opacity. This could be done by a minor modification.

### 3. Section 25-315(1)(c)

We are seriously concerned with the continuing changing of dates and compliance schedule requirements for veneer dryers. The initial regulation required submission of the compliance schedule in March 1973. This date was later revised to the end of December 1972. On this basis, the regional authority negotiated compliance schedules with the mills in our region and the Board of Directors subsequently adopted orders as required to comply with the Oregon Implementation Plan. Now proposed (1)(c) would require information that is not compatible with the schedules adopted within the past two months.

4. Section 25-315(1)(d)

We are deeply concerned about the proposed exemption of particulate emission limitations. We are not aware of any evidence that demonstrates control technology is not available to meet existing particulate standards as required for all other sources (and in present veneer dryer regulations). The proposal is particularly disturbing and inequitable to other sources since it is common knowledge some areas of Oregon exceed the federal ambient air standards for particulates which include the locations where veneer dryers are operating.

5. Section 25-315(1) (f)(g) (h)

These sections are unnecessary since existing regulations either contain similar information or the Department has the power in existing regulations to require source tests, to hold public hearings, and to revise regulations, etc.

6. The Board of Directors are seriously concerned that the proposed veneer dryer regulations do provide a preferential position to a source class for which in their opinion, there is no justification. We request your serious consideration to stop the trend toward less restrictive state regulations for the larger size industrial plants. We believe the public expects more from its state environmental quality agency.

Very truly yours,

R. E. Hatchard  
Program Director

REH:sm

INDUSTRY COMMITTEE STATEMENT ON VENEER DRYER STANDARDS  
ENVIRONMENTAL QUALITY COMMISSION HEARING

January 26, 1973

My name is Vincent J. Tretter, Jr. and I am Senior Environmental Engineer with Georgia-Pacific Corporation. I am here today representing the Industry Committee on Veneer Dryers. The plywood industry recognizes that the visible blue haze coming from plywood veneer dryers is a problem and has sponsored a study conducted by Washington State University to define the problem. When the Washington State Study was completed, industry embarked on a crash program to develop equipment to control veneer dryer emissions. Industry's progress has been reported on a quarterly basis to the Oregon Department of Environmental Quality by the American Plywood Association. Several types of control equipment have been tested and we now feel that control of the blue haze emissions can be accomplished.

Industry is in agreement with the approach of setting only opacity limitations on veneer dryer emissions because of the lack of correlation between opacity and any mass emission rate. The problem associated with veneer dryer emission is one of visibility reduction and it is logical to have a standard that reflects the amount of visibility reduction. Stack opacities have been used extensively for control of other types of emissions and the technique of reading opacities is well defined.

We offer the following two suggestions for changes in the proposed regulations:

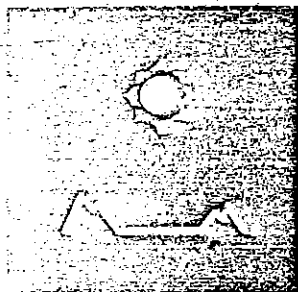
SECTION (1)(a)

Section (1)(a) may be subject to different interpretations and introduces terminology that may result in enforcement difficulties. The term "condensable hydrocarbons or characteristic 'blue haze'" has no precise definition and could be subject to a number of interpretations. We believe that if Section (1)(b) of the regulation is met, Section (1)(a) will also be met. We therefore suggest that section (a) be included at the beginning of the regulation and be labeled as a policy statement, using the following wording: "It is the policy of the commission that no later than December 31, 1974, no person shall operate any veneer dryer or veneer dryers such that visible air contaminants including condensable hydrocarbons or the characteristic blue haze are emitted in such quantities that create any 'blue haze' to be observed in the area surrounding a veneer dryer. A public hearing shall be held by the Department no later than January 1, 1975 to review current technology and to determine if these regulations are adequate to meet this policy." The regulations would then start out with the present Section (1)(b).

SECTION (1)(b)

We suggest insertion of the word "arithmetic" before "average" in the first sentence to prevent misinterpretation. The regulation would

then read" "As soon as practicable, but no later than December 31, 1974, no person shall operate any veneer dryer such that visible air contaminants emitted therefrom at any time exceed 20% opacity as defined by Section 21-005(4) from any one stack or an arithmetic average of 10% opacity as so defined from all stacks of that veneer dryer."



# MID WILLAMETTE VALLEY AIR POLLUTION AUTHORITY

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

March 13, 1973

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED

MAR 14 1973

OFFICE OF THE DIRECTOR

Diarmuid F. O'Scannlain, Director  
Department of Environmental Quality  
1234 S.W. Morrison Street  
Portland, Oregon 97205

SUBJ: VENEER DRYER DATA

Dear Mr. O'Scannlain:

In February you requested a rather large amount of data on veneer dryers which you will find enclosed.

I hope that your staff will make similar information available to the Authority on veneer dryers as well as hogfuel boilers.

My staff is prepared to make available at the Authority offices all emission testing data and opacity data on veneer dryers. Because of the large number and volume of such data it has not been included with this letter.

Sincerely yours,

Michael D. Roach  
Director

MDR:DM:db:002

Encl.

VENEER DRIER DATA SHEET

From: Mid-Willamette Valley  
Air Pollution Authority

Date February 14, 1973

TABULATION OF VENEER DRIER DATA

<u>Item</u>	<u>Description</u>	<u>Comment</u>
1)	Total number of veneer driers	<u>49 + 2 new dryers under review</u>
2)	Number in compliance	<u>2</u>
3)	Number with compliance schedules	<u>47</u>
4)	Number of emission points per drier	<u>Highest <math>\approx</math> 4 Lowest 1</u>
5)	Total number of emission points all driers	<u>more than 90 exhause stacks plus other emission points</u>
6)	Compliance determined by:	
	a) visible limitations	<u>Yes, 20% existing, 10% new dryers</u>
	b) process weight	<u>Yes, for entire plant site</u>
	c) mass emissions	<u></u>
	d) grain loading	<u>Yes, 0.2 existing, 0.1 new dryers</u>
	e) other (state)	<u>Fugitive emissions</u>
7)	Type of test(s) required to verify compliance	<u>opacity readings +RAC train source test on control equip. exhaust.</u>
8)	Number of emission points required to be tested to certify compliance (each drier)	<u>each dryer tested will have all emission points tested, with some exceptions</u>
9)	Source tests by agency to certify compliance (RAC train data sent to DEQ twice previously)	
	a) number	<u>98 source tests consisting of both RAC train and condenser train samples.</u>
	b) test methods used i.e. EPA, DEQ, PNWIS, APCA, Other	<u>RAC train generally used as per S-8 method condensor trains used anisokinetically</u>

Item	Description	Comment
10)	Source test by consultants to certify compliance	
	a) number	<u>2, other tests underway presently</u>
	b) test method(s) used: i.e. EPA, DEQ, PNWIS, APCA, Other	<u>1 midget impingers 1 RAC train</u>
11)	Source tests by industry to certify compliance	
	a) number	<u>1 test underway presently</u>
	b) test method(s) used: i.e. EPA, DEQ, PNWIS, APCA, other	<u>RAC train, DEQ-PNWIS method</u>
12)	Number of veneer driers with control equipment installed	<u>Six</u>
13)	Types of control equipment installed	<u>4 incineration, 2 gas-cooling and collection</u>
14)	Total emissions from veneer driers	
	a) emission type(s)	<u>condensable HC    non-condensable HC</u>
	b) annual tonnage each type	<u>≈ 1486TPY            unknown</u>
15)	Total reduction projected by compliance	
	a) emission type(s)	<u>condensable HC    Non-condensable HC</u>
	b) annual tonnage each type	<u>≈ 892TPY            unknown</u>
16)	Projected date for all veneer driers to be in compliance	<u>July, 1974</u>

Additional Comments:

See attached on dryers under control plus control methods.

---



---



---



DRYERS UNDER CONTROL  
AND CONTROL METHODS

1. Boise Cascade Corporation, Albany

Wasteco sanderdust-fired furnace installed 6/71 to provide process heat and to afterburn 100% of veneer dryer exhaust. This installation was the first veneer dryer control installation in the U. S. It has performed satisfactorily as an emission control device and has been source tested.

2. Mt. Jefferson Lumber Co., Lyons

Home-made gas cooling apparatus installed 6/72 with refinements continuing to date. This is a very small dryer at a very small plywood mill. Arrangements are being made for source testing in near future.

3. U. S. Plywood Corporation, Willamina (now Champion International Corporation)

Wheelabrator high-energy filter installed 9/72 on a new dryer installation. This installation provides for a water-spray gas-cooling chamber ahead of the filter. Operational problems have occurred but emission control is apparently satisfactory. Vendor is now doing testing. The Authority will test in near future.

4. Leading Plywood Corporation, Corvallis

Moore-Oregon Lo-Em equipment installed 12/72. This device consists of a change in gas combustion equipment on a gas-heated dryer. The Authority will conduct emission testing in the near future.

5. Simpson Timber Company, Albany

Emissions from two veneer dryers are ducted to an existing hogfuel boiler to be after burned. Ductwork was installed 1/73. The hogfuel boiler exhaust is to be tested.

6. Willamette Industries Inc., Dallas

Emissions from one zone on a sham dryer are now routed to an American Air Filter Kinpactor scrubber. Emission tests on this unit will occur in early March.

Lane  
Regional  
AIR  
POLLUTION  
AUTHORITY

V. J. ADKISON  
Program Director

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

BOARD OF DIRECTORS

WICKES BEAL  
Eugene

NANCY HAYWARD  
Lane County

CHARLES TEAGUE  
Eugene

DARWIN COURTRIGHT  
Springfield

VERN STOKESBERRY  
Cottage Grove

March 2, 1973

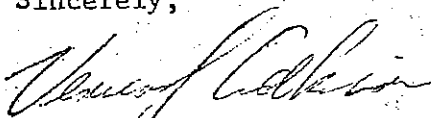
Mr. D. F. O'Scannlain, Director  
Dept. of Environmental Quality  
1234 S.W. Morrison  
Portland, Oregon 97205

Dear Mr. O'Scannlain:

In response to your inquiry of February 8th regarding veneer  
driers within Lane County, the attached sheet has been com-  
piled by this Agency. We sincerely hope the information  
contained will assist you in your endeavor to develop regulations  
for this source.

If we may be of further assistance, please contact this Agency.

Sincerely,



Verner J. Adkison  
Director

PTW:jd

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED  
MAR 8 - 1973

AIR QUALITY CONTROL

VENEER DRIER DATA SHEET

From:

Lane Regional Air

Pollution Authority

Date March 2, 1973

TABULATION OF VENEER DRIER DATA

<u>Item</u>	<u>Description</u>	<u>Comment</u>
1)	Total number of veneer driers	53
2)	Number in compliance	2
3)	Number with compliance schedules	51
4)	Number of emission points per drier	Highest <u>9</u> Lowest <u>1</u>
5)	Total number of emission points all driers	153
6)	Compliance determined by:	
	a) visible limitations	yes
	b) process weight	yes
	c) mass emissions	yes
	d) grain loading	yes
	e) other (state)	
7)	Type of test(s) required to verify compliance	visual
8)	Number of emission points required to be tested to certify compliance (each drier)	all
9)	Source tests by agency to certify compliance	
	a) number	none
	b) test methods used i.e. EPA, DEQ, PNWIS, APCA, other	--

Item	Description	Comment
10)	Source test by consultants to certify compliance	
	a) number	None
	b) test method(s) used: i.e. EPA, DEQ, PNWIS, APCA, other	---
11)	Source tests by industry to certify compliance	
	a) number	None
	b) test method(s) used: i.e. EPA, DEQ, PNWIS, APCA, other	
12)	Number of veneer driers with control equipment installed	2
13)	Types of control equipment installed	scrubber/incinerator
14)	Total emissions from veneer driers	
	a) emission type(s)	Fine Part. Total H.C.
	b) annual tonnage each type	307.5 tons / 200.9
15)	Total reduction projected by compliance	
	a) emission type(s)	Fine Part. Total H.C.
	b) annual tonnage each type	40%
16)	Projected date for all veneer driers to be in compliance	December 31, 1974

Additional Comments:

---

---

---

---

AOC

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

20 March 1973

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

Attention: Diarmuid O'Scannlain

Gentlemen:

Please find enclosed the completed Veneer Drier Data Sheet which you requested to assist your staff in its review of this class of sources.

Very truly yours,

*REH*  
R. E. Hatchard  
Program Director

REH:tbj  
Enclosure

*original to ESU*

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

RECEIVED  
MAR 22 1973

OFFICE OF THE DIRECTOR

State of Oregon  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 RECEIVED  
 MAR 23 1973  
 AIR QUALITY CONTROL

OFFICE OF DEPUTY DIRECTORS  
 RECEIVED  
 MAR 23 1973

DEPT. OF ENVIRONMENTAL QUALITY

VENEER DRIER DATA SHEET

From:

COLUMBIA-WILLAMETTE AIR POLLUTION  
1110 NE COUCH  
PORTLAND, ORE.

Date March 19, 1973

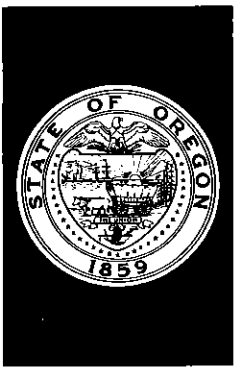
TABULATION OF VENEER DRIER DATA

Item	Description	Comment
1)	Total number of veneer driers (NOT PLANTS)	12
2)	Number in compliance	0
3)	Number with compliance schedules	10
4)	Number of emission points per drier	Highest <u>9</u> Lowest <u>4</u>
5)	Total number of emission points all driers	<u>49</u>
6)	Compliance determined by:	
	a) visible limitations	<u>YES</u>
	b) process weight	
	c) mass emissions	
	d) grain loading	<u>YES</u>
	e) other (state)	
7)	Type of test(s) required to verify compliance	<u>Existing plants in excess of visible emissions</u>
8)	Number of emission points required to be tested to certify compliance (each drier)	<u>ALL</u>
9)	Source tests by agency to certify compliance	
	a) number	<u>NONE</u>
	b) test methods used i.e. EPA, DEQ, PNWIS, APCA, Other	<u>PNWIS</u>

Item	Description	Comment												
10)	Source test by consultants to certify compliance													
	a) number	1												
	b) test method(s) used: i.e. EPA, DEQ, PNWIS, APCA, Other	WASHINGTON STATE UNIVERSITY 18 AUGUST 1972												
11)	Source tests by industry to certify compliance													
	a) number	NONE												
	b) test method(s) used: i.e. EPA, DEQ, PNWIS, APCA, other													
12)	Number of veneer driers with control equipment installed	NONE												
13)	Types of control equipment installed													
14)	Total emissions from veneer driers													
	a) emission type(s)	<table border="1"> <tr> <td>BEL 417/GAS Aired</td> <td>BEL 419 (SHEET)</td> </tr> <tr> <td>TOTAL GASE - 151.707</td> <td>TOTAL ORE - 6.25</td> </tr> <tr> <td>TOTAL SOLID - 34.919</td> <td>TOTAL PART - 45.10</td> </tr> <tr> <td>NO<sub>x</sub> - 15.610</td> <td></td> </tr> <tr> <td>SO<sub>x</sub> - 3.124</td> <td></td> </tr> <tr> <td>CO - 3.021</td> <td></td> </tr> </table>	BEL 417/GAS Aired	BEL 419 (SHEET)	TOTAL GASE - 151.707	TOTAL ORE - 6.25	TOTAL SOLID - 34.919	TOTAL PART - 45.10	NO <sub>x</sub> - 15.610		SO <sub>x</sub> - 3.124		CO - 3.021	
BEL 417/GAS Aired	BEL 419 (SHEET)													
TOTAL GASE - 151.707	TOTAL ORE - 6.25													
TOTAL SOLID - 34.919	TOTAL PART - 45.10													
NO <sub>x</sub> - 15.610														
SO <sub>x</sub> - 3.124														
CO - 3.021														
	b) annual tonnage each type													
15)	Total reduction projected by compliance													
	a) emission type(s)	NONE AT THIS TIME												
	b) annual tonnage each type													
16)	Projected date for all veneer driers to be in compliance	31 DECEMBER 1974												

Additional Comments:

The authority compliance program for veneer dryer program is based on existing DEQ VENEER DRYER REGULATIONS.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5263

TOM McCALL  
GOVERNOR

### MEMORANDUM

DIARUID 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 (a), April 2, 1973, EQC Meeting  
CWAPA Variance 73-1 to Union Carbide Corporation

### Background

Ferroalloys Division of Union Carbide Corporation operates a calcium carbide production facility at 11920 N. Burgard Boulevard, Portland, Oregon.

By letter dated January 5, 1973, Union Carbide petitioned CWAPA for a variance from the Authority's Title 32 Emission Standards to permit bypassing of scrubber on the #1 calcium carbide furnace for cleaning and maintenance periods.

The emissions from the production furnace normally are passed through a scrubber. Each month the scrubber requires an average of two cleaning and maintenance periods of about three hours each, during which furnace emissions would be bypassed through an auxiliary stack. Alternative procedures to venting through the auxiliary stack are:

- A. De-energize the furnace during scrubber maintenance which would result in:
  1. Loss of production
  2. Company loss in payment for unused power
  3. Possible lost wages for some company employees
- B. Install a second scrubber for standby duty at a cost of \$70,000. This alternative is not considered practical at this time because there is some uncertainty about future status of the calcium carbide segment of Union Carbide's business.



CWAPA granted the requested variance through July 31, 1973, subject to the following conditions:

1. To the degree possible cleaning and maintenance of the scrubber equipment serving furnace #1 will be scheduled with furnace maintenance.
2. During the period of scrubber shutdown and the use of the auxiliary stack every effort will be made to flare the gas from the auxiliary stack.
3. Furnace operations will be closely supervised to assure minimum emissions without using the auxiliary stack.
4. Union Carbide Corporation will notify the Authority prior to utilizing the auxiliary stack.
5. Prior approval must be obtained from the Authority staff if the auxiliary stack is to be used for any single period greater than five hours or more than twice in any month.

The variance and reference materials have been forwarded for Department review and Commission action.


#### Analysis

The variance as granted, satisfies all Department review criteria and is considered adequate to protect the public interests.

Reference material submitted by CWAPA indicates the company has considered all other practical alternatives. The company is resolving the uncertainty about future calcium carbide production and is committed to developing a new compliance schedule by August 1, 1973.

#### Director's Recommendation

The Director recommends that CWAPA Variance 73-1 to Union Carbide corporation, be approved as submitted.

  
DIARMUID F. O'SCANNLAIN

LDB:sb  
3/15/73

# COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

5 March 1973

Department of Environmental Quality  
1234 Southwest Morrison Street  
Portland, Oregon 97205

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED

MAR 9 1973

OFFICE OF THE DIRECTOR

Attention: Mr. Dairmuid O'Scannlain, Director

Subject: CWAPA Variance No. 73-1  
Union Carbide Corporation

## BOARD OF DIRECTORS

Francis J. Ivancie, Chairman  
City of Portland

Ed Stefani, Vice-Chairman  
Clackamas County

Burton C. Wilson, Jr.  
Washington County

Ben Padrow  
Multnomah County

A.J. Ahlborn  
Columbia County

Richard E. Hatchard  
Program Director

Gentlemen:

Please find enclosed CWAPA Variance No. 73-1 which we request be reviewed by your Department and presented to the Environmental Quality Commission for their approval.

Also enclosed to assist in your review are the following documents:

- a. Letter, Union Carbide Corporation, 5 January 1973
- b. CWAPA staff memorandum, 1 February 1973
- c. Minutes, CWAPA Advisory Committee, 15 February 1973
- d. Minutes, CWAPA Board of Directors, 16 February 1973

Very truly yours,

  
R. E. Hatchard  
Program Director

REH:jl  
Enclosures

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

In the matter of: ) No. 73-1  
UNION CARBIDE CORPORATION )  
a corporation ) VARIANCE  
INCLUDING FINDINGS AND  
CONCLUSION

FINDINGS

I

By letter dated 5 January 1973 Union Carbide Corporation by R.D. Forgens, Manager Portland Works is petitioned for a variance from Title 32 Emission Standards in Columbia-Willamette Air Pollution Authority Rules to permit emissions from the auxiliary stack serving the calcium carbide furnace in excess of those permitted by said Title 32 for two periods per month while bypassing the scrubber on said #1 furnace for cleaning and maintenance purposes.

II

The term of the requested variance would expire on 31 July 1973 at which time Union Carbide Corporation will file with Columbia-Willamette Air Pollution Authority a schedule of compliance for said furnace.

CONCLUSION

Pursuant to the provisions of ORS 449.880 in Columbia-Willamette Air Pollution Rules Title 23, Columbia-Willamette Air Pollution Authority has the power to grant the requested variance and said variance should be granted for a limited

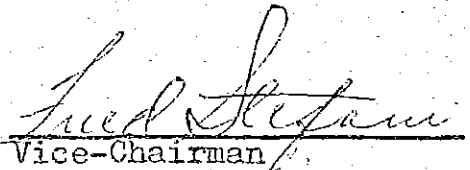
period of time subject to certain conditions hereinafter set forth. Based upon the foregoing findings and this conclusion the Board of Directors makes the following

ORDER

NOW THEREFORE IT IS HEREBY ORDERED that a VARIANCE from the provisions of Title 32 Emission Standards Columbia-Willamette Air Pollution Authority Rules be granted to Union Carbide Corporation, a corporation, to permit the bypassing of the scrubber serving furnace #1 for cleaning and maintenance of said scrubber. Subject to the following conditions:

1. To the degree possible cleaning and maintenance of the scrubber equipment serving furnace #1 will be scheduled with furnace maintenance.
2. During the period of scrubber shutdown and the use of the auxiliary stack every effort will be made to flare the gas from the auxiliary stack.
3. Furnace operations will be closely supervised to assure minimum emissions without using the auxiliary stack.
4. Union Carbide Corporation will notify the Authority prior to utilizing the auxiliary stack.
5. Prior approval must be obtained from the Authority staff if the auxiliary stack is to be used for any single period greater than five hours or more than twice in any month.

Entered in Portland, Oregon the 16th. day of February 1973.

  
Vice-Chairman



UNION CARBIDE CORPORATION

FERROALLOYS DIVISION

PORTLAND WORKS, POST OFFICE BOX 03070, PORTLAND, OREGON 97203

January 5, 1973

Mr. Wayne Hanson
Control Director
Columbia-Willamette Air Pollution Authority
1010 N. E. Couch St.
Portland, Oregon 97232

The auxiliary stack on our No. 1 furnace, through which we bypass the scrubber for cleaning and maintenance, is noted as substandard. The record discloses that we bypass the scrubber an average of twice each month for a period of approximately three hours - an average of approximately 6 hours per month. The alternatives to the auxiliary stack are:

- A) Deenergize the furnace, which results in lost production and payment for power not utilized and possibly lost wages for some personnel.
B) Install a second scrubber, at a cost of approximately \$70,000, to function as a standby.

Since we are presently uncertain of the future of the calcium carbide segment of our business, we request a variance of your rules until August 1, 1973, at which time we are committed to developing for your approval a new compliance schedule.

In support of this request we will schedule, to the degree possible, the cleaning and maintenance of the scrubber equipment with other furnace maintenance which means that the furnace will be deenergized. We will also make every effort to flare the gas during the necessary use of the auxiliary stack. The flaring greatly reduces the volume of fume and dust.

As in the past we would continue to notify CWAPA of auxiliary stack use.

R. D. Forgeng
R. D. Forgeng
Manager Portland Works

/ir

Routing slip table with columns for 'To' and 'Action' containing handwritten initials and dates.

COLUMBIA-WILLAMETTE  
AIR POLLUTION AUTHORITY  
1010 N. E. COUCH STREET  
PORTLAND, OREGON 97232  
PHONE (503) 233-7176

1 February 1973

MEMORANDUM

TO: Board of Directors  
FROM: R. E. Hatchard, Program Director  
SUBJECT: Variance Request - Union Carbide

Dear Board Members:

On 5 January 1973 Union Carbide Corp., 11920 N. Burgard Boulevard, requested a variance from the authority rules, a copy of which is enclosed.

The variance, if granted, would allow Union Carbide emissions in excess of the authority rules from the auxiliary stack serving the calcium carbide furnace. These emissions would occur approximately six hours a month while the air pollution control equipment is being cleaned. During normal operation the emissions are collected from around the furnace electrodes and passed through a scrubber. When the scrubber is cleaned, the emissions collected by the furnace hood are vented through a natural draft auxiliary stack with some fumes escaping around the hooding and through the larger roof monitors.

On 1 January 1973 the authority issued an Air Contaminant Discharge Permit to Union Carbide. Although the emissions from the auxiliary stack are limited, the authority cannot issue a permit to a source which is not in compliance with the authority rules unless a compliance schedule is made a condition of the permit. Since Union Carbide was unable to enter into a compliance schedule until 1 August 1973 the alternatives were:

- 1) Discontinue furnace operation when the scrubber is cleaned. According to Union Carbide, this could result in a layoff of some personnel.
- 2) Apply for a variance from the authority rules until 1 August 1973.

The variance request satisfies conditions of our authority rules and considering the quantity of emissions involved, we believe the request is reasonable and Union Carbide is required to enter into a mutually acceptable compliance schedule by 1 August 1973. Therefore, the staff recommends the variance be granted from Rule 32 (Emission Standards) to allow emissions from the calcium carbide furnace and auxiliary stack while cleaning the air pollution control equipment serving said furnace until 1 August 1973, with the following conditions:

ROUTING	
To	Noted by
<i>W.H.</i>	<i>W.H.</i>
<i>J.R.</i>	<i>J.R.</i>
From:	
Action:	


Board of Directors

Page 2

1 February 1973

- 1) Furnace operations will be closely supervised to assure minimum emission while using the auxiliary stack.
- 2) Union Carbide will notify the authority prior to utilizing the auxiliary stack.
- 3) Prior approval must be obtained from the authority staff if the auxiliary stack is to be used for any single period greater than five hours or more than twice a month.

Respectfully submitted,

  
R. E. Hatchard  
Program Director

REH:whs

4

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

ADVISORY COMMITTEE MEETING  
5:00 p.m., Thursday, 15 February 1973  
Auditorium, Portland Water Service Bldg.

Present:

Advisory Committee: Darrel Johnson, Chairman  
Walter Nutting, Vice-Chairman  
Jack Cassidy  
John Donnelly, M. D.  
Bob Dow  
Anthony Federici  
Charles Haney  
Betty Morton  
Carleton Whitehead  
Ed Winter

Staff: R. E. Hatchard, Program Director  
Wayne Hanson, Deputy Program Director  
Jack Lowe, Administrative Director

Minutes

The meeting was called to order by Chairman Johnson and the minutes of the 4 January 1973 meeting were approved as submitted.

Sub-Committee Reports

Variances

Carleton Whitehead, Chairman, stated his sub-committee had reviewed a variance request from Union Carbide Corporation. The company is requesting a variance to allow emissions from their calcium carbide furnace in excess of those allowed by authority rules, during approximately six hours per month while the air pollution control equipment is being cleaned, until 1 August 1973. Mr. Whitehead pointed out this company has been cooperative, has expended a great deal of money in air pollution control equipment installations. The emission, if this variance is granted, will be relatively small. Mr. Whitehead reported that the sub-committee agreed with the staff report, that this was a reasonable variance request. There is no provision for extension of the variance, and the variance would be subject to the specific conditions as outlined in staff memorandum dated 1 February 1973.

After discussion, it was unanimously voted to recommend to the Board of Directors that Union Carbide be granted a variance subject to conditions as outlined in memorandum of 1 February 1973, until 1 August 1973, to allow excessive emissions from the calcium carbide stack at specific times when the air pollution equipment is being cleaned.



Solid Waste - Open Burning

Mr. Haney, Chairman of this sub-committee, in answer to a question raised at the last Advisory Committee meeting, stated that a pilot plant is in operation in the State of Washington studying the desirability of burning refuse as fuel for steam or power generation. This is done in some European cities; however it seems undesirable in this area from an economic standpoint, primarily because of the lack of concentration of population on the west coast. He added that in all aspects of recycling, population concentration is a tremendously important factor in determining whether or not the recycling will be economically feasible.

The Advisory Committee accepted the report from the staff, dated 26 January 1973, concerning the 1972 Annual Summary Report of Domestic Open Burning.

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

BOARD OF DIRECTORS MEETING  
10:00 a.m., Friday, 16 February 1973  
Auditorium, Portland Water Service Bldg.

Present:

Board of Directors: Fred Stefani, Vice-Chairman  
A. J. Ahlborn  
Mildred Schwab

Staff: R. E. Hatchard, Program Director  
Wayne Hanson, Deputy Program Director  
Jack Lowe, Administrative Director  
Cecil Quesseth, Legal Counsel  
Mid-Willamette Valley Air Pollution Authority

Others: Robert Baldwin, Director, Multnomah County Planning Commission  
Walter Nutting, Advisory Committee  
Nancy Stevens, Coalition for Clean Air

Minutes

The meeting was called to order by Vice-Chairman Stefani. Commissioner Ahlborn moved, Commissioner Schwab seconded and the motion carried to approve the minutes of the 19 January 1973 Board meeting as recorded. It was agreed by the Board members to postpone the election of officers until all active Board members are present.

Advisory Committee Meeting

Mr. Walt Nutting reported on the Advisory Committee meeting, held 15 February 1973. He stated the Advisory Committee considered the variance request of Union Carbide Company and recommended that the Board grant the request. He stated the Committee also considered the proposed budget for fiscal year 1973-74, which included slight changes in the contributions by the participating counties. He added that the Advisory Committee recommends the adoption of the proposed budget.

Mr. Nutting stated that the Advisory Committee considered the Department of Environmental Quality January 1973 draft of the proposed parking facility regulation which would eliminate CWAPA activity in regard to air pollution control from parking facilities and highways. The proposed draft would also eliminate any local planning facility input to the parking regulations. He reported the consensus of opinion of the Advisory Committee was that an amendment should be proposed which would retain local control over air pollution aspects of the parking facilities and highways in urban areas.

Mr. Nutting expressed the concern of the Advisory Committee regarding HB 2329 which proposes to eliminate regional authorities. He stated the committee will assist the Board to defeat this bill.

Mr. Nutting, on behalf of the Advisory Committee, extended a cordial invitation to each of the Board members to occasionally attend their meetings, to help them in their deliberations and observe how the Advisory Committee handles the matters presented to them. It was suggested that a Board member visit with the Advisory Committee on a regular periodic basis.

Public Hearing - Department of Environmental Quality Regulations on Parking Facilities

Mr. Hatchard stated that changes have been made recently by the Department of Environmental Quality in the proposed parking facilities regulations. The draft received 15 February 1973 will be studied by the CWAPA staff. He introduced Mr. Robert Baldwin, Multnomah County Planning Director, who stated his staff has reviewed the original DEQ proposal, the CWAPA proposed regulations and the 9 February DEQ revisions to the proposed parking facilities regulations. He made the following comments:

- (1) In the 9 February 1973 DEQ draft, the requirements of land use planning have been eliminated; Multnomah County Planning Department believes this is an improvement as there is no basis on which the DEQ may review land use plans.
- (2) There should be included a procedure whereby plans submitted may be amended or reviewed in periods of less than 5 years.
- (3) The regulation should include the guidelines not yet prepared.
- (4) The role of the regional authority regarding parking facilities should be strengthened.
- (5) The 9 February 1973 DEQ draft includes a provision whereby an applicant may appeal or have a hearing on his application. The original draft did not include this provision.
- (6) More discussion is needed of the role of the Oregon State Highway Department regarding urban highways and freeways; some arrangement should be made between DEQ and the OSHD so that air pollution considerations are made in connection with the building of major highways and freeways.

Chairman Stefani thanked Mr. Baldwin for his comments.

Mr. Hatchard read a letter dated 14 February 1973 addressed to CWAPA from the Clackamas County Board of Commissioners, stating they have reviewed the CWAPA proposed draft of parking facilities regulation and are in accord with the proposal. The letter also stated that local control should be kept at a maximum.

Mrs. Nancy Stevens, representing the Oregon-Washington Coalition for Clean Air, made a statement on the proposed parking facility regulation on behalf of her organization. Several suggestions for changes were made, including a change which would include the criteria for establishing parking facilities as part of the regulation. Mrs. Stevens provided the Board with a copy of her statement.

After further discussion, Mr. Hatchard suggested that the hearing be continued and the planning agencies be requested to review the latest DEQ draft proposal and CWAPA's proposal and submit their comments, revisions or additions.

There was agreement by the Board that the hearing be continued and resumed at the 16 March 1973 meeting.

Mr. Hanson introduced Mr. Storrs Waterman, a member of the Environmental Quality Commission, and the Board extended an invitation to Mr. Waterman to also attend the continuation of the hearing. Mr. Waterman stated he felt that cooperation and input from the local level was an important and necessary part of any environmental program.

#### Enforcement:

#### Linnton Plywood, NW Portland

Mr. Hanson stated that after considerable negotiations with this company, a two phase order has been agreed upon for control of sander dust and emissions from the veneer dryers, bringing the plant into full compliance by 31 December 1974. Mr. Hanson read a statement from Linnton Plywood to the Board, concluding, "It should be noted that it may become necessary and appropriate that consideration be given in the future to a variance request or a modification of the existing order based upon the facts of their study." Mr. Hanson stated that the company wanted the Board to know that they have not decided which control system will be used for the veneer dryer emissions, and after study, the company may wish to request an amendment to the order. However, they do feel the dates for compliance are reasonable. Mr. Hanson stated the staff recommends the Order be entered.

Commissioner Ahlborn moved, Commissioner Schwab seconded and the motion carried to accept the Consent and adopt the Order in the matter of Linnton Plywood.

#### Oregon Ready Mix Co., Inc., Oregon City

Mr. Hanson stated that an order has been negotiated with Oregon Ready Mix to bring emissions from their concrete batch plant located behind the Oregon City Shopping Center into compliance with Authority rules by 15 March 1975. Mr. Hanson explained the company is committing themselves to shut down their existing plant and place a completely new plant into operation before that time. The staff believes the compliance time is reasonable and recommended that the Order be adopted.

Commissioner Schwab moved, Commissioner Ahlborn seconded and the motion carried to accept the Consent and adopt the Order in the matter of Oregon Ready Mix Co., Inc.

#### Barker Manufacturing Company, N.E. Portland

Because of the wrong equipment supplied by a manufacturer, Barker Manufacturing Company is asking that the compliance date of their paint spray emissions be extended from 31 December 1972 in the original order to 28 February 1973. The staff recommends this extention be granted.

Commissioner Ahlborn moved, Commissioner Schwab seconded and the motion carried to extend the compliance time for Barker Manufacturing Company's paint spray booth emissions until 28 February 1973.

#### Union Carbide Company, North Portland

Mr. Hanson reported that Union Carbide Company has requested a variance from the Authority rules until 1 August 1973 to by-pass the control equipment on the calcium carbide furnace while cleaning the control equipment. The resulting emissions would occur about twice per month for a total of 6 hours. It is the staff

recommendation that the variance be granted until 1 August 1973, subject to specific conditions as outlined in a 1 February 1973 memorandum to the Board.

Commissioner Stefani commented that the Advisory Committee had reviewed this variance request and recommended it be granted. Commissioner Schwab moved, Commissioner Ahlborn seconded and the motion carried to grant this variance.

Nancy Stevens, Oregon-Washington Coalition for Clean Air, suggested that environmental groups be notified and given a chance to comment, if Union Carbide requests to use the by-pass more often than twice a month or for a period greater than 5 hours. Mr. Hanson replied that we will notify the Oregon-Washington Coalition for Clean Air if the by-pass is used more than twice per month or for longer than 5 hours.

#### Public Hearing - Compliance Schedules

Mr. Hatchard stated this was a continuation of the public hearing begun at the 19 January 1973 Board meeting, in order to meet federal requirements that a public hearing be held on each compliance schedule as part of the Oregon Implementation Plan.

Chairman Stefani announced it was the time and place for the public hearings, public notice having previously been published, and read the following list of companies whose compliance schedules are being considered at these public hearings:

Linnton Plywood  
Rich Manufacturing Company  
Oregon Ready Mix Company, Inc.

Chairman Stefani called for comments from the representatives of these companies or from members of the public. There were no comments or statements.

Commissioner Schwab moved, Commissioner Ahlborn seconded and the motion carried to continue the public hearings at the 16 March 1973 Board of Directors meeting for the compliance schedules of the following firms:

Cargill Incorporated  
B. P. John Furniture Company  
Louis Dreyfus Corporation  
Kaiser Gypsum Company, Inc.  
Portable Equipment Company

#### Legislative Review

Mr. Hatchard stated that the following bills have been introduced into the Legislature by the House Committee on Environment and Land Use at the request of the three regional authorities: HB 2201, concerning the permit fees being retained by the regional authority instead of transfer to the Department of Environmental Quality and return to the region; HB 2202, enables regional authorities to enforce wise standards adopted by the Environmental Quality Commission; HB 2203, provides that the regional authorities are subject to the State of Oregon local budget laws, and after the Board has determined the financial support required for the year, this amount then becomes the obligation of the participating governmental units to budget and pay; SB 77, which is a topical revision of the Oregon Revised Statutes concerning environmental matters. Mr. Hatchard added that SB 77 also includes other substantial legislative changes, which our legal counsel feels should be separated from the

revision and considered as separate legislative matters.

Mr. Hatchard stated that a brief statement on each of the bills would be prepared and mailed to both the Board and Advisory Committee during the week of 20 February 1973. He stressed that testimony on some of the bills being considered by the Legislature by the Board members themselves is needed to assure their passage.

Mr. Hatchard also stated that HB 2329 has been introduced. This bill would abolish regional authorities. An analysis of this bill is being prepared and will be sent to the Board the week of 20 February 1973.

Mr. Hatchard added that SB 186 requires agency public hearings on pollution matters upon petition of any five persons. He reported that the agency is supporting the bill.

Nancy Stevens read the following statement concerning the environmental group's stand on HB 2329:

"The Coalition for Clean Air will not take the position as to whether or not air pollution authorities should continue as entities, but we will instead work for existing authorities to insure the maximum effectiveness." She added the group will raise questions concerning funding, citizen access, etc. in consideration of this bill.

#### Other Matters

#### Noise Studies

Mr. Hatchard suggested that the Board request information from the Department of Environmental Quality having to do with noise studies, i.e., equipment, measurement methods, etc., in a general way to begin to prepare the staff for possible handling of noise pollution problems. Mr. Hatchard stated the state agency will most likely be adopting noise regulations in July 1973, and if HB 2202 becomes law, noise pollution control will become a part of regional air authorities' responsibility. After discussion, the Board agreed to discuss the matter of noise pollution control, and the funding of such control, with their respective Boards of Commissioners, and raise this matter again at a later meeting.

#### Authorization for Training

Mr. Hatchard recommended that authorization be given to reimburse two staff members, (Bob Harris and Carter Webb) for successful completion of two terms of a course, "Air Pollution Control Systems" at Clackamas Community College, at a total cost of \$84.00.

Commissioner Ahlborn moved, Commissioner Schwab seconded and the motion carried to authorize this training expenditure, \$84.00, for two staff members for two terms each at Clackamas Community College.

#### Public Service Employment Program

Mr. Hatchard recommended that the Board direct a letter to the Multnomah County Civil Service Commission, regarding the regular employment of Don Gerber, Assistant Engineer, now working under the Public Service Employment Program, funds for which will probably be unavailable after 1 July 1973. The Board approved regular employment of Mr. Gerber, authorized inclusion of his position in the 1973-74 budget and directed that necessary action be initiated to induct Mr. Gerber into the position.

### Report on Daily Publication of Air Pollution Watch

Mr. Hatchard reported that a press conference has been set for 10:00 a.m., 29 February 1973, at which time the new "Air Pollution Watch" reporting system will be initiated. He reported that the new system deals with direct air pollution measurements which will be reported at 4:00 p.m. daily to the news media.

Nancy Stevens stated the environmental groups are hoping for a more general, easily understood reporting system, which can inform the public of air pollution levels in relation to health. Mr. Hatchard stated the new Air Pollution Watch will report carbon monoxide, sulfur dioxide and particulate levels to begin with, and two other pollutants will be added to the report during the summer months.

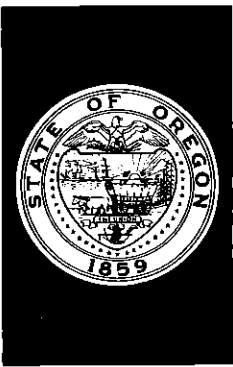
### Magnetic Card Selectric Typewriter

Mr. Hatchard recommended the Board authorize the rental for the last two months of this fiscal year of a magnetic card selectric typewriter. This equipment will substantially speed up processing of the large volume of air pollution permits which must be handled, as well as significantly improve other administrative functions. Money is available in this fiscal year's budget, and the continued rental of this machine is in the proposed FY 1973-74 budget.

After discussion, Commissioner Schwab moved, Commissioner Ahlborn seconded and the motion carried authorizing the equipment rental contract with IBM for a Magnetic Card Selectric Typewriter.

The Board thanked Mr. Cecil Quesseth, counsel for Mid-Willamette Valley Air Pollution Authority, for attending the meeting today, filling in for Mr. Crofoot who was out of town.

The meeting was adjourned at 11:30 a.m.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5301

TOM McCALL  
GOVERNOR

### 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  
Portland

ARNOLD M. COGAN  
Portland

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item Fb, for April 2, 1973, EQC Meeting  
MWVAPA Variance to Cedar Lumber, Inc. dated  
February 28, 1973

### Background

Cedar Lumber, Inc. operates a sawmill located in Linn County between Mill City and Lyons. The mill processes about 25 million board feet annually specializing in the utilization of low-grade logs of the type, which were at one time left in the forests as culls. The species processed are about 85% hemlock and 15% Douglas fir. The processing of these low-grade logs produces larger amounts of waste than would normally be expected from an equivalent volume of standard logs. The bark waste for instance contains large amounts of wood chunks and splinters. It has been estimated that the mill produces between 5,000 and 7,000 tons of waste annually. Efforts by the mill management to find markets for its waste have been unsuccessful. The bark mulch product which they can produce has a large content of wood splinters making it an unattractive product compared with the competing products from other sources. Cedar Lumber, Inc. has, on the other hand, found some acceptance and utilization of their sawdust waste.



Cedar Lumber, Inc. operated two wigwam waste burners until July, 1971, when the burners were shut down. Since that time, the waste has been dumped and piled on adjacent mill property. The pile now covers several acres and last November was over 25 feet high.

Spontaneous fires have been a continuing problem. On November 27, 1972, the surface temperature on the west end of the pile was observed to be hotter than 212°F.

On December 4, 1972, Cedar Lumber, Inc. stopped piling their waste and have since been operating an unmodified wigwam waste burner at the request of MWVAPA in order to cease the undesirable practice of landfilling wood wastes. It is the conclusion of both Cedar Lumber, Inc. and MWVAPA that the only viable solution at this time is to burn the waste.

With an Order Granting Variance dated February 28, 1973, MWVAPA granted Cedar Lumber, Inc. a variance from MWVAPA visible emission and particulate regulations, being MWR 32-010, 32-030 and 32-080, to operate its unmodified wigwam waste burner for the period from February 28, 1972, to and including December 1, 1973, subject to the following conditions:

1. Visible emissions shall be kept at the minimum possible level that can be achieved with the operation of the existing unmodified wigwam waste burner;

2. Planning and construction shall commence not later than June 30, 1973, so that by December 1, 1973, a hog, bin, and metering equipment shall be operational, which bin shall be compatible either to truck loading or for metering hog fuel to the existing wigwam or future boiler plant installation. The dates of purchase of major items of equipment, of initiation of construction or fabrication and of completion of construction shall be reported to the Authority; and

3. The firm shall commence operating the wigwam with uniform, metered feed, and whenever possible, the wigwam shall be operated 24 hours per day so that start-ups and shut-downs are minimized.

As required by ORS 448.810, the variance and reference materials have been received for Department review and Commission action. A copy of these materials is attached.

### Analysis

The Department is in agreement with the MWVAPA conclusion that the past practice of using wood waste for landfill at the Cedar Lumber, Inc. site is not an acceptable means of disposal and must be

stopped. As indicated earlier both the petitioner and MWVAPA have concluded that the only alternative available at this time is to burn the waste in an existing unmodified wigwam waste burner.

It is concluded that the solution envisioned by this variance is that the demand for hog fuel will increase to the point that Cedar Lumber, Inc. wood waste can be used as an energy source in efficient fuel burning equipment. In the foreseeable future there appears to be little likelihood that the demand for hog fuel will increase sufficiently to make this possible. Background information submitted by MWVAPA indicates that there is now a considerable surplus of hog fuel in the regional area. Evidence indicates that surpluses of wood waste, including hog fuel, in a number of instances are now being stockpiled or disposed of at various dumps.

It is also concluded that the operation of the wigwam waste burner will have to continue for an extended period.

MWVAPA's submittal indicates that they are seeking wider utilization of hog fuel and we would encourage that effort.

It is the conclusion of the Department that utilization and operation of a modified wigwam waste burner would result in better air quality than continued use of an unmodified wigwam waste burner.

The MWVAPA conclusion that an unmodified wigwam waste burner burning continuously metered hog fuel "should come as close to meeting emission standards as a new modified wigwam" waste burner is not supported by data available to the Department. To the contrary, comparative emission inventory factors show that an unmodified wigwam

waste burner emits almost five times as much particulate matter as a modified wigwam waste burner. It is the staff's observation and experience that when a modified wigwam waste burner is properly installed and operated, it can meet the visible emission standards established by the Commission.

Two factors promise to make this wigwam waste burner smokier than most:

1. Burning of hog fuel appears to produce a smokier fire than unhogged mill waste.
2. Hemlock waste normally has a high moisture content and produces heavy smoke. Information provided by MWVAPA indicates that most of the waste produced by Cedar Lumber, Inc. comes from hemlock.

It is the conclusion of the staff that this variance does not adequately protect the air quality because it allows an uncontrolled wigwam waste burner to operate.

The problems of wood waste disposal at Cedar Lumber, Inc. do not appear to be unique compared to other similar operations. As indicated in the attached MWVAPA Staff report, Cedar Lumber, Inc. approached the Authority on November 8, 1972, about the possibility of installing a modified wigwam waste burner under a one-year variance while continuing to investigate and develop other disposal methods. On the basis of this and other information in the Regional staff report, it is concluded that the applicant has demonstrated a good-faith effort in complying with the applicable rules and in suggesting possible solutions.

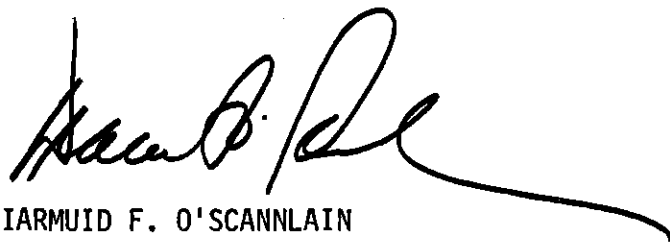
Conclusion:

1. The EQC policy by rule relative to wigwam waste burners is:
  - (1) Encourage the complete utilization of wood waste residues.
  - (2) Phase out, wherever reasonably practicable, all disposal of wood waste residues by incineration.
  - (3) Require the modification of all wigwam waste burners to minimize air contaminant emissions.
  - (4) Require effective monitoring and reporting of wigwam waste burner operating conditions.
2. The variance granted by MWVAPA will stop wood wastes from being landfilled by this company.
3. Air quality is not adequately protected by the variance granted.
4. It is believed that Air Quality would be best served by modifying the wigwam waste burner, as soon as practicable.
5. The MWVAPA has exclusive air quality jurisdiction over this source type within their territory; however, the granting of a variance from their rules and also the Department rules is contrary to past EQC actions.
6. If this variance is approved similar variance requests can be expected.

Director's Recommendation

The Director recommends that the MWVAPA variance to Cedar Lumber, Inc. dated February 28, 1973, be approved subject to the following additional conditions:

1. The wigwam waste burner shall be modified as soon as practicable, but not later than August 1, 1973. If economics dictate that both the wigwam waste burner modification and the storage facilities cannot be completed, the wigwam waste burner modifications shall be completed first.
2. Until the wigwam waste burner is modified, the petitioner shall cease operation of the wigwam waste burner when notified that an Air Pollution Alert, Warning or Emergency exists within the Willamette Valley, and shall not operate the wigwam waste burner for the duration of any such Air Pollution Alert, Warning or Emergency.



DIARMUID F. O'SCANNLAIN



## DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 5301

TOM McCALL  
GOVERNOR

### 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  
Portland

ARNOLD M. COGAN  
Portland

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item G, for April 2, 1973, Meeting  
Medford Corporation, Hearings Officer's Report

### Background

Pursuant to a published notice, a Public Hearing was held at the Jackson County Courthouse, Medford, Oregon, on March 15, 1973, beginning at 7:30 p.m. The hearing was held to consider the Department's proposed issuance of an Air Contaminant Discharge Permit.

The proposed permit included conditions for the operation of:

1. An existing sawmill and planing mill, including three (3) hog fuel boilers and eleven (11) cyclones;
2. An existing plywood plant including four (4) veneer driers and eleven (11) cyclones; and

3. A proposed medium density hardboard plant including three (3) Heil driers, twenty-seven (27) cyclones and six (6) bag filters to be constructed and operated on the same general plant site by December 31, 1974.

A Hearings Officer's report has been received and is attached. Also attached are copies of written testimony, the proposed permit and a list of attendance. There was a total attendance of twenty-nine (29) persons although only seventeen (17) signed the attendance list.

Director's Recommendation

It is recommended that the Environmental Quality Commission issue an Air Contaminant Discharge Permit to Medford Corporation as proposed and amended by the Department of Environmental Quality.

It is recommended by the Department of Environmental Quality that Section A, Item 5 of the proposed Air Contaminant Discharge Permit be deleted and a new Item 5 be added with the following wording:

5. Maintenance and operation of hog fuel boiler #3 shall be such that the steam production shall be limited so that particulate loading of the stack emissions will not exceed 02. grains/standard cubic foot.

  
DIARMUID F. O'SCANLAIN



BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY

OF THE STATE OF OREGON

In the Matter of the )  
Proposed Air Contamination ) HEARINGS OFFICER'S REPORT  
Permit For: MEDFORD CORPORATION)

TO: Members; Environmental Quality Commission  
FROM: Arnold B. Silver, Hearings Officer

Pursuant to published notice, your Hearings Officer convened a public hearing at the Jackson County Courthouse, Medford, Oregon, on March 15, 1973, beginning at 7:30 p.m., to consider the Department's proposed issuance of an air contaminant permit to Medford Corporation.

WITNESSES TESTIFYING

Henry Padgham	Jackson County Commissioner
Gene Hopkins	Medford Chamber of Commerce
R. J. Hogue	Medford Corporation
Harry M. Demaray	Citizen
A. E. (Ben) Graham	Citizen
M. F. Gier	Payless Auto Sales
Paul Preppernall	Medford Corporation
J. P. Rowan	Citizen
Forrest Smith	Citizen
Peter Wicke	Consulting Engineer Medford Corporation

Letters were also made part of the hearing's record.

SUMMARY

All witnesses favored issuance of the permit to Medford Corporation. No person objected to Medford Corporation's operational plan or expansion program. Concern was expressed by one or two witnesses that the proposed permittee should be inspected periodically by the Department to insure that strict compliance with the permit is had immediately.

The Department testified, by report, that the proposed permit would protect the public health and also insure compliance with environmental standards for the Rogue River Basin.

MAJOR POINTS BROUGHT FORTH

1. Medford Corporation would utilize wood wastes

from other mills, thus reducing the number of sources emitting air contaminants into the atmosphere.

2. The proposed expansion of MEDCO would be of great economic benefit to the community and the state, and at the same time air quality would be protected and upgraded by the technological controls to be engineered and installed in the plant.

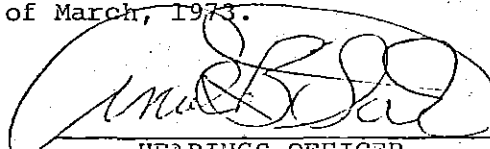
3. A minor dispute was presented as to whether MEDCO's new facility was a "hardboard plant or a particle-board plant". The Department's and Peter Wicke's best engineering judgment is that the plant is a hardboard plant.

4. Paul Preppernall objected to the permit standards as being more restrictive than the Department's published rules. It should be pointed out: (a) The company's own tests indicated it can meet the permit standards, (b) The Department feels the permit standards are the highest and best practical treatment, (c) The rules, set minimum standards, not maximum standards.

#### RECOMMENDATION

Your Hearings Officer recommends to the Environmental Quality Commission that it issue to Medford Corporation the air contaminant discharge permit as proposed by the Department of Environmental Quality, with only such changes therein as may be directed by the Commission or may be recommended by the Director to the Commission.

Dated this 21 day of March, 1973.



HEARINGS OFFICER

MEDFORD  TRIBUNE

33 NORTH FIR STREET

P.O. BOX 1108

PHONE 779-1411

MEDFORD, OREGON 97501

March 13, 1973

Environmental Quality Commission  
Hearing  
Jackson County Courthouse  
Medford, Oregon

Gentlemen:

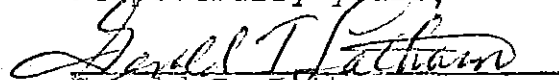
This letter is in support of the Medford Corporation application for a permit to construct and operate a new facility for manufacturing particle board in North Medford.

I have personally been acquainted with the Medco management team for over forty years. They have shown and proven their community responsibilities as good citizens.

Their management of resources of land and timber have usually been the forerunner of change for conservation and utilization of the resource.

It is a pleasure to support a firm that has responded to social and economic change for the betterment of our community.

Respectfully yours,



Gerald T. Latham  
Executive vice-president  
and General Manager

Past president  
Medford Chamber of Commerce  
Oregon Newspaper Publishers Assn.  
Jackson County Planning Comm.

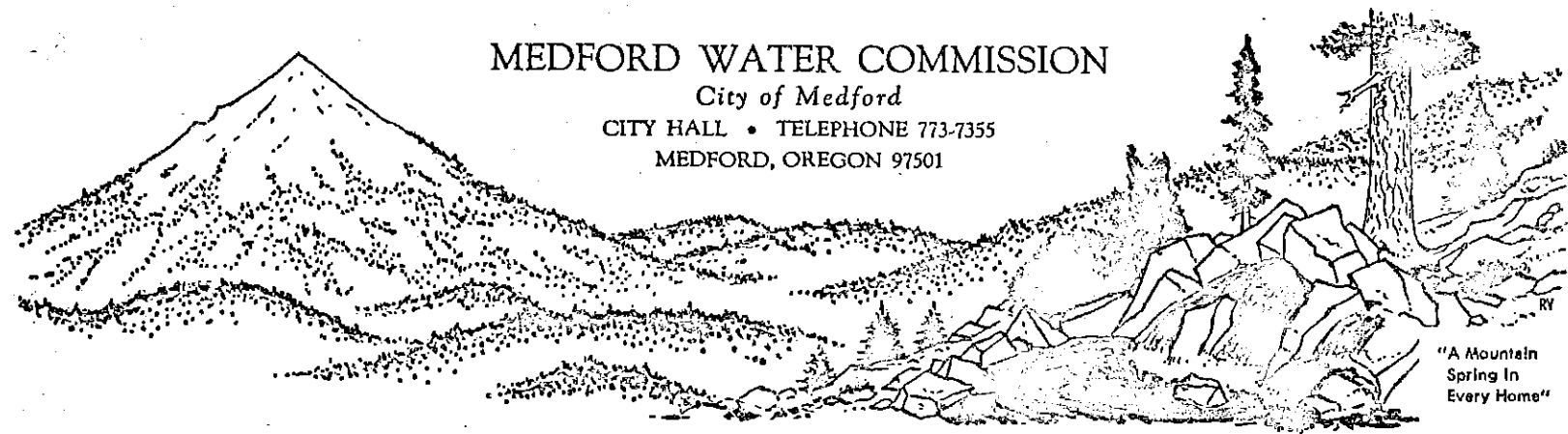
Board member now  
Mt. Ashland Ski Corp.  
Providence Hospital  
Associated Oregon Industries  
Rogue Basin Flood Control &  
Water Resources  
Medford Chamber of Commerce

# MEDFORD WATER COMMISSION

City of Medford

CITY HALL • TELEPHONE 773-7355

MEDFORD, OREGON 97501



"A Mountain  
Spring In  
Every Home"

March 12, 1973

Medford Corporation  
P. O. Box 550  
Medford, Oregon 97501

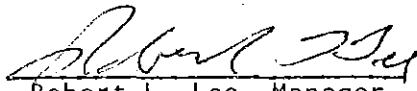
Attention: Edmund Ericksen, Director of  
Fiber Products

Gentlemen:

This letter will confirm our letter of December 19, 1972, in which we stated that the Medford Water Commission had considered and approved your application for water service for the proposed fiberboard plant to be located between Highway 99 and the Southern Pacific Railroad tracks and North of your present plant.

The area to be occupied by the proposed plant is partially within the City of Medford and that portion outside of the limits of Medford is within the Elk City Water District. There is an existing large trunk water main fronting on three sides of the area to be occupied by the proposed plant.

MEDFORD WATER COMMISSION

By   
Robert L. Lee, Manager

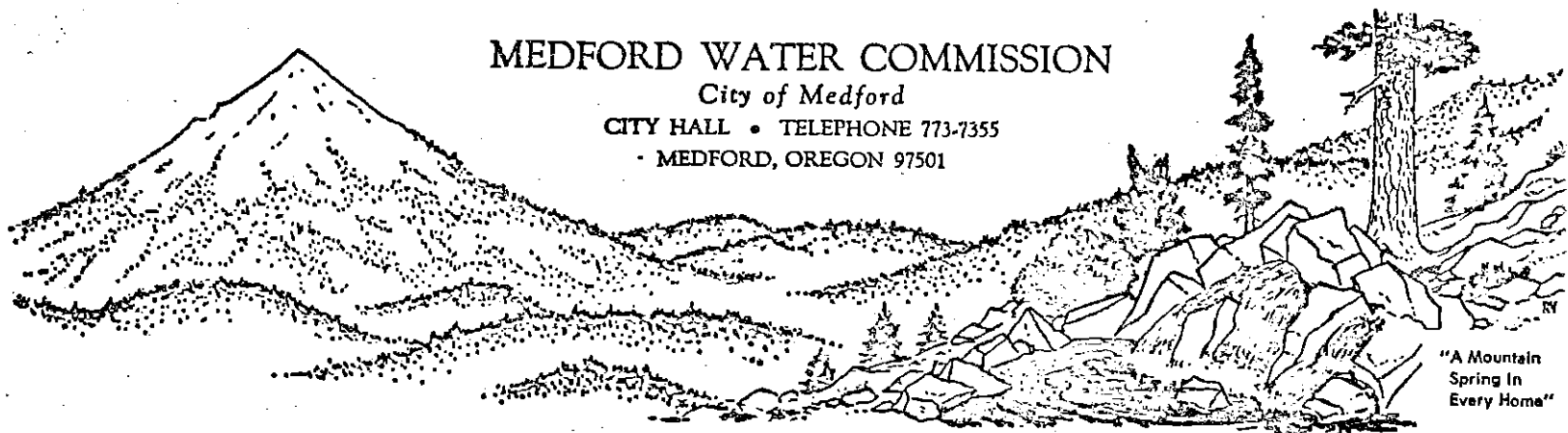
RLL:sf

# MEDFORD WATER COMMISSION

City of Medford

CITY HALL • TELEPHONE 773-7355

• MEDFORD, OREGON 97501



"A Mountain  
Spring In  
Every Home"

December 19, 1972

BJH

Medford Corporation  
P. O. Box 550  
Medford, Oregon 97501

Attention: Edmund Ericksen, Director Fiber Products

Gentlemen:

At their regular meeting held December 18, 1972, the Medford Water Commission considered your application for water service for the proposed fiberboard plant to be located between Highway 99 and the S.P. Railroad tracks and North of your present plant. Based on our discussions held at your office on December 11 regarding fire-flow requirements and your letter of December 14 setting out water uses for the proposed plant, the Commission did approve the provision of water service to the plant.

As regards rate schedules which would apply to the service, the Commission had agreed that the large full-flow meter which would provide fire service and potable water (designated as meter No. 2 in your water supply requirements) could receive service under our rate schedule 2C3 for water and sewer service within the city limits of Medford. Water supplied to the process water system (meter No. 1) would be used entirely without the city limits of Medford and would be charged at the schedule 4 rates for service outside of the city limits of Medford.

We are enclosing a copy of the two rate schedules involved. Assuming that meter No. 1 would be a 4" meter which would be adequate to supply the maximum emergency water requirements, and using your consulting engineering firm's estimate of water uses, the average monthly cost would be \$577. Assuming that meter No. 2 would be a 10" full-flow fire meter, the average monthly bill for water would be \$126 and based on a 2" meter size, the average monthly bill for sewer service would be \$30. In addition, the boiler make-up water which would come through your existing service connections and based on a continuous flow of twenty gallons per minute, would run around \$115 per month. Using these figures, your monthly water cost while the plant is in operation would be around \$818 and the sewer service cost would be around \$30 per month. The sewer service cost is based on your providing pre-treatment such as settling and assumes that the average strength of the effluent would be less than 300 p.p.m.

Page 2  
Medford Corporation  
December 19, 1972

MEDFORD WATER COMMISSION  
1000 Main Street  
Medford, Oregon 97504

If there are further questions, please call.

MEDFORD WATER COMMISSION

By   
Robert L. Lee, Manager

RLL:sf  
Enclosure

TO: [Illegible]

FROM: [Illegible]

SUBJECT: [Illegible]

[Illegible text follows]

[Illegible text follows]

SCHEDULE 2C3  
 COMMERCIAL WATER AND SEWER SERVICE  
 WITHIN THE CITY LIMITS OF MEDFORD  
 Effective 1 January, 1971

Application:

This rate schedule shall apply to all accounts within the City Limits of Medford that are not classified as residential, public schools, hospitals or churches under the Regulations Governing Water Service.

Rate:

(a) Ready to Serve Charge per Month

Meter Size	Water	Sewer	Total
5/8" x 3/4"	\$ 2.05	\$ 3.50	\$ 5.55
1"	2.75	3.50	6.25
1 1/2"	4.30	5.20	9.50
2"	6.30	7.20	13.50
3"	13.00	15.00	28.00
4"	21.00	24.00	45.00
6"	40.00	47.00	87.00
8"	75.00	71.00	146.00
10"	110.00	94.00	204.00

(b) Water and Sewer Gallonage Charges per Month

Summer Season - May through September

All gallonage, per 1,000 gallons      \$ 0.11      \$ 0.16      \$ 0.27

Winter Season - October through April

1st 300,000 gallons, per 1000 gal.      \$ 0.11      \$ 0.16      \$ 0.27  
 All over 300,000 gallons, per 1000 gal.      0.06      0.16      0.22

(c) High Elevation Gallonage Surcharge  
 Per Month

For service above elevation 1500, where booster pumping is provided by the utility, for each 150 feet in elevation or additional fraction thereof, per 1000 gallons      \$ 0.02

SCHEDULE 4

Effective 1 January, 1971

Water Service Outside the City of Medford  
to Individual Customers

Application:

This rate schedule shall apply to all accounts outside of the city limits of Medford except to accounts classified as utility customers in accordance with the Regulations Governing Water Service, and except fire standby service.

Rates:

(a) Ready to Serve Charge per Month

Meter Size	Charge
5/8" x 3/4"	\$ 3.40
1"	4.60
1 1/2"	7.20
2"	10.50
3"	22.00
4"	35.00
6"	67.00
8"	125.00
10"	185.00
12"	250.00

(b) Gallonage Charge per Month

Summer Season - May through September

1st 300,000 gallons, per 1000 gal.	\$ 0.25
All over 300,000 " " " "	0.165

Winter Season - October through April

1st 300,000 gallons, per 1000 gal.	\$ 0.25
All over 300,000 " " " "	0.09

(c) High Elevation Gallonage Surcharge  
Per Month

For service above elevation 1500, where booster pumping is provided by the utility, for each 150 feet in elevation or additional fraction thereof, per 1000 gallons \$ 0.04



PRELIMINARY ESTIMATE

December 12, 1972

MEDFORD CORPORATION  
 PROPOSED HARDBOARD PLANT  
 WATER SUPPLY REQUIREMENTS

	<u>AVERAGE</u> <u>CONTINUOUS</u> <u>GPM</u>	<u>MAXIMUM</u> <u>INSTANTANEOUS</u> <u>GPM</u>	<u>TOTAL</u> <u>AVERAGE</u> <u>GPD*</u>
<u>Process Water System</u>			
<u>Meter # 1 (None to sewer)</u>			
Cooling Tower Makeup: (Closed loop system)			
Compressor cooling	80		
Blender cooling	40		
Press cooling plattens	35		
Press hydraulics	180		
Air cond. and misc.	<u>50</u>		
	385 x 5% =	20	50
Resin & wax makeup	1	5	28,800
Refiner cooling & sprays	<u>75</u>	<u>75</u>	<u>1,440</u>
	96	130	108,000
			138,240

Potable Water System

Meter # 2 (All to sewer)

Washdown: Blender area	1.04	30	1,500
Washdown: General areas	0.28	30	400
Washrooms & drinking fountains	2.08	10	3,000
Boiler makeup	---From Sawmill Water Supply---		
	<u>3.40</u>	<u>70</u>	<u>4,900</u>
			<i>8 1/2 sawmills</i>

SUMMARY OF WATER REQUIREMENTS (From Above Data)

	<u>Meter # 1</u>	<u>Meter # 2</u>
Normal Average Use	96 gpm	3.4 gpm
Normal Maximum Instantaneous	130 gpm	70 gpm
Maximum Emergency (Without cooling tower)	461 gpm	70 gpm

*Potable &  
Fire Protection*

\* Plant operation 24 hr/day - 330 days/year

COLUMBIA ENGINEERING INTERNATIONAL, INC.

PRELIMINARY ESTIMATE  
December 12, 1972

MEDFORD CORPORATION  
PROPOSED HARDBOARD PLANT  
WATER DISPOSAL REQUIREMENTS

Water Source	Estimated Gallons/Day	Contaminants Prior to Primary Treatment	Primary Treatment Method	Contaminants After Primary Treatment	Effluent Disposal
Refiner cooling and sprays	108,000	Small quantity of wood fiber in warm water (say 110° F)	Skimming-settling basin # 1	Negligible	Irrigation Canal
Washdown blender Area	1,500	Small quantity of wood fiber plus maximum 15 gpd of urea-formaldehyde or phenol formaldehyde resin	Skimming-settling basin # 2 to remove wood fiber and settle out majority of resin solids	Highly diluted resin with estimated B.O.D. level of 1000 p.p.m. or maximum of 2000 p.p.m.	To City Sanitary Sewer
Washdown - General Areas	400	Small quantity of wood fiber	Same skimming-settling basin # 2 to remove wood fiber	Nearly clear water	To City Sanitary Sewer
Washroom and Drinking fountains	3,000 (probably only 1500-2000 GPD now)	Sanitary sewage	None	Sanitary Sewage	Direct to City Sanitary Sewer
Sump Pumps from Pits	Negligible	Same wood fiber	Same skimming-settling basin as washdown	Nil	To City Sanitary Sewer
Roof drains and Surface water	----	----	----	----	Normal natural drainage pattern

Statement by Henry F. Padgham, Jr.

Before the Department of Environmental Quality Concerning  
the Application for an Air Contaminant Discharge Permit by

Medford Corporation, March 15, 1973

---

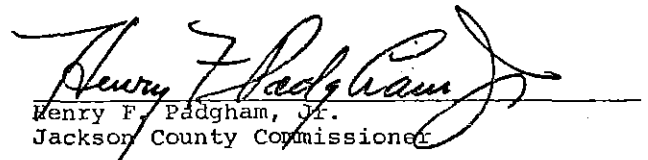
Mr. Chairman:

I am Henry Padgham, 2707 Springbrook Road, Medford and have been a resident of Jackson County for 46 years. During a great many of these years, I have had the opportunity of working closely with the management of Medford Corporation. This association has been while conducting my own business and now while serving as a member of the Board of County Commissioners.

Over these years, I have been impressed by the real concern manifested by Medford Corporation in maintaining the highest possible environmental standards, both in their timber management practices and manufacturing processes.

I can think of no reason why our community will not benefit, both economically and environmentally, by the construction and operation of the new Medco hardboard plant.

As a private citizen and as a member of the Board of County Commissioners, I heartily recommend approval of the appropriate D.E.Q. permits for expansion of the Medford Corporation operations.

  
Henry F. Padgham, Jr.  
Jackson County Commissioner

TESTIMONY OF:

Gene Hopkins  
Manager  
Medford Chamber of Commerce  
304 So. Central  
Medford, Oregon 97501

---

WHO WE REPRESENT

Medford Chamber of Commerce has membership of 480 business and professional firms from the Medford and Central Point city areas. Total individual membership as of February 28, 1973 stands at 873 business and professional persons.

Although we strongly approve of the Medford Corporation project under consideration here tonight, my mission is to present testimony directed toward the economic impact of the proposed expansion.

DIRECT CONTRIBUTION

Value Added

1. The value of waste wood products is increased in its conversion to medium and high density hardboard at the processing plant approximately 6-3/4 times.

(Note: The value added by manufacture is derived by subtracting the total cost of materials from the value of shipments and other receipts. Materials include chips, supplies, fuel, electrical energy, cost of resales, and miscellaneous receipts. The result is adjusted to make allowance for net change in finished products and work-in-process inventories between the beginning and end of the year. The value added, derived from these calculations

indicates the additional value that has arisen from transforming materials used in the manufacturing process (planer shavings, veneer trim, sawdust, etc.) into products (particle board). In a statistical sense it represents the money that is available for salaries and wages, interest, profit, property, taxes, and depreciation charges.)

2. To each dollar's worth of waste wood, about \$6.75 is added by converting the by-products into products at the processing plant.

3. The expected gross sales of \$15,000,000 is of great significance to the region's economic position. It compares with the total value of our horticultural crops of the area of \$13,000,000, and exceeds by roughly \$7,000,000 the total value of our tourist industry

#### Employment

1. There will initially be 90 jobs generated by the Medford Corporation hardboard plant.

2. Using a very rough measurement of relations between basic employment (jobs generated by the project), secondary employment (retail, service, and other employees serving the basic employees) and population, it is estimated that 90 jobs generate more than 134 other jobs and supports a total population of about 535 (including employees and their families).

3. Annual payroll for 90 manufacturing employees in Jackson County is estimated in excess of \$970,000. (Table #1)

4. This payroll is distributed in the community in the following manner:

(Computed from Statistical Abstract, 1972 -- U. S. Department of Commerce -- for family of four living in a non-metropolitan area with an intermediate budget of \$9,600)

- 22.2% -- Food
- 21.5% -- Housing
- 8.8% -- Transportation
- 10.7% -- Personal care
- 4.9% -- Medical and dental care
- 20.4% -- Taxes
- 11.5% -- Time payments

5. The economic impact of that payroll is estimated at \$1,592,663. (See Table #2)

6. Pacific Northwest Economic Base Study -- U. S. Department of Interior -- Bonneville Power Administration estimated 5.6% increase in employment over period until 1985, which translates as an addition of approximately 5.6 employees to the starting work force.

7. We look on that increase of 5.6% in this work force as being on the modest side for the same publication predicts: "On the basis of recent trends and expectations as to the size, quantity and volume of timber that will be available, it is assumed that future increases in veneer by consumption in western Oregon will rise from the 1962 level of 3.2 billion board feet to 5.4 billion board feet in 1985, a 69% increase." This report places the volume of "unused plant residues" in western Oregon at a total for all species at 169 million cubic feet -- 162 million cubic feet from softwoods.

The major source of raw material for hardboards is from veneer and plywood industry which in the Bonneville report produced 38 million cubic feet of unused residue and the lumber industry which produced 123 million cubic feet of residue.

It is assumed residue from veneer and plywood industry will continue somewhat parallel to historical pattern and that production of particle board per man hour will remain somewhat similar to the current pattern then we conclude that employment opportunity in its manufacture will grow at a greater rate than the 5.6% predicted in that report.

#### MEASURING THE INDIRECT CONTRIBUTION

The direct contribution of this project tells only part of the story. The indirect contribution, although more elusive and more difficult to measure, is possibly more important than the direct effects discussed earlier.

To manufacture wood products and to put them in the hands of the final user requires the use of materials and services from many other industries located within the region and outside: transportation, electric power, paint, containers, chemicals, and so forth. The extent of the inter-relationship between timber-based industries and other industries is apparent from input-output studies.

As is shown in Table #3, to produce \$1,000 worth of lumber and wood products, the industry paid \$322 to labor, profits, etc.; \$284 to itself for raw material; \$93 to forestry (nurseries, forestry services, etc.); \$51 for transportation and warehousing; \$8 for fabricated products; \$8 for auto repair and services; \$7 for chemicals and chemical products, etc.

While detailed information is not available regarding inter-industry transaction for Oregon, certain studies have been made by the

University of Oregon. These studies and other information available indicate a large portion of all economic activity in the region is related to timber based industries in one way or another. A substantial share of the region's transportation industry was developed to serve timber-based industries. The wholesale trade, electric power, and communication industries are in part dependent on the industry. A good portion of the service and retail industries are developed to serve the industry.

Less obvious, though of major importance, are the linkages between the manufacture of wood products and manufacture of other products. Virtually all types of industrial activities in western Oregon include manufacture of products for use in the wood products industry. A large part of these associated economic activities is located in the metropolitan areas, especially Portland.

#### CONCLUSION

Hardboard (particle board) is the rising star of the wood products industry. In 1963, less than 500 million square feet of board was produced. This year more than 3 billion board feet will be consumed by home builders and manufacturers of furniture, cabinets, and fixtures. The reasons for this growth are twofold. The first has been the continuous improvement in board quality. The second is an increasing awareness of the versatility of hardboard and particle board as a unique wood product with its own distinct advantages.

The forest products industry (particularly Medford Corporation) has proved its willingness to tackle -- and find solutions for -- problems such as waste disposal, air and water pollution and greater log utilization. Let's make sure those who are quick to criticize this firm -- and the forest



products industry -- are aware of its achievements and what its future holds for the Medford community.

Thank you.

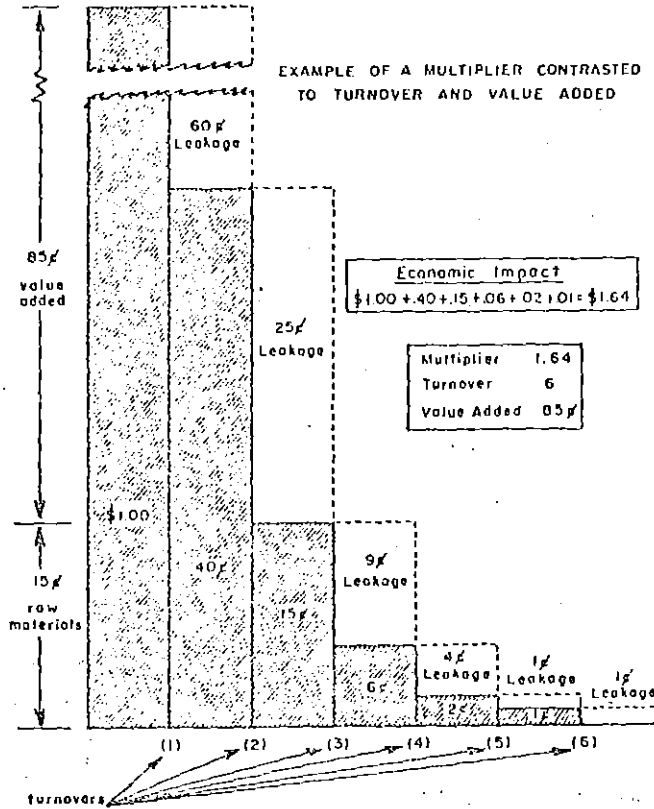


TABLE 2

INTER-INDUSTRY PAYROLL COMPARISONS  
JACKSON COUNTY 3rd QUARTER 1971

	<u>Average Monthly Pay</u>
Agriculture, Forestry and Fisheries	\$597.90
Mining	
Contract Construction	\$811.60
Manufacturing	\$899.20
Transportation, Communication, Electric, Gas, and Sanitary Service	\$824.60
Wholesale and Retail Trade	\$463.70
Finance, Insurance and Real Estate	\$517.70
Services	\$360.40
Government	\$789.80

SOURCE: Oregon Covered Employment and Payrolls by Industry and County

TABLE 1

Table #3

DIRECT REQUIREMENTS OF THE LUMBER AND  
WOOD PRODUCTS INDUSTRY PER \$1,000 OF GROSS OUTPUT<sup>a</sup>  
United States, 1958  
(Producers' Prices)

Requirements	Dollars
Value added <sup>b</sup>	322
Lumber and wood products	284
Forestry products	93
Gross imports of goods and services	53
Transportation and warehousing	51
Wholesale-retail trade	43
Agricultural products	24
Petroleum refining and related industries	9
Fabricated metals products	8
Auto repair and services	8
Business travel, etc.	7
Chemicals and products	7
Paper and allied products	7
Plastics and synthetic materials	7
Electricity, gas, water, sanitary services	6
Real estate and rental	6
Rubber and miscellaneous plastic products	6
Finance and insurance	6
Business services	6
Paints and allied products	4
Paper board containers and boxes	4
Stone and clay products	4
Printing and publishing	4
Communications	3
Stampings, screw products, bolts	2
Wooden containers	2
Household furniture	2
Hotels, personal and repair services	2
Special industry machinery and equipment	2
Miscellaneous manufacturing	2
All other items	16
Total	1,000

a Includes lumber and wood products industry (SIC 24), except wooden containers (SIC 244).

b Compensation of employees, proprietor's income, corporate profits, net interest, capital consumption allowances, indirect business taxes.

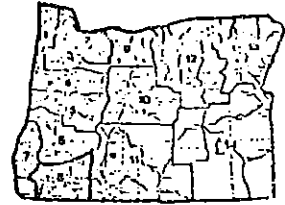
Source: U. S. Department of Commerce, Survey of Current Business, Sept. 1965, Vol. 45, No. 9

JACKSON - JOSEPHINE

DISTRICT #8

**COMPREHENSIVE HEALTH PLANNING COUNCIL, INC.**

1313 MAPLE GROVE DRIVE / MEDFORD, OREGON 97501 / PHONE 779-2330



Memo to: Members, Environmental Committee

From: Chairman, Harry Demaray *HD*

Subject: Program for meeting, Thursday, March 15, 1973

Instead of the usual type meeting, we will attend the public hearing for the Air Contaminant Discharge Permit Application of Medford Corporation that will convene at our scheduled meeting time:

7:30 p.m. on

Thursday, March 15, 1973

at the auditorium in the Jackson  
County Courthouse

The enclosed report that describes the contaminant sources and sets limits for the amounts of particulate permitted should be thoroughly studied before the meeting. Come prepared to participate or observe, as you see fit.

This experience should provide some insight of the methods and procedures currently being used by the state to control air pollution. And, it will give us a first-hand opportunity to evaluate the effectiveness of the controls.

Should you have any questions regarding the contents of the report please call me at 773-7355 during the day or 779-5794 at home.

The enclosed questionnaire is for your use in assembling data for our environmental directory. Please bring your findings and questions to our next meeting on April 19, which will be held at 7:30 p.m. in the Jackson County Health Department.

Tape on Medford Corporation Public Hearing,  
Jackson County Courthouse Auditorium,  
Medford, Oregon, 7:30 P.M., 15 March 1973.

- 000 - Arnold Silver, Hearing's Officer, opening statements
- 011 - Russel Royer, Associate Engineer, DEQ, staff presentation
- 075 - Arnold Silver
- 080 - Henry Padgham, Jr., Jackson County Commissioner
- 087 - Gene Hopkins, Medford Chamber of Commerce
- 126 - Russel J. Hogue, President, Medford Corporation
- 137 - Harry Demaray, Environmental Planner, City of Medford
- 183 - A. E. Graham, citizen
- 200 - N. F. Gier, Owner, Pay Less Auto Sales.
- 207 - Paul Peppernau, Chief Engineer, Medford Corporation
- 216 - J. P. Rowan, Chairman of Jackson-Josephine Comprehensive Planning Commission
- 224 - Arnold Silver
- 227 - Peter Wiecke, Vice President, Columbia Engineering
- 266 - Forrest Smith, citizen
- 274 - Arnold Silver
- 273 - Presentation of letters from City of Medford  
by Edmond Ericksen, Director Fibre Products, Medford Corp.
- 279 - Adjournment of Public Hearing

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 4/1/76

Page 1 of 9

APPLICANT:

MEDFORD CORPORATION  
North Pacific Highway  
Medford, Oregon 97501

REFERENCE INFORMATION

File Number 15-0048

Appl. No.: 0040 Received: 1/2/73

OTHER AIR Contaminant Sources at this Site:

<u>Source</u>	<u>SIC</u>	<u>Permit No.</u>
---------------	------------	-------------------

Source(s) Permitted to Discharge Air Contaminants:

NAME OF AIR CONTAMINANT SOURCE

STANDARD INDUSTRY CODE AS LISTED

SAWMILL	2421
PLYWOOD PLANT	2432
HARDBOARD PLANT	2493

Permitted Activities

Until such time as this permit expires or is modified or revoked, MEDFORD CORPORATION is herewith permitted to operate its sawmill, planing mill, dry kilns, wigwam waste burner, plywood plant, veneer dryers, particleboard plant and steam-generating boiler facilities, including those processes related thereto located at Medford, Oregon, and to discharge therefrom treated air, gas and steam emissions containing air contaminants in conformance with the requirements, limitations and conditions of Sections A through D of this permit.

Divisions of Permit Specifications:

Page

Section A - Sawmill and Planing Mill	2
Section B - Plywood Plant	4
Section C - Hardboard Plant	6
Section D - General Requirements	8

MEDFORD CORPORATION

SECTION A - SAWMILL AND PLANNING MILL  
(including (3) Hog fuel Boilers  
and (11) Cyclones)

Performance Standards and Emission Limits

1. Particulate emissions from any single air contaminant source other than fuel or refuse burning equipment shall not exceed 0.2 gr/SCF and a total of 22 lb/hr.
2. Visible emissions from the modified wigwam waste burner must not equal or exceed 20% Opacity for an aggregated time of more than three (3) minutes in any one (1) hour.
3. Boiler stack emissions shall be limited as follows:
  - a. Visible emissions - Must not equal or exceed 40% opacity for an aggregated time of more than three (3) minutes in any one (1) hour.
  - b. Particulate emissions - Not more than 0.2 grain/standard cubic foot corrected to 12% CO<sub>2</sub>.
4. Hog fuel boilers #1 and #2 shall be operated and maintained to achieve minimum air contaminant discharges to the atmosphere until modified or replaced.
5. Maintenance and operation of hog fuel boiler #3 shall be such that the stack emissions, as evidenced by the test results dated September, 1972, are controlled to a maximum emission limit of 62 lb/hr with steaming rates not greater than 110,000 lb/hr.

Compliance Program and Schedule

6. The wigwam waste burner, shall only be utilized for the disposal of wood waste residues, and shall be modified in accordance with approved plans and specifications submitted to the Department of Environmental Quality on January 17, 1973.
7. A compliance demonstration of the modified wigwam waste burner shall be witnessed and approved by the Department of Environmental Quality before utilization for the disposal of wood waste residues on a routine basis and within sixty (60) days after modification of the wigwam waste burner is completed.
8. Hog fuel boiler #1 and #2 shall be modified or replaced in order to attain compliance with emission limits set forth in Item 3 (a and b) on or before July 1, 1974.



## PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the

Department of Environmental Quality

MEDFORD CORPORATION

## 8. (continued)

- a. Plans and specifications for attaining compliance shall be submitted to the Department of Environmental Quality for review and approval on or before July 1, 1973.
- b. The boiler stack emissions shall be isokinetically sampled to demonstrate compliance with emission limits set forth in Item 3 (a and b). All test data and results shall be submitted to the Department of Environmental Quality to confirm compliance on or before September 30, 1974.

Monitoring and Reporting

9. Records of the daily hog fuel boiler operations shall be maintained by the company for the prior six (6) month period and shall be available for inspection by the Department of Environmental Quality. Procedures for monitoring and data reporting shall be:

- a. Estimated average hourly steam production for each boiler for twenty-four (24) hour day of operation.
- b. Estimated average hourly units of hog fuel fired during each twenty-four (24) hour day of operation.

10. Temperature charts for the operation of the modified wigwam waste burner shall be submitted to the Department of Environmental Quality by no later than the fifth (5th) day of each month for the preceding month.

11. The company shall promptly notify the Department of Environmental Quality by telephone or in person of any scheduled maintenance or malfunction of air pollution control equipment that may cause or tend to cause a significant increase of air contaminant emissions. Such notice shall include:

- a. The nature and quantity of increased air contaminant emissions that are likely to occur during the maintenance or repair period.
- b. The expected length of time that the air pollution control equipment will be out of service.
- c. The corrective action that shall be taken.
- d. The precautions that shall be taken to prevent a future reoccurrence of a similar condition.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 4/1/76

Page 4 of 9

Appl. No: 0040

File No: 10-0048

MEDFORD CORPORATION

SECTION B - PLYWOOD PLANT  
(Including (4) veneer dryers and (11) Cyclones).

Performance Standards and Emission Limits

1. Particulate emissions from any single air contaminant source other than fuel or refuse burning equipment shall not exceed 0.2 gr/SCF.
2. Total particulate emission from all cyclones or air contaminant discharge sources shall not exceed a maximum allowable discharge rate of 50 lb/hr. This emission limitation is based on a maximum hourly production capacity for this facility of 72,000 sq. ft per hour (3/8" basis).
3. Veneer dryer emissions shall be controlled on or before December 31, 1974 in a manner approved by the Department of Environmental Quality such that visible air contaminants:
  - a. Including condensible hydrocarbons, or the characteristic "blue haze", are not emitted in such quantities that create any "blue haze" to be observed beyond the edge of the building, or at a distance greater than fifty (50) feet from any veneer dryer, whichever is greater.
  - b. Emitted therefrom do not at any time equal or exceed 20% opacity from any one stack or an average of 10% opacity from all stacks of that veneer dryer.

Compliance Program and Compliance Demonstration Schedule

4. Plans and specifications to control veneer dryer emissions within the prescribed limits shall be submitted to the Department of Environmental Quality for review and approval on or before May 1, 1973.
5. Issuance of purchase orders for air contaminant discharge control equipment required to complete any necessary construction/or modification work to control the emissions from all veneer dryers shall be by no later than August 31, 1973.
6. Any required construction and/or modification work, or changes in any operating procedures, to control the emissions from all veneer dryers, shall commence by no later than March 31, 1974.
7. All construction and/or modification work to control veneer dryer emissions shall be completed in accordance with Department of Environmental Quality approved plans and specifications and shall be completed at the earliest practical date, but, in any case, by no later than December 31, 1974.
8. The veneer dryers shall be demonstrated to the Department of Environmental Quality as being capable of continuous operation in compliance with OAR, Chapter 340, Section 25-315(1), at the earliest practical date, but, in any case, no later than December 31, 1974.

## PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

MEDFORD CORPORATION

9. At least one (1) representative veneer dryer shall be tested in accordance with the Department of Environmental Quality established methods unless otherwise agreed to by the Department of Environmental Quality in writing. A written report of the test results shall be submitted to the Department of Environmental Quality on or before December 31, 1974.

Monitoring and Reporting

10. A record of daily steam consumption by the veneer dryers shall be maintained by the company for the prior six (6) month period and shall be available for inspection by the Department of Environmental Quality.

11. The company shall promptly notify the Department of Environmental Quality by telephone or in person of any scheduled maintenance or malfunction of air pollution control equipment that may cause or tend to cause a significant increase of air contaminant emissions. Such notice shall include:

- a. The nature and quantity of increased air contaminant emissions that are likely to occur during the maintenance or repair period.
- b. The expected length of time that the air pollution control equipment will be out of service.
- c. The corrective action that shall be taken.
- d. The precautions that shall be taken to prevent a future reoccurrence of a similar condition.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 4/1/76

Page 6 of 9

Appl. No: 0040

File No: 10-0048

MEDFORD CORPORATION

SECTION C - HARDBOARD PLANT  
(Including (3) Hiel dryers,  
(27) cyclones and (6) Bag Filters)

Performance Standards and Emission Limits

1. Particulate emissions from any single air contaminant source other than fuel or refuse burning equipment shall not exceed 0.1 gr/SCF.
2. Total particulate emissions from all cyclones and/or air contaminant discharges sources shall not exceed the maximum allowable discharge rate of 108 lb/hr. This limitation is based on a maximum hourly production capacity for this facility of 108,000 sq. ft/hr. (1/8" basis)
3. Emissions for the Hiel dryer stacks shall be controlled within the following limits:
  - a. Visible emissions - Must not equal or exceed 20% opacity for an aggregated time of more than three (3) minutes in any one (1) hour.
  - b. Particulate emissions - Not more than 0.1 gr/SCF.
4. Complete all construction of the hardboard plant on or before December 31, 1974 in accordance with Department of Environmental Quality approved plans and specifications that were submitted to the Department on January 2, 1973.
5. Demonstrate to the Department of Environmental Quality that the hardboard facility can operate in continuous compliance with OAR, Chapter 340, Section 25-325 by sampling all emission sources in accordance with Department of Environmental Quality approved methods. All test data and results must be submitted to the Department to confirm compliance within ninety (90) days after start-up.

Monitoring and Reporting

6. The company shall promptly notify the Department of Environmental Quality by telephone or in person of any scheduled maintenance or malfunction of air pollution control equipment that may cause or tend to cause a significant increase of air contaminant emissions. Such notice shall include:
  - a. The nature and quantity of increased air contaminant emissions that are likely to occur during the maintenance or repair period.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

MEDFORD CORPORATION

---

6. (continued)

- b. The expected length of time that the air pollution control equipment will be out of service.
- c. The corrective action that shall be taken.
- d. The precautions that shall be taken to prevent a future reoccurrence of a similar condition.

MEDFORD CORPORATION

SECTION D - GENERAL REQUIREMENTS

(for all manufacturing activities  
listed in this permit)

Monitoring and Reporting

1. Annual reports of the amounts of solid waste residues and mill waste clean-up generated by the total operation and the methods utilized for their disposal shall be submitted to the Department of Environmental Quality commencing July 1, 1973.

Prohibited Activities

2. No open burning shall be conducted on the plant site.
3. The unmodified wigwam waste burner shall not be utilized for any solid waste disposal purposes.

Special Conditions

4. "Fugitive emissions" and "Nuisance conditions" as defined by Oregon Administrative Rules, Chapter 340, Section 21-050, shall be corrected and the air contaminants shall be controlled or removed in a manner approved by the Department of Environmental Quality.
5. All solid waste and mill clean-up shall be disposed of in a manner and at locations approved by the Department of Environmental Quality.
6. Operation of the modified wigwam waste burner shall be limited to times during possible up-set or breakdown conditions or for the disposal of bark or wood waste residues that cannot be utilized in the hog fuel boilers. Total operation time will be limited to an aggregated period of thirty (30) days per year and any extension of this total operating period beyond thirty (30) days per year will require approval from the Department of Environmental Quality.
7. Department of Environmental Quality representatives shall be permitted access to the plant site at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.
8. No construction, installation, enlargement or major alteration or modification of any air contaminant source shall be made without prior approval from the Department of Environmental Quality. Plans and specifications and a request for approval for such construction, installation or modification shall be submitted to the Department of Environmental Quality as prescribed in OAR, Chapter 340, Sections 20-020, 20-025 and 20-030.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 4/1/76

Page 9 of 9

Appl. No: 0040

File No: 10-0048

MEDFORD CORPORATION

---

9. All air contaminant generating processes and all air contaminant control equipment located at this facility site shall be maintained and operated at full efficiency and effectiveness at all times, such that emissions of contaminants are kept at lowest practicable levels.

10. The Annual Compliance Determination Fee shall be submitted to the Department of Environmental Quality according to the following schedule:

<u>Amount Due</u>	<u>Date Due</u>
\$250.00	April 1, 1974
\$250.00	April 1, 1975

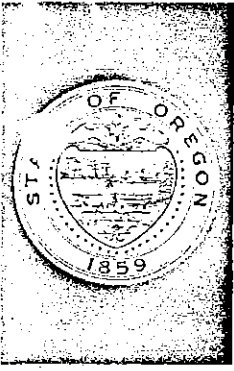
11. This permit is subject to termination if the Department of Environmental Quality finds:

- 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 air contaminants emitted to the atmosphere.

PLEASE SIGN

Name	Address	Organization
Glen S. [unclear]	304 S. Central	Medford ORC
O. Higgins	38 No. Berkeley Way	Medford Assoc
Paul Papp	2308 HUNTER DR.	Medford, OR
Gardner	3572 S. [unclear]	Medford
John E. [unclear]	2845 [unclear] [unclear] City	Medford Assoc. Inc.
Robert W. [unclear]	375 - W. B. [unclear] VENCOVER, OR	Columbia Eng. Indust. Inc.
E. [unclear]	1467 Blackhawk	Medford
Robert E. [unclear]	2645 Willamette Eugene, Oregon	Columbia Engineering Internat. Inc.
A. E. [unclear]	1205 [unclear] Rd 711 [unclear] Ave	Ela. Const
Harry M. [unclear]	18 N. Modoc Ave Medford	self
Forrest E. [unclear]	1145 Sage Rd.	Medford
J. E. [unclear]	177 Greenway Circle	Medford
R. [unclear]	2209 Hillcrest	Medford
C. [unclear]	249 White Oak Dr	Medford
Donald [unclear]	140 Kensington Sq.	Medford
H. E. [unclear]	3780 Modoc Ave	Medford
A. [unclear]	685 So Modoc	Medford





# DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL  
GOVERNOR

## NOTICE OF PUBLIC HEARING

Diarmuid F. O'Scannlain  
Director

## FOR ISSUANCE OF

ENVIRONMENTAL QUALITY  
COMMISSION

## AIR CONTAMINANT DISCHARGE PERMITS

B. A. McPHILLIPS  
Chairman, McMinnville

EDWARD C. HARMS, JR.  
Springfield

STORRS S. WATERMAN  
Portland

GEORGE A. McMATH  
Portland

ARNOLD M. COGAN  
Portland

Medford Corporation, North Pacific Highway, Medford, has applied to the Department of Environmental Quality for an Air Contaminant Discharge Permit in accordance with Oregon Revised Statutes 449.727 for the operation of: (1) an existing sawmill and planing mill, including three (3) hog fuel boilers and eleven (11) cyclones; (2) an existing plywood plant including four (4) veneer driers and eleven (11) cyclones; and (3) a proposed medium density hardboard plant, including three (3) Heil Driers, twenty-seven (27) cyclones and six (6) bag filters to be constructed and operated on the same general plant site by December 31, 1974.

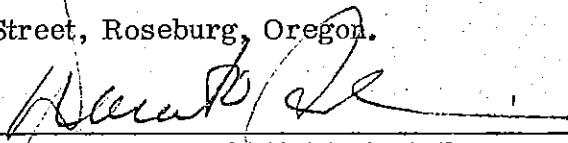
Any interested person desiring to submit written testimony concerning the issues of fact, law or policy related to these matters may do so by forwarding them within thirty (30) days from the date of this notice to the office of the Department of Environmental Quality, Air Quality Control Division, 1234 S. W. Morrison Street, Portland, Oregon 97205, or may be heard orally at the public hearing on the date and at the time stated on the following page.

The Department of Environmental Quality, after reviewing the application of Medford Corporation, has prepared a proposed Air Contaminant Discharge Permit for presentation at a Public Hearing to be held at the time and place listed below:

Time and Date: 7:30 p.m., March 15, 1973

Place: Jackson County Courthouse  
Auditorium  
10 South Oakdale  
Medford, Oregon 97501

Copies of the proposed permit are available upon request from the Department of Environmental Quality, 1234 S. W. Morrison St., Portland, or 1000 S. E. Stephens Street, Roseburg, Oregon.

  
DIARMUID F. O'SCANNLAIN, Director

2-12-73  
Date

Department of Environmental Quality  
Air Quality Control Division

AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

Medford Corporation  
North Pacific Highway  
Medford, Oregon 97501

---

Background

1. Medford Corporation presently operates a sawmill and planing mill, a steam boiler facility and a plywood manufacturing plant at Medford.
2. The plant site is roughly triangular in shape and is bounded by the Southern Pacific Railroad tracks on the long southwest side and by Highway 99 on the east and most of the north sides. There is a small intrusion of some commercial and residential properties of about four square blocks in area beside Highway 99 on the north side of the plant site. Other residential areas are in general, located about 2 or 3 blocks away from the plant site.
3. The company has requested approval for the construction of a new hardboard facility. The Department has reviewed the plans and specifications and has recommended approval by the EQC for this installation.
4. Particulate emissions from the sawmill and planing mill have been judged by the Department to be in compliance with the allowable emission limitation of .2 gr/SCF and 22 lbs/hr based on the results of DEQ-AQCD tests.
5. Particulate emissions of less than 40 lb/hr from air contaminant sources at the plywood plant have been demonstrated by the company to be in compliance with the allowable maximum emission limitation of 72 lb/hr based on a maximum hourly production rates of 72,000 sq. ft. (3/8" basis)
6. Of the three (3) hog fuel boilers at the sawmill facility, boilers #1 and #2, with a combined steam production capacity of 50,000 lbs/hr, have been tested and determined by the Department as not presently operating within emission limitations. Boiler #3, with a steam production capacity of 100,000 lb/hr has been tested and particulate emissions were measured at .17 gr/SCF at 12% CO<sub>2</sub>. The maximum allowable emission limits for this boiler would be .2 gr/SCF at 12% CO<sub>2</sub>. This result indicates that #3 boiler is in compliance with OAR, 340, Section 21-020.
7. The DEQ-AQCD has received three (3) letters from interested parties requesting further information and expressing concern regarding conditions that may be established in the Air Contaminant Discharge Permit for Medford Corporation.

Evaluation

1. A modification or replacement program for hog fuel boilers #1 and #2 designed to attain compliance with emission limitations by no later than September 30, 1974 shall be submitted to the Department on or before July 1, 1973.

2. A program to control veneer dryer emissions, by no later than December 31, 1974, to the limitations established in OAR, Chapter 340, Section 25-315 (as proposed for amendment on January 26, 1973) shall be submitted to the Department on or before May 1, 1973.
3. Construction of the new hardboard facility would be completed no later than December 31, 1974 and compliance with emission limitations would be demonstrated within ninety (90) days after start-up.
4. The maximum allowable particulate emissions in accordance with regulations would be 108 lbs/hr based on a maximum hourly production capacity of 108,000 sq. ft. (1/8" basis)
5. Total annual particulate emissions from the hardboard facility on a 24 hr/day, 5 day/wk, 50 wks/yr are calculated to be approximately 325 tons/yr.
6. DEQ-AQCD emission calculations and projections to 1975 indicate that, even with the added emissions from the new hardboard source, the requirements and goals established by the State of Oregon Clean Air Act Implementation Plan for the Medford and Jackson County areas will be met during 1975 as scheduled.
7. The DEQ has made a preliminary field survey of any potential noise pollution that may occur at or around the proposed site for the new hardboard plant. Further studies will be made within the next thirty (30) days. There is some possibility that a new proposed apartment complex adjacent to the plant site could be effected, but specific information is not available at the present time to evaluate this potential condition.
8. The installation of a new hardboard plant as a utilization facility for existing and future wood waste residues would be highly desirable from an overall pollution control standpoint. The manufacture of hardboard truly represents the highest and best treatment of sawdust, sanderdust, wood shavings and wood chips that must otherwise be disposed of by burning or in landfill sites.

#### Discussion

1. The company has effectively controlled particulate emissions for all air contaminant sources to less than the maximum allowable limits except for the stack emissions from boilers #1 and #2 and the veneer dryers.
2. Emissions from boilers #1 and #2 can be controlled by the addition of proven air pollution control devices or by replacement with a new boiler(s). The time schedule set forth in the proposed permit is realistic for the accomplishment of necessary modification and/or construction work.
3. The control of emissions from the veneer dryers are, at present, limited by the "state of the art". However, several new installations in Oregon show great promise and it is anticipated that the veneer dryer emissions will be controllable by several practicable methods within the time schedule set forth in the proposed permit.

1. A new hardboard plant built in accordance with the approved plans and specifications can be operated in accordance with emission limitations established by regulations and this proposed permit.
5. The new hardboard manufacturing facility is highly desirable from an over-all pollution control standpoint.
6. The addition of the air contaminant discharges from the new hardboard plant sources will still allow, on a county-wide basis, the accomplishment of the goals and objectives of reducing particulate emissions by 1975, as stated in the State of Oregon Clean Air Act Implementation Plan.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 4/1/76

Page 1 of 9

APPLICANT:

MEDFORD CORPORATION  
North Pacific Highway  
Medford, Oregon 97501

REFERENCE INFORMATION

File Number 15-0048

Appl. No.: 0040 Received: 1/2/73

OTHER AIR Contaminant Sources at this Site:

<u>Source</u>	<u>SIC</u>	<u>Permit No.</u>
---------------	------------	-------------------

Source(s) Permitted to Discharge Air Contaminants:

NAME OF AIR CONTAMINANT SOURCE

STANDARD INDUSTRY CODE AS LISTED

SAWMILL	2421
PLYWOOD PLANT	2432
HARDBOARD PLANT	2493

Permitted Activities

Until such time as this permit expires or is modified or revoked, MEDFORD CORPORATION is herewith permitted to operate its sawmill, planing mill, dry kilns, wigwam waste burner, plywood plant, veneer dryers, particleboard plant and steam-generating boiler facilities, including those processes related thereto located at Medford, Oregon, and to discharge therefrom treated air, gas and steam emissions containing air contaminants in conformance with the requirements, limitations and conditions of Sections A through D of this permit.

Divisions of Permit Specifications:

Page

Section A - Sawmill and Planing Mill	2
Section B - Plywood Plant	4
Section C - Hardboard Plant	6
Section D - General Requirements	8

MEDFORD CORPORATION

SECTION A - SAWMILL AND PLANNING MILL  
(including (3) Hog fuel Boilers  
and (11) Cyclones)

Performance Standards and Emission Limits

1. Particulate emissions from any single air contaminant source other than fuel or refuse burning equipment shall not exceed 0.2 gr/SCF and a total of 22 lb/hr.
2. Visible emissions from the modified wigwam waste burner must not equal or exceed 20% Opacity for an aggregated time of more than three (3) minutes in any one (1) hour.
3. Boiler stack emissions shall be limited as follows:
  - a. Visible emissions - Must not equal or exceed 40% opacity for an aggregated time of more than three (3) minutes in any one (1) hour.
  - b. Particulate emissions - Not more than 0.2 grain/standard cubic foot corrected to 12% CO<sub>2</sub>.
4. Hog fuel boilers #1 and #2 shall be operated and maintained to achieve minimum air contaminant discharges to the atmosphere until modified or replaced.
5. Maintenance and operation of hog fuel boiler #3 shall be such that the stack emissions, as evidenced by the test results dated September, 1972, are controlled to a maximum emission limit of 62 lb/hr with steaming rates not greater than 110,000 lb/hr.

Compliance Program and Schedule

6. The wigwam waste burner, shall only be utilized for the disposal of wood waste residues, and shall be modified in accordance with approved plans and specifications submitted to the Department of Environmental Quality on January 17, 1973.
7. A compliance demonstration of the modified wigwam waste burner shall be witnessed and approved by the Department of Environmental Quality before utilization for the disposal of wood waste residues on a routine basis and within sixty (60) days after modification of the wigwam waste burner is completed.
8. Hog fuel boiler #1 and #2 shall be modified or replaced in order to attain compliance with emission limits set forth in Item 3 (a and b) on or before July 1, 1974.

8. (continued)

- a. Plans and specifications for attaining compliance shall be submitted to the Department of Environmental Quality for review and approval on or before July 1, 1973.
- b. The boiler stack emissions shall be isokinetically sampled to demonstrate compliance with emission limits set forth in Item 3 (a and b). All test data and results shall be submitted to the Department of Environmental Quality to confirm compliance on or before September 30, 1974.

Monitoring and Reporting

9. Records of the daily hog fuel boiler operations shall be maintained by the company for the prior six (6) month period and shall be available for inspection by the Department of Environmental Quality. Procedures for monitoring and data reporting shall be:

- a. Estimated average hourly steam production for each boiler for twenty-four (24) hour day of operation.
- b. Estimated average hourly units of hog fuel fired during each twenty-four (24) hour day of operation.

10. Temperature charts for the operation of the modified wigwam waste burner shall be submitted to the Department of Environmental Quality by no later than the fifth (5th) day of each month for the preceding month.

11. The company shall promptly notify the Department of Environmental Quality by telephone or in person of any scheduled maintenance or malfunction of air pollution control equipment that may cause or tend to cause a significant increase of air contaminant emissions. Such notice shall include:

- a. The nature and quantity of increased air contaminant emissions that are likely to occur during the maintenance or repair period.
- b. The expected length of time that the air pollution control equipment will be out of service.
- c. The corrective action that shall be taken.
- d. The precautions that shall be taken to prevent a future reoccurrence of a similar condition.



MEDFORD CORPORATION

SECTION B - PLYWOOD PLANT  
(Including (4) veneer dryers and (11) Cyclones).

Performance Standards and Emission Limits

1. Particulate emissions from any single air contaminant source other than fuel or refuse burning equipment shall not exceed 0.2 gr/SCF.
2. Total particulate emission from all cyclones or air contaminant discharge sources shall not exceed a maximum allowable discharge rate of 50 lb/hr. This emission limitation is based on a maximum hourly production capacity for this facility of 72,000 sq. ft per hour (3/8" basis).
3. Veneer dryer emissions shall be controlled on or before December 31, 1974 in a manner approved by the Department of Environmental Quality such that visible air contaminants:
  - a. Including condensible hydrocarbons, or the characteristic "blue haze", are not emitted in such quantities that create any "blue haze" to be observed beyond the edge of the building, or at a distance greater than fifty (50) feet from any veneer dryer, whichever is greater.
  - b. Emitted therefrom do not at any time equal or exceed 20% opacity from any one stack or an average of 10% opacity from all stacks of that veneer dryer.

Compliance Program and Compliance Demonstration Schedule

4. Plans and specifications to control veneer dryer emissions within the prescribed limits shall be submitted to the Department of Environmental Quality for review and approval on or before May 1, 1973.
5. Issuance of purchase orders for air contaminant discharge control equipment required to complete any necessary construction/or modification work to control the emissions from all veneer dryers shall be by no later than August 31, 1973.
6. Any required construction and/or modification work, or changes in any operating procedures, to control the emissions from all veneer dryers, shall commence by no later than March 31, 1974.
7. All construction and/or modification work to control veneer dryer emissions shall be completed in accordance with Department of Environmental Quality approved plans and specifications and shall be completed at the earliest practical date, but, in any case, by no later than December 31, 1974.
8. The veneer dryers shall be demonstrated to the Department of Environmental Quality as being capable of continuous operation in compliance with OAR, Chapter 340, Section 25-315(1), at the earliest practical date, but, in any case, no later than December 31, 1974.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 4/1/76

Page 5 of 9

Appl. No: 0040

File No: 10-0048

MEDFORD CORPORATION

---

9. At least one (1) representative veneer dryer shall be tested in accordance with the Department of Environmental Quality established methods unless otherwise agreed to by the Department of Environmental Quality in writing. A written report of the test results shall be submitted to the Department of Environmental Quality on or before December 31, 1974.

Monitoring and Reporting

10. A record of daily steam consumption by the veneer dryers shall be maintained by the company for the prior six (6) month period and shall be available for inspection by the Department of Environmental Quality.

11. The company shall promptly notify the Department of Environmental Quality by telephone or in person of any scheduled maintenance or malfunction of air pollution control equipment that may cause or tend to cause a significant increase of air contaminant emissions. Such notice shall include:

- a. The nature and quantity of increased air contaminant emissions that are likely to occur during the maintenance or repair period.
- b. The expected length of time that the air pollution control equipment will be out of service.
- c. The corrective action that shall be taken.
- d. The precautions that shall be taken to prevent a future reoccurrence of a similar condition.

MEDFORD CORPORATION

SECTION C - HARDBOARD PLANT

(Including (3) Hiel dryers,  
(27) cyclones and (6) Bag Filters)

Performance Standards and Emission Limits

1. Particulate emissions from any single air contaminant source other than fuel or refuse burning equipment shall not exceed 0.1 gr/SCF.
2. Total particulate emissions from all cyclones and/or air contaminant discharges sources shall not exceed the maximum allowable discharge rate of 108 lb/hr. This limitation is based on a maximum hourly production capacity for this facility of 108,000 sq. ft/hr. (1/8" basis)
3. Emissions for the Hiel dryer stacks shall be controlled within the following limits:
  - a. Visible emissions - Must not equal or exceed 20% opacity for an aggregated time of more than three (3) minutes in any one (1) hour.
  - b. Particulate emissions - Not more than 0.1 gr/SCF.
4. Complete all construction of the hardboard plant on or before December 31, 1974 in accordance with Department of Environmental Quality approved plans and specifications that were submitted to the Department on January 2, 1973.
5. Demonstrate to the Department of Environmental Quality that the hardboard facility can operate in continuous compliance with OAR, Chapter 340, Section 25-325 by sampling all emission sources in accordance with Department of Environmental Quality approved methods. All test data and results must be submitted to the Department to confirm compliance within ninety (90) days after start-up.

Monitoring and Reporting

6. The company shall promptly notify the Department of Environmental Quality by telephone or in person of any scheduled maintenance or malfunction of air pollution control equipment that may cause or tend to cause a significant increase of air contaminant emissions. Such notice shall include:
  - a. The nature and quantity of increased air contaminant emissions that are likely to occur during the maintenance or repair period.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 4/1/76

Page 7 of 9

Appl. No: 0040

File No: 10-0048

MEDFORD CORPORATION

---

6. (continued)

- b. The expected length of time that the air pollution control equipment will be out of service.
- c. The corrective action that shall be taken.
- d. The precautions that shall be taken to prevent a future reoccurrence of a similar condition.

MEDFORD CORPORATIONSECTION D - GENERAL REQUIREMENTS(for all manufacturing activities  
listed in this permit)Monitoring and Reporting

1. Annual reports of the amounts of solid waste residues and mill waste clean-up generated by the total operation and the methods utilized for their disposal shall be submitted to the Department of Environmental Quality commencing July 1, 1973.

Prohibited Activities

2. No open burning shall be conducted on the plant site.
3. The unmodified wigwam waste burner shall not be utilized for any solid waste disposal purposes.

Special Conditions

4. "Fugitive emissions" and "Nuisance conditions" as defined by Oregon Administrative Rules, Chapter 340, Section 21-050, shall be corrected and the air contaminants shall be controlled or removed in a manner approved by the Department of Environmental Quality.
5. All solid waste and mill clean-up shall be disposed of in a manner and at locations approved by the Department of Environmental Quality.
6. Operation of the modified wigwam waste burner shall be limited to times during possible up-set or breakdown conditions or for the disposal of bark or wood waste residues that cannot be utilized in the hog fuel boilers. Total operation time will be limited to an aggregated period of thirty (30) days per year and any extension of this total operating period beyond thirty (30) days per year will require approval from the Department of Environmental Quality.
7. Department of Environmental Quality representatives shall be permitted access to the plant site at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.
8. No construction, installation, enlargement or major alteration or modification of any air contaminant source shall be made without prior approval from the Department of Environmental Quality. Plans and specifications and a request for approval for such construction, installation or modification shall be submitted to the Department of Environmental Quality as prescribed in OAR, Chapter 340, Sections 20-020, 20-025 and 20-030.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 4/1/76

Page 9 of 9

Appl. No: 0040

File No: 10-0048

MEDFORD CORPORATION

---

9. All air contaminant generating processes and all air contaminant control equipment located at this facility site shall be maintained and operated at full efficiency and effectiveness at all times, such that emissions of contaminants are kept at lowest practicable levels.

10. The Annual Compliance Determination Fee shall be submitted to the Department of Environmental Quality according to the following schedule:

<u>Amount Due</u>	<u>Date Due</u>
\$250.00	April 1, 1974
\$250.00	April 1, 1975

11. 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 air contaminants emitted to the atmosphere.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5301

TOM McCALL  
GOVERNOR

### MEMORANDUM

DIARUID 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 H, April 2, 1973, EQC Meeting

Public Hearing for the Adoption of Compliance Schedules Adopted by the Columbia Willamette Air Pollution Authority

### Background

At the January 26, 1973, meeting, the Environmental Quality Commission adopted compliance schedules and Permits issued by the Department and the Regional Authorities as required by the Environmental Protection Agency in the Federal Register, Title 40, parts 51.4 and 51.15.

The compliance schedules presented with this report represent schedules adopted by the Columbia Willamette Air Pollution Authority since January 26, 1973, and will be submitted to the Environmental Protection Agency as prescribed in the Federal Register, Title 40, part 51.15(a)(2), "Such Compliance Schedules shall be submitted to the Administration within 60 days following the date such schedule is adopted"...

Discussion

As required by the E. P. A., there are presented at this hearing compliance schedules for adoption as follows:

1. Linnton Plywood.
2. Oregon Ready-mix (Oregon City).
3. Rich Manufacturing Company.

The compliance schedules presented in this report have been reviewed at a public hearing by the Columbia Willamette Air Pollution Authority and were adopted by the CWAPA board on February 16, 1973.

These compliance schedules when adopted become a part of the State of Oregon Implementation Plan under the Federal Clean Air Act.

Recommendations

It is the recommendation of the Director that this hearing be opened for testimony by interested persons, and in the event that significant adverse testimony is not received, that upon the close of this hearing:

1. The compliance schedules for Linnton Plywood, Oregon, Ready Mix and Rich Manufacturing be approved, and



2. That the Commission adopt an order approving and adopting the compliance schedules as part of Oregon's Clean Air Act Implementation Plan, with the schedules referred hereto in the attachments made part of the order.

This order is made to meet the requirements of E. P. A. in its interpretation of the Federal Clean Air Act.

  
DIARMUID F. O'SCANNLAIN

Before the Environmental Quality Commission

Of the State of Oregon

In the Matter of Adoption of )  
Compliance Schedules developed )  
by the Columbia Willamette Air )  
Pollution Authority )

Order of Adoption

This matter having come before the Environmental Quality Commission on the 2nd day of April, 1973, to consider public testimony, views and data regarding adopting compliance schedules for Linnton Plywood, Oregon Ready-Mix (Oregon City) and Rich Manufacturing Company, developed and adopted by Columbia Willamette Air Pollution Authority, which shall become part of the State's Implementation Plan under the Clean Air Act, and as required in the Federal Register, Title 40, parts 51.4(a)(1), 51.6(a), and 51.6(d); public notice regarding this hearing having been furnished to the public in advance of the hearing to meet the requirements of the Environmental Protection Agency in its interpretation of the Clean Air Act; and the Commission having considered the proposed compliance schedules and requirements of the Environmental Protection Agency; and after considering and evaluating public testimony, views and data; and now fully advised, does hereby enter the following:

Order

1. The compliance schedules for Linnton Plywood, Oregon Ready Mix (Oregon City) and Rich Manufacturing Company attached to this order, are hereby adopted by the Environmental Quality Commission and are made a part of the State of Oregon's Implementation Plan.

Dated this 2nd day of April, 1973.

---

B. A. McPhillips, Chairman  
Environmental Quality Commission

IN THE MATTER OF

LINNTON PLYWOOD ASSOCIATION,

a Cooperative Corporation

)  
)  
)  
)  
)

No. 72-20

ORDER

INCLUDING FINDINGS AND CONCLUSIONS

### FINDINGS

#### I

The Linnton Plywood Association, a Cooperative Corporation, operates a plywood mill located at 10504 NW St. Helens Road, Portland, Oregon 97231.

#### II

The Columbia-Willamette Air Pollution Authority contends that the operation of the plywood mill described in paragraph I hereof results in emissions of air contaminants in excess of those permitted by the Rules of said Authority, contributing to air pollution within the affected area, none of which is admitted by the said Linnton Plywood Association.

#### III

The Linnton Plywood Association being desirous of settling and compromising the issues in contention by cooperation rather by formal public hearing and/or litigation, made and entered a Consent for an ORDER providing for the designing, acquisition and installation of air contaminant control systems to control emissions from its Plywood Plant located at 10504 NW St. Helens Road, Portland, Oregon 97231.

### CONCLUSION

The hereinabove described Consent is approved and based upon said consent and the findings hereinabove contained and pursuant to the provisions of ORS 449.895, Title 44, Rule 44-040, Columbia-Willamette Air Pollution Authority Rules, the Columbia-Willamette Air Pollution Authority Board of Directors makes the following:

ORDER

IT IS HEREBY ORDERED Linnton Plywood Association, operating a plywood mill located at 10504 NW St. Helens Road, Portland, Oregon 97231, design, engineer, acquire and install air contaminant control systems to control said plywood mill so that it will at all times operate in compliance with Columbia-Willamette Air Pollution Authority Rules, said designing, engineering, acquisition and installation to be accomplished in phases as follows:

PHASE I

Sander Dust Control

15 July 1973 or before, control of all sander dust generated in the production of plywood in compliance with the Rules of Columbia-Willamette Air Pollution Authority, said control to be accomplished in accordance with Notice of Construction No. 354, filed 27 October 1972 and the engineering plans and specifications filed therewith as finally approved.

PHASE II

Veneer Dryers

1. 1 July 1973, submit in writing to the Authority a report describing the methods of veneer dryer control investigated including a statement of advantages and disadvantages of each such method and a description of the method selected for control of the veneer dryer and a statement as to why the method selected was selected over the other methods investigated.

2. 1 January 1974, or before, file with Columbia-Willamette Air Pollution Authority a Notice of Construction along with complete engineering plans and specifications of the system or systems for the control of emissions from the veneer dryers.

3. 1 July 1974, Linnton Plywood Association shall submit a written report to the Authority summarizing the then current status of the completion of the control program.

4. 31 December 1974, or before, the control system or systems shall be completely installed and in operation and the entire plywood plant including the veneer dryers shall be operating in compliance with the Columbia-Willamette Air Pollution Authority Rules.

Entered at Portland, Oregon, the 16<sup>th</sup> day of February 1973.

*Lued Steffani*  
Vice-Chairman

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

In the matter of: ) No. 73-6  
)  
OREGON READY MIX CO., INC. ) ORDER  
)  
a Corporation ) INCLUDING FINDINGS AND CONCLUSION

FINDINGS

I

The Oregon Ready Mix Co., Inc., a corporation, operates a concrete batch plant located on McLoughlin Boulevard in Oregon City, Oregon.

II

The Columbia-Willamette Air Pollution Authority contends that the operation of the concrete batch plant described in paragraph I hereof results in emission of air contaminants in excess of those permitted by the rules of said authority contributing to air pollution within the affected area, none of which is admitted by the said Oregon Ready Mix Co., Inc.

III

The Oregon Ready Mix Co., Inc. being desirous of settling and compromising the issues in contention by cooperation rather than by formal public hearing and/or litigation, made and entered a Consent for an ORDER providing for the designing, acquisition and installation of air contaminant control systems to control emissions from its concrete batch plant located on McLoughlin Boulevard in Oregon City, Oregon.

CONCLUSION

The hereinabove described Consent is approved and based upon said Consent and the findings hereinabove contained and pursuant to the provisions of ORS 449.895 and Title 44, Rule 44-040, Columbia-Willamette Air Pollution Authority Rules, the Columbia-Willamette Air Pollution Authority Board of Directors makes the following:

ORDER

IT IS HEREBY ORDERED the OREGON READY MIX CO., INC. operating a concrete batch plant located between the Oregon City Shopping Center and Main Street on McLoughlin Boulevard in Oregon City, Oregon, design, engineer, acquire and install air contaminant control systems to control said concrete batch plant to that it will at all times operate in compliance with Columbia-Willamette Air Pollution Authority Rules. Said designing, engineering, acquisition and installation to be accomplished in accordance with the schedule as follows:

1. 15 April 1974 or before, submit to the authority, a written report containing a preliminary description of proposed air pollution control equipment and new plant site if any.

2. 15 September 1974 or before, file with Columbia-Willamette Air Pollution Authority a Notice of Construction along with complete engineering plans and specifications of the system or systems for the control of emissions from the concrete batch plant.

3. 15 November 1974 or before, obtain approval by Columbia-Willamette Air Pollution Authority of engineering plans and specifications with any required amendments thereto.

4. 15 March 1975 or before, the control systems shall be completely installed and in operation and the entire concrete batch plant operating in compliance with Columbia-Willamette Air Pollution Authority rules.

IT IS HEREBY FURTHERED ORDERED that in the event said Oregon Ready Mix Co., Inc. decides to continue operation of the concrete batch plant located on McLoughlin Boulevard between the Oregon City Shopping Center and Main Street in Oregon City, Oregon and operate or construct a new concrete batch plant at a different location, said existing concrete batch plant shall not be operated from and after 15 March 1975 in violation of any rules or standards of Columbia-Willamette Air Pollution Authority and any operation or construction of a different or new concrete batch plant shall be in compliance with Columbia-Willamette Air Pollution Authority rules.

Entered at Portland, Oregon the 16<sup>th</sup> day of February 1973.

Lued Stefani  
Vice-Chairman

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

In the Matter of:  
RICH MANUFACTURING COMPANY,  
a Corporation

)  
)  
)  
)  
)

No. 72-15  
ORDER INCLUDING  
FINDINGS AND CONCLUSIONS

FINDINGS

I

Rich Manufacturing Company, a corporation, operating a foundry at 866 North Columbia Boulevard, Portland, Oregon 97217, recognizes the air contaminant emissions from said foundry are in excess of those permitted by the Columbia-Willamette Air Pollution Authority Rules, and being desirous of complying with said rules, made and entered into a Consent (For entry of Order) providing for the acquisition and installation of certain air pollution control systems and to perform certain affirmative acts to control emissions of air contaminants from the said foundry located at 866 North Columbia Boulevard, Portland, Oregon 97217.

CONCLUSIONS

I

The past and current operation of the foundry by Rich Manufacturing Company located at 866 North Columbia Boulevard, Portland, Oregon 97217 was and is in violation of emission standards contained in the rules of the Columbia-Willamette Air Pollution Authority.

II

Pursuant to the terms of the consent heretofore executed by Rich Manufacturing Company, a corporation, and the provisions of ORS 449.895 and Title 44, Rule 44-040, Columbia-Willamette Air Pollution Authority Rules, the Board of Directors has authority to enter the herein contained order.



### III

The hereinabove described consent is approved and based upon said consent and the findings and conclusions hereinabove contained, the Columbia-Willamette Air Pollution Authority Board of Directors makes the following:

#### ORDER

IT IS HEREBY ORDERED that Rich Manufacturing Company, a corporation, operating a foundry at 866 North Columbia Boulevard, Portland, Oregon 97217, design, engineer, acquire and install an air contaminant control system to control said foundry so that it will at all times operate in compliance with Columbia-Willamette Air Pollution Authority Rules. Said designing, engineering and acquisition and installation of the system or systems to be accomplished as follows:

#### PHASE I

##### HOODING AND DUCTING FOR INDUCTION FURNACE AND GAS-FIRED PREHEATER

1. 1 February 1973 or before, file with Columbia-Willamette Air Pollution Authority a notice of construction along with complete engineering plans and specifications of all hooding and ducting for the control of emissions of contaminants from the induction furnace and gas fired pre-heater.
2. 1 April 1973 or before, obtain approval by Columbia-Willamette Air Pollution Authority of the engineering plans and specifications with any required amendments.
3. 1 October 1973 or before, the hooding and ducting system provided for herein shall be completely installed with testing completed and test results furnished to Columbia-Willamette Air Pollution Authority.

#### PHASE II

##### POLLUTION CONTROL EQUIPMENT

1. 1 October 1973 or before, file with Columbia-Willamette Air Pollution Authority a notice of construction along with complete engineering plans and specifications of the system or systems for the control of emissions collected by the hooding and ducting system or systems for the control of emissions collected by the hooding and ducting system provided for in Phase I hereof and for the emissions from the induction furnace tapping and the holding ladle.


2. 1 December 1973 or before, obtain approval by Columbia-Willamette Air Pollution Authority of the engineering plans and specifications with any required amendments.

3. 1 January 1974 or before, Rich Manufacturing Company shall have issued purchase orders for all components of the approved control system or systems with copies thereof furnished to Columbia-Willamette Air Pollution Authority.

4. 1 April 1974, Rich Manufacturing Company shall submit a written report to the Authority summarizing the then current status of the completion of the control program.

5. 1 Aug 1974 or before, the control system or systems shall be completely installed and in operation at the Rich Manufacturing Company foundry in compliance with the Columbia-Willamette Air Pollution Authority Rules.

Entered at Portland, Oregon, this 20th day of October 1972.

  
Chairman



## DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 5301

TOM McCALL  
GOVERNOR

### 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  
Portland

ARNOLD M. COGAN  
Portland

To: Environmental Quality Commission  
From: Director  
Subject: Agenda Item I, for April 2, 1973, Meeting  
Proposed Air Contaminant Discharge Permits Public Hearing

The Department issued public notice on February 28, 1973, that consideration would be given at this hearing to issuance of Air Contaminant Discharge Permits for eight (8) industrial air contamination sources as follows:

1. Umpqua Excavation and Paving, a stationary asphalt plant located at 1940 N. E. Newton Creek, Roseburg, Oregon.
2. J. C. Compton Company, a portable asphalt plant which could operate in any county under DEQ jurisdiction.
3. Road and Driveway Company, a stationary asphalt plant located in Newport, Oregon.
4. Amalgamated Sugar Company, a sugar refining mill located in Nyssa, Oregon.

5. Publishers Paper Company, a sulfite pulp and paper mill located in Newberg, Oregon.
6. Publishers Paper Company, a sulfite pulp and paper mill located in Oregon City, Oregon.
7. Menasha Corporation, a natural sulfite pulp and corrugated medium mill located in North Bend, Oregon.
8. Boise Cascade Corporation, a sulfite pulp and paper mill located in Salem, Oregon.

Written public comment was received relative to the proposed permits for Umpqua Excavation and Paving, J. C. Compton Company, Menasha Corporation and Boise Cascade Corporation. No public comment was received relative to the proposed permits for Amalgamated Sugar Company, Road and Driveway Company, Publishers Paper Company, Newberg and Publishers Paper Company, Oregon City.

Comments were received from all companies except Menasha Corporation.

Of particular note are the general comments submitted by the Asphalt Paving Association of Oregon, a copy of which is attached and made a part of the record of this hearing. In this letter

Mr. Mike Huddleston, Manager of the association, infers that zoning conditions are a part of the proposed asphalt plant permits. There are no zoning conditions in any of the proposed permits including the three (3) proposed asphalt plant permits. Also inferred in this letter are conditions relating to noise and dusts off the property. Again, no conditions are contained in the proposed permits relative to noise control. There is a requirement under Monitoring and Reporting to submit monthly reports on forms furnished by the Department delineating certain operating parameters which provides the Department with a "measuring stick" of the cleanliness of the operation. Mr. Huddleston has raised the question as to the Department's authority relative to dust suppression measures so as to control fugitive dust emissions. The Department is requiring that all areas under the control of the operator be maintained such that fugitive type dust emissions are controlled at all times. Dust suppression measures on public access roads are not included as a permit condition. Under paragraph #5 the Association has indicated that the Department is discriminating against some operators of asphalt plants in that it will require an outside consultant to perform emission source sampling to verify compliance with the rules while at the same time the Department's sampling team has conducted tests on other asphalt plants. The Department has sampled only those plants which were included in a special study to examine the performance characteristics of various types of plants and equipment during the

1971 season, and during the 1972 season only (2) plants were resampled to determine the continuing capability of maintaining compliance. And finally, in paragraph #6 the Asphalt Paving Association is concerned that the monitoring requirements are excessive. Since the location of these plants is most critical in relation to people, the Department has no other means of measuring the control of emissions other than through a monitoring and reporting program which is a part of these proposed permits. The permits do provide that by written approval from the Department, changes in monthly reporting can be made as may be indicated from actual operating experience.

All comments received by the Department were considered and changes are recommended in the proposed permits, where considered warranted. In summary the following actions are recommended:

1. Umpqua Excavation and Paving, Roseburg: Comments were received from one resident living on Newton Creek Road approximately four (4) blocks from the asphalt plant who expressed concern for the dust emissions as well as the heavy truck traffic. Suggested restrictions from this individual include limiting hours of operation of the plant, prohibiting the use of jake brakes, and prohibiting operation during periods when the wind is from the east. The Douglas County Planning Department informed the Department of Environmental Quality that the county is currently considering zon-

ing (R-2) for this area. If approved this operation would become a non-conforming use and could be operated indefinitely at this site provided no expansion or discontinuity of more than a one (1) year period occurs. No special permit conditions were requested by the county. The company submitted comments regarding zoning and truck traffic discussed in the background report. The company requested that the dust suppression methods be limited only to plant property and not to any public roads. Comments relating to monitoring and reporting were considered when preparing the permit and are reflected in the proposed permit.

Recommendation

The Director recommends that the proposed Air Contaminant Discharge Permit, No. 10-0006, for Umpqua Excavation and Paving be issued with the following additional condition under Prohibited Activities:

"Discharges of air contaminants from sources not covered by this permit are prohibited."

2. J. C. Compton Company, a portable asphalt plant: The Southeast Oregon Council of Governments requested information regarding the total annual quantity of air contaminants discharged and what this percentage would mean to their environment. This request was answered by letter dated February 20, 1973. No special permit conditions were requested by the county.

The company submitted comments regarding zoning and truck traffic discussed in the background report. The company requested that the dust suppression methods be limited only to plant property and not to any public roads. Comments relating to monitoring and reporting were considered when preparing the permit and are reflected in the proposed permit.

Recommendation

The Director recommends that the proposed Air Contaminant Discharge Permit, No. 37-0044, for J. C. Compton Company be issued with the following additional condition under Prohibited Activities:

"Discharges of air contaminants from sources not covered by this permit are prohibited."

3. Road and Driveway Company, Newport: No public comments have been received by the Department. The company submitted comments relative to monitoring and reporting. The company does not wish to be required to submit monthly reports and objects to the nozzle inspection more than once a year. No changes were made as a result of these requests because the staff feels that the requests are reasonable and necessary at the outset of the permit program.

Recommendation

The Director recommends that the proposed Air Contaminant Discharge Permit, No. 21-0001, for Road and Driveway Company be issued



with the following additional condition under Prohibited Activities:

"Discharges of air contaminants from sources not covered by this permit are prohibited."

4. Amalgamated Sugar Company, Nyssa: No public comments were received. The company submitted comments to clarify certain conditions relating to the operation of the lime kilns. As a result, the Department proposes to make the following changes:

- a. The company has advised that the exhaust gases from these two (2) lime kilns are scrubbed, compressed and utilized to carbonate the impure sugar juice and no discharge is made to the atmosphere. There is, however, a small exhaust fan on top of each kiln which operates to control the oxygen level in the kiln during the recharging cycle. These fans draw off the air admitted during this charging cycle and may, on occasion, emit a puff of visible emissions. As a consequence, the Department proposes to eliminate condition number 4.a.
- b. The company also requested that the compliance dates for installation of the second baghouse collector be extended to coincide with the start of the 1974 campaign (usually mid-October). The Department did not

propose to extend this date since it will assure completion of the installation prior to the operating season.

Recommendation

The Director recommends that the proposed Air Contaminant Discharge Permit, No. 23-0002, for Amalgamated Sugar Company be issued with the above noted change and the following additional condition under Prohibited Activities:

"Discharges of air contaminants from sources not covered by this permit are prohibited."

5. Publishers Paper Company, Newberg: No public comments were received as a result of the Public Notice. This permit was prepared incorporating the requirements of the Mid-Willamette Valley Air Pollution Authority relating to operation of the steam boilers. The Mid-Willamette Valley Air Pollution Authority has also reviewed the proposed permit and no comments have been received. The company has responded, and requested certain changes. The Company pointed out that the maximum capacity is 250 tons of pulp per day, instead of 230 tons per day. It is recommended that this change be incorporated in the final permit. Other suggested changes are presented below:

- a. The Company objected to the short duration, on grounds that they should be able to expect some reasonable life

for installed controls. This objection appears to be based on a misconception of purposes of the permit, and the Department would not recommend changing the expiration date.

- b. The Company commented that the time from submitting a report on steam-generating boiler particulate tests to submitting a compliance proposal is short, amounting to four (4) months. However, the final compliance date is only five (5) months after submission of a proposal (February 1, 1973). It should be pointed out that the permit does not prevent the Company's performing the tests and developing such compliance programs as prove necessary well ahead of the deadlines.
  
- c. The Company commented that restricting recovery furnace particulate emissions to three (3) pounds per ton of pulp is unjustifiably restrictive. They generally can operate within 3 lb/ton, but occasionally their tests indicate an emission between 3 and 4 lb/ton. Applying the general requirement, that all production and control equipment be operated such that emissions would be minimized, would prevent the Company's deliberately allowing emissions to rise to the legal maximum of 4 lb/ton. The staff concludes that the purposes originally intended could be served by

changing the pertinent conditions of the permit to read as follows:

"5. The recovery furnace particulate emissions shall not exceed three (3) pounds per adt as an annual average and 750 pounds per day as an annual average, and at no time shall exceed four (4) pounds per adt."

Recommendation

The Director recommends that the proposed Air Contaminant Discharge Permit, No. 36-6142, for Publishers Paper Company, Newberg Division be issued with the above noted change and the following additional condition under Prohibited Activities:

"Discharges of air contaminants from sources not covered by this permit are prohibited."

6. Publishers Paper Company, Oregon City: No public comments have been received as a result of the Public Notice. The permit was prepared incorporating the requirements of the Columbia Willamette Air Pollution Authority relating to the operation of the steam boilers. The Columbia Willamette Air Pollution Authority has reviewed this permit and no comments have been submitted. The Company has responded, and requested certain changes. Suggested changes are presented below:

- a. The Company objected to the short duration, on grounds that they should be able to expect some reasonable life for in-

stalled controls. This objection appears to be based on a misconception of the purpose of the permit, and the Department would not recommend changing the expiration date.

- b. The Company commented that the time from submitting a report on steam-generating boiler particulate tests to submitting a compliance proposal is short, amounting to four (4) months. However, the final compliance date is only five (5) months after submission of a proposal (February 1, 1973). It should be pointed out that the permit does not prevent the Company's performing the tests and developing such compliance programs as prove necessary well ahead of the deadlines.
  
- c. The Company commented that restricting recovery furnace particulate emissions to three (3) pounds per ton of pulp is unjustifiably restrictive. They generally can operate within 3 lb/ton, but occasionally their tests indicate an emission between 3 and 4 lb/ton. Applying the general requirement that all production and control equipment be operated such that emissions would be minimized would prevent the Company's deliberately allowing emissions to rise to the legal maximum of 4 lb/ton. The staff concludes that the purposes originally intended could be served by changing the pertinent conditions of the permits to read as follows:

"5. The recovery furnace particulate emissions shall not exceed three (3) pounds per adt as an annual average and 690 pounds per day as an annual average, and at no time shall exceed four (4) pounds per adt."

Recommendation

The Director recommends that the proposed Air Contaminant Discharge Permit, No. 03-1850, for Publishers Paper Company, Oregon City Division be issued with the above noted change and the following additional condition under Prohibited Activities:

"Discharges of air contaminants from sources not covered by this permit are prohibited."

7. Menasha Corporation, North Bend: One (1) comment was received from the University of Oregon, Institute of Marine Biology, expressing concern for odors from the mill. Submitted with the letter of comment was a survey report conducted by two (2) undergraduate students during the summer of 1972. No significant information is contained in this survey. The company did not submit any comments.

Recommendation

The Director recommends that the proposed Air Contaminant Discharge Permit, No. 06-0015, for Menasha Corporation be issued with the following additional condition under Prohibited Activities:

"Discharges of air contaminants from sources not covered by this permit are prohibited."

8. Boise Cascade Corporation, Salem: A petition with 75 signatures was received from the Marion County Children's Services Division which "would seriously object to the state granting permission to Boise Cascade to discharge air pollutants from its Salem plant." The petition went on to say that the undersigned "endorse your goals for clean water and air, and would see granting of this type permit a step in the wrong direction." It should be pointed out that the purpose of the permit program is to draw all of the emission and operating requirements together and issue a single permit which allows the state to conduct a more rigorous control program than might be practicable otherwise. The Department will advise the Marion County Children's Services Division of these goals. The proposed permit is a Multiple Source Permit and was prepared by the Mid-Willamette Valley Air Pollution Authority and the Department, and contains restrictions and limitations applicable to both the Department and Regional Authority rule. Comments from the company were received by letter dated March 15, 1973. The company has requested until July 1, 1974, to demonstrate compliance of the digester pump-out system. The company is committed to a program to complete this installation prior to December 31, 1973, and will know whether SO<sub>2</sub> emissions from the system have been eliminated at the time of start-up. It is felt that a run-in period will be necessary to verify stability of all newly installed equipment. Because of this the Department has recommended a change in conditions #1, #3 and #9 of the proposed permit. The company has

indicated that a production capacity of 330 adt per day will be achievable after completion of the control program. The company also stated that this control system was designed to meet a 500 ppm emission concentration at the 330 adt per day production capacity. The permit application and, to date, the emission data and production capacity, as reported to the Department, does not indicate that production has reached a level of 330 adt per day. Further, the Department has not approved any production increases for this mill since 1969 and would not recommend any plant production increases until compliance with all applicable regulations is demonstrated. Therefore, the changes recommended by

the Department appear below under conditions #1 and #2. The company has stated that since all SO<sub>2</sub> emission points will be collected and discharged through a single stack the proposed limit of eighteen (18) pounds of SO<sub>2</sub> per adt is more restrictive than the allowable under OAR, 340, Section 25-355(2), which would allow twenty (20) pounds of SO<sub>2</sub> per adt on a mill site basis. The Department is of the opinion that other small point sources may have some emissions of SO<sub>2</sub> including the steam power boilers when firing residual fuel oil during natural gas curtailments. The company has further suggested that the pump-out system be allowed an SO<sub>2</sub> emission of 0.2 pounds per minute per ton in accordance with OAR, 340, Section 25-355(2)(a).

The Department considers that the eighteen (18) pounds of SO<sub>2</sub> per adt is achievable and reasonable in light of the other



sources. Further, no emissions of  $\text{SO}_2$  should result in a closed digester pump-out system. The company submitted a compliance program for controlling particulate emissions from the recovery furnace from the current reported level of 5.5 pounds per adt to less than 4.0 pounds per adt if furnace optimization does not bring about this reduction. Since this is a small amount (1.5 pounds per adt), improvement within the current facility has a reasonable chance of success. The Department therefore proposes that conditions #5 and #10 be modified to reflect compliance with OAR, 340, Section 25-365, in that compliance of the recovery system particulate emissions must be achieved with the other sources by no later than July 1, 1974. If furnace optimization fails to provide the necessary reduction then a formal compliance schedule would be required, a new permit prepared accordingly and Public Hearings held on this matter prior to approval and submission to EPA. Condition #4 should be deleted because of duplication since the opening conditional statement and conditions #2 and #6 adequately require  $\text{SO}_2$  emissions from all sources to be controlled.

As a consequence to the above discussion it is recommended that the Boise Cascade Corporation permit be modified as follows:

1. After July 1, 1974, sulfur dioxide ( $\text{SO}_2$ ) emissions from the sulfite pulp mill (including the recovery system) shall not exceed twenty (20) pounds per unbleached, air-dried ton (adt) of pulp produced, five thousand (5,000) pounds of  $\text{SO}_2$  per day as a monthly average, and six thousand two hundred (6,200) pounds per day as a maximum daily emission.

2. No change.
  - a. No change.
  - b. No change.
  - c. Eighteen (18) pounds per ton and 4,500 pounds per day as a monthly average.
  - d. Eighteen (18) pounds per ton and 5,580 pounds per day.
  
3. Blow pit vent SO<sub>2</sub> emissions shall be kept to the lowest practicable levels at all times.
  
4. Eliminate.
  
5. As soon as practicable but not later than July 1, 1974, the recovery furnace particulate emissions shall not exceed the following:
  - a. Four (4) pounds per adt of pulp produced.
  - b. An opacity equal to or greater than twenty percent (20%) for an aggregated time or more than three (3) minutes in any one (1) hour.
  
6. Emissions from the steam-generating boilers, fired by natural gas and alternatively residual fuel oil, shall not exceed:
  - a. Two-tenths (0.2) grain per standard cubic foot, at twelve percent (12%) carbon dioxide (CO<sub>2</sub>) or at fifty percent (50%) excess air.

- b. An opacity equal to or greater than twenty percent (20%) for an aggregated time of more than three (3) minutes in any one (1) hour.
- c. One thousand (1,000) ppm of sulfur dioxide (SO<sub>2</sub>).

Compliance Demonstration Schedule

9. Installation of blow pit vent SO<sub>2</sub> emission controls, as approved by the Department of Environmental Quality, shall continue according to the following schedule:

- a. Purchase orders for remaining components and for all site preparation and erection work as issued, shall be confirmed in writing by no later than April 15, 1973.
- b. Construction shall be completed by no later than December 31, 1973.
- c. In the event that the company is unable to demonstrate compliance by December 31, 1973, the company shall submit reports to the Department on not less than a monthly basis relative to the problems encountered and the procedures and time schedules implemented to solve those problems.
- d. Compliance shall be demonstrated as soon as possible after the installation is completed, but in no case later than July 1, 1974.

- e. The permittee shall notify the Department of Environmental Quality in writing within fourteen (14) days of the completion of each of these conditions, and further, shall submit an interim progress report by not later than August 1, 1973, describing the construction status for installing the components of the blow-pit vent control system.

10. The mechanism and location of particulate formation in the recovery system, and the minimizing of emissions possible through operating-parameter optimization shall be determined and reported by no later than July 1, 1973.

#### Part B Torula Yeast Manufacturing

The process weight should be changed to 14,500 pounds per hour.

#### Recommendation

The Director recommends that the proposed Air Contaminant Discharge Permit, No. 24-4171, for Boise Cascade Corporation, Salem Paper Group, be issued with the above noted changes and the following additional condition under Prohibited Activities:

"Discharges of air contaminants from sources not covered by this permit are prohibited."

  
DIARMUID F. O'SCANNLAIN

General  
Comments  
Asphalt Plant Permits

THE SYMBOL OF ASPHALT PAVING EXCELLENCE

QUALITY

ECONOMY



INTEGRITY

RESEARCH

STAFF:

MIKE HUDDLESTON  
Manager

STATE OFFICERS:

FORREST MORSE  
President  
Lebanon, Oregon

FRED ANUNSEN  
Vice President  
Salem, Oregon

IVAN WICKERSHAM  
Secretary-Treasurer  
McMinnville, Oregon

ASSOCIATION OFFICE:

Phone (503) 363-3858

3421 25th Street, S.E. — P. O. Box 2228 — Salem, Oregon 97308

March 20, 1973

Harold Patterson, Administrator  
1234 S.W. Morrison St.  
Portland, Or. 97205

Dear Harold:

I am still not in agreement with you on some major points in your Air Contaminant Discharge Permits for asphalt plants. Our areas of disagreement are as follows.

1. Reference to zoning has no right to be a part of a permit.
  - a. If a plant is in the proper zone, no problem exists.
  - b. If a plant has been zoned as a non-conforming use, he is protected forever by ORS 215.360
  - c. Stay out of zoning and stick to # per hour that is the intent of the permit system.
2. The intent of the permit system does not include noise and dust suppression off the property, nor operating hours at the plant other than plant operating time. If we can't get these out of the permits we will have to appeal to the board at the hearing or go to court.

The risk of private lawsuits that could make the permit invalid because of conditions that exist that are not rightfully covered by the permit, but are in there at your insistence are great, and we don't want to run that unnecessary risk.

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED  
MAR 23 1973

AIR QUALITY CONTROL

3. Dust Suppression Measures. You merely have to change one word to make this a reasonable regulation. It should read (heavily traveled roads or areas on the plant site). You say at the plant site. This leaves us open to dust suppression on public roads if used for access. You can't make us do that as you have no jurisdiction as to what can be placed on a public road. Please read ORS 368.205 Section 2(a) and ORS 368.210.

4. If you have the power to order a person to suppress dust on public roads, then start with the Five Rivers Road in Lincoln County which has over 200 log trucks a day, which means 400 counting round trips. Then start on over 17,000 miles of unpaved roads (public) in Oregon.

5. Demonstrated Compliance.

- a. We are not against demonstrated compliance as long as you pay for the 1st test or any test that you order and it proves to be successful.
- b. The handling of your test program has not been in step with the regional authorities and within your department you are not treating all plants the same. You know in this day and age you shouldn't discriminate. Why do you test part of the plants free, some of the plants twice for free, and then order other to pay? Why did all the regions do all the tests free and you don't? All we want is uniformity.
  1. All plants tested free once.
  2. You pay for any plant that you order tested if he passes.

6. Monitoring. Your insistence that we send in monitoring reports on a monthly basis is absurd.

- a. In case of a complaint you must make a direct call to the plant or send your district man to properly evaluate the complaint.
- b. There is no method known to man that will allow you to use the parameter information and determine the operating condition of a plant.
- c. The information is useless and will cause you to build a bigger building to store them in, and cause the taxpayers (me) an undue expense to pay for paper storeage that gathers dust.

Sincerely yours,

ASPHALT PAVEMENT ASSOCIATION

*Mike Huddleston*

Mike Huddleston P.E.  
Manager

MH/ag

P.S. See you at the hearing or in court.

General  
Comments  
Asphalt Plant  
Permits

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED  
FEB 21 1973

AIR STAFF  
MIKE HUDDLESTON  
Manager

STATE OFFICERS:

FORREST MORSE  
President  
Lebanon, Oregon

FRED ANUNSEN  
Vice President  
Salem, Oregon

IVAN WICKERSHAM  
Secretary-Treasurer  
McMinnville, Oregon

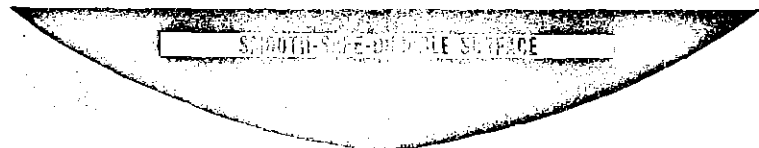
THE SYMBOL OF ASPHALT PAVING EXCELLENCE

QUALITY

INTEGRITY

ECONOMY

RESEARCH



3421 25th Street, S.E. — P. O. Box 2228 — Salem, Oregon 97308

ASSOCIATION OFFICE:  
Phone (503) 363-3858

February 20, 1973

Mr. Harold Patterson  
Air Quality Engineer  
Dept. of Environmental Quality  
1234 S.W. Morrison  
Portland, Oregon

Dear Harold:

On January 24, 1973, Mr. Burkitt, and Mr. Skirvin met at the Country Squire in Eugene with several asphalt plant owners to mutually discuss the air contaminant discharge permits for asphalt plants. We certainly appreciate the opportunity to be heard and sincerely believe that working together in this manner we can accomplish the goals you are striving for and at the same time not impose an economic hardship on our industry.

The review of a sample permit has led to some facts that we feel we must comment on at this time and perhaps you can omit certain provisions that we feel are not within the scope of an air contaminant discharge permit.

We believe that the only purpose of the permit is to control particulate emission from asphalt plants at the rate prescribed by law. Therefore we believe that any reference in the permit to zoning problems, traffic problems, noise problems, and etc are beyond the intend of the permit law. We believe these problems to be beyond the scope of your department and can best be handled by the local government having jurisdiction. We further believe that due to the lack of a monitoring device, that you need some information to correctly monitor an operation. However, we believe you need only that monitoring information necessary to judge air contaminant standards and not information regarding any other phase of the industry. I will spell out some specific items that are not necessary to monitor the asphalt plant emission.

1. First, we do not like the language, "highest possible level of air quality."
  - a. No one is perfect.
  - b. No one can monitor 100% efficiency at all times. (This is what "highest possible" means to us.)
  - c. We think the language should be highest practical level.

If you cannot change this language then we need a letter explaining your interpretation of what highest possible means to you.

2. We do not believe we should be forced to dust suppression measures on any road under public jurisdiction. It should not be part of your permit and the solution should be worked out with the local government.

3. We do not feel that demonstrated compliance by testing is necessary on all plants. Certified testing of equipment by types and sizes should furnish you all the information necessary to be able to certify compliance. The inventory of tests made in Oregon and other states covers almost every conceivable type of equipment and your staff should be able to draw conclusive evidence from these tests.

In case of a court case, a test run and paid for by the plant owner could not be used against him, you would still have to run your own.

4. Monitoring requirements vary considerably by regions. Your department approved regional monitoring provisions that are less than yours. You actually have to say they are not derogatory to the air quality. Why do you then insist on more strict monitoring on your own permits?

PARAMETER

1. Time period of any operation.  
We decline this and say operating period of the plant is all we will furnish.
2. Number of truck loads of asphalt produced.  
We decline this as not being a monitoring item necessary to determine the amount of air contaminant discharged.
3. Weekly inspection of water nozzles.  
We decline this as this inspection should be made at intervals of tons of asphalt produced and not time.
4. Same applies to removing, cleaning, and replacing nozzles.
5. We object to the mailing of monitoring information to you and believe only that we should keep it available at the plant for your inspection.
6. I am sure other items will come forth as additional permits are issued.

Sincerely yours,

ASPHALT PAVEMENT ASSOCIATION



Mike Huddleston P.E.  
Manager





DOUGLAS  
COUNTY

PLANNING DEPARTMENT

COURTHOUSE ANNEX #2, 205 S.E. JACKSON ST. • ROSEBURG, OREGON 97470 • 503/672-3311

*Unsupervised Excavation and Paving*  
State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
DEC 15 1972  
AIR QUALITY CONTROL

December 11, 1972

Department of Environmental Quality  
Air Contaminant Discharge Permit Program  
1234 S. W. Morrison Street  
Portland, Oregon 97205

Gentlemen:

Our office was recently contacted regarding permit #002, Dan M. Parker.

The Douglas County Planning Department would like to identify specific concerns for future reference but; is not implying that this Air Contaminant Discharge Permit be denied.

The Interim Douglas County, Year 1990 General Development Plan does not recognize the location of this plant as an industrial development area. The Newton Creek District has been recognized as a prime residential development area. Public sewer and water are available and recently the County did a major improvement on Newton Creek Road.

The haul to and from the plant site requires, one way, a 1.25 mile trip which dissects the neighborhood in question. The speed limit on Newton Creek Road is 25 MPH which also alludes to the residential nature of the area.

We are currently considering zoning for this area of County in which this property is located. The first in possibly a series of meetings will be held December 13, 1972. The zoning classification being considered for the plant site is (R-2) Multiple-family Residential District. The paving plant would become a non-conforming use under that classification.

A non-conforming use can operate indefinitely but if ceased for a period of more than one year, may not be re-established. The non-conforming use can not be enlarged.

The Planning Department felt it would be important to identify these concerns to your agency for, at a future date, they might become more meaningful.

If our office may be of any additional assistance, feel free to contact us.

Yours truly,

*Keith L. Cubic*

Keith L. Cubic  
Planner

1552 NE Newton CK Rd.  
Roseburg, Oregon  
Umpqua Excavation  
and Paving

D. E. Q. - No Contaminant Discharge Program  
Gentlemen: I would like to comment on  
the air containment discharge permit  
for the "Umpqua Excavation and  
Paving" plant - 1940 NE Newton CK  
Rd.

I live at 1552 NE Newton CK Rd.,  
9 tenths of a mile east of the Jct  
of Newton CK Rd. and NE Stephens.

My comments on the Umpqua Excavation  
plant are as follows:

1. The present air discharge does settle  
in the area where I live. During the  
summer the smoke which comes  
from this operation does flow westward  
and down Newton Creek.

2. I believe this permit should be  
restricted only to allow operations on  
days when the wind will blow  
the discharge to the east and away  
from the Newton Creek residential  
area.

3. Their trucks <sup>OK</sup> ~~not~~ be allowed to operate

on Saturdays and Sunday and only between the hours of 8:00 AM and 5:00 PM. We now have lots of children living in the Newton Creek area. These trucks - "Thompson Paving, County and other trucks can not possibly stop if a child were to get in front of one of them.

4. No trucks - be allowed to operate with "jake brakes" These type of brakes are just too noisy in a subdivision.

In regard to items 1 and 2; the U.S.F.S., B.L.M. and field burning operations are restricted by smoke management guidelines. Then why not the "Thompson Paving Company" be restricted only to operate when their smoke will not go into the Newton Creek residential area.

I hope you will take these items into consideration.

Thank you very much

Donald W. Kolbe 12/10/12

~~Final~~

December 12, 1972

Mr. Donald W. Kobelin  
1552 N.E. Newton Creek Road  
Roseburg, Oregon 97470

*Handwritten:*  
HNB - FAS  
*(with initials above)*

AQC/29 - Umpqua Excavation  
and Paving

Dear Mr. Kobelin:

This will acknowledge receipt of your comments on the air  
contaminant discharge permit application of Umpqua Excavation and  
Paving. Your comments have been forwarded to our Portland office  
and will be carefully considered during our evaluation of the permit  
application. Thank you for your interest in this matter.

Very truly yours,

James R. Sheetz  
District Engineer  
Roseburg District

JRS:je

cc: Thru Field Services Division  
to Air Quality Division



FAS

State of Oregon

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

To: Thru ~~FAB~~ to ~~HMB~~ *(Handwritten initials)*

From: JRS, Roseburg District Office *(Handwritten initials)*

Subject: AQC - Umpqua Excavation and Paving Co., Roseburg  
Comments on permit application No. 0002

Date: 12/4/72

1. Record of complaints, smoke and dust:

- (1) Donald W. Kobelin, 1552 N.E. Newton Creek Road  
May 22, 1970, July 10, 1969, April 21, 1969, May 17, 1968
- (2) Mrs. Eunice Harms, 1532 Newton Creek Road, May 13, 1969
- (3) Mr. Enyard (?), September 20, 1966

No recent complaints from private citizens.

2. Douglas County Planning Department shows this area for residential.

Will be sending in a letter expressing concern about dust, smoke, noise and traffic. May need to consider a permit condition that calls for future (long-term) relocation of the plant to reduce conflict with surrounding land use. Future noise evaluations may disclose need for more control measures.

3. Wastewater disposal has been observed to be satisfactory.

4. Do wet scrubbers result in emissions less than allowable? (40 lb/hr?)

Testing program?

JRS:je



State of Oregon

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

To: Thru PH, Field Services Division to JRS - RP Date: 11//30/72  
From: JRS, Roseburg District Office  
Subject: AQC - Umpqua Excavation and Paving  
Roseburg

Telecon Novmber 29, 1972 with Keith Cubic, Douglas County

Planning Department. They received the public notice of the permit application for the subject company and are concerned about the location of the asphalt plant. They have the area largely planned for residential development and have some minor objections to dust and traffic, and noise that does result from this type of activity. He said they intend to submit a letter regarding this to the Department.

JRS:je

# Umpqua Excavation and Paving

1940 N. E. NEWTON CREEK ROAD  
ROSEBURG, OREGON 97470

March 12, 1973

Department of Environmental Quality  
Terminal Sales Building  
123 1/2 S. W. Morrison St.  
Portland, Or. 97205

Attention: Mr. Diarmuid F. O'Scannlain

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
MAR 14 1973

OFFICE OF THE DIRECTOR

Gentlemen:

We have received your proposed air contaminant discharge permit provisions and request changes as follows:

Oregon Administrative Rules allow us 14 days after mailing to reply. Your letter only grants us 7 days. The date should be extended until March 2, 1973.

## Back round

Section 8. The complaints on the trucks should be handled by the local authority having jurisdiction and are not related to an air contaminant discharge permit and should not be mentioned in this report.

## Evaluation

Section 6. Zoning is a local authority matter and at the present time the area is not zoned and no violation is effect and no mention of what might be is called for.

# Umpqua Excavation and Paving

1940 N. E. NEWTON CREEK ROAD  
ROSEBURG, OREGON 97470

## Permit

### Performance Standards and Emission Limits.

2. No one can operate at 100 % efficiency all the time, not even the DQ. The word possible should be changed to practical.
3. Dust suppression measures should be limited to our property and our roads only. We are not responsible for dust on public roads.
4. Because of inclement weather, no contracts and the availability of testers the June 1, 1973 date should be changed to July 1, 1973.
5. For the same reasons as above, the June 15, 1973 date should read August 15, 1973. (15 days not enough to make a comprehensive study if necessary), and September 1, 1973 date should be October 1, 1973.

### 6. Monitoring

You have a district office in Roseburg, about 15 minutes drive from the plant. Records would just draw dust in your Portland office. We will make them available at our office on mail in any single day's report on request.

## Parameter

- (a) - Only the operation line of the plant is required for monitoring. We want (a) omitted.
- (d) - The number of trucks is not necessary to monitor. The tons of asphalt is all that is required. We want (d) omitted.
- (i) - Once the stockpile is crushed, the average minimum and maximum 200 mesh material will not vary, 1 $\frac{1}{2}$  all year- frequency should be annually.
- (e) - Cleaning and removing nozzle on a time basis is foolish. A tons basis is more reasonable, we suggest every 50,000 tons.



# Umpqua Excavation and Paving

1940 N. E. NEWTON CREEK ROAD  
ROSEBURG, OREGON 97470

(n) - Daily is foolish, we will record the days, an increase is observed.

## Special Conditions

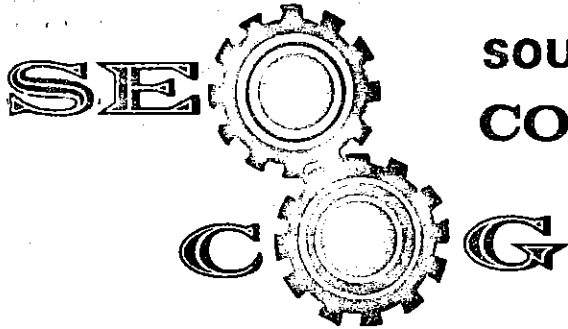
11. We may decide to use another type of nozzle as Teflon. We will keep spares on hand of the type we use but not necessarily stainless.
13. Department officials should call at the office first and be prepared to meet all of our plant safety requirements as well as OSHA, SAF, and Bureau of Mine Safety regulations.

Sincerely yours,



Dan Parker

J.C. Compton Co.



# SOUTHEAST OREGON COUNCIL OF GOVERNMENTS

Vale City Hall \* Vale, Oregon 97918  
Telephone AC503 473-3252

MARGIE KENT, Director  
STATE of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
FEB 12 1973  
**AIR QUALITY CONTROL**

February 9, 1973

Harold Burkitt  
Department of Environmental Quality  
1234 SW Morrison  
Portland, Oregon 97205

Dear Mr. Burkitt:

SECOND REQUEST

On December 7, 1972 I sent you a letter at the request of the Malheur County Advisory Committee to the Southeast Oregon Council of Governments. I did not receive an answer so I assume the letter must have been lost in the mail.

Requests have been received from the Ontario Asphalt Co., J.C. Compton Co., and L.W. Vail Co., Inc. in Ontario for Air Contaminant Discharge permits.

It would be appreciated if you could provide us with a copy of the annual quality of air contaminants discharged by these firms and what that percentage would mean to our environment. Ontario is a growth center, and there could be a problem in the future.

Your assistance in this matter will be appreciated.

Sincerely,

MARGIE A. KENT  
Director

MAK/rlw

**CHARTER MEMBERS**

- Malheur County
- Harney County
- City of Ontario
- City of Burns
- City of Hines
- City of Nyssa
- City of Vale

**ADVISORY COMMITTEE**

- \* Law Enforcement Planning Committee
- \* Ancillary Manpower Planning Board
- \* Rural Development Committee
- Malheur County Advisory Committee
- Harney County Advisory Committee

*Matthew J. Sen*

February 20, 1973

**Diarmuid F. O'Scannlain**

**Ms. Margie A. Kent, Director  
Southeast Oregon Council of Governments  
Vale City Hall  
Vale, Oregon 97918**

**Re: Air Contaminant Discharge Permits for  
Ontario Asphalt Co., J. C. Compton Co.  
and L. W. Vail Co., Inc.**

**Dear Ms. Kent:**

**This letter is in response to your February 9, 1973 inquiry concerning air contaminant discharge permits for Ontario Asphalt Co., J. C. Compton Co. and L. W. Vail Co., Inc.**

**Since this permit program is quite new, I am forwarding the applicable Department of Environmental Quality regulations for your information. You will note in the permit procedure regulation that the Department is required to provide public notice when an application is received. Apparently this is what has attracted your attention to the program.**

**The permit program is not a permissive activity, but rather requires an applicant to file an application to allow operation under specified conditions and rules. Any permit proposed or issued contains restrictive emission limits, compliance schedules, and conditions of operation. The actual sections of a permit may include: Name of air contaminant source; permitted activities; performance standards and emission limits; compliance program and schedule (where applicable); monitoring and reporting; prohibited activities; special conditions.**

Ms. Margie A. Kent  
February 20, 1973  
Page 2

The purpose of the program is to draw all these requirements together and issue one permit which allows the state to conduct a more rigorous control program than might be practicable otherwise.

The Department will provide public notice for all air contaminant discharge permits before issuance. When a proposed permit has been developed to the public notice stage, your Council of Governments may wish to review the proposed permit itself. These permits will have a qualitative emission limitation in them as indicated previously.

It is generally considered that an asphalt plant which meets the permit conditions should not cause an adverse effect on its neighbors or a community at large, and indeed the permit conditions are intended to be drawn to prevent this from happening.

Should you have any additional questions on this or any other matter concerning the Department of Environmental Quality, please feel free to contact this office, or our District Engineer, Mr. James Van Domsica, in Pendleton.

Very truly yours,

Original Signed By  
Diarmuid F. O'Scannlain

FEB 21 1973

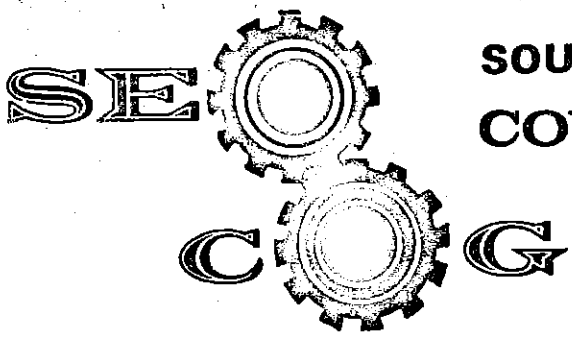
DIARMUID F. O'SCANNLAIN  
Director



DFO'S:FAS:h

cc: District Engineer

J. C. Compton Co.



# SOUTHEAST OREGON COUNCIL OF GOVERNMENTS

Vale City Hall \* Vale, Oregon 97918

Telephone AC503 473-3252

MARGIE KENT, Director

December 7, 1972

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
DEC 13 1972  
AIR QUALITY CONTROL

Harold Burkitt  
Department of Environmental Quality  
1234 SW Morrison  
Portland, Oregon 97205

Dear Mr. Burkitt:

The Advisory Committee to the Southeast Oregon Council of Governments is presently evaluating the request for a permit to discharge air contaminants by the Ontario Asphalt Co.

It would be appreciated if you could provide us with a copy of the annual quantity of air contaminants discharged by this firm and what that percentage would mean to our environment.

Ontario is a growth center, and even though the present site location of Ontario Asphalt is 6 miles northwest of the City, there could be a problem in the future.

This information is needed before December 12, 1972.

Sincerely,

MARGIE A. KENT  
Director

MAK/rlw

#### CHARTER MEMBERS

Malheur County    City of Ontario    City of Nyssa \*  
Harney County    City of Burns    City of Vale \*                         City of Hines

#### ADVISORY COMMITTEE

Law Enforcement Planning Committee    Malheur County Advisory Committee  
Ancillary Manpower Planning Board    Harney County Advisory Committee  
Rural Development Committee



PHONE: 472-4155

State of OREGON AREA CODE 503

DEPARTMENT OF ENVIRONMENTAL QUALITY

J. C. COMPTON COMPANY RECEIVED  
FEB 22 1973

Highway Construction



General Contractors OFFICE OF THE DIRECTOR

P. O. BOX 86

McMINNVILLE, OREGON 97128

February 21, 1973

Department of Environmental Quality  
Terminal Sales Building  
1234 SW Morrison Street  
Portland, OR 97205

RE: Proposed Air Contaminant Discharge  
Permit for a Portable Hot-Mix  
Asphaltic Concrete Paving Plant  
File No. 37-0044

Attention Mr. Diarmuid F. O'Scannlain

Gentlemen:

We have reviewed your proposed air contaminant discharge permit provisions and feel that the following comments are necessary.

In your letter you have invited us to submit any comments prior to February 23, 1973. Oregon Administrative Rules Chapter 340, Section 14-025, Paragraph (2) states in part: "All comments must be submitted in writing within 14 days after mailing of the proposed provisions if such comments are to receive consideration prior to final action on the application." As the proposed provisions were postmarked February 16, 1973, we interpret this to mean our comments must be received by March 2, 1973.

Proposal 5 should be rewarded so that our responsibility includes only our private roads and areas. Watering, oiling, or paving of public roads is actually the responsibility of that respective public agency, not a private party.

We would like to have both Proposals 6 and 7 under Compliance Demonstration Schedule extended thirty (30) days. May 1, may prove to be too early in the year for submittal in the event of late inclement weather and scheduling of subcontractors. It also looks as if there will be quite a demand for qualified persons. This is putting a pretty tight time limit on getting the information submitted especially if there is a limited supply of qualified emission test program persons. For both these reasons, we would also like to see the July 1, 1973 date extended to August 1, 1973.

February 21, 1973

Due to the mobility of our operation, we feel that the monthly monitoring report will be at many times irrelevant and, therefore, should be deleted. Our plant moves on an average of every six weeks during the construction season. Each location has different characteristics such as amount of fines and moisture content and these would not necessarily carry over to the next location. Rather, we would suggest that this information be available upon request as it is kept on file at our main office and at the plant site.

The parameter 8.a. in many cases has no bearing on the monitoring of the hot-mix asphalt plant and control facilities and should be deleted. As an example, we may have a rock crusher located at the same site. Operations involving the crusher do not involve the operation and maintenance of the hot-mix asphalt plant and control facilities.

The number of truck loads of asphalt produced has no bearing on the operation and maintenance of the hot-mix asphalt plant and control facilities and is only a duplication of parameter C (amount of asphalt produced). It should, therefore, be deleted.

We would like to see the frequencies of parameters 8.g. and 8.h. revised so that when an increase in particulate emissions is observed, the pressure drop across the baghouse be checked. Our plant operator is continually in a position to observe the stack and dial indicators in the switch house for any malfunctions. A plant oiler is at the plant site taking care of preventative maintenance. This specific daily testing is an additional, unnecessary expense.

Bags in the baghouse should be inspected on a tonnage basis rather than time basis. During a week of inclement weather or plant or street equipment breakdown, the amount the bags are used will be much less than a week of continual production. We propose that the frequency be changed to every 100,000 tons of asphalt produced or when visual inspection deems necessary.

The time limit in Proposal 11 is impractical. If a project is completed after 5 p.m. on a Friday, how do you notify the D. E. Q. within 48 hours? If anything, this should be on a working day basis rather than hourly. The 48 hour requirement makes a phone call necessary in many parts of the state due to postal services. We are required to file a notice of construction for each location we go into. This notice of construction is in itself a notification. Therefore, this proposal should be deleted.

The specific date that must be indicated in Proposal 14 is often subject to change. This again is subject to inclement weather, breakdown, and other job conditions. It would seem more practical to indicate a period during which this test may be taken. (we propose a week) and then notify the D. E. Q. 24 hours to testing.

Department of Environmental Quality


Page 3

February 21, 1973

We would like one additional proposal to be added; that the D. E. Q. personnel comply with the plant safety regulations.

Sincerely,

J. C. COMPTON COMPANY

By   
William C. Mayhew

WCM:sb

cc: District Office  
Asphalt Pavement Association of Oregon

PHOTOCOPYED FROM ORIGINALS TO DIRECTOR'S

RECEIVED

FEB 23 1973

DEPT OF ENVIRONMENTAL QUALITY



HWS

# Road & Driveway Co.

BOX 128 / OLD TOLEDO HIGHWAY / PHONE 265-5831  
NEWPORT, OREGON 97365

February 21, 1973

Department of Environmental Quality  
Air Quality Control Division  
Terminal Sales Bldg.  
1234 S. W. Morrison Street  
Portland, Oregon

Re: Proposed Air Contaminant Discharge  
Permit File No. 21-0001

Gentlemen:

In regard to the Permit provisions we do not object to keeping records of the information requested, but do object to reporting them monthly. We are willing to have said records available at plant site office at anytime for your inspection.

Concerning 'Monitoring and Reporting' ---  
Item (a) This information is not necessary to monitor the air contamination discharge.

Item (d) Same as above.

Cleaning and replacing water nozzles should be done on inspection of same and from observation of the stack. After a full year in operation our nozzles are clean and in good repair. With our plant tonnage and the clean water we use annual cleaning is enough.

Yours truly,

*Lewis S. Pickens*

Lewis S. Pickens  
President

DEPARTMENT OF ENVIRONMENTAL QUALITY  
RECEIVED  
FEB 23 1973

LSP/lvf



EHS ✓

To: HMP  
HMP  
0047

# THE AMALGAMATED SUGAR COMPANY

FIRST SECURITY BANK BUILDING • BOX 1520 OGDEN, UTAH 84402

March 15, 1973

Mr. E. J. Weathersbee, Deputy Director  
Department of Environmental Quality  
Terminal Sales Building  
1234 S.W. Morrison St.  
Portland, Oregon 97205

Re: Proposed Air Contaminant Discharge  
Permit, Nyssa, Malheur County,  
SIC 2063, File No. 23-0002

Dear Sir:

We have reviewed the proposed Air Contaminant Discharge Permit for The Amalgamated Sugar Company and wish to submit the following comments:

In the Review Report under Background paragraph 2b. The lime kilns have a total capacity of 35,000 lb/hr. of limerock rather than 60,000 lb/hr. as shown.

Paragraph 5 of the Evaluation is not clear. The exhaust gases from the two lime kilns are scrubbed, compressed and utilized to carbonate the impure sugar juice. There are no filter units in these systems. Any particulate emissions from the lime kilns would be contained in the scrubbers or in the carbonation process. If desired, tests could be performed on the carbonation vessel stack to determine compliance.

Paragraph 4 under Performance Standards of the Permit Provisions again refers to lime kiln emissions. Our comments above would apply to this too.

Paragraph 9 under Performance Standards requires the installation of a baghouse collector on the existing Foster-Riley boiler before July 1, 1974. Since our operation is seasonal, the boiler will not be in use from March, 1974 until October, 1974. To allow adequate time for installation, we believe that a deadline for the baghouse installation of October 1, 1974 would be appropriate.

Very truly yours,

J. R. Corsberg  
Vice President - Operations



# THE AMALGAMATED SUGAR COMPANY

FIRST SECURITY BANK BUILDING • BOX 1520 OGDEN, UTAH 84402

Department of Environmental Quality  
 State of Oregon  
 1234 South West Morrison Street  
 Portland, Oregon 97205

Attention: MR. H. H. BURKITT  
Chief of Engineering Services

March 20, 1973 State of Oregon  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
**RECEIVED**  
 MAR 23 1973  
**AIR QUALITY CONTROL**

Dear Mr. Burkitt:

In compliance with your phone request, we are pleased to submit the following data; one copy of drawing no. LL-2012 and one copy of drawing no. 8353.

The drawing no. LL-2012 entitled CO<sub>2</sub> Gas Flow and Control System shows the application and location of the kiln exhausters fans. These fans are normally throttled to the off position although they are run continuously. The function of the fans is to pull the air off the top of the kiln that is admitted when the charge door is open. The kiln is charged approximately seventeen (17) times an hour and the control valve opens the line to the fan approximately five (5) seconds during the addition of each charge. This is to draw up the air as I mentioned, that is normally admitted during this time.

The capacity of the fans is shown on the drawing. The capacity of the CO<sub>2</sub> compressors is shown on Drawing 8353. There are four compressors; 33, 33A, 33B and 33C. The total aggregate capacity of the CO<sub>2</sub> compressors is 16,300 CFM. The gas is drawn over the top of the kiln and passes through a double wet type scrubbing system and then to the CO<sub>2</sub> compressors. It is then discharged in to the carbonator where it passes up through approximately twenty (20) feet of juice.

The major portion of the CO<sub>2</sub> is used up in a chemical reaction with a saccharate milk that is added to the carbonator. The discharge products from the stack run approximately eight (8) to ten (10) percent CO<sub>2</sub> with a small amount of oxygen and the balance nitrogen. This is a product that has been in effect, wet scrubbed three times.

Mr. H. H. Burkitt  
Dept of Environmental Quality  
Portland, Oregon  
March 20, 1973  
Sylvester M. Heiner

You also asked the question as to how much gas comes off the kiln. The rock that we burn is approximately ninety eight (98%) percent calcium carbonate. We burn approximately three hundred seventy two (372) tons in twenty four (24) hours. This amounts to approximately six hundred twenty (620) tons of gas that is removed from the kilns and put through the carbonators per day.

I trust this answers your questions in regard to the operation of our lime kilns.

Sincerely,

THE AMALGAMATED SUGAR COMPANY



Sylvester M. Heiner  
Chief Engineer

SMH/mf

Enclosures (2 drawings)



SIDNEY W. FORSTROM  
GENERAL MANAGER  
PULP AND PAPER

March 9, 1973

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

Attention: Air Quality Control Division

Gentlemen:

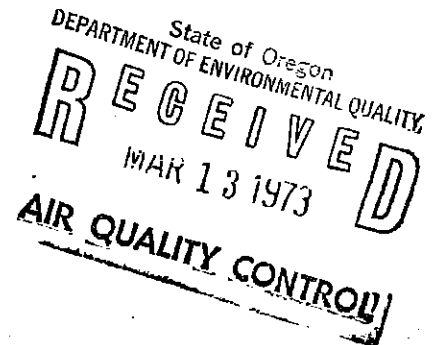
Relative to the proposed Air Contaminant Discharge Permits submitted to us for our Oregon City and Newberg pulp and paper divisions, we submit the following comments for your consideration.

1. BOTH DIVISIONS

a. The expiration date of 31 December 1974 for each plant seems to be unrealistic in light of the extensive programs for bringing SO<sub>2</sub> emissions into compliance. These projects are expensive, and once compliance is achieved, they should have a reasonable life expectancy. Five years would certainly be a more appropriate permit period for the sulphite pulping operations.

The difficulties of projecting programs or standards relating to boiler emissions until such time as testing and evaluation have been completed are apparent. We would suggest that a separate section of the permits, to be reconsidered not later than 31 December 1974, deal with the boiler SO<sub>2</sub> situation for the periods during which natural gas curtailment forces us to burn oil.

Boiler testing and evaluation dates appear to be realistic. However, the four month period (from May 1, 1974 to September 1, 1974) for submitting a compliance schedule for what could prove to be a complex control problem, appears to be unduly restrictive.



b. The proposals for a three pound per ton particulate maximum from the recovery systems should be modified to the four pound standard in your existing rules. We presently operate well within the three pound limit. However, any significant operating variable which might move us into the 3-4 lb./ton range would also be considered a violation. Your requirement for efficient operation of the facilities would act as a mechanism to prevent poor control to result in higher emissions. Further, there is at present no assurance that there will not be changes in the testing procedures for particulate now being applied.

c. We have no objection to D. E. Q. representatives having access to our plants at reasonable times. However, we would request that this condition carry a requirement for notification to our personnel, so that we might be in a position to accompany them and minimize personnel hazards.

## 2. NEWBERG DIVISION

The permit indicates the sulphite pulping capacity of this division to be 220 tons per day, and establishes total maximums in recovery emissions, blow stack emissions, miscellaneous sources, and particulates on that basis. The mill has a rated capacity of 250 tons per day, and on an occasional good production day exceeds the 220 tons per day level. We would request the 250 tons per day capacity be entered into the permit, and the total allowable figures based on a maximum 20#/ton, be adjusted accordingly.

Sincerely,

*S. N. Farstrom*  
n

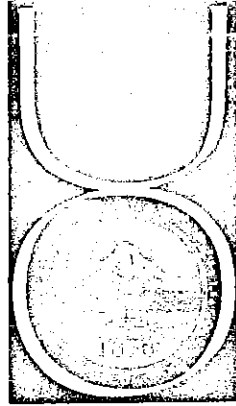
SWF:nh

cc: P. Schnell  
R. O. Smith  
J. Freeberg

Menasha Corporation

OREGON INSTITUTE OF  
MARINE BIOLOGY

CHARLESTON, OREGON 97420  
telephone (code 503) 888-4297



State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
UNIVERSITY OF OREGON  
**RECEIVED**  
NOV 29 1972  
**AIR QUALITY CONTROL**

November 28, 1972

Department of Environmental Quality  
Air Contaminant Discharge Permit Program  
1234 S. W. Morrison Street  
Portland, Oregon 97205

Dear Sir:

This letter is in response to your recent notification concerning Menasha Corporation's application for an air contaminant discharge permit.

There appears to be an odor problem produced by this mill. During the summer of 1972, two students surveyed the surrounding area by asking the residents several questions regarding air quality. Two hundred and seventy-five (275) people were interviewed and of these, one hundred and twenty-three (123) thought there was an objectionable odor problem. The largest number of respondents believe Menasha to be the source of these odors.

I am including a copy of the student's report. These students are obviously not qualified census takers or sociologists. I believe, however, that there may be a problem here and the Department of Environmental Quality should look into this more thoroughly.

Would you please send to this office a copy of the annual quantity of air contaminants discharged by the applicant as recorded by D.E.Q.

Sincerely,

*Paul P. Rudy*  
Paul P. Rudy S.L.  
Director

PPR:s1

Air Pollution Survey

by

Bob Elliot and Linda Collins

Environmental Projects

Dr. W. H. H. H.

Summer 1972



## I. Introduction

This is the year for 'air pollution'. The Department of Environmental Quality is putting greater pressures on industries throughout the State of Oregon to clean up air pollution. This led to the development of a survey in the local area to determine whether this issue was a problem. Two areas, Empire and North Bend, were selected due to their proximity to industry and its suspected effect on them. By random selection, eleven blocks (see map) in the Empire area were sampled and a representative six blocks in the North Bend location.

Two interviewers conducted the door to door survey. Each interviewer was responsible for his separate block. The doorbell was rung, and whoever answered the door was asked to respond to the questionnaire. If there were other occupants immediately present, they were also asked to respond. In this way, the survey hoped to include an equal number of men and women. Furthermore, weekends were selected as well as weekdays in order to again avoid sampling error in choosing respondents.

The following is a sample questionnaire for the purpose of clarifying responses:

Question #1

Does Your Area Occasionally Have an Odor Problem? Yes, No

A yes response included the mere recognition of odor regardless of frequency of occurrence. Therefore, yes responses could mean many variations in frequency and these are listed in the section marked 'Comments'. A no response would signify no odor recognition at any time and the interview was then terminated.

Question #2

Do You Object to these Odors? Yes No

A yes response meant objection to the odors. A no response meant there was no objection whatsoever. In cases where the respondent answered "I am used to it", he was still asked to respond with either a yes or a no.

Question #3

Can you Identify the Source of These Odors? No. Menasha. Mud Flats. other.

No indicated that the respondent could not identify the source. In the other cases, the respondent answered to the best of his ability according to personal knowledge as to the source.

Question #4

Do These Odors Aggravate Your Health in Anyway? Yes, No

Yes indicated a specific illness either caused or aggravated by the odors. No meant that there was no health problem.

II. Data

A. Empire

The Empire Area was comprised of the following blocks:

- #1. Grant to Wall to Harris to Wasson
- 2. Michigan to Schonmema to Noble to Morriston
- 3. Crocker to Lakeshore to Maxwell
- 4. Harris to Grant to Cannon
- 5. Madison to Michigan to Morriston to Noble
- 6. Michigan to Schonmema to Noble to Morriston
- 7. Grant to Wall to Taylor to Wasson
- 8. Grant to Cannon to Harris to Wasson
- 9. Michigan to Wall to Noble to Maple
- 10. Michigan to Wall to Noble to Wasson
- 11. Michigan to Wasson to Noble to Cannon

The following page is a table of the results of sampling on each block.

B. North Bend

The North Bend Area was comprised of the following blocks:

Block #	<i>0/0</i> EMPIRE		AREA <i>0/0/0/0</i>		#3 No	Menasha	Mud	Other	#4	
	Question #1 Yes No		Yes No						Yes	no
1	9	5	3	2	3	6	0	0	0	6
2	8	7	4	3	1	2	2	1 <i>dead</i>	0	4
3	9	6	3	5	0	6	2	0	1	6
4	3	1	1	0	0	3	0	0	0	2
5	23	3	16	7	1	15 $\frac{1}{2}$	4 $\frac{1}{2}$	1 <i>Charley area</i>	3	16
6	2	4	0	2	0	2 $\frac{1}{2}$	$\frac{1}{2}$	0	0	2
7	4	1	3	1	1	2	1	0	0	4
8	5	0	4	1	0	5	0	0	0	5
9	6	4	5	4	2	4	2	0	1	8
10	5	3	4	5	0	2	5	1 <i>1-5000 ft. 2-1000 ft.</i>	0	10
11	12	4	10	6	3	3	7	3 <i>1-5000 ft. 2-Capt. 1000 ft.</i>		
Total	86	38	53	36	11	51	24	6	5	77

Plus, there were also 3 refusals.

- #1. Connecticut to Hayses to Colorado to Grant
2. Johnson to Connecticut to Lincoln to Virginia
3. Johnson to Connecticut to Lincoln to Colorado
4. Simpson Heights
5. Johnson to Connecticut to Grant to Virginia
6. Connecticut to Hayses to Colorado to Gardiner
7. Johnson to Connecticut to Grant to Colorado

The following page is a table of the results of sampling.

### III. Comments

The survey did not differentiate between Menasha's lagoon odors and pulp mill odors. Some residents in the Empire area clearly stated a difference. However, the majority of people in Empire and North Bend specifically stated the source as the pulp mill and not the lagoon.

The Empire Area appears to be a highly transient one, some respondents mentioning that they are new to the area. Thus, they may not be familiar with local industries and mud flat smells. Often they compare local air pollution to that in the major cities such as Los Angeles. Therefore, on a comparison basis, the Empire area in which they live seems to be non-polluted.

In the Empire Area, the air problem seems to occur rarely, one respondent claiming ten times a year. The odors seem to be carried on the north winds, although cloudy, calm weather conditions make the

EMPIRE AND NORTH BEND COMBINED

Block #	Question #1		#2		#3		Menasha	Mud	Other	#4	
	Yes	No	Yes	No	No	Yes				No	
North Bend	114	37	70	36	6	93½	8½	15	3	104	
Empire	86	38	53	36	11	51	24	6	5	77	
Total	200	75	123	72	17	144½	32½	21	8	181	

Combining areas, there were 15 refusals.

Total number interviewed:

- 200 completed interview
- 75 terminated after first question
- 15 refusals

NORTH BEND

Blocks #	Question #1		#2		#3	Menasha	Mud	Other	#4	
	Yes	no	Yes	No	No				Yes	no
1	11	12	10	1	1	8½	1	½ <i>sewer plant</i>	1	8
2	13	4	10	0	1	11	0	2 <i>burning of garbage chickens</i>	0	11
3	15	1	12	0	1	11½	1	2½ <i>garbage sewage</i>	0	13
4	7	10	11	10	2	19½	1½	6 <i>5-gal. cement 1-wet shaver</i>	0	22
5	11	0	8	3	0	9	1	1 <i>disposal</i>	0	11
6	22	4	10	15	0	19	4	2 <i>Bath</i>	2	23
7	15	6	9	7	1	15	0	0	0	16
Total	114	37	70	36	6	93½	8½	15	3	104

Plus, there were 12 refusals

Calculation of Percentages

Question #1- % of residents responding out of the total asked.

Empire- 69%  
North Bend- 76%

Question 2- % of residents objecting to these odors

Empire-60%  
North Bend-66%

Question 3- % of residents who could not identify the source

Empire-12%  
North Bend-5%

% of those residents who identified Menasha

Empire- 55%  
North Bend- 77%

% of those who identified the mud flats

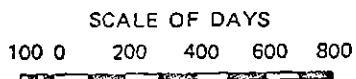
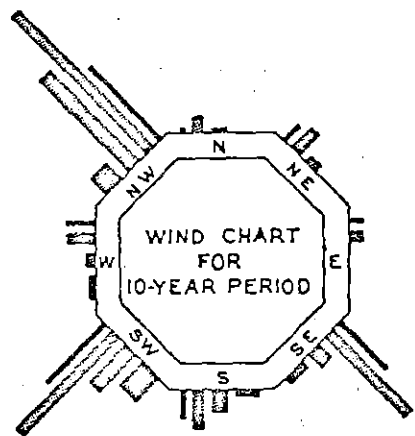
Empire- 26%  
North Bend- 6%

% of those residents who stated other sources

Empire- 7%  
North Bend- 12%

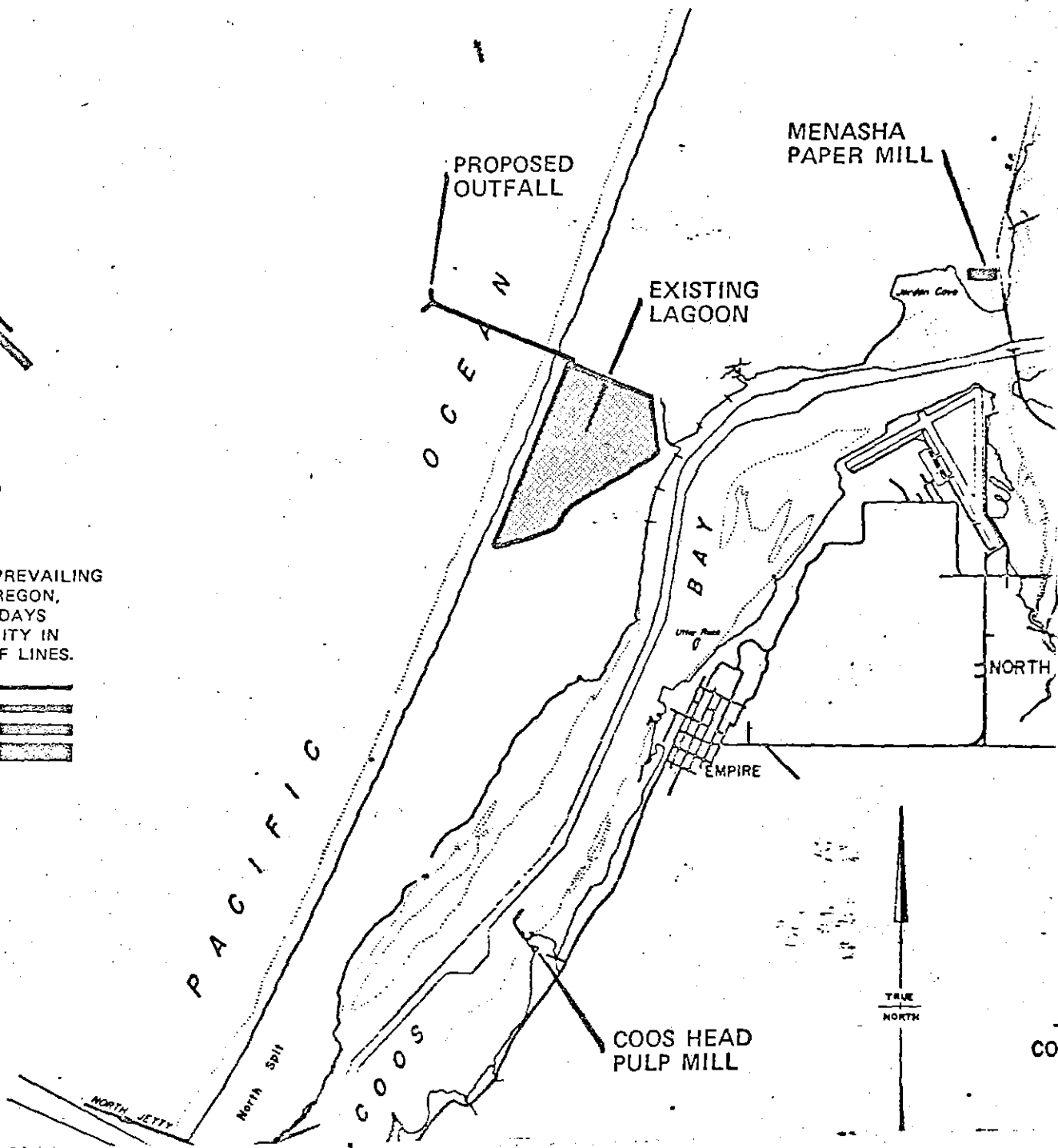
Question 4- % of those with health effects-

Empire- 6%  
North Bend- 3%



MEAN VELOCITY AND DURATION OF PREVAILING WINDS AT ENTRANCE OF COOS BAY, OREGON, FOR 10-YEAR PERIOD. DURATION IN DAYS SHOWN BY LENGTH OF LINES. VELOCITY IN MILES PER HOUR SHOWN BY WIDTH OF LINES.

- |                             |  |
|-----------------------------|--|
| 5 TO 10 MILES SHOWN THUS    |  |
| 10 - 20 MILES SHOWN THUS    |  |
| 20 - 30 MILES SHOWN THUS    |  |
| 30 OR MORE MILES SHOWN THUS |  |





smellslinger. Respondants may claim that they are used to these smells, have lived with them for a long time, and they were not too struggling(?).

As to identification of the source, Coos Head Pulp Mill was mentioned as a problem when it was in operation. For two residents it seemed like the odor was from a 'fertilizer plant'. For another, it just smelled like dead fish-in the spring, mainly. One stated that it was the sewerage disposal plant located near Cape Arago lumber company. Even though Coos Head is closed, one respondent stated that the left-over chips mix with the mud at low tide to cause an odor.

The vast majority of individuals find no aggravation of health.

The following comments were made:

1. 'the odor gags you, so don't go outside'
2. 'stay in the house and don't garden'
3. 'it affects my allergy'
4. Out of a total of three asthmatics, two have no problem but the third one does.
5. Two other individuals complained of a headache and coughing.
6. the odors make one person's illness worse.

One woman complained that when the odors are prominent, the color of her house can be changed for periods up to five days. The house changes from a white to a darker shade. [This may be due to a lead base paint in which the lead compound reacts with the sulfur dioxide to form lead sulfate] ?

The North Bend area is a more densely populated one, Airport Heights being a middle class neighborhood. The area has an odor problem occasionally, like the Empire Area, but it differs in that most residents of Airport Heights object more strongly when it occurs. Some have mentioned the winter time, or that the odors are brought in by the wind (north, northwest) at all times of the year. Some specifically state that cloudy, foggy, still days are the worst. In addition to day time, the smells can also happen at night or in the afternoon up to five hours. One person mentioned southerly winds.

Most people in Airport Heights identify Menasha pulp mill as a source. However, some do not object too strongly since it does not

happen often enough. One woman does not object because it employs people and does the community good. One man does not object because he is a truck driver at Menasha. There are objections when the odor enters the house and stays inside.

One long time resident stated that the odors were not present before the Menasha pulp mill was built. Another stated she felt the odors were from the <sup>sewage</sup> disposal for the city of North Bend. Many mentioned a sewer smell, the sewer plant being located between the mill and the residential area. The source <sup>may be</sup> the settling, pond (lagoon), but only when it rains. One woman has called up Menasha and complained on two occasions but has received no satisfaction. They tell her the odor is from the mud flats. She claims this is an insult to her intelligence.

Again, most interviewees claim no damage to health. Five people with asthma did not indicate any signs of aggravation. However, one individual's sinus condition was significantly aggravated by the odors (she lives at 1672 Grant Ave.) There had been no problem before moving here four years ago. One woman claimed nausea. (She lives at 1675 Garfield Ave.) Another claimed it irritated asthma, but not enough to warrant going to the doctor. One claimed that your nose turns red because of holding it' and another man says 'it doesn't bother your body, but it blows your mind'. One woman claimed it turned her house paint from yellow to red.

The only other area of North Bend was Simpson Heights. This is an upper middle class neighborhood. There seems to be a soot problem as well as an odor problem, but the source of soot may be different from the source of the odor. Johnson's Cement Products Company is located immediately north of Simpson Heights area and was identified as a major source of dust in the neighborhood. It was not identified as a source of odor. Noise pollution occurs

Compliments

Age	Symptoms
42 ♀	Eye watk & itch, nose stuff up & drains
15 ♀	Nasal stuffiness, SOB, fatigue
9 ♀	Nasal stuffiness, drainage
7 ♀	Severe headache
2 ♀	Asthma
6	Asthma, fatigue
37	Sore throat, headache, sinus drainage
31	Upset stomach, nose burn
53	Asthma
15	Headache, nose burn
14	Snoring, chest congestion & wheezing
40	Nasal drainage
37	Nasal drainage
24	Eyes burn & itch, sinuses congested
3	Sinus congestion
8	Sore throat & headache
1	Irritability & nasal congestion
10	Watery, itchy eye
7	Nasal congestion & drainage
4	Chest congestion & wheezing
30	Asthma
36	Headache, fatigue, sore throat, fluid retention
37	Fatigue, fluid retention, headache
11	Headache
37	Severe headache, chest pain, nausea
7	Headache
8	Headache
66	Severe upset stomach, nausea, weakness
36	Slight head, sore throat, fatigue sinus aching

\* Compliments of Dr. Morgan - Bay Clinic in Cove Bay.

(10)

at night as well as day from Johnson's Cement Products. The neighborhood is growing closer and closer to this company. Many of the trees from the natural buffer zone between the neighborhood and company have been cut down to make room for more residents. Four people state that the odor <sup>from Menasha</sup> occurs under calm conditions. Six believe it occurs with the North wind.

One woman said that the Menasha Mill was originally publicized in the newspapers <sup>before being built</sup> as a non-polluting pulp mill. But this has since proven to be erroneous. Visiting people of one resident deem the odors to be offensive, but the resident herself does not. Two people say that it is not a rotten egg odor.

Two asthma sufferers are not affected- the mill is not close enough and the odors not often enough. It seems to be more of an esthetic problem than a health problem. One mentioned headaches- but could not identify the source. An emphysema patient in the neighborhood is required to periodically take oxygen. But he was not available for an interview so no conclusions <sup>could be made</sup> as to whether his condition was initiated or aggravated by the odors could be made.

There was a woman, Mrs. Buzzel who lives at 824 Arago Street, Empire, who independently conducted a survey within her immediate neighborhood on the health effects of the pulp mill odors. All persons who answered her survey agreed that the Menasha mill was the source of the odors. She found that they occur most often in the morning under damp and slightly windy conditions.

Her oldest daughter is effected in such a manner that she must be taken to a clinic. When she wals to the bus stop in the mornings, when the odors are strong, masal stuffiness and fatigue can occur to such an extent that her mother takes her to the Bay Clinic. The nine year old has nasal stuffiness and drainage, the 7 year old gets

(15)

severe headaches, the two year old suffers from asthma. Their mother believes these disorders are due to the pulp mill odors.

The next group of complaints is from five families, four of which still live in Mrs. Buzzel's area, and one of which has since moved away.

The last group is comprised of patients that have been seeing Dr. Morgan ( Mrs. Buzzel is included in this group). One of these patients found that the medical treatment was not adequate to solve the health problem, so the patient moved from the Empire to the Charleston area, 7 miles away from the mill. Another victim was suffering from similar health effects and was only relieved of these problems after her husband was transferred out of the area. The fourth patient resides north of the pulp mill ( as opposed to the three others, they lived south) and she too is considering selling her property in order to avoid these odors that cover her area occaissionally.

The following page is that comprised by Mrs. Buzzel and Dr. Morgan

#### IV. Map

The map gives an overview of the sampling areas, Empire in blue ink, and North Bend in black. One can refer to these areas in keying in on specific blocks. The map gives the spacial relationship between the Menasha lagoon and the Menasha pulp mill.

#### V. Conclusions

This study has shown that there is an odor problem in these areas, specifically in North Bend, that merits attention by the Department of Environmental Quality. The major source of pollution can confidently be stated as a pulp mill, the Menasha Paper Board Corporation. The study was also able to uncover residents with health problems-illnesses either

aggravated or initiated by the odors. Whether this fact will help DEQ start action on the problem will be determined by the citizens themselves. People of the Empire, North Bend area must get together to act as an effective force in eliminating or curtailing the odors. The only option available at this time for these residents is to make a long distance call to the Department of Environmental Quality at Portland or to write them at the following address:

1234 Southwest Morrison Street  
Portland, Oregon

There is no local agency that can handle such complaints at this time. The only other resort is to call the Menasha Corporation.



Boise Cascade

State of Oregon  
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED  
MAR 16 1973

AIR QUALITY CONTROL

**Paper Group**

1600 S.W. 4th Avenue  
Portland, Oregon 97201  
(503) 224-7250

March 15, 1973

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

Attention: Mr. Clint Ayers

Gentlemen:

In response to your letter of March 8, 1973 regarding the proposed Air Contaminant Discharge Permit for the Boise Cascade Salem Sulfite Mill, File No. 24-4171, we wish to make the following comments:

Referring to the proposed permit outline:

Page 2, part 1 of Section A - Sulfite Pulp and Paper

The compliance schedule for the blow-pit emissions was originally April 1974. We have volunteered to accelerate the completion date for this project to December 31, 1973. However, to use this as the compliance date for the total mill is felt to be unrealistic. We therefore request that the outside date of July 1, 1974 contained in the Sulfite Mill Regulation be allowed for total mill compliance in case unforeseen problems occur after completion of the installation. This additional period allowed for total mill compliance would then allow sufficient time to make corrections to the system, if needed.

Page 2, part 2

The establishment of a monthly average SO<sub>2</sub> standard of 400 ppm based on today's production is again totally unrealistic. The present average production rate has been limited due to ash problems, etc. in the recovery furnace area, however, these are being resolved and the mill designed production capacity of 330 AD tons per day will be attained. At this production rate, our system was designed to meet a 500 ppm emission whereas the regulation was set at a 800 ppm. It is therefore suggested that the monthly average SO<sub>2</sub> emission be at least 500 ppm to allow for full productive capacity and should the design limit be found to be in error, that further allowances be made, providing the 800 ppm hourly average is not exceeded.

Page 2, part 2c

The Sulfite Mill Regulations set a stringent limit of 20 pounds of SO<sub>2</sub> per AD ton of unbleached pulp for a total mill emission. The use of a total was done deliberately since each mill has a different number of emission point

Mr. Clint Ayers  
March 15, 1973  
Page Two

sources. We presently have three point sources of emission but plan to reduce this to one, utilizing the recovery furnace stack as the sole emission point. On this basis, the limit of 18 pounds of SO<sub>2</sub> per AD ton is too restrictive since these other sources will contribute to it. It is therefore suggested that Page 2, parts 2c, 3b and 4b be struck and a new paragraph be inserted to read:

The total mill SO<sub>2</sub> emissions excluding power boilers shall not exceed 20 pounds per AD ton and 6,600 pounds per day (based on 330 AD tons per day).

Page 2, part 3b

Until the digester pump-out system has demonstrated that essentially no discharge will evolve as designed, we feel that undue restriction has been placed on this yet uncompleted system. It is suggested that some allowance be made for this system at this time up to the regulation limitation of 0.2 pounds SO<sub>2</sub> per minute per ton.

Part 4b would also be covered above.

Page 2, part 5 and Page 3, parts 10, a,b,c,d,e and f

It is as yet uncertain whether the recovery furnace particulate emissions are truly exceeding the four (4) pounds per AD ton. This is a result of the limited number of tests obtained to-date and uncertainty of the correct application of the test procedure. We have been reporting the higher readings in order to be completely above-board in our reports. If it should prove we are presently in compliance, then the wording of paragraph 5 is no problem and paragraph 10 would be unnecessary. On the other hand, if it is determined that we are not in compliance then the compliance schedule is far too restrictive in light of the dimension of the problem. Based on the miniscule amount of particulate to be further removed to attain 4 pounds per AD ton, it is requested that sufficient time be allotted to investigate the various alternatives for solving this problem so it may be done in an economically reasonable manner. We are therefore requesting, should the particulate emission be found to be in excess of 4 pounds per AD ton, that the following compliance schedule be approved:

Complete Particulate Emission Study	December 1, 1973
Complete Preliminary Engineering	February 1, 1974
Submit Construction Schedule	May 1, 1974
Submit Progress Report	November 1, 1974
Compliance	May 1, 1975

This schedule represents the earliest date to derive a satisfactory program for reducing the particulate levels, particularly if an additional system is required. The original system was installed with the addition of a multiclone system for removal of particulate even though our spent liquor has an ash under 1% and no other ammonia base recovery system had made this provision. It should be understandable that it is not desirable to add a further large expenditure to achieve a relatively small reduction in particulate emission.



Mr. Clint Ayers  
March 15, 1973  
Page Three

Page 4, part 11c

At such time as the particulate levels are under control and stable operation has been attained, it is recommended that the testing schedule requirements be reduced from 3 to 2 tests per month.

Permit Expiration Date

Setting December 31, 1974 as the permit expiration date provides only 21 months duration. We request a longer permit period to give us an adequate period of time to bring emissions under control, perfect operating practice and accumulate performance data. December 31, 1976 is recommended as the expiration date for this permit.

Page 5, section B, part 1 (Performance Standards)


The process weight quantity of 9000#/hr. is too low. Based on the design production rate of 1400# of yeast production per hour, we would have an input of 14,500# spent liquor solids per hour. It is requested that the particulate emission limit be based upon 14,500#/hr. process rate.

Page 5, part 2 (Performance Standards)

We would appreciate more detail on the definition of the Ringelmann No. 1 and 20% opacity standards as applied to the Yeast Plant emission itself. We would like to know how these standards apply to the existing plume.

Very truly yours,

BOISE CASCADE/PAPER GROUP

  
Joe Kolberg  
Manager Environmental Control

JK:cjs

Department of Environmental Quality  
Air Quality Control Division

## AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

UMPQUA EXCAVATION & PAVING  
1940 N. E. Newton Creek  
Roseburg, Oregon 97470Background

1. Umpqua Excavation & Paving operates an existing stationary asphalt concrete plant at 1940 N. E. Newton Creek Road, Roseburg.
2. The plant is a 3000 lb per batch system manufactured by Standard Steel Corporation. The maximum production rate equals 120 t/hr (based on 45 second batch cycles). The normal production rate is considered to be on the order of 80 t/hr.
3. The plant itself is of good repair. The dust control equipment will be completely replaced with new equipment by March 1973.
4. The DEQ has reviewed preliminary plans for the new dust controls and required submission of final plans and specifications. The new system will include the following equipment in series; a dry cyclone, a water scrubber, a wet fan and a combined wet cyclone and exhaust stack.
5. The scheduled improvement is considered to be capable of meeting applicable DEQ-AQCD regulations.
6. Demonstration of compliance can only be accomplished by source testing.
7. The scrubber water is and will be routed through settling ponds and recirculated. No water is discharged from the ponds.
8. All raw materials, including aggregate, and products are moved by truck on Newton Creek Road, a rapidly developing residential street. These practices have caused complaints from neighboring residents even though the street is paved and curbed.
9. The plant is around a corner and out of direct sight of Newton Creek Road residences.
10. The owners and operators of the plant reside at the plant site.

Evaluation

1. A dust control improvement program which is expected to achieve compliance with AQCD regulations will be completed before the next paving season.
2. This site is within a special control area, therefore high efficiency controls are required.

3. The following emission limitations are applicable to the exhaust system discharge from this asphalt plant:
  - a.) The total particulate emission rate cannot exceed 40 lb/hr
  - b.) The concentration of particulate matter cannot exceed 0.2 gr/SCF
  - c.) Visible emissions (excluding condensed water) cannot exceed 20% opacity for a period or periods totalling more than 3 minutes in any 1 hour.

The presence of a steam plume and the size of the asphalt plant cause the use of the opacity limitation to be ineffective. Therefore, opacity is not a condition of the proposed permit.

4. A source test is necessary to demonstrate compliance and determine quantities of both exhaust gases and air contaminants (particulates).
5. Should the plant not achieve compliance as expected when the improvements in progress are completed, a compliance schedule must be developed rapidly and compliance should be achievable during the 1973 paving season (prior to September 1, 1973).
6. The plant may eventually need to relocate due to increasing urbanization, but no such plans now exist.
7. A Water Quality Control Division waste discharge permit does not appear needed at this time.
8. The dust controls should be capable of compliance for at least 5 years, so a long term (5 yr.) permit is proposed.

#### Recommendation

1. It is recommended that the attached proposed permit conditions be reviewed for issuance to Umpqua Excavation and Paving.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 1/1/78

Page 1 of 4

APPLICANT:

UMPQUA EXCAVATION & PAVING  
1940 N. E. Newton Creek Road  
Roseburg, Oregon 97470

REFERENCE INFORMATION

File Number 10-0006

Appl. No.: 0002 Received: 11/1/72

OTHER AIR Contaminant Sources at this Site:

<u>Source</u>	<u>SIC</u>	<u>Permit No.</u>
none		

Source(s) Permitted to Discharge Air Contaminants:

NAME OF AIR CONTAMINANT SOURCE

STANDARD INDUSTRY CODE AS LISTED

STATIONARY HOT-MIX ASPHALTIC  
CONCRETE PAVING PLANT

2951

Permitted Activities

Until such time as this permit expires or is modified or revoked, UMPQUA EXCAVATION & PAVING is herewith permitted to operate its Standard Steel Corporation, 3000 pounds per batch, stationary hot-mix asphaltic concrete paving plant, including those processes and activities directly related or associated thereto at 1940 N. E. Newton Creek Road, Roseburg, Oregon, and to discharge therefrom treated exhaust gases containing air contaminants in conformance with the requirements, limitations, and conditions of this permit.

Performance Standards and Emission Limits

1. At all times all air contaminant generating processes and all contaminant control equipment shall be maintained and operated at full efficiency and effectiveness, such that the emission of air contaminants are kept at the lowest practicable levels and in no instance shall emissions from the hot-mix asphalt concrete paving plant and all associated dust control equipment including the dry cyclone, water scrubber, wet fan and combined wet cyclone and exhaust stack exceed that:
  - a. for total particulate matter, an emission rate of forty (40) pounds per hour.
  - b. for particulate concentration in the dust control system exhaust, 0.2 grains per standard cubic foot.
2. Ancillary sources of air contaminants such as, but not limited to, the drier openings, screening and classifying system, hot rock elevator, bins, hoppers and pug mill mixer shall be controlled at all times so as to maintain the highest possible level of air quality and the lowest possible discharge of air contaminants.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 1/1/78

Page 2 of 4

Appl. No: 0002

File No: 10-0006

UMPQUA EXCAVATION & PAVING

3. Dust suppression measures such as, but not limited to, watering, oiling, or paving of all heavily traveled roads or areas at the plant site, including access roads, shall be conducted so that fugitive type dust generated by vehicles involved or associated with this operation will be adequately controlled at all times.

Compliance Demonstration Schedule

4. The results of an emission test program conducted by qualified persons according to procedures approved in advance by the Department shall be submitted to the Department by no later than June 1, 1973.

*30 days*

5. If the results of the emission test program required in condition 4. indicates noncompliance with condition 1., UMPQUA EXCAVATION AND PAVING shall develop and submit to the Department of Environmental Quality by no later than June 15, 1973 for review and approval a detailed schedule for achieving compliance with condition 1. This hot-mix asphalt plant must be in compliance with condition 1. by no later than September 1, 1973 and demonstrated by an emission test program.

Monitoring and Reporting

6. The operation and maintenance of the hot-mix asphalt plant and control facilities shall be effectively monitored. A record of all such data shall be maintained and submitted to the Department of Environmental Quality within fifteen (15) days after the end of each calendar month. Unless otherwise agreed to in writing the information collected and submitted shall be in accordance with testing, monitoring and reporting procedures on file with and approved by the Department of Environmental Quality and shall include, but not necessarily be limited to, the following parameters and frequencies:

<u>Parameter</u>	<u>Minimum Frequency</u>
a. The starting time and period of operation of the hot-mix asphalt plant	Daily
b. The amount of asphalt produced	Daily
c. The water pressure at each scrubber and wet fan	Daily

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS.

Prepared by the Staff of the  
Department of Environmental Quality

UMPOUA EXCAVATION AND PAVING

<u>Parameter</u>	<u>Minimum Frequency</u>
d. The pressure drop across the fan	Daily
e. A description of any maintenance to the dust control system	As performed
f. The average, minimum and maximum percent of -200 mesh material in the drier feed	Monthly
g. The date of inspecting all water nozzles in the dust control system	As performed
h. The water flow rate	Daily
i. The date of removing, cleansing and replacing all water nozzles in the dust control system	Biannually
j. The date, amount, location, and method of disposal of any solids removed from settling ponds	As performed
k. Any observable increase in particulate emissions from the plant, suspected reason for such increased emissions and projected date for any corrective action to reduce the emission increase	Daily

7. The final monthly report required in condition 6. submitted during any calendar year shall include the quantities and types of fuels used during that calendar year or operating season.

8. The Department shall be promptly notified of any upset condition in accordance with OAR, Chapter 340, "Upset Conditions" which may cause or tend to cause any detectable increase in atmospheric emissions. Such notice shall include the reason for the upset and indicate the precautions taken to prevent a recurrence.

UMPOUA EXCAVATION AND PAVING

Prohibited Activities

- 9. No open burning shall be conducted at the plant site.
- 10. No treated or untreated scrubber water shall be discharged to any public waterway unless such discharge is the subject or a valid waste discharge permit issued by the Department of Environmental Quality.

Special Conditions

- 11. A sufficient number of spare water nozzles shall be maintained at the plant for installation into the dust control system as necessary.
- 12. All solid wastes or residues shall be disposed of in manners and at locations approved by the Department of Environmental Quality.
- 13. Department of Environmental Quality representatives shall be permitted access to the plant site at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.
- 14. No alteration, modification, expansion or relocation of the subject asphalt plant or the related activities shall be made without prior notice to and approval by the Department of Environmental Quality.
- 15. The Annual Compliance Determination Fee shall be submitted to the Department of Environmental Quality according to the following schedule:

<u>Amount Due</u>	<u>Date Due</u>
a. \$100.00	December 1, 1973
b. \$100.00	December 1, 1974
c. \$100.00	December 1, 1975
d. \$100.00	December 1, 1976

16. This permit is subject to termination if the Department of Environmental Quality finds:

- a. That it was procured by misrepresentation of any material fact or by lack of full disclosure in the application.
- b. That there has been a violation of any of the conditions contained herein.
- c. That there has been a material change in quantity or character of air contaminants emitted to the atmosphere.
- d. That the hot-mix asphalt plant has been or may be relocated without notice to and approval by the Department of Environmental Quality.

Department of Environmental Quality  
Air Quality Control Division

## AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

J. C. COMPTON CO.  
P. O. Box 86  
McMinnville, OR 97128Background

1. J. C. Compton Co. owns and operates two portable hot-mix asphalt plants at various locations throughout Oregon.
2. The plant being considered here is a 16,000 lb per batch system manufactured by Standard Steel Corporation. The maximum production rate equals 640 t/hr (based on 45 second batch cycles). The normal production rate is considered to be on the order of 400 t/hr.
3. The asphalt plant and dust control system were new prior to the 1972 paving season and are in good repair.
4. The dust control system includes a baghouse followed by a fan. This equipment has experienced operating difficulties and has not performed up to specifications which were guaranteed (mainly air volume). A complete set of new double walled bags will be installed prior to the 1973 paving season in an attempt to improve the baghouse capacity and performance.
5. The plant is presently located about 3 miles N. W. of Ontario and about 1/4 mile N. E. of Highway 80-N. Asphalt production at this location, which began around October 1, 1972, will require another 3 weeks of operation for completion.
6. Although the dust control system can be considered capable of meeting applicable DEQ-AQCD regulations, demonstration of compliance can only be achieved by source testing.
7. There is no water discharge from this asphalt plant.
8. The AQCD asphalt plant regulation limits the duration of air contaminant discharge permits to 1 year for portable plants. The regulation also requires DEQ approval for the air pollution controls to be installed at each site location or set-up.

Evaluation

1. The following emission limitations or restrictions are applicable to the exhaust system discharge from this portable asphalt plant.



Within Special Control Areas:

- a. Since the process weight exceeds 30 t/hr, the total particulate emission rate cannot exceed 40 lb/hr.
- b. Since this plant is a new source (installed after June 1, 1970), the concentration of particulate matter cannot exceed 0.1 gr/SCF. (Assuming an exhaust volume equal to 54,000 SCFM, 0.1 gr/SCF is equivalent to 45.3 lb/hr.)
- c. Visible emissions (excluding condensed water) cannot exceed 20% opacity for a period or periods totalling more than 3 minutes in any 1 hour.

Outside Special Control Areas:

- a. Particulate collection efficiency shall be no less than 80% on a weight basis.
  - b. Particulate matter emitted shall not create or tend to create a hazard to human, animal or plant life, or unreasonably interfere with agricultural operations, recreation areas, vehicular traffic, or the enjoyment of life and property.
2. For operation within a special control area both the 40 lb/hr particulate emission rate and 0.1 gr/SCF may be applied since for this plant these limitations are equally restrictive. The opacity equivalent to 0.1 gr/SCF or 40 lb/hr in this case may be 5% or less. Thus the limitation of 20% opacity is not restrictive in this case and is not included as a permit condition.
  3. For operation outside a special control area. A.Q.C.D. regulation allows higher emission rates (80% collection efficiency) as long as undue hazards or unreasonable interferences do not occur. These conditions are included in the permit. As a matter of actual practice, the baghouse and fan will always be operated irregardless of location.
  4. A source test is necessary to demonstrate compliance and determine quantities of both exhaust gases and air contaminants (particulates).
  5. Should the plant not achieve compliance as expected, a compliance schedule must be developed rapidly and compliance must be achieved during the 1973 paving season (prior to July 1, 1973).
  6. A Water Quality Control Division waste discharge permit is not required.

Recommendation:

1. It is recommended that the attached proposed permit conditions be reviewed for issuance to J. C. Compton Co.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 12/31/73  
Page 1 of 5

APPLICANT:

J. C. COMPTON CO.  
P. O. Box 86  
McMinnville, OR 97128

REFERENCE INFORMATION

File Number 37-0044  
Appl. No.: 0003 Received: 11/1/72  
OTHER AIR Contaminant Sources at this Site:

<u>Source</u>	<u>SIC</u>	<u>Permit No.</u>
none		

Source(s) Permitted to Discharge Air Contaminants:

NAME OF AIR CONTAMINANT SOURCE

STANDARD INDUSTRY CODE AS LISTED

PORTABLE HOT-MIX ASPHALTIC  
CONCRETE PAVING PLANT

2951

Permitted Activities

Until such time as this permit expires or is modified or revoked, J. C. COMPTON, CO. is herewith permitted to operate its Standard Steel Corporation, 16,000 pounds per batch, portable hot-mix asphaltic concrete paving plant, including those processes and activities directly related or associated thereto and to discharge therefrom treated exhaust gases containing air contaminants in conformance with the requirements, limitations, and conditions of this permit. This permit is valid for site locations or set-ups within the State of Oregon excluding that portion of the Portland Interstate Air Quality Control Region comprising the Oregon counties of Benton, Clackamas, Columbia, Lane, Linn, Marion, Multnomah, Polk, Washington and Yamhill.

Performance Standards and Emission Limits

1. At all times and at all site locations or setups all air contaminant generating processes and all air contaminant control equipment shall be maintained and operated at full efficiency and effectiveness, such that the emission of air contaminants are kept at the lowest practicable levels.
2. At site locations or setups within special control areas:
  - a. The total particulate matter emission rate shall not exceed forty (40) pounds per hour
  - b. The particulate concentration in the dust control system exhaust shall not exceed 0.1 grains per standard cubic foot.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/73

Page 2 of 5

Appl. No: 0003

File No: 37-0044

J. C. COMPTON CO.

---

3. At site locations or setups outside special control areas:
  - a. The particulate collection efficiency shall be no less than eighty (80) percent on a weight basis.
  - b. The particulate matter emitted shall not create or tend to create a hazard to human, animal or plant life, or unreasonably interfere with agricultural operations, recreation areas, vehicular traffic, or the enjoyment of life and property.
4. Ancillary sources of air contaminants such as, but not limited to, the drier openings, screening and classifying system, hot rock elevator, bins, hoppers and pug mill mixer shall be controlled at all times so as to maintain the highest possible level of air quality and the lowest possible discharge of air contaminants.
5. Dust suppression measures such as, but not limited to, watering, oiling, or paving of all heavily traveled roads or areas at the plant site, including access roads, shall be conducted so that fugitive type dust generated by vehicles involved or associated with this operation will be adequately controlled at all times.

Compliance Demonstration Schedule

6. The results of an emission test program conducted by qualified persons according to procedures approved in advance by the Department shall be submitted to the Department no later than June 1, 1973.
7. If the results of the emission test program required in condition 6. indicates noncompliance with condition 1., J. C. COMPTON CO. shall develop and submit to the Department of Environmental Quality by no later than June 15, 1973 for review and approval a detailed schedule for achieving compliance with condition 1. This hot-mix asphalt plant must be in compliance with condition 1. by no later than August 1, 1973 as demonstrated by an emission test program.

Monitoring and Reporting

8. The operation and maintenance of the hot-mix asphalt plant and control facilities shall be effectively monitored. A record of all such data shall be maintained and submitted to the Department of Environmental Quality within fifteen (15) days after the end of each calendar month on forms provided by the Department. Unless otherwise agreed to in writing the information collected and submitted shall include, but necessarily be limited to, the following parameters and frequencies:

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/73

Page 3 of 5

Appl. No: 0003

File No: 37-0044

J. C. COMPTON CO.

---

<u>Parameter</u>	<u>Minimum Frequency</u>
a. The starting time and period of operation of the hot-mix asphalt plant	Daily
b. The amount of asphalt produced	Daily
c. A description of any maintenance to the dust control system	As performed
d. The pressure drop across baghouse	Daily
e. Any observable increase in particulate emissions from plant, suspected reason for such increased emission and projected date of any action to reduce the emission increase	Daily
f. The amount, location and method of disposal of baghouse collected reject material	As performed
g. The date of inspecting all bags in baghouse	Weekly
h. The date and number of bags replaced	As performed
i. The average, minimum and maximum percent of -200 mesh material in the drier feed	Monthly

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS  
Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/73  
Page 4 of 5  
Appl. No: 0003  
File No: 37-0044

J. C. COMPTON CO.

---

9. The final monthly report required in condition 7. submitted during any calendar year shall include the quantities and types of fuels used during that calendar year or operating season.

10. The Department shall be promptly notified of any upset condition in accordance with OAR, Chapter 340, "Upset Conditions" which may cause or tend to cause any detectable increase in atmospheric emissions. Such notice shall include the reason for the upset and indicate the precautions taken to prevent a recurrence.

Prohibited Activities

11. No open burning shall be conducted at the plant site.

Special Conditions

12. The subject asphalt plant shall not be operated at any site location or set-up without obtaining written approval from the Department of Environmental Quality for the air pollution controls to be installed and operated at each site location or set-up.

13. The subject asphalt plant shall not be operated until the Department of Environmental Quality has acknowledged receipt of a contract agreement which shall indicate the date on which an emission test program will be conducted in accordance with procedures on file with and approved by the Department of Environmental Quality. Failure to conduct the emission test program on the date indicated shall be considered a violation of this permit condition.

14. A sufficient number of spare bags shall be maintained at the plant for installation into the baghouse as necessary.

15. All solid wastes or residues shall be disposed of in manners and at locations approved by the Department of Environmental Quality.

16. Department of Environmental Quality representatives shall be permitted access to the plant site at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.

17. No alteration, modification, expansion or relocation of the subject asphalt plant or the related activities shall be made without prior notice to and approval by the Department of Environmental Quality.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/73

Page 5 of 5

Appl. No: 0003

File No: 37-0044

J. C. COMPTON CO.

---

18. 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 air contaminants emitted to the atmosphere.

Department of Environmental Quality  
Air Quality Control Division

AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

ROAD AND DRIVEWAY CO.  
P. O. Box 128  
Newport, Oregon 97365

---

Background

1. Newport Road and Driveway Co. owns and operates an existing stationary asphalt concrete plant off Harney Road in Newport. This site is within a Special Control Area.
2. The plant is a Model 82, continuous flow (or mix) system manufactured by Pioneer Division of Portec, Inc. The maximum production rate equals 130 tons per hour. The normal production rate is considered to be on the order of 100 t/hr.
3. The asphalt plant is about 15 years old. A major portion of the existing dust control system was new in early 1970.
4. The dust control system components in series following the dryer include a multicone, fan, spray-chamber scrubber (4 ft dia. - 60 ft length) and exhaust stack. Dust emissions from the remainder of the plant are picked up by a second fan, passed through a large cyclone and fed to the spray-chamber scrubber.
5. The scrubber water is routed to a settling pond and recirculated. Although scrubber water is not discharged, a temporary Waste Discharge Permit has been issued for this facility.
6. No aggregate production occurs at this plant site. All raw materials are brought to the plant site by trucks.
7. The emissions from this asphalt plant as measured during the 1971 and 1972 seasons were 18.7 and 20.6 pounds per hour respectively. The corresponding particulate emission concentrations were 0.16 and 0.17 grains per standard cubic foot of dry exhaust gas.

Evaluation

1. The following emission limitations or restrictions are applicable to the exhaust system discharge from this stationary asphalt plant:
  - a. The maximum allowable total particulate emission rate equals 40 lb/hr when the process weight exceeds 30 t/hr. (The normal production rate is 100 t/hr.)

- b. The maximum allowable particulate concentration equals 0.2 gr/SCF since this plant was in existence prior to June 1970. (Assuming an average exhaust volume equal to 14,000 SCFM, 0.2 gr/SCF is equal to 24 lb/hr.)
  - c. Visible emissions (excluding condensensed water) cannot exceed 20% opacity for a period or periods totalling more than 3 minutes in any 1 hour.
2. The 0.2 gr/SCF is the most restrictive emission limitation for this plant since the average exhaust gas volume as measured in 1971 and 1972 does equal 14,000 SCFM on a dry basis. Should the exhaust gas volume be increased to above 23,333 SCFM, the 40 lb/hr particulate emission rate would become the most restrictive emission limitation. (Such an increase is not planned.)

Although the 40/hr allows about 60% more emissions than 0.2 gr/SCF, the 40 lb/hr emission rate limitation is included as a permit condition. As indicated above, it would not be applicable unless the exhaust volume was increased to above 23,333 SCFM.

The opacity equivalent to 0.2 gr/SCF in this case would be much less than 20%. The variable steam plume which leaves the scrubber stack reduces the effectiveness and increases the difficulty of applying the opacity limitation. Since it is significantly less restrictive than either 0.2 gr/SCF or 40 lb/hr and difficult to apply, the opacity limitation is not included as a permit condition.

- 3. This asphalt plant is considered to be in compliance with the AQCD asphalt plant regulation based on the test results obtained in 1971 and 1972. A compliance demonstration schedule is not included in the proposed permit.
- 4. A regular Waste Discharge Permit for this operation is in process at this time.
- 5. The dust control system has been able to sustain compliance so a long term (5 yr.) permit is proposed.

#### Recommendation

- 1. It is recommended that the proposed permit conditions be reviewed for issuance to Road and Driveway Co.



PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 1/1/78

Page 1 of 4

APPLICANT:

ROAD AND DRIVEWAY CO.  
P. O. Box 128  
Newport, Oregon 97365

REFERENCE INFORMATION

File Number 21-0001

Appl. No.: 0004 Received: 11/20/72

OTHER AIR Contaminant Sources at this Site:

<u>Source</u>	<u>SIC</u>	<u>Permit No.</u>
none		

Source(s) Permitted to Discharge Air Contaminants:

NAME OF AIR CONTAMINANT SOURCE

STANDARD INDUSTRY CODE AS LISTED

STATIONARY HOT-MIX ASPHALTIC  
CONCRETE PAVING PLANT

2951

Permitted Activities

Until such time as this permit expires or is modified or revoked, ROAD AND DRIVEWAY CO. is herewith permitted to operate its Pioneer Model 82, continuous flow, stationary hot-mix asphaltic concrete paving plant, including those processes and activities directly related or associated thereto at Newport, Oregon and to discharge therefrom treated exhaust gases containing air contaminants in conformance with the requirements, limitations, and conditions of this permit.

Performance Standards and Emission Limits

1. At all times all air contaminant generating processes and all air contaminant control equipment shall be maintained and operated at full efficiency and effectiveness, such that the emission of air contaminants are kept at the lowest practicable levels and in no instance shall the emission from the hot-mix asphalt concrete paving plant and all associated dust control equipment including the cyclone, multicone, spray-chamber scrubber, two fans and exhaust stack exceed:
  - a. for total particulate matter, an emission rate of forty (40) pounds per hour.
  - b. for particulate concentration in the dust control system, exceed 0.2 grains per standard cubic foot.
2. Ancillary sources of air contaminants such as, but not limited to, the drier openings, screening and classifying system, hot rock elevator, bins, hoppers and pug mill mixer shall be controlled at all times so as to maintain the highest possible level of air quality and the lowest possible discharge of air contaminants.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 1/1/78

Page 2 of 4

Appl. No: 0004

File No: 21-0001

ROAD AND DRIVEWAY CO.

3. Dust suppression measures such as, but not limited to, watering, oiling, or paving of all heavily traveled roads or areas at the plant site, including access roads, shall be conducted so that fugitive type dust generated by vehicles involved or associated with this operation will be adequately controlled at all times.

Monitoring and Reporting

4. The operation and maintenance of the hot-mix asphalt plant and control facilities shall be effectively monitored. A record of all such data shall be maintained and submitted to the Department of Environmental Quality within fifteen (15) days after the end of each calendar month on forms provided by the Department. Unless otherwise agreed to in writing the information collected and submitted shall be in accordance with testing, monitoring and reporting procedures on file with and approved by the Department of Environmental Quality and shall include, but not necessarily be limited to, the following parameters and frequencies:

<u>Parameter</u>	<u>Minimum Frequency</u>
a. The time period of operation of the hot-mix asphalt plant	Daily
b. The amount of asphalt produced	Daily
c. The water pressure at the scrubber	Daily
d. The pressure drop across the fans	Daily
e. A description of any maintenance to the dust control system	As performed
f. The average, minimum and maximum percent of -200 mesh material in the drier feed	Monthly

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

ROAD AND DRIVEWAY CO.

Recom. Expir. Date: 1/1/78

Page 3 of 4

Appl. No: 0004

File No: 21-0001

<u>Parameter</u>	<u>Minimum Frequency</u>
g. The date of inspecting all water nozzles in the dust control system	As performed
h. The water flow rate	Daily
i. The date of removing, cleansing and replacing all water nozzles in dust control system	Biannually
j. The amount, location and method of disposal of any solids removed from the settling pond	As performed
k. Any observable increase in particulate emissions from plant, suspected reason for such increased emission and projected date for any corrective action to reduce the emission increase	Daily

5. The final monthly report required in condition 4. submitted during any calendar year shall include the quantities and types of fuels used during that calendar year or operating season.

6. The Department shall be promptly notified of any upset condition in accordance with OAR, Chapter 340, "Upset Conditions" which may cause or tend to cause any detectable increase in atmospheric emissions. Such notice shall include the reason for the upset and indicate the precautions taken to prevent a recurrence.

Prohibited Activities

9. No open burning shall be conducted at the plant site.

10. No treated or untreated scrubber water shall be discharged to any public waterway unless such discharge is the subject or a valid waste discharge permit issued by the Department of Environmental Quality.

Special Conditions

11. A sufficient number of spare water nozzles shall be maintained at the plant for installation into the dust control system as necessary.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS  
Prepared by the Staff of the  
Department of Environmental Quality  
ROAD AND DRIVEWAY CO.

Recom. Expir. Date: 1/1/78  
Page 4 of 4  
Appl. No: 0004  
File No: 21-0001

12. All solid wastes or residues shall be disposed of in manners and at locations approved by the Department of Environmental Quality.

13. Department of Environmental Quality representatives shall be permitted access to the plant site at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.

14. No alteration, modification, expansion or relocation of the subject asphalt plant or the related activities shall be made without prior notice to and approval by the Department of Environmental Quality.

15. The Annual Compliance Determination Fee shall be submitted to the Department of Environmental Quality according to the following schedule:

<u>Amount Due</u>	<u>Date Due</u>
a. \$100.00	December 1, 1973
b. \$100.00	December 1, 1974
c. \$100.00	December 1, 1975
d. \$100.00	December 1, 1976

16. This permit is subject to termination if the Department of Environmental Quality finds:

- a. That it was procured by misrepresentation of any material fact or by lack of full disclosure in the application.
- b. That there has been a violation of any of the conditions contained herein.
- c. That there has been a material change in quantity or character of air contaminants emitted to the atmosphere.

Department of Environmental Quality  
Air Quality Control Division

AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

AMALGAMATED SUGAR COMPANY  
Nyssa, Oregon 97913

---

Background

1. The Amalgamated Sugar Company operates a beet sugar manufacturing facility at Nyssa.
2. Existing visible and particulate emission sources at the plant site consist of the following:
  - a. (4) Coal fired boilers with a total steam capacity of 355,000 lb/hr
  - b. (2) Lime kilns with a total capacity of 60,000 lb/hr.
  - c. (3) Pulp dryers with a total capacity of about 450,000 lb/hr.
3. The company will install a new Foster - Wheeler coal-fired boiler during 1973 in accordance with plans and specifications that were approved by the Department of Environmental Quality. This boiler will have 200,000 lb/hr steam generating capacity.
4. Sugar manufacturing operations are conducted only during a limited season of about twenty-two (22) weeks duration starting about October 1 of each year.
5. The company, because of cancellation of their natural gas contracts, has been forced to reconvert all of the boilers to fire low sulfur coal to generate steam.
6. The waste sugar beet residues left from the sugar manufacturing processes are sold as cattle feed.
7. The waste residues from the lime kilns and the coal ash and collected particulate from the boilers are disposed of in a landfill on the plant site.

Evaluation

1. The three (3) existing Babcock - Wilcox boilers with a total steam capacity of 255,000 lb/hr have been tested and demonstrated as capable of operating in compliance with emission limitations.

2. The existing Foster - Riley boiler with a steam capacity of 100,000 lb/hr has been tested and is not presently capable of operating in compliance with emission limitations. The company will install a bag filter unit in accordance with Department approved plans and specifications in order to attain compliance. The installation of the emission control equipment will be completed in 1974 and the company will re-test the stack emissions and demonstrate to the Department that the boiler can operate in compliance with emission limitations on or before December 1, 1974.
3. The installation of the new Foster - Wheeler boiler with a steam capacity of 200,000 lb/hr will be completed on or before September 30, 1973. The boiler stack emissions will be tested to demonstrate operation in compliance with emission limitations and test results will be submitted to the Department on or before December 15, 1973.
4. Scrubber units have been installed on the three (3) pulp dryers in accordance with Department approved plans and specifications in order to control emissions within established limits. Tests to demonstrate operation in compliance with emission limits will be made and submitted to the Department on or before December 15, 1973.
5. Filter units have been installed on the two (2) lime kilns in accordance with Department approved plans and specifications. Tests to demonstrate operation in compliance with emission limitations will be made and submitted to the Department on or before December 15, 1973.
6. Installation of monitoring and recording equipment on the new Foster - Wheeler boiler on or before September 30, 1973 is required as follows:
  - a. A smoke detector and recorder
  - b. A sulfur dioxide (SO<sub>2</sub>) monitor and recorder
  - c. A nitrogen oxide (NO<sub>x</sub>) monitor and recorder.
7. The company shall maintain a file of daily records for the new Foster - Wheeler boiler as follows:
  - a. Opacity measurements of the stack emissions
  - b. Emission measurements of SO<sub>2</sub>
  - c. Emission measurements of NO<sub>x</sub>
  - d. Amount of coal burned.
  - e. Sulfur content of coal burned

All records are to be maintained for two (2) years from the date of recording and shall be submitted to the Department when so requested.

8. The installation of the monitoring and recording equipment (Item 6) and the maintenance of records (Item 7) are a requirement of the permit and also a requirement specified in the Federal Register, Vol. 36, No. 247, dated December 23, 1971.
9. An analysis of the impact of the air contaminant discharges from the plant on the ambient air quality has been made by the technical staff of the Department. From this analysis, it was concluded that the ambient air quality goals and standards, as set forth in the State of Oregon Clean Air Act Implementation Plan for the Nyssa area, would be met on or before July 1, 1975.

#### Discussion

1. The company is, and has been, proceeding on a comprehensive compliance program and schedule to achieve compliance with emission limitations. All necessary remaining company actions required to attain compliance have been incorporated in the proposed permit.
2. The time schedules for the additional air pollution control work that must be done by the company have been established to accomplish compliance with emission limitations at the earliest practicable date consistent with the ability of the company to make the required expenditures for equipment and construction, the length of time required for installation work and the necessary demonstration of compliance tests that can only be made during the limited operating period of the facility.

#### Recommendation

It is recommended that the proposed Air Contaminant Discharge Permit for the Amalgamated Sugar Company be approved.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 3/1/76

Page 1 of 5

APPLICANT:

AMALGAMATED SUGAR COMPANY  
Nyssa, Oregon 97913

REFERENCE INFORMATION

File Number 23-0002  
Appl. No.: 0047 Received: 1/8/73  
OTHER AIR Contaminant Sources at this Site:

<u>Source</u>	<u>SIC</u>	<u>Permit No.</u>
---------------	------------	-------------------

Source(s) Permitted to Discharge Air Contaminants:

NAME OF AIR CONTAMINANT SOURCE

STANDARD INDUSTRY CODE AS LISTED

MANUFACTURING BEET SUGAR

2063

Permitted Activities

Until such time as this permit expires or is modified or revoked, AMALGAMATED SUGAR COMPANY is herewith permitted to operate its beet sugar manufacturing facility, steam and electric power generating facilities, pulp dryers, lime kilns, and those processes and activities directly related or associated thereto located at Nyssa, Oregon, and to discharge therefrom treated exhaust gases containing air contaminants in conformance with the requirements, limitations and conditions of this permit.

Performance Standards and Emission Limits

1. All air contaminant generating processes and all air contaminant control equipment located at this facility site shall be maintained and operated at full efficiency and effectiveness at all times, such that emissions of contaminants are kept at the lowest practicable levels.
2. The steam and electric power generating facilities shall be operated within the following limitations:

<u>Boiler</u>	<u>Maximum Steam Production</u>	<u>Particulate Emission Limit*</u>	<u>Opacity Limit**</u>
Foster-Wheeler (1)-new	200,000 lb/hr	0.1 gr/SCF	20%
Babcock and Wilcox (3)-existing	(255,000 lb/hr)	0.2 gr/SCF	40%
#1 B & W	85,000 lb/hr		
#2 B & W	85,000 lb/hr		
#3 B & W	85,000 lb/hr		
Foster-Riley (1)-existing	100,000 lb/hr	0.2 gr/SCF	40%



PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 3/1/76

Page 2 of 5

Appl. No: 0047

File No: 23-0002

AMALGAMATED SUGAR COMPANY

2. (continued)

- \* Grains per standard cubic foot at twelve percent (12%) carbon dioxide (CO<sub>2</sub>) or at fifty percent (50%) excess air.
- \*\* Opacity of visible emissions that shall not be equaled or exceeded for an aggregated time period of more than three (3) minutes in any one hour.

3. The three (3) beet pulp dryers shall be operated within the following limitations:

- a. A maximum particulate emission rate from each dryer shall not exceed 0.2 gr/SCF and 73.0 lb/hr based on a process weight of 150,000 lbs/hr.
- b. The maximum visible emissions shall not equal or exceed 40% opacity for more than three (3) minutes in any one (1) hour.

4. The two (2) lime kilns shall be operated within the following limitations:

- a. A maximum particulate emission rate from each kiln shall not exceed 0.2 gr/SCF and 22.2 lb/hr based on a process weight of 30,000 lbs/hr.
- b. The maximum visible emission shall not equal or exceed 40% opacity for more than three (3) minutes in any one (1) hour.

5. The use of coal containing greater than 1.0 percent sulfur by weight is prohibited without prior approval from the Department of Environmental Quality and then only if the higher sulfur content coal is used in such a manner or control provided such that sulfur dioxide emissions can be demonstrated to be equal to or less than those resulting from the use of coal with no greater than 1.0 percent sulfur by weight.

6. Sulfur dioxide (SO<sub>2</sub>) emissions from the new Foster - Wheeler 200,000 lb/hr steam production boiler shall be limited to 1.2 lb per million BTU heat input when coal is burned.

7. When the presence of uncombined water is the only reason for failure to meet the visible emission limitations of conditions 2, 3 or 4 of this permit such failure shall not be a violation of this permit.

Compliance Demonstration Schedule

The Amalgamated Sugar Company shall:

8. Complete in accordance with the Department of Environmental Quality approved plans and specifications on or before September 30, 1973 the following installations:

- a. The new Foster - Wheeler 200,000 lb/hr coal fired boiler and baghouse collection system, including

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS  
Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 3/1/76  
Page 3 of 5  
Appl. No: 0047  
File No: 23-0002

AMALGAMATED SUGAR COMPANY

8. (Continued)

1. A photoelectric or other type of smoke detector and recorder.
2. An instrument for continuously monitoring and recording sulfur dioxide emissions.
3. An instrument for continuously monitoring and recording emissions of nitrogen oxides.

9. Install a new baghouse collection system on the existing Foster Riley boiler on or before July 1, 1974.

10. Demonstrate to the Department of Environmental Quality that the new Foster - Wheeler boiler, the existing Foster - Riley boiler, the three (3) beet pulp dryers and the two (2) lime kilns are capable of continuous compliance with the emission limits set forth in this permit by isokinetically sampling the boiler stack emissions as prescribed in OAR, Chapter 340, Section 20-040 and in accordance with Department of Environmental Quality approved procedures.

All test data and results shall be submitted to the Department of Environmental Quality for review and approval as follows:

<u>Emission Source</u>	<u>Test Report Submission Date</u>
New Foster - Wheeler 200,000 lb/hr boiler	on or before December 15, 1973
(3) Beet Pulp Dryers	on or before December 15, 1973
(2) Lime Kilns	on or before December 15, 1973
Existing Foster - Riley 100,000 lb/hr boiler	on or before December 1, 1974

Monitoring and Reporting

11. All emission monitoring equipment shall be calibrated on a routine basis and maintained and operated as per manufacturer's instructions.

12. The company shall maintain a file of the following records and measurements for the new Foster - Wheeler boiler:

- a. Daily chart records of the opacity of the boiler stack emissions.
- b. Daily chart records of sulfur dioxide (SO<sub>2</sub>) emissions.
- c. Daily chart records of nitrogen oxide (NO<sub>x</sub>) emissions.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

AMALGAMATED SUGAR COMPANY

Recom. Expir. Date: 3/1/76

Page 4 of 5

Appl. No: 0047

File No: 23-0002

12. (continued)

- d. Daily records of the amount of coal burned.
- e. A record of the sulfur content of the coal burned.
- f. All records shall be maintained for two (2) years from date of recording.
- g. Copies of records shall be submitted to the Department of Environmental Quality for review when requested.

Prohibited Activities

13. No open burning shall be conducted on the plant site.

Special Conditions

14. "Fugitive emissions" and "Nuisance conditions" as defined by Oregon Administrative Rules, Chapter 340, Section 21-050, shall be corrected and the air contaminants shall be controlled or removed in a manner approved by the Department of Environmental Quality.

15. All solid waste and mill clean-up shall be disposed of in a manner and at locations approved by the Department of Environmental Quality.

16. Department of Environmental Quality representatives shall be permitted access to the plant site at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.

17. No construction, installation, enlargement or major alteration or modification of any air contaminant source shall be made without prior approval from the Department of Environmental Quality. Plans and specifications and a request for approval for such construction, installation or modification shall be submitted to the Department of Environmental Quality as prescribed in OAR, Chapter 340, Sections 20-020, 20-025 and 20-030.

18. The Annual Compliance Determination Fee shall be submitted to the Department of Environmental Quality according to the following schedule:

<u>Amount Due</u>	<u>Date Due</u>
\$50.00	March 1, 1974
\$50.00	March 1, 1975

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 3/1/76

Page 5 of 5

Appl. No: 0047

File No: 23-0002

AMALGAMATED SUGAR COMPANY

---

19. 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 appreciation.
- b. That there has been a violation of any condition contained herein.
- c. That there has been a material change in quantity or character of air contaminants emitted to the atmosphere.

Department of Environmental Quality  
Air Quality Control Division

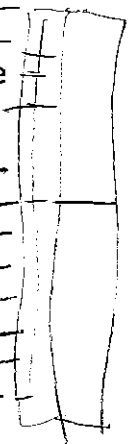
AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

PUBLISHERS PAPER COMPANY  
Wynooski Road  
Newberg, Oregon

---

Background

1. Publishers Paper Company operates a sulfite pulp and paper mill on Wynooski Road southeast of Newberg. The capacity is 220 ton/day of unbleached, air-dried pulp.
2. The pulp is produced in four batch digesters of 14.4 tons per digester capacity. Pulp batches are discharged approximately at intervals of one and two-third hours, with an accompanying discharge of sulfur dioxide ( $\text{SO}_2$ ). After discharge from the digesters, the pulp is washed of spent sulfite (cook) liquor and of dissolved wood solids, which amount to approximately half the weight of chips charged initially. This liquor is evaporated to approximately 50% solids and incinerated in a recovery furnace. The combustion products include  $\text{SO}_2$  and magnesium oxide ( $\text{MgO}$ ) from the cook liquor. These compounds are removed from the flue gases by means of mechanical collectors (principal mechanism for  $\text{MgO}$  removal) and a series of four scrubbers, which remove both  $\text{SO}_2$  and  $\text{MgO}$  in a water solution. The solution is "fortified" with sulfur dioxide gas produced in a sulfur burner and returned to the digester area for reuse as a cooking liquor.
3. The status of controls at this mill is:
  - a. Digester blow  $\text{SO}_2$ : A system was installed in mid-1972 for condensing and scrubbing blow gases. It functioned but in so doing caused an additional discharge of  $\text{SO}_2$  to the liquid waste treatment system. Additional capacity is being provided for relieving  $\text{SO}_2$  from the digesters prior to discharging the pulp. The improved system and its installation schedule are the subject of Condition #9 of the Air Contaminant Discharge Permit. The completed system is designed to reduce emissions below three pounds of  $\text{SO}_2$  per ton of pulp, with compliance to be demonstrated by September 1, 1973.
  - b. Recovery Furnace: Particulate ( $\text{MgO}$  and fly ash) emissions have ranged from 1.1 to 3.2 pounds per ton of pulp, with an average of 2.1 pounds per ton since monitoring started.  $\text{SO}_2$  emissions have peaked over 2,000 ppm (for periods on the order of minutes), and averaged 210 ppm during 1972, and 175 ppm from July through December 1972. The average mass emission rate from July to December 1972 was 13.5 pounds of  $\text{SO}_2$  per air-dried ton.
  - c. Other Sources: Other sources of  $\text{SO}_2$  are from the pulp-washing system and amount to approximately one pound per ton.



4. Monitoring and reporting are to be performed according to procedures approved by the Department. This mill uses a Barton coulometric titrator for monitoring SO<sub>2</sub> emissions from the recovery furnace. Particulate measurements at present are made with an impinger train.
5. The power boilers are fueled with natural gas, with residual oil as a backup. Stack tests, to be performed during the Winter of 1973-1974 (period of maximum gas curtailment), are required to establish the compliance status of the furnaces while they are on oil. If compliance cannot be demonstrated, a compliance program is required to be submitted by September 1, 1974, including a schedule to achieve compliance by February 1, 1975. The date for submission of a compliance schedule was chosen to allow for including that schedule in the next permit, due to be issued by December 31, 1974 (the expiration date of this permit).

### Evaluation

1. The digester controls are the final step in this mill's program for compliance with the Sulfite Mill Emission Regulation. This mill has served as the "pilot plant" study for controls at Publishers-Oregon City, so that the controls installed at Newberg have been somewhat experimental. Accordingly, the problems have been greater than are normally met in installing facilities of established design.
2. It is anticipated that with the installation of the relief-system modifications, the mill will be adequately controlled to prevent nuisance-level SO<sub>2</sub> ambient odors.
3. The applicable limits on emissions from this mill are:
  - a. Mill-site SO<sub>2</sub>: Twenty pounds per ton of air-dried, unbleached pulp produced.
  - b. Recovery furnace SO<sub>2</sub>: Not to exceed 800 parts per million as an hourly average
  - c. Blow-pit vent SO<sub>2</sub>: Not to exceed 0.2 pounds of SO<sub>2</sub> per minute per ton of pulp produced in the digesters, averaged over 15 minutes.
  - d. Recovery furnace particulate: Not to exceed four pounds per ton of pulp.
  - e. Power boilers: Residual fuel oil sulfur not to exceed 2.5% by weight, and by July 1, 1974, not to exceed 1.75% by weight. Particulate not to exceed 0.2 grains per standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air, nor a smoke opacity of 20%.
4. Because the SO<sub>2</sub> compliance program will not be complete until late 1973, and the power boiler compliance status cannot be determined until early 1974, a two-year permit is proposed in order to allow an opportunity for revising the permit conditions as indicated by the performance of the control system and to allow an opportunity to include the power boiler compliance schedule in a new permit.

Recommendation

It is recommended that the attached proposed permit be reviewed for issuance to Publishers Paper Co., Newberg Division.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 12/31/74  
Page 1 of 5

APPLICANT:

PUBLISHERS PAPER COMPANY  
Newberg Division  
Wynooski Road  
Newberg, Oregon

REFERENCE INFORMATION

File Number 36-6142  
Appl. No.: 0013 Received: 11/1/72  
OTHER AIR Contaminant Sources at this Site:

<u>Source</u>	<u>SIC</u>	<u>Permit No.</u>
---------------	------------	-------------------

Source(s) Permitted to Discharge Air Contaminants:

NAME OF AIR CONTAMINANT SOURCE

STANDARD INDUSTRY CODE AS LISTED

SULFITE PULP AND PAPER

2621

Permitted Activities

Until such time as this permit expires or is modified or revoked, PUBLISHERS PAPER COMPANY is herewith permitted to operate its 220 ton/day (pulp capacity) sulfite pulp and paper mill consisting of pulp and paper making facilities, cook chemical preparation facilities, cook chemical recovery facilities, and steam-generating boiler facilities, including those processes and activities directly related or associated thereto located at Newberg, Oregon, and to discharge therefrom treated exhaust gases containing air contaminants in conformance with the requirements, limitations, and conditions of this permit.

Performance Standards and Emission Limits

All air contaminant-generating processes and all air-contaminant-control equipment shall be maintained and operated at maximum efficiency and effectiveness, such that emissions of air contaminants are kept to lowest practicable levels, and in addition:

1. Sulfur dioxide (SO<sub>2</sub>) emissions on a millsite basis shall not exceed twenty (20) pounds per ton of unbleached, air-dried ton (adt) of pulp produced after September 1, 1973.
2. The recovery furnace SO<sub>2</sub> emissions shall not exceed the following:
  - a. 800 ppm as an hourly average
  - b. 200 ppm as a monthly average
  - c. Sixteen (16) pounds per ton and 3500 pounds per day



PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

PUBLISHERS PAPER COMPANY, Newberg Division

Recom. Expir. Date: 12/31/74

Page 2 of 5

Appl. No: 0013

File No: 36-6142

3. The blow pit vent SO<sub>2</sub> emissions shall:
  - a. Be kept to the lowest practicable levels at all times.
  - b. Not exceed three (3) pounds per adt and 660 pounds per day after September 1, 1973.
4. SO<sub>2</sub> emissions from all sources except the recovery furnace boilers 1, 2, 3, 5, 6, and 7, and the blow pit vent shall not exceed one (1) pound of SO<sub>2</sub> per adt and 220 pounds per day.
5. The recovery furnace particulate emissions shall not exceed three (3) pounds per adt and 660 pounds per day.
6. All steam generating boiler particulate emissions shall not exceed 0.2 grains per standard cubic foot corrected to twelve percent (12%) CO<sub>2</sub> or at fifty percent (50%) excess air, and shall not equal or exceed the opacity indicated below when fired on the specific fuel for that limit for more than three (3) minutes in any one (1) hour:

<u>Boiler</u>	<u>Fuel</u>	<u>Opacity</u>	<u>Grains/SCF</u>	<u>Sulfur Dioxide</u>
1	N.G.*	20%	0.2	1,000 ppm
2,3,5,6,7	N.G./Oil**	20%	0.2	1,000 ppm
2,3	Sludge & Knots	40%	0.2	1,000 ppm

\* N.G. refers to natural gas only

\*\* N. G. /Oil refers to natural gas, or alternatively residual fuel oil.

7. The use of residual fuel oil containing more than two and one half percent (2.5%) sulfur by weight is prohibited.
8. The use of residual fuel oil containing more than one and three quarters percent (1.75%) sulfur by weight is prohibited after July 1, 1974.

Compliance Demonstration Schedule

9. Blow pit vent controls shall be improved by the installation of additional digester relief capability to reduce blow pit vent emissions to no more than three (3) pounds of SO<sub>2</sub> per adt and no more than 660 pounds of SO<sub>2</sub> per day according to the following schedule:
  - a. Components (additional relief capacity and additional heat exchanger) shall be purchased by no later than February 15, 1973.
  - b. Construction shall be started by no later than February 28, 1973.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS  
Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/74

Page 3 of 5

Appl. No: 0013

File No: 36-6142

PUBLISHERS PAPER COMPANY, Newberg Division

9. Continued

- c. Installation shall be completed by no later than August 1, 1973.
  - d. Compliance shall be demonstrated by no later than September 1, 1973, using procedures on file with and approved by the Department of Environmental Quality.
  - e. The permittee shall notify the Department of Environmental Quality in writing within 14 days of the completion of each of these conditions.
10. The permittee shall submit to the Department of Environmental Quality for review and approval a detailed program and time schedule of tests to evaluate visible and particulate emissions from boilers #2, #3, #5, #6 and #7 while being fired with residual fuel oil by no later than July 1, 1973, and a report and analysis of the test results by no later than May 1, 1974; further, if such tests and evaluations do not demonstrate compliance with permit condition No. 6, a detailed compliance schedule setting forth a program to bring any boiler which does not comply with condition No. 6 into compliance by no later than February 1, 1975, shall be submitted by no later than September 1, 1974, for review and approval by the Department of Environmental Quality.
11. The permittee shall submit to the Department of Environmental Quality a detailed program and time schedule of tests to evaluate visible and particulate emissions from boilers #2 and #3 while being fired with waste sludge and knots by no later than July 1, 1973, and a report and analysis of the test results on or before May 1, 1974; further, if such tests and evaluations do not demonstrate compliance with permit condition No. 6, a detailed compliance schedule setting forth a program to bring any boiler which does not comply with condition No. 6 into compliance by no later than February 1, 1975, shall be submitted by no later than September 1, 1974, for review and approval by the Department of Environmental Quality.

Monitoring and Reporting

12. The operation and maintenance of the sulfite pulp and paper production and control facilities shall be effectively monitored. A record of all such data shall be maintained and a summary submitted to the Department of Environmental Quality within fifteen (15) days after the end of each calendar month. Unless otherwise agreed to in writing the information collected and submitted shall be in accordance with testing, monitoring and reporting procedures on file with and approved by the Department of Environmental Quality, and shall include, but not necessarily be limited to, the following parameters and frequencies:

<u>Parameter</u>	<u>Minimum Frequency</u>
a. Digester blow pit vent sulfur dioxide emissions	Once per week
b. Recovery furnace sulfur dioxide emissions	Continually monitored

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS  
Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/74

Page 4 of 5

Appl. No: 0013

File No: 36-6142

PUBLISHERS PAPER COMPANY, Newberg Division

12. Continued

- |   |  |
|---|--|
| c. Recovery furnace particulate emissions | Three (3) times per month                  |
| d. Production of unbleached pulp          | Summarized monthly from production records |

13. The final monthly report required in condition No. 12, submitted during any calendar year shall include the quantities and types of fuels used during that calendar year.
14. The Department shall be promptly notified of any upset condition in accordance with OAR, Chapter 340, "Upset Conditions" which may cause or tend to cause any detectable increase in atmospheric emissions. Such notice shall include the reason for the upset and indicate the precautions taken to prevent a recurrence.

Emergency Reduction Plan

15. The Company shall establish and maintain a "Preplanned Abatement Strategy", filed with and approved by the Department of Environmental Quality, and implemented in response to Air Pollution Alerts, Warnings, and Emergencies as they are Declared and Terminated by the Department of Environmental Quality.

Prohibited Activities

16. No open burning shall be conducted at the plant site.

Special Conditions

17. All solid wastes or residues shall be disposed of in manners and at locations approved by the Department of Environmental Quality.
18. Department of Environmental Quality representatives shall be permitted access to the plant site at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.
19. No alteration, modification or expansion of the subject sulfite pulp and paper production facilities shall be made without prior notice to and approval by the Department of Environmental Quality.
20. The Annual Compliance Determination Fee shall be submitted to the Department of Environmental Quality according to the following schedule:

Amount Due

\$175.00

Date Due

December 1, 1973

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

PUBLISHERS PAPER COMPANY, Newberg Division

---

Recom. Expir. Date: 12/31/74

Page 5 of 5

Appl. No: 0013

File No: 36-6142

21. 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 air contaminants emitted to the atmosphere.

Date Feb. 20, 1973

Department of Environmental Quality  
Air Quality Control Division

AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

PUBLISHERS PAPER COMPANY  
OREGON CITY, OREGON

---

Background

1. Publishers Paper Company operates a sulfite pulp and paper mill at the south end of Main St. in downtown Oregon City. The pulping capacity at this facility is 230 tons per day of unbleached, air-dried sulfite pulp.
2. The pulp is produced in six batch digesters three (3) of which have a capacity of 9.25 tons and three (3) a capacity of 6.25 tons per batch. Pulp batches are discharged at approximately one-hour intervals, with accompanying discharges of sulfur dioxide ( $\text{SO}_2$ ) to the atmosphere. After discharge from the digesters, the pulp is washed of spent sulfite (cook) liquor and of dissolved wood solids, which amount to approximately half the weight of chips charged initially. This liquor is evaporated to approximately 50% solids and incinerated in a recovery furnace. The combustion products include  $\text{SO}_2$  and magnesium oxide ( $\text{MgO}$ ) from the cook liquor. These compounds are removed from the flue gas by means of mechanical collectors (principal mechanism for  $\text{MgO}$  removal) and a series of Venturi-scrubbers, which remove both  $\text{SO}_2$  and  $\text{MgO}$  in a water solution. The scrubber effluent is "fortified" with sulfur dioxide gas produced in a sulfur burner and returned to the digester area for reuse as a cooking liquor.
3. The status of controls at this mill is:
  - a. Digester blow  $\text{SO}_2$ : The company proposed a system for control of blow pit vent emissions, to be installed first at Publisher's Newberg Division, modified as necessary to attain compliance, and the modified system to be installed at the Oregon City Division. This schedule indicates compliance by no later than August 1, 1974.
  - b. Recovery Furnace  $\text{SO}_2$ : A fourth scrubbing stage is to be added to the existing three, and is to be operational by September 30, 1973. At that time, the Oregon City recovery furnace will have the same degree of control as does the recovery furnace at Newberg, which emits under 16 pounds of  $\text{SO}_2$  per ton of pulp. Presently,  $\text{SO}_2$  emissions at Oregon City average 370 ppm and 27 pounds per ton.
  - c. Recovery Furnace Particulate: Emissions have averaged 2.9 pounds per ton since the commencement of monitoring. They should decrease somewhat after the fourth scrubbing stage is installed.
  - d. Other sources of  $\text{SO}_2$  are mainly from the pulp washing system and amount to 2 pounds per ton.

4. The monitoring and reporting program is to be performed according to procedures approved by the Department. This mill uses a Barton coulometric titrator for monitoring SO<sub>2</sub> emissions from the recovery furnace. Particulate measurements at present are made with an impinger train.
5. The power boilers are fueled with natural gas, with residual oil as a back-up. Stack tests, to be performed during the Winter of 1973-1974 (period of maximum gas curtailment), are required to establish the compliance status of the furnaces while they are operated on oil. If compliance cannot be demonstrated, a compliance program is required to be submitted by September 1, 1974, including a schedule to achieve compliance by February 1, 1975. The date for submission of this compliance schedule was chosen to allow for including that schedule in the next permit, due to be issued by December 31, 1974 (the expiration date of this permit).

### Evaluation

1. The sensitive location of this mill dictates the care needed in achieving compliance. It is necessary that the controls installed function well upon completion and placement in operation. Also, the restricted nature of the rather crowded plant site makes installation of control facilities difficult and also restricts the possibilities of adding additional controls if necessary. These considerations led to the Company's proposing that the control techniques be implemented first at Newberg and, after eliminating errors, implementing them at Oregon City.
2. It is anticipated that adding the fourth scrubbing stage will bring the Oregon City recovery furnace easily within compliance.
3. The subsequent installation of blowpit vent emission controls should eliminate ambient nuisance SO<sub>2</sub> odors in Oregon City.
4. The applicable limits on emissions from this mill are:
  - a. Mill-site SO<sub>2</sub>: 20 pounds per ton of air-dried, unbleached pulp produced.
  - b. Recovery Furnace SO<sub>2</sub>: Not to exceed 800 ppm as an hourly average.
  - c. Blow-pit Vent SO<sub>2</sub>: Not to exceed 0.2 pounds of SO<sub>2</sub> per minute per ton of pulp produced in the digesters, averaged over 15 minutes.
  - d. Recovery Furnace Particulate: Not to exceed 4 pounds per ton of pulp produced.
  - e. Power Boilers: Residual fuel oil sulfur not to exceed 2.5% by weight, and by July 1, 1974, not to exceed 1.75% by weight. Particulate not to exceed 0.2 grains per standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air, nor a smoke opacity equal to or greater than 20% opacity.

5. The SO<sub>2</sub> compliance program will not be complete until August, 1974. By that time, measurements will have been taken to establish the compliance status of the power boilers while they are fueled by oil. The emission rates after compliance and the power boiler compliance schedules should be included in a permit, so that the recommended duration of this permit is for two (2) years (until Dec. 31, 1974).

Recommendation

It is recommended that the attached proposed permit be reviewed for issuance to Publishers Paper Company, Oregon City Division.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 12/31/74

Page 1 of 5

APPLICANT:

PUBLISHERS PAPER COMPANY  
419 Main Street  
Oregon City, Oregon

REFERENCE INFORMATION

File Number 03-1850  
Appl. No.: 0014 Received: 11/1/72  
OTHER AIR Contaminant Sources at this Site:

<u>Source</u>	<u>SIC</u>	<u>Permit No.</u>
none		

Source(s) Permitted to Discharge Air Contaminants:

NAME OF AIR CONTAMINANT SOURCE

STANDARD INDUSTRY CODE AS LISTED

SULFITE PULP AND PAPER

2621

Permitted Activities

Until such time as this permit expires or is modified or revoked, PUBLISHERS PAPER COMPANY is herewith permitted to operate its 230 ton/day (pulp capacity) sulfite pulp and paper mill consisting of pulp and paper making facilities, cook chemical preparation facilities, cook chemical recovery facilities, and steam-generating boiler facilities, including those processes and activities directly related or associated thereto located at Oregon City, Oregon, and to discharge therefrom treated exhaust gases containing air contaminants in conformance with the requirements, limitations, and conditions of this permit.

Performance Standards and Emission Limits

All air contaminant-generating processes and all air-contaminant-control equipment shall be maintained and operated at maximum efficiency and effectiveness, such that emissions of air contaminants are kept to lowest practicable levels, and in addition:

1. Sulfur dioxide (SO<sub>2</sub>) emissions on a mill site basis shall not exceed twenty (20) pounds per unbleached, air-dried ton (adt) of pulp produced, and 4,600 pounds per day after August 1, 1974.
2. The recovery furnace SO<sub>2</sub> emissions shall:
  - a. Be kept to lowest practicable levels at all times.
  - b. Not exceed any of the following conditions after September 30, 1973:
    1. 800 ppm as an hourly average
    2. 500 ppm as a monthly average
    3. 15 pounds per adt and 3,450 pounds per day.



PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/74

Page 2 of 5

Appl. No.: 0014

File No.: 03-1850

for PUBLISHERS PAPER COMPANY

3. The blow pit vent SO<sub>2</sub> emissions shall:
  - a. Be kept to the lowest practicable levels at all times.
  - b. Not exceed three (3) pounds per adt and 690 pounds per day after August 1, 1974.
4. SO<sub>2</sub> emissions from sources other than the recovery furnace and blow pit vent shall:
  - a. Be kept to the lowest practicable levels at all times.
  - b. Not exceed two (2) pounds per ton and 460 pounds per day after August 1, 1974.
5. The recovery furnace particulate emissions shall not exceed three (3) pounds per adt and 690 pounds per day nor equal or exceed 20% opacity for a time period aggregating more than three (3) minutes in any one hour.
6. All steam generating boiler particulate emissions shall comply with the following:

Boiler	Fuel	Steam Capacity (2)	Opacity (3)	Grains/SCF (4)	Sulfur Dioxide	Bachrach
A, B, C, and D	N.G.	140,000 (4 boilers)	20%	0.2	1000 ppm	-----
A, B, C, and D	Res. Oil	140,000 (4 boilers)	20%	0.2	1000 ppm	4
G	N.G.	85,000	20%	0.2	1000 ppm	-----
G	Res. Oil	85,000	20%	0.2	1000 ppm	4
G	Sludge & Knots	85,000	40%	0.2	1000 ppm	-----
4	N.G.	30,000	20%	0.2	1000 ppm	-----
5	N.G.	35,000	20%	0.2	1000 ppm	-----

- (1) "N.G." refers to natural gas, "Res. Oil" to "residual fuel oil" The use of fuels other than these is prohibited unless approved by the Department of Environmental Quality.
- (2) Steam Capacity in pounds per hour.
- (3) Shall not equal or exceed the indicated opacity for more than three (3) minutes in any one (1) hour.
- (4) Grains per standard cubic foot, corrected to twelve percent (12%) CO<sub>2</sub> or fifty percent (50%) excess air.

PUBLISHERS PAPER COMPANY

---

7. The use of residual fuel oil containing more than two and one-half percent (2 1/2%) sulfur by weight is prohibited.
8. The use of residual fuel oil containing more than one and three quarters percent (1 3/4%) sulfur by weight is prohibited after July 1, 1974.

Compliance Demonstration Schedule

9. Recovery furnace SO<sub>2</sub>-emission controls shall be provided according to the following schedule:
  - a. Ordering major units of equipment to be completed by no later than February 1, 1973.
  - b. Construction to begin by no later than February 1, 1973.
  - c. Construction completed by no later than September 15, 1973.
  - d. Compliance demonstrated by December 1, 1973.
10. Blow-pit vent SO<sub>2</sub>-emission controls shall be provided according to the following schedule:
  - a. Detailed engineering to begin by no later than June 1, 1973.
  - b. Ordering components to begin by no later than September 1, 1973.
  - c. Construction to begin by no later than September 1, 1973.
  - d. Construction to be complete by June 30, 1974.
  - e. Compliance demonstrated by August 1, 1974.
11. Other source SO<sub>2</sub>-emission controls, exclusive of the recovery furnace and blow pit vent, shall be provided according to the following schedule:
  - a. A description of each emission point to be controlled and the method of control shall be submitted for review and approval by no later than May 1, 1973.
  - b. Detailed engineering for control of the emission points selected shall be complete by no later than August 1, 1973.
  - c. Construction shall be started by no later than August 1, 1973.
  - d. Construction shall be completed by no later than December 1, 1973.
  - e. Compliance shall be demonstrated by January 1, 1974.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

PUBLISHERS PAPER COMPANY

Recom. Expir. Date: 12/31/74

Page 4 of 5

Appl. No: 0014

File No: 03-1850

12. The permittee shall notify the Department of Environmental Quality in writing within 14 days of the completion of each part of Conditions 9, 10, and 11 above.
13. The permittee shall submit to the Department of Environmental Quality for review and approval a detailed program and time schedule of tests to evaluate visible and particulate emissions from boilers A, B, C, D, and G while being fired with residual fuel oil by no later than July 1, 1973 and a report and analysis of the test results by no later than May 1, 1974; further, if such tests and evaluations do not demonstrate compliance with permit condition No. 6, a detailed compliance schedule setting forth a program to bring any boiler which does not comply with condition No. 6 into compliance by no later than February 1, 1975, shall be submitted by no later than September 1, 1974 for review and approval by the Department of Environmental Quality.
14. The permittee shall submit to the Department of Environmental Quality a detailed program and time schedule of tests to evaluate visible and particulate emissions from boiler G while being fired with waste sludge and knots by no later than July 1, 1973 and a report and analysis of the test results by no later than May 1, 1974; further, if such tests and evaluations do not demonstrate compliance with permit condition No. 6, a detailed compliance schedule setting forth a program to bring boiler G into compliance with condition No. 6 by no later than February 1, 1975, shall be submitted by no later than September 1, 1974 for review and approval by the Department of Environmental Quality.

Monitoring and Reporting

15. The operation and maintenance of the sulfite pulp and paper production and control facilities shall be effectively monitored. A record of all such data shall be maintained and a summary submitted to the Department of Environmental Quality within fifteen (15) days after the end of each calendar month. Unless otherwise agreed to in writing the information collected and submitted shall be in accordance with testing, monitoring and reporting procedures on file with and approved by the Department of Environmental Quality, and shall include, but not necessarily be limited to, the following parameters and frequencies:

<u>Parameter</u>	<u>Minimum Frequency</u>
a. Digester blow pit vent sulfur dioxide emissions	Once per week
b. Recovery furnace sulfur dioxide emissions	Continually monitored
c. Recovery furnace particulate emissions	Three (3) times per month
d. Production of unbleached pulp	Summarized monthly from production records

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/74

Page 5 of 5

Appl. No: 0014

File No: 03-1950

PUBLISHERS PAPER COMPANY

- 16. The final monthly report required in condition No.15 submitted during any calendar year shall include the quantities and types of fuels used during that calendar year.
- 17. The Department shall be promptly notified of any upset condition in accordance with OAR, Chapter 340, "Upset Conditions" which may cause or tend to cause any detectable increase in atmospheric emissions. Such notice shall include the reason for the upset and indicate the precautions taken to prevent a recurrence.

Emergency Reduction Plan

- 18. The Company shall establish and maintain a "Preplanned Abatement Strategy", filed with and approved by the Department of Environmental Quality, and implemented in response to Air Pollution Alerts, Warnings, And Emergencies as they are Declared and Terminated by the Department of Environmental Quality.

Prohibited Activities

- 19. No open burning shall be conducted at the plant site.

Special Conditions

- 20. All solid wastes or residues shall be disposed of in manners and at locations approved by the Department of Environmental Quality.
- 21. Department of Environmental Quality representatives shall be permitted access to the plant site at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.
- 22. No alteration, modification or expansion of the subject sulfite pulp and paper production facilities shall be made without prior notice to and approval by the Department of Environmental Quality.
- 23. The Annual Compliance Determination Fee shall be submitted to the Department of Environmental Quality according to the following schedule:

<u>Amount Due</u>	<u>Date Due</u>
\$175.00	December 1, 1973

- 24. 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 air contaminants emitted to the atmosphere.

Department of Environmental Quality  
Air Quality Control Division

AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

Menasha Corporation  
North Bend, Oregon

---

Background

1. Menasha Corporation operates a neutral-sulfite, semi-chemical corrugating medium pulp and paper mill on Jordan Point in North Bend. The maximum pulp capacity is 250 air-dry tons per day of neutral-sulfite, semi-chemical pulp.
2. The pulp is produced in two stages. First, chips are cooked in a continuous digester which softens them. Next, the softened chips are mechanically pulped. The cook liquor is made by dissolving sulfur dioxide in a sodium carbonate solution, in a manner in that the solution is always alkaline. During digestion, the liquor becomes less alkaline, but never to the point of becoming acid. Emissions of sulfur dioxide from the cook-liquor preparation are small, generally under 0.05 pounds of sulfur dioxide per ton of pulp and 40 parts per million concentration. Sulfur dioxide emissions from digestion are zero.
3. The Company is installing a "Spent Liquor Incinerator" (SLI), as part of a water-quality control program. The purpose of the unit is to incinerate wood solids dissolved in the digestion process, as an alternative to discharging them through a liquid waste treatment system. The SLI will emit both SO<sub>2</sub> and reduced sulfur gases e.g., hydrogen sulfide and its organic substitution homologs. The emissions of both of these chemical species are guaranteed to be less than 5 parts per million, which is not enough to have a noticeable effect off of the plant grounds. The mass emissions are limited to 0.1 pounds of SO<sub>2</sub> per ton, 0.05 pounds of reduced sulfur per ton and four (4) pounds of particulate per ton of pulp pending tests on the unit when it is in operation.
4. The only source at this mill which is known to be out of compliance is one of two (2) hog fuel boilers. The other hog fuel boiler is believed to be in compliance, but a stack emission test is required to confirm its status.
5. Monitoring and reporting of emissions are to be performed according to procedures on file with and approved by the Department of Environmental Quality. This mill uses a Theta Sensor coulometric monitor for SO<sub>2</sub> emissions.

Evaluation

1. The applicable limits for this mill are:
  - a. Plant site SO<sub>2</sub>: 20 pounds per ton of pulp produced
  - b. SLI SO<sub>2</sub>: Not to exceed 800 ppm as an hourly average

## Evaluation

1. (continued)
  - c. SLI Particulate: Four (4) pounds per ton
  - d. Hog fuel boilers: Not to exceed 0.2 grains per standard foot nor a smoke opacity equal or greater than 40% for an aggregated time period of three (3) minutes in any one hour.
2. The permit duration is proposed to terminate after the SLI is placed in operation, so that normal emissions may be incorporated into a new permit or, if necessary, a compliance program may be established. The expiration date that is proposed is December 31, 1974.

## Recommendation

It is recommended that the proposed permit be reviewed for issuance to Menasha Corporation.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 12/31/74  
Page 1 of 4

APPLICANT:

MENASHA CORPORATION  
Jordan Point  
North Bend, Oregon

REFERENCE INFORMATION

File Number 06-0015  
Appl. No.: 0011 Received: 11/1/72  
OTHER AIR Contaminant Sources at this Site:

<u>Source</u>	<u>SIC</u>	<u>Permit No.</u>
---------------	------------	-------------------

Source(s) Permitted to Discharge Air Contaminants:

NAME OF AIR CONTAMINANT SOURCE

STANDARD INDUSTRY CODE AS LISTED

SULFITE PULP AND CORRUGATING MEDIUM

2631

Permitted Activities

Until such time as this permit expires or is modified or revoked, MENASHA CORPORATION is herewith permitted to operate its 250 ton per day (maximum pulp capacity) neutral sulfite semichemical pulp and corrugating medium mill, consisting of liquor-making facilities, pulping facilities, corrugating-medium-making facilities, and steam-generating boiler-facilities, including those processes and activities directly related thereto located at North Bend, Oregon, and to discharge therefrom treated exhaust gases containing air contaminants in conformance with the requirements, limitations, and conditions of this permit.

Performance Standards and Emission Limits

All air contaminant-generating processes and all air-contaminant-control equipment shall be maintained and operated at maximum efficiency and effectiveness, such that the emissions of air contaminants are kept to the lowest practicable levels, and in addition:

1. Sulfur dioxide (SO<sub>2</sub>) emissions on a mill-site basis shall not exceed three-tenths (0.3) pounds per air-dried ton (adt) of pulp produced.
2. SO<sub>2</sub> emissions from the liquor-plant absorption tower shall not exceed 40 parts per million and 0.05 pounds SO<sub>2</sub> per adt.
3. Emissions from the spent-liquor incinerator shall not exceed the following after September 1, 1974:
  - a. SO<sub>2</sub> shall not exceed ten (10) ppm and one-tenth (0.1) pounds per adt,
  - b. Total reduced sulfur, present as sulfides, shall not exceed ten (10) ppm and 0.05 pounds per adt,
  - c. Particulate emissions shall not exceed four (4) pounds per adt, 1,000 pounds per day, nor equal or exceed 20% opacity for an aggregated time period of more than three (3) minutes in any one hour.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/74

Page 2 of 4

Appl. No: 0011

File No: 06-0015

MENASHA CORPORATION

4. Steam-generating boiler facilities shall be operated within the following limitations:

<u>Boiler</u>	<u>Maximum Steam Production</u>	<u>Particulate Emission Limit *</u>	<u>Opacity Limit **</u>	<u>Date</u>
1	85,000 lb/hr	0.2 gr/SCF	40%	December 1, 1973
2	104,000 lb/hr	0.2 gr/SCF	40%	March 31, 1973

\* Grains per standard cubic foot at twelve percent (12%) carbon dioxide (CO<sub>2</sub>) or at fifty percent (50%) excess air.

\*\* Opacity of visible emissions that shall not be equaled or exceeded for an aggregated time period of more than three (3) minutes in any one hour.

Compliance Demonstration Schedule

5. Continuous monitoring of SO<sub>2</sub> emissions from the spent liquor incinerator shall be commenced at the time the incinerator is placed into operation by no later than June 1, 1974. Compliance with the SO<sub>2</sub> limit of condition 3. a. of this permit shall be demonstrated by no later than September 1, 1974.
6. Demonstrate to the Department of Environmental Quality that the Number 2 hog fuel fired boiler is capable of continuous compliance with the emission limits set forth in condition 4. above by isokinetically sampling the boiler stack emissions as prescribed in OAR, Chapter 340, Section 20-040 and in accordance with Department of Environmental Quality approved procedures, said test results to be submitted to the Department of Environmental Quality by no later than March 31, 1973.
7. The Number 1 hog fuel boiler shall be modified by improving the fuel distribution and replacing the bottom gratings by no later than September 30, 1973. Compliance shall be demonstrated by isokinetic sampling in accordance with condition 6, above, said test results to be submitted to the Department of Environmental Quality by no later than December 1, 1973.
8. Demonstrate to the Department of Environmental Quality that particulate emissions from the Spent Liquor Incinerator comply with the particulate emission limit of four (4) pounds per ton of pulp by no later than September 1, 1974.

Monitoring and Reporting

9. The operation of and emissions from the pulp mill and hog-fuel boilers shall be effectively monitored. A record of all such data shall be maintained and a summary submitted to the Department of Environmental Quality within fifteen (15) days after the end of each calendar month. Unless agreed to in writing, the information collected and submitted shall be in accordance with testing, monitoring and reporting procedures on file with and approved by the Department of Environmental Quality, and shall include, but not necessarily be limited to the following parameters and frequencies:



PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS  
Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/74

Page 3 of 4

Appl. No: 0011

File No: 06-0015

MENASHA CORPORATION

---

9. (continued)

<u>Parameters</u>	<u>Minimum Frequency</u>
a. Acid System Adsorption Tower SO <sub>2</sub> emissions	Continuous Monitor
b. Spent Liquor Incinerator SO <sub>2</sub> emissions	Continuous Monitor
c. Spent Liquor Incinerator Particulate Emissions	Three (3) times per month
d. Production of Unbleached pulp	Summarized from production records

10. The final monthly report required in Condition 8. submitted in any calendar year shall include the quantities and types of fuels used during that calendar year.

11. The Department of Environmental Quality shall be notified promptly of any upset condition in accordance with OAR, Chapter 340, "Upset Conditions" which may cause or tend to cause any detectable increase in atmospheric emissions. Such notice shall include reason for the upset and indicate the precautions taken to prevent a recurrence.

Prohibited Activities

12. No open burning shall be conducted at the plant site.

Special Conditions

13. All solid wastes or residues shall be disposed of in manners and at locations approved by the Department of Environmental Quality.

14. Department of Environmental Quality representatives shall be permitted access to the plant site at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.

15. No alteration, modification, or expansion of the subject sulfite pulp and paper production facilities shall be made without prior notice to and approval by the Department of Environmental Quality.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/74

Page 4 of 4

Appl. No: 0011

File No: 06-0015

MENASHA CORPORATION

---

16. The Annual Compliance Determination Fee shall be submitted to the Department of Environmental Quality according to the following schedule:

Amount Due

Date Due

\$175.00

December 1, 1973

17. This permit is subject to termination if the Department of Environmental Quality finds:

- a. That it was procured by any misrepresentation of 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 Air Contaminants emitted to the atmosphere.

Department of Environmental Quality  
Air Quality Control Division

AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

Boise Cascade Corporation  
Salem, Oregon

---

Background

1. Boise Cascade Corporation operates a sulfite pulp and paper mill at Commercial and Trade Streets in downtown Salem. The pulp capacity is 310 tons per day of air-dried, unbleached sulfite pulp.
2. The pulp is produced in six batch digesters each with a capacity of 12.5 tons. Pulp batches are discharged at approximately one-hour intervals, with accompanying discharges of sulfur dioxide ( $\text{SO}_2$ ) to the atmosphere. The pulp is washed of spent sulfite (cook) liquor and dissolved wood solids (which amount to approximately half the weight of chips initially charged) in the blow pits. The liquor is evaporated to approximately 50% solids and incinerated in a recovery furnace. The combustion products include flyash and  $\text{SO}_2$ . Almost all of the flyash is removed in a mechanical collector while the  $\text{SO}_2$  and the remaining flyash is treated for removal in a scrubber. The scrubber effluent is fortified with sulfur dioxide gas produced in a sulfur burner, and returned to the digester area for reuse as a cooking liquor.
3. The status of controls at this mill is:
  - a. Digester blow  $\text{SO}_2$ : The company is installing a system for pumping pulp out of the digesters instead of blowing it out under pressure as is the present practice. The system is scheduled for completion by December 1, 1973 at which time the emissions of  $\text{SO}_2$  from digester blows should be reduced essentially to zero.
  - b. Recovery furnace  $\text{SO}_2$ : Emissions of  $\text{SO}_2$  average 350 ppm and 17.5 pounds of  $\text{SO}_2$  per ton of pulp produced.
  - c. The other source of  $\text{SO}_2$  is the acid plant, which is under one (1) pound per ton.
  - d. Recovery furnace particulate presently averages 5.5 pounds per ton. A compliance schedule is included in the permit which will result in compliance with the limit of four (4) pounds per ton of particulate by December 31, 1974. That the emissions are not presently in compliance is a part of the failure of this installation to perform as guaranteed. The control technique to be applied is not yet determined. It may happen that compliance can be achieved by optimizing operating parameters, in which case compliance would be possible quite readily. If equipment must be added, however, that equipment must be designed, ordered, delivered, installed, placed in operation and tested. The compliance schedule as presented in the permit is based on allowing a five-month analytical and test period to determine

whether parameter optimization will yield compliance, while simultaneously requiring the preliminary engineering which would be required for the controls which will be needed if that optimization does not achieve compliance.

4. The monitoring and reporting program is to be performed according to procedures approved by the Department. This mill uses a DuPont Model 460 SO<sub>2</sub> Photometric (ultraviolet) monitor for recovery furnace SO<sub>2</sub>, and the Oregon-Washington Committee method (manual sampling technique) for blow pit vent emissions.
5. The power boilers are fueled with natural gas, with residual oil as a backup.
6. Mid-Willamette Valley Air Pollution Authority provided permit criteria for the Torula Yeast Plant, located on the mill site. The emission limits are based on the Authority's general tables relating emissions to process weight.

#### Evaluation

1. The location of this mill requires that control of emissions be highly efficient. The pump-out system for digester control is maximum control efficiency, essentially 100%. The permit conditions and compliance schedule embodies the proposal submitted by the company in response to the Sulfite Mill Emission Regulation and approved by the Department of Environmental Quality. It is expected that the installation of a pump-out system essentially will eliminate SO<sub>2</sub> odors in the vicinity of this mill.
2. The applicable limits on air contaminant discharges from this mill are:
  - a. Plant-site SO<sub>2</sub>: 20 pounds per ton of pulp produced
  - b. Recovery furnace SO<sub>2</sub>: Not to exceed 800 ppm as an hourly average
  - c. Recovery furnace particulate: Four (4) pounds per ton
  - d. Digester SO<sub>2</sub>: Commented on in paragraph 1 above
3. The permit duration is proposed to terminate after controls are installed, so that post-control, normal emissions can be incorporated into a new permit. The expiration date that is proposed to be December 31, 1974.

#### Recommendation

It is recommended that the attached proposed permit be reviewed for issuance to Boise Cascade for its Salem mill.

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
DEPARTMENT OF ENVIRONMENTAL QUALITY

Recommended Expiration Date: 12/31/74

Page 1 of 6

APPLICANT:

BOISE CASCADE CORPORATION  
Paper Group  
Salem, Oregon

REFERENCE INFORMATION

File Number 24-4171  
Appl. No.: 0012 Received: 11/1/72  
OTHER AIR Contaminant Sources at this Site:

<u>Source</u>	<u>SIC</u>	<u>Permit No.</u>
---------------	------------	-------------------

Source(s) Permitted to Discharge Air Contaminants:

NAME OF AIR CONTAMINANT SOURCE

STANDARD INDUSTRY CODE AS LISTED

SULFITE PULP AND PAPER  
TORULA YEAST MANUFACTURE

2621  
2821

Permitted Activities

Until such time as this permit expires or is modified or revoked, BOISE CASCADE PAPER GROUP is herewith permitted to operate its 310 ton/day (pulp capacity) sulfite pulp and paper mill consisting of pulp and paper making facilities, cook chemical preparation facilities, cook chemical recovery facilities, and steam-generating boiler facilities, including those processes and activities directly related or associated thereto located at Salem, Oregon, and to discharge therefrom treated exhaust gases containing air contaminants in conformance with the requirements, limitations, and conditions of this permit.

Divisions of Permit Specifications:

Page

Section A - Sulfite Pulp and Paper  
Section B - Torula Yeast Manufacture  
Section C - General Requirements

2  
5  
6

BOISE CASCADE CORPORATION

SECTION A - SULFITE PULP AND PAPER

Performance Standards and Emission Limits

All air contaminant-generating processes and all air-contaminant-control equipment shall be maintained and operated at maximum efficiency and effectiveness, such that emissions of air contaminants are kept to lowest practicable levels, and in addition:

1. Sulfur dioxide (SO<sub>2</sub>) emissions on a mill-site basis shall not exceed twenty (20) pounds per unbleached, air-dried ton (adt) of pulp produced after December 31, 1973.
2. The recovery furnace SO<sub>2</sub> emissions shall not exceed the following:
  - a. 800 ppm as an hourly average
  - b. 400 ppm as a monthly average
  - c. Eighteen (18) pounds per adt and 5,590 pounds per day.
3. Blow pit vent SO<sub>2</sub> emissions shall:
  - a. Be kept to the lowest practicable levels at all times.
  - b. Be reduced to essentially no discharge after December 31, 1973.
4. SO<sub>2</sub> emissions from sources other than the recovery furnace and boilers #4, #5, and #6, shall:
  - a. Be kept to lowest practicable levels at all times.
  - b. Not exceed one (1) pound per adt.
5. Recovery furnace particulate emissions shall not exceed four (4) pounds per ton after July 1, 1974.
6. The steam-generating boilers, fired by natural gas and alternatively residual fuel oil, shall not exceed:
  - a. Two-tenths (0.2) grain per standard cubic foot, at twelve percent (12%) carbon dioxide (CO<sub>2</sub>) or at fifty percent (50%) excess air.
  - b. An opacity equal to or greater than forty percent (40%) for an aggregated time of more than three (3) minutes in any one (1) hour.
  - c. One thousand (1000) ppm of sulfur dioxide (SO<sub>2</sub>).

PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/74

Page 3 of 6

Appl. No: 0012

File No: 24-4171

BOISE CASCADE CORPORATION

---

7. The use of residual fuel oil containing more than two and one-half percent (2.5%) sulfur by weight is prohibited.
8. The use of residual fuel oil containing more than one and three-quarters percent (1.75%) sulfur by weight is prohibited after July 1, 1974.

Compliance Demonstration Schedule

9. Installation of blow pit vent SO<sub>2</sub> emission controls, as approved by the Department of Environmental Quality, shall continue to proceed according to the following schedule:
  - a. Purchase orders for remaining components and for all site preparation and erection work to be issued by no later than March 15, 1973.
  - b. Construction to be completed by no later than December 1, 1973.
  - c. Compliance to be demonstrated by no later than January 15, 1974.
  - d. The permittee shall notify the Department of Environmental Quality in writing within fourteen (14) days of the completion of each of these conditions, and further, shall submit an interim progress report by no later than August 1, 1973 describing the construction status for installing the components of the blow-pit vent control system.
10. Recovery furnace particulate control shall be implemented according to the following schedule:
  - a. The mechanism and location of particulate formation, and chemical composition of the particulate shall be determined and reported to the Department of Environmental Quality by no later than July 1, 1973.
  - b. The alternative methods that may be implemented, in the event that optimizing furnace and scrubber parameters should fail to provide compliance, shall be reported to the Department of Environmental Quality and described in terms of efficiency, cost, and time required to install by no later than July 1, 1973.
  - c. If parameter optimization does not yield compliance, an alternative method shall be selected and plans, specifications and a construction schedule shall be submitted to the Department of Environmental Quality by no later than September 15, 1973.

10. (continued)

- d. Major equipment items shall be ordered and placement of orders confirmed in writing to the Department of Environmental Quality by no later than December 15, 1973.
- e. An interim report on construction progress shall be submitted by no later than July 1, 1974.
- f. Compliance shall be demonstrated by no later than December 31, 1974.

Monitoring and Reporting

11. The operation and maintenance of the sulfite pulp and paper production and control facilities shall be effectively monitored. A record of all such data shall be maintained and a summary submitted to the Department of Environmental Quality within fifteen (15) days after the end of each calendar month. Unless otherwise agreed to in writing the information collected and submitted shall be in accordance with testing, monitoring and reporting procedures on file with and approved by the Department of Environmental Quality, and shall include, but not necessarily be limited to, the following parameters and frequencies:

<u>Parameter</u>	<u>Minimum Frequency</u>
a. Digester blow pit vent sulfur dioxide emissions	Once per week
b. Recovery furnace sulfur dioxide emissions	Continually monitored
c. Recovery furnace particulate emissions	Three (3) times per month
d. Production of unbleached pulp	Summarized monthly from production records

12. The final monthly report required in condition No. 11 submitted during any calendar year shall include the quantities and types of fuels used during that calendar year.
13. The Department shall be promptly notified of any upset condition in accordance with OAR, Chapter 340, "Upset Conditions" which may cause or tend to cause any detectable increase in atmospheric emissions. Such notice shall include the reason for the upset and indicate the precautions taken to prevent a recurrence.



PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS

Prepared by the Staff of the  
Department of Environmental Quality

Recom. Expir. Date: 12/31/74

Page 5 of 6

Appl. No: 0012

File No: 24-4171

BOISE CASCADE CORPORATION

---

SECTION B - TORULA YEAST MANUFACTURING

Permitted Activities

Until such time as this permit expires or is modified or revoked, BOISE CASCADE is herewith permitted to operate its 1400 pound/hour dry basis Torula Yeast Plant (9000 pound/hour spent sulfite liquor input) consisting of fermenters, separators, wash tanks, pasteurizer, spray dryer with exhaust cyclones and scrubber, and packaging station exhaust baghouse collector located at Salem, Oregon, and to discharge therefrom treated exhaust gases containing air contaminants in conformance with requirements, limitations, and conditions of this permit.

Performance Standards and Emission Limits

1. Particulate emissions from the plant shall not:
  - a. Exceed 0.1 grain per standard cubic foot of exhaust gas from any single source.
  - b. Exceed 9.36 pounds per hour from all emission sources in the plant at a production rate of 1400 pounds per hour, or such lower levels of emission as may be achievable with the present control equipment.
2. Air contaminant emissions from any single source of emission shall not be as dark or darker in shade as that designated as number one (No. 1) on the Ringelmann Chart or equal to or greater than twenty (20) percent opacity for a period of more than three (3) minutes in any one (1) hour.

Monitoring and Reporting

1. The operation of the plant shall be regularly monitored and inspected to insure that compliance with all applicable rules and regulations is maintained. All air contaminant control equipment shall be inspected regularly; records shall be maintained of the dates of inspection and maintenance and such records shall be made available at the plant site for review when requested.
2. At the end of each calendar year a report shall be submitted including annual production and operating hours.
3. Any scheduled maintenance of operating or emission control equipment which would result in any violation of this permit shall be reported at least twenty-four (24) hours in advance.
4. Any upsets or breakdowns which result in any violations of this permit shall be reported within one (1) hour.

BOISE CASCADE CORPORATION

SECTION C - GENERAL REQUIREMENTS

Emergency Reduction Plan

1. The Company shall establish and Maintain a "Preplanned Abatement Strategy", filed with and approved by the Department of Environmental Quality, and implemented in response to Air Pollution Alerts, Warnings, and Emergencies as they are Declared and Terminated by the Department of Environmental Quality, or Regional Authority.

Prohibited Activities

2. No open burning shall be conducted at the plant site.

Special Conditions

3. All solid wastes or residues shall be disposed of in manners and at locations approved by the Department of Environmental Quality.
4. Department of Environmental Quality representatives shall be permitted access to the plant site at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.
5. No alteration, modification or expansion of the subject sulfite pulp and paper production facilities shall be made without prior notice to and approval by the Department of Environmental Quality.
6. The Annual Compliance Determination Fee shall be submitted to the Department of Environmental Quality according to the following schedule:

Amount Due

Date Due

\$175.00

December 1, 1973

7. 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 air contaminants emitted to the atmosphere.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5301

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. J, April 2, 1973, EQC Meeting  
Dillard Veneer Co. (Hearings Officer's Report)

Attached is a signed copy of the order of the Hearings Officer's findings regarding the emissions from the Dillard Veneer Company's wigwam waste burner.

This order having been duly executed on the 24th day of March, 1973, by L. B. Day, the Hearings Officer, is presented for your adoption.

  
DIARMUID F. O'SCANNLAIN

HHB:sb  
3/26/73

## BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY

## OF THE STATE OF OREGON

In the Matter of )  
 DILLARD VENEER COMPANY, ) ORDER  
 an Oregon Corporation. )

This matter was continued by the Hearings Officer several times for final decision until December 15, 1972, to allow time for complying with the Order of Continuance entered October 24, 1972. The provisions of this Order have been complied with and the following Findings of Fact are entered:

## FINDINGS OF FACT

## I.

Dillard Veneer Company owns and operates a wigwam waste burner in Dillard, Douglas County, Oregon. This burner burns and incinerates quantities of wood wastes and residues, and as a result thereof, quantities of air contaminants in the form of smoke and particulate matter are emitted into the outdoor atmosphere. The company is located in a special control area as defined by Chapter 340, OAR Section 21-010(2).

## II.

Departmental staff observed the emissions of air contaminants from respondent's wigwam burner for a period of over two years. A partial list of observations are as follows:

<u>Date</u>	<u>Ringelmann</u>	<u>Opacity</u>
February 26, 1971	5	100%
May 26, 1971	2.8	56%
June 9, 1971	2.7	54%
July 6, 1971	5	100%
July 22, 1971	4.6	92%
August 18, 1971	4.15	83%
December 16, 1971	5	100%
January 17, 1972	1.5	30%
February 10, 1972	4	80%
February 28, 1972	3	60%
March 15, 1972	5	100%
March 27, 1972	0.5	10%
April 6, 1972	3	60%
May 4, 1972	1.875	28.5%
May 4, 1972	0.3785	7.57%
May 4, 1972	1.45	29%
May 4, 1972	0.125	2.5%
May 10, 1972	3	60%

June 10, 1972	1.8	36%
August 23, 1972	3	60%
October 11, 1972	2.1	42%
November 13, 1972	1.2375	25.75%
November 13, 1972	1.025	20.5%
November 17, 1972	0.5375	10.75%
November 17, 1972	0.7625	15.25%
November 17, 1972	1.175	23.5%
November 17, 1972	1.875	37.5%
November 20, 1972	0.8675	17.25%
November 21, 1972	0 to .25	0 to 5%

Those emissions that are as dark or darker in shade as that designated as No. 1 on the Ringelmann chart or equal to or greater than 20% opacity are in excess of emissions allowed by OAR, Chapter 340, Section 21-015(2).

### III.

The Department of Environmental Quality staff has endeavored from time to time by conference, conciliation and persuasion with Dillard Veneer Company to eliminate or reduce the source, amount or cause of the air contamination resulting from the operation of the company's wigwam waste burner.

### IV.

The company has met with Roseburg Lumber Company to discuss possible utilization of Dillard Veneer's wood waste residues in the Roseburg Lumber Company hog fuel boilers. Roseburg Lumber Company has informed Mr. Johnson (Dillard Veneer) and Mr. Dole (counsel) that it would dispose of Dillard Veneer's wood waste residues without charge in the hog fuel boilers as soon as installation was completed, if the residues would be delivered without charge. The hog fuel boilers will be installed sometime during the early part of 1974, according to present plans.

From the foregoing Findings of Fact I have entered the following Conclusion of Law.

### CONCLUSION OF LAW

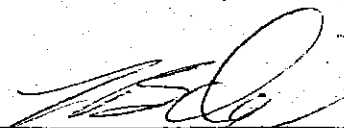
The emissions of air contaminants in the form of smoke and particulate matter into the outdoor atmosphere from the company's wigwam waste burner has and will continue to violate Section 21-015(2), Chapter 340, OAR.

From the foregoing, the following Order is entered.

ORDER

1. Dillard Veneer Company may utilize its wigwam waste burner until March 1, 1974, upon the following conditions:
  - (a) A primary fire bed of scrap wood and the addition of diesel or fuel oil shall be used for start-up; and
  - (b) All burning material in the burner shall be completely extinguished by no later than (12) hours after commencement of the burn-down period.
2. Dillard Veneer Company shall immediately begin negotiations with Roseburg Lumber Company for the disposition of its wood waste residues upon completion and installation of Roseburg Lumber Company's hog fuel boiler. A memorandum of understanding or letter signed by both Dillard Veneer Company and Roseburg Lumber Company outlining the time, methods and procedures to be followed for transfer of Dillard Veneer Company's wood waste residues to Roseburg Lumber Company's hog fuel boiler shall be submitted to the Department no later than December 15, 1973.
3. Dillard Veneer shall terminate the use of their wigwam waste burner upon transfer of their wood waste residues to Roseburg Lumber Company's hog fuel boiler but not later than March 1, 1974.
4. In the event no transfer of Dillard Veneer Company's wood waste residues to Roseburg Lumber Company is made by March 1, 1974, Dillard Veneer shall forthwith terminate the use and operation of its present wigwam waste burner.
5. Dillard Veneer may utilize its wigwam waste burner after March 1, 1974, only if it is modified in accordance with engineering plans submitted to the Department of Environmental Quality for review and approval. In lieu of modification of the burner, Dillard Veneer may propose an alternative method of disposal of its wood waste residues to the Department of Environmental Quality for examination and approval.

Dated this 24 day of March, 1973.

  
HEARINGS OFFICER



# DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5301

## 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 K, April 2, 1973, EQC Meeting  
Natural, Scenic and Recreational Areas

### Background

At the November 30, 1972, Commission meeting State representative Norma Paulus, Chairman of the DEQ Advisory Committee on Natural, Scenic and Recreational Areas gave a report on the Committee's activities. The Commission at that time directed that the staff make an in depth evaluation of the Committee's recommendations and at the March, 1973, EQC meeting propose a specific plan of action relative to them.

### Discussion

The recommendations of the advisory committee contain a number of items that are currently under review by the state legislature, i.e. comprehensive land use plan, surface and sub-surface sewage disposal controlled by a single state agency, control of off road vehicles.

A major area of concern in Natural, Scenic and Recreational Areas is noise pollution control.

Conclusion

The legislature currently has under consideration several legislative proposals that may materially influence any program or regulation that the Department might propose at this time. The Department has not as yet promulgated any noise emission standards and measurement procedures. The Department considers it would be a more appropriate time to submit a report following the completion of legislation and adoption of noise standards.

Recommendation

It is the recommendation of the Director that the Department defer any specific plan of action until the legislature completes its action and the Department promulgates noise standards.



DIARMUID F. O'SCANNLAIN

**Attachment**



## ATTACHMENT

**Excerpt from the Minutes of the Environmental Quality Commission Meeting of November 30, 1972.**

### NATURAL, SCENIC & RECREATIONAL AREAS COMMITTEE REPORT

State Representative Norma Paulus, Chairman of the DEQ Advisory Committee on Natural, Scenic and Recreational Areas, was present and gave a report on the Committee's activities. She said the Committee had held a good many meetings during the past six months, that its membership was fairly evenly divided between industrial and environmental interests, that the buffer zone concept was the major issue under consideration, that it was not defeated or discarded until the final Committee's meeting, and that they had concluded that there is definite need for (1) a state land use policy and (2) consolidation into a single agency (preferably DEQ) of all jurisdiction over subsurface sewage disposal installations in the state.

She referred to the past migration of the population from the farms to the city, then from the city to the suburbs, and now to the use of a second home to "get away from it all." She pointed out that the main problem seems to be the conflicts between various types of recreationists, including particularly the use of off-road vehicles. She strongly recommended that this latter problem be dealt with by the legislature with the legislature telling where such vehicles can be used as well as where they cannot be used.

She stated that the State Parks Department was one agency that opposed control over buffer zones.

She felt that the work of the Committee had been very beneficial. She was highly commended by Chairman McPhillips and Director Day for her efforts in this matter.

Following a brief discussion of this subject by the Commission members it was agreed that the staff should proceed to make an in-depth evaluation of the Committee's recommendations and at the March 1973 EQC meeting propose a specific plan of action relative to them.

HOME ADDRESS  
NORMA PAULUS (MRS. WILLIAM G.)  
3090 PIGEON HOLLOW ROAD S  
SALEM, OREGON 97302  
MARION COUNTY



COMMITTEES  
MEMBER:  
JUDICIARY  
NATURAL RESOURCES  
SUBCOMMITTEES  
VICE CHAIRMAN:  
FISH AND GAME

HOUSE OF REPRESENTATIVES  
SALEM, OREGON  
97310

October 12, 1972

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

Dear L.B.:

For the past six months your Advisory Committee has conducted an inquiry into the effects of management and use on the quality of our primary natural, scenic and recreational areas in Oregon.

We have received testimony from the following individuals:

<u>Name</u>	<u>Representing</u>	<u>Topic</u>
R. Armstrong	DEQ	General Overview
R. McHugh	DEQ	Mountain Lake Water Quality
W.J. Kavarsten	Council of Governments	Rural Lane Use Planning
Sr. Hector Macpherson	Legislature	Lane Use Planning
B. Vladimiroff	U.S. Bureau of Lane Management	) Administrative Practices and Recreation Area Conflicts
F. deHoll	U.S. Forest Service	
E. Smith	U.S. Bureau of Sport Fisheries and Wildlife	
R. McCosh/R. Potter	State Parks and Recreation	) Status of Oregon Law
John Rutter	National Park Service	
Lee Johnson	Attorney General	
G. Sandberg	DEQ	Noise in Recreation Areas
P. Curran/F. Bolton	DEQ	Sewage in Recreation Areas

Based upon the testimony received and our personal experiences, your committee recommends that:

1. Environmental Standards for the protection of Natural, Scenic and Recreational areas be developed by the DEQ and approved by the EQC after public hearings.

2. Following approval of the proposed regulations, the DEQ prepare and maintain a list of areas to be designated as Natural, Scenic and Recreational Areas; that environmental standards be developed and maintained for all designated areas; and that the area designation and resulting environmental standards be approved by the EQC only after a public hearing.

3. Environmental standards adopted by the DEQ be enforced as follows:

a. The DEQ shall issue permits if necessary to enforce environmental standards.

b. The DEQ shall cooperate with public agencies responsible for Natural, Scenic and Recreational Areas for the enforcement of the environmental standards.

4. In order to minimize needless environmental degradation within Natural, Scenic and Recreational Areas of Oregon, it is recommended that the managing agencies of all land under public ownership or administration develop and enforce a comprehensive plan for each designated area. It is further recommended that the plan and any modifications thereof be submitted to the DEQ to be reviewed for compliance with relevant environmental standards.

5. That there is an urgent need for a comprehensive land use plan for the State of Oregon. Therefore, it is recommended that the Legislature designate a single state agency to direct the development and implementation of a comprehensive land use plan in close cooperation with local and regional planners.

6. That the need for control of all surface and sub-surface sewage disposal is critical and regarded as an essential ingredient of consistent land management for all areas. Therefore, it is recommended that the legislature authorize a single State agency to review and approve all surface and sub-surface sewage disposal systems within the State of Oregon.

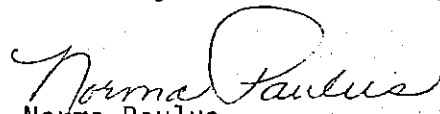
7. That the problem of incompatible uses adjacent to Natural, Scenic and Recreational Areas be dealt with by Legislative action.

8. That the Environmental Quality Commission forward recommendations to the Legislature that there is a need for control of off-road vehicles and that the Legislature direct the managing agencies to designate areas where off-road vehicles are permitted.

In addition to these specific recommendations, our committee has proposed regulations for the environmental protection of these areas. A copy of these regulations and the minutes of our last meeting are enclosed.

It has been a pleasure to serve as Chairman of this committee and I am hopeful that our findings and recommendations will be of assistance in promulgating regulations to protect Oregon's natural, scenic and recreational areas.

Sincerely,

  
Norma Paulus

cc: Committee Members

Mr. Ward Armstrong  
Mr. David Barrows  
Mr. William Bartholomew  
Mr. Dean Brice  
Mr. Craig Chisholm  
Mr. Martin Davis  
Mr. Frank Gilchrist  
Mr. James Haas  
Mr. Irvin Luiten  
Mr. Edward Maney  
Mr. Robert Madison  
Mr. Richard Roy  
Mr. J. Schroeder  
Mr. John Schwabe  
Mr. Ron Schwarz  
Mr. Edward Smith

Ms. Ann Squier  
Mr. David Talbot  
Mr. Lyle Van Gordon  
Mr. Larry Williams

Affiliation

Association of Oregon Industries  
Association of O & C Counties  
State Engineer  
Pacific Power & Light Co.  
Attorney at Law  
Oregon Environmental Council  
Gilchrist Timber Co.  
Oregon Fish Commission  
Weyerhaeuser Co.  
Hanna Mining Co.  
Publishers Paper  
Attorney at Law  
State Forester  
Attorney at Law  
Willamette High Grade Concrete Co.  
U.S. Bureau of Sport Fisheries and  
Wildlife  
Oregon Shores Conservation Coalition  
State Parks  
Pacific Power and Light Co.  
Oregon Environmental Council

PROPOSED  
REGULATIONS FOR ENVIRONMENTAL PROTECTION  
OF NATURAL, SCENIC AND RECREATIONAL AREAS

I. STATEMENT OF POLICY

Natural scenic and recreational areas represent a natural resource of unique importance to the State of Oregon. As a major part of the cultural heritage of citizens of the State, and as a key element in developing and maintaining tourism and recreation as a viable industry, the environment of natural scenic and recreational areas is deserving of the highest level of protection.

Therefore, it is hereby declared to be the policy of the Environmental Quality Commission to regulate activities in these areas as follows:

- a. The environment of natural scenic and recreational areas shall not be altered from the natural state except to the minimum degree compatible with reasonable recreational and forest management practices.
- b. Activities other than those related to forest management shall be conducted in such a manner that environmental degradation is virtually imperceptible to persons using the area for recreational purposes.

II. DEFINITIONS:

As used in this regulation, the term:

1. "Person" means the United States and agencies thereof, the State, any individual, public or private corporation, political subdivision, governmental agency, municipality, industry, co-partnership, association, firm, trust, estate or any other legal entity whatever.
2. "Commission" means the Environmental Quality Commission.
3. "Department" means the Department of Environmental Quality.
4. "Wilderness" means any area so designated by the Congress of the United States pursuant to Public Law 88.577.
5. "Wild and Scenic Rivers" means any area so designated by the Congress of the United States pursuant to Public Law 90.542.
6. "Scenic Waterway" means a river or a segment of river, and related adjacent land, that has been designated as such in accordance with ORS 390.805 to 390.925.
7. "Ocean Shore" means any area so defined by ORS 390.605(2).
8. A "Natural, Scenic and Recreational Area" may be any area included in the following list:
  - a. Any area administered by the U. S. Forest Service and designated as a recreational site, special interest area, or national recreational area.
  - b. Any area administered by the U. S. Bureau of Land Management and designated as a recreation site.
  - c. Any wilderness.
  - d. Any wild and scenic river.

- e. Any scenic waterway.
  - f. Any lands administered by the U. S. National Park Service.
  - g. Any lands administered by the U. S. Bureau of Sport Fisheries, Wildlife Refuge Division.
  - h. Any State park.
  - i. Any forest park as designated by the State Forester.
  - j. Any ocean shore.
  - k. County Parks.
9. "Regulated Areas" include Natural, Scenic and Recreational areas for which environmental standards are established by the Department.

III. ENVIRONMENTAL STANDARDS FOR REGULATED AREAS:

- 1. The Commission shall adopt environmental standards for each Regulated Area in the State of Oregon to control air and water quality, noise levels, solid waste which conflict with the declared policy.
- 2. The following activities shall be exempt from the environmental standards:
  - a. Forestry and logging.
  - b. Activities of governmental employees in the public agency administering the Regulated Area.
  - c. Activities prompted by a natural disaster or other emergency.
- 3. Candidate areas shall be proposed to the Commission and considered for adoption after appropriate evaluation.

IV. PERMITS:

- 1. No person shall commence construction or initiate any activity or operation within a Regulated Area which may result in violation of environmental standards for the area unless such person holds a valid permit issued

by the Department.

2. If a pre-existing activity, or one which has been initiated prior to adoption of environmental standards, results in violation of the standards, the Department may require the responsible person to obtain a permit as a condition to the continuation of such activity. The Department shall be under no obligation to issue the permit.
3. Permits shall be issued by the Department pursuant to the Department's published regulations.
4. Within 60 days after receipt of an application in satisfactory form, the Department shall either deny the request or issue a permit unless within that time a Commission hearing is scheduled by the Department, or unless local governmental action is pending pursuant to paragraph 7 below. Such scheduling of a hearing or such pendency of local governmental action shall stay the 60-day period.
5. A public hearing on a permit application shall be held by the Commission, or its hearing officer, if scheduled by the Department upon either:
  - a. A determination by the Department that the application may result in significant environmental impact or public interest; or
  - b. The petition by any interested person or group, if such person or group has no other meaningful public forum for review of questions raised by the petition, provided the petition is not deemed by the Department to be spurious.
6. To inform the public of permit applications, the Department shall publish notice of applications in the communities near the Regulated



Area in question, at the offices of the Department, and by any other effective means for informing the public.

7. No permit application shall be finally acted upon by the Department prior to action upon the proposed activity by the local governmental body, if any, with responsibility for planning and zoning in the Regulated Area, unless such body requests earlier action by the Department.
8. The permit shall be in addition to and not in lieu of other permits or requirements of federal, state or local governments.

V. PENALTIES:

1. Any violation of environmental standards adopted by the Department shall be a crime punishable upon conviction by the maximum fine or term of imprisonment or both under the applicable provision of Oregon statutory law, and shall give rise to civil liability to the State as provided by Oregon statutory law.

ADVISORY COMMITTEE ON NATURAL, SCENIC AND RECREATIONAL AREAS

Minutes

September 26, 1972

The meeting was called to order at 7:00 p.m. by the Chairman, Norma Paulus, in the Tualatin Ramada Inn. The following Committee members were present:

- |                    |                                 |
|--------------------|---------------------------------|
| 1. W. Armstrong    | 10. R. Roy                      |
| 2. Wm. Bartholomew | 11. R. Munteer for J. Schroeder |
| 3. D. Brice        | 12. J. Schwabe                  |
| 4. C. Chisholm     | 13. R. Schwarz                  |
| 5. M. Davis        | 14. E. Smith                    |
| 6. J. Haas         | 15. A. Squier                   |
| 7. I. Luiten       | 16. W. Gaskill for D. Talbot    |
| 8. E. Maney        | 17. L. Van Gordon               |
| 9. R. Madison      | 18. L. Williams                 |

Specific discussions as to Committee recommendations and proposed regulations ensued and the following action was taken by the Committee:

Ann Squier moved that paragraph 1 of the recommendation read as follows:

"1. Regulations for the environmental protection of these areas and their respective transition areas, if any, be developed by the Department of Environmental Quality and approved by the Environmental Quality Commission after public hearings."

The motion was defeated by a vote of 12 to 6.

Ed Smith moved that the following statement and its related definition be adopted as paragraph 1 of the recommendations:

"1. Environmental standards for the protection of Natural, Scenic and Recreational areas and their respective buffer zones be developed by the Department of Environmental Quality and approved by the Environmental Quality Commission after public hearings.

Buffer zones mean any area within one mile and adjacent to a Natural, Scenic and Recreational area in which Environmental Standards shall be imposed that are equal to or not more stringent than those standards set for the parent area designated for protection."

An amendment was proposed by John Schwabe to delete all reference to buffer zones or transition areas.

This amendment was adopted by a vote of 12 to 6.

The amended motion was adopted. (11 Yes, 7 No.)

Ward Armstrong moved that the following statement be adopted as paragraph 2 of the recommendations:

"Following approval of the proposed regulations the Department of Environmental Quality shall request land managing agencies to submit a list of Natural, Scenic and Recreational areas to be protected."

Larry Williams proposed the following amendment to Mr. Armstrong's motion:

"That the Environmental Quality Commission shall provide a means of public petition for areas to be included as Natural, Scenic and Recreational Areas."

This amendment was adopted. (13 Yes, 5 No.)

Martin Davis moved that the motion be additionally amended as follows:

"Following approval of the proposed regulations, the Department of Environmental Quality shall request land managing agencies to submit a list of Natural, Scenic, and Recreational areas to be protected and their buffer zones on an individual basis as warranted by the natural features of the area, if any. That the Environmental Quality Commission shall provide a means of public petition for areas to be included as Natural, Scenic and Recreational areas."

This amendment was defeated. (14 No, 4 Yes.)

The amended motion was defeated by a vote of 10 to 8.

It was moved by John Schwabe that the second paragraph in the recommendation read as follows:

"Following approval of the proposed regulations, the Department of Environmental Quality prepare and maintain a list of areas to be designated as Natural, Scenic and Recreational Areas; that environmental standards be developed and maintained for all designated areas; and that the area designation and the resulting environmental standards be approved by the Environmental Quality Commission only after a public hearing."

This motion was adopted. (10 Yes, 8 No.)

Dick Roy moved that the following statement be adopted as paragraph 3 of the recommendations:

"3. Environmental Standards adopted by the Department of Environmental Quality be enforced as follows:

A. The Department of Environmental Quality shall issue permits if necessary to enforce environmental standards.

B. The Department of Environmental Quality shall cooperate with public agencies responsible for Natural, Scenic and Recreational Areas for the enforcement of the environmental standards."

This motion was adopted. (18 Yes, 0 No.)

Dick Roy moved that the following section be included in the proposed regulations:

"II. Definitions

As used in this regulation, the term:

1. "Person" means the United States and agencies thereof, the State, any individual, public or private corporation, political subdivision, governmental agency, municipality, industry, copartnership, association, firm, trust, estate or any other legal entity whatever.
2. "Commission" means the Environmental Quality Commission.
3. "Department" means the Department of Environmental Quality.
4. "Wilderness" means any area so designated by the Congress of the United States pursuant to Public Law 88.577.
5. "Wild and Scenic Rivers" means any area so designated by the Congress of the United States pursuant to Public Law 90.542.
6. "Scenic Waterway" means a river or a segment of river, and related adjacent land, that has been designated as such in accordance with ORS 390.805 to 390.925.
7. "Ocean Shore" means any area so defined by ORS 390.605 (2).
8. A "Natural, Scenic and Recreational area" may be any area included in the following list:
  - a. Any area administered by the U.S. Forest Service and designated as a recreational site, special interest area, or national recreational area.
  - b. Any area administered by the U.S. Bureau of Land Management and designated as a recreation site.
  - c. Any wilderness.

- d. Any wild and scenic river.
  - e. Any scenic waterway
  - f. Any lands administered by the U.S. National Park Service.
  - g. Any lands administered by the U.S. Bureau of Sport Fisheries, Wildlife Refuge Division.
  - h. Any State park.
  - i. Any forest park as designated by the State Forester.
  - j. Any area of unique natural, scenic or recreational value to the State of Oregon, after being identified and designated a Natural, Scenic and Recreational area by the Commission.
  - k. Any ocean shore.
  - l. County Parks.
9. "Regulated Areas" include Natural, Scenic and Recreational areas for which environmental standards are established by the Department."

Irv Luiten moved to amend the motion to delete J from the list under 8 and accordingly adjust K and L to J and K.

This amendment was adopted by a vote of 10 to 8.

The amended motion was adopted. (13 Yes, 5 No.)

It was also moved by Dick Roy that the following section be adopted in the proposed regulations:

"III. Environmental Standards for Regulated Areas

1. The Commission shall adopt environmental standards for each Regulated Area in the State of Oregon to control air and water quality, noise levels, solid waste which conflict with the declared policy.
2. The following activities shall be exempt from the environmental standards:
  - a. Forestry and logging.
  - b. Activities of governmental employees in the public agency administering the Regulated Area.
  - c. Activities prompted by a natural disaster or other emergency.

3. Environmental standards shall be adopted, where compatible with the declared policy, to exempt by regulation the noncommercial use of private land in a buffer zone."

It was moved by Larry Williams that this motion be amended to include the following statement:

- "4. Candidate areas shall be proposed to the Commission and considered for adoption after appropriate evaluation."

This amendment was adopted. (18 Yes, 0 No.)

John Schwabe moved to delete subsection 3 from the motion and change No. 4 to No. 3.

This motion was adopted. (11 Yes, 7 No.)

The motion as amended was adopted by a vote of 17 to 1.

It was then moved by John Schwabe that the following sections be adopted in the proposed regulations:

"I. Statement of Policy

Natural, scenic and recreational areas represent a natural resource of unique importance to the State of Oregon. As a major part of the cultural heritage of citizens of the State, and as a key element in developing and maintaining tourism and recreation as a viable industry, the environment of natural, scenic and recreational areas is deserving of the highest level of protection.

Therefore, it is hereby declared to be the policy of the Environmental Quality Commission to regulate activities in these areas as follows:

- a. The environment of natural, scenic and recreational areas shall not be altered from the natural state except to the minimum degree compatible with reasonable recreational and forest management practices.
- b. Activities other than those related to forest management shall be conducted in such a manner that environmental degradation is virtually imperceptible to persons using the area for recreational purposes."

"IV. Permits

1. No person shall commence construction or initiate any activity or operation within a Regulated Area which may result in violation of environmental standards for the area unless such person holds a valid permit issued by the Department.
2. If a pre-existing activity, or one which has been initiated prior to adoption of environmental standards, results in violation of the standards, the Department may require the responsible person to obtain a permit as a condition to the continuation of such activity. The Department shall be under no obligation to issue the permit.
3. Permits shall be issued by the Department pursuant to the Department's published regulations.
4. Within 60 days after receipt of an application in satisfactory form, the Department shall either deny the request or issue a permit unless within that time a Commission hearing is scheduled by the Department, or unless local governmental action is pending pursuant to paragraph 7 below. Such scheduling of a hearing or such pendency of local governmental action shall stay the 60-day period.
5. A public hearing on a permit application shall be held by the Commission, or its hearing officer, if scheduled by the Department upon either:
  - a. A determination by the Department that the application may result in significant environmental impact or public interest; or
  - b. The petition by any interested person or group if such person or group has no other meaningful public forum for review of questions raised by the petition, provided the petition is not deemed by the Department to be spurious.
6. To inform the public of permit applications, the Department shall publish notice of applications in the communities near the Regulated Area in question, at the offices of the Department, and by any other effective means for informing the public.

7. No permit application shall be finally acted upon by the Department prior to action upon the proposed activity by the local governmental body, if any, with responsibility for planning and zoning in the Regulated Area, unless such body requests earlier action by the Department.
8. The permit shall be in addition to and not in lieu of either permits or requirements of federal, state or local governments."

"V. Penalties

1. Any violation of environmental standards adopted by the Department shall be a crime punishable upon conviction by the maximum fine or term of imprisonment or both under the applicable provision of Oregon statutory law, and shall give rise to civil liability to the State as provided by Oregon statutory law.
2. As a matter of enforcement policy, the Commission intends that private persons shall have standing in the courts of Oregon."

Irv Luiten moved to amend the motion by deleting in its entirety Sub-section 2 of Section 5 as proposed.

The motion was adopted by a vote of 12 to 6.

The amended motion was adopted. (18 Yes, 0 No.)

It was moved that the following statement be included in the Committee's recommendations:

After a general discussion, Chairman Paulus authorized to include the following statement in the Committee's recommendations:

"That the problem of incompatible uses adjacent to natural, scenic and recreational areas be dealt with by legislative action."

The meeting was adjourned at 11:00 p.m. by the Chairman, Norma Paulus.





# DEPARTMENT OF ENVIRONMENTAL QUALITY

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

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 L, April 2, 1973, EQC Meeting

## Tax Credit Applications

Attached are review reports on 5 Tax Credit Applications. These applications and the recommendations of the Director are summarized on the attached table.

DIARMUID F. O'SCANNLAIN

WEG:ahe  
Attachments (1)

March 22, 1973

TAX CREDIT APPLICATIONS

<u>Applicant</u>	<u>Appl. No.</u>	<u>Facility</u>	<u>Claimed Cost</u>	<u>% Allocable to Pollution Control</u>	<u>Director's Recommendation</u>
Donald H. Scott	T-414	30,000 gallon concrete tank & manure pump	\$ 4,610.50	80% or more	Issue
Donald H. Scott, Gail Sheelar dba S & S Farms	T-415	30,000 gallon concrete tank, manure pump & related controls	5,309.00	80% or more	Issue
Boise Cascade Corporation Elgin Plant	T-421	Collection troughs & pans, 1300 gallon collection sump with screens, 770 gallon storage tank, 3 pumps, and related piping & controls	10,109.00	80% or more	Issue
Miami Shingle & Shake Company	T-426	Modification of wigwam waste burner	22,500	80% or more	Issue
Boise Cascade Corporation Elgin Plant	T-431	Modification of wigwam waste burner	38,100.45	80% or more	Issue

WEG:ahe

March 22, 1973

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

---

1. Applicant

Donald H. Scott  
Route 1, Box 195  
Gaston, Oregon 97119

The applicant owns and operates a 100 cow dairy located approximately four (4) miles south of Forest Grove on Highway 47 in Washington County.

2. Description of Claimed Facility

The claimed facility consists of a 30,000 gallon concrete tank and a manure pump which is powered by a tractor power take-off.

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

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

Facility cost: \$4,610.50 (Photostatic copies of cancelled checks and receipts for work and equipment were submitted)

3. Evaluation of Application

Prior to the implementation of the claimed facility, liquid drainage from the milking parlor, stall barns, and holding areas were uncontrolled and would empty into the area drainage. With the claimed facility, all liquid waste is collected into the concrete tank from which it is hauled by tank trailer for land disposal on agricultural land. Investigation reveals the facility is well designed and well operated. No problems have been observed since implementation.

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 \$4,610.50 with 80% or more of the cost allocated to pollution control be issued for the facilities claimed in Tax Application No. T-414.

R. J. Nichols  
ak

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

---

1. Applicant

Donald H. Scott  
Gail Sheelar dba S & S Farms  
Star Route, Box 135  
Forest Grove, Oregon 97116

The applicants own and operate a dairy and grain farm approximately one (1) mile west of Forest Grove on Gales Creek Highway in Washington County.

2. Description of Claimed Facility

The claimed facility consists of a 30,000 gallon concrete tank, a manure pump with electric motor and related controls.

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

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

Facility cost: \$5,309.00 (Photostatic copies of cancelled checks and receipts for work and equipment were submitted.)

3. Evaluation of Application

Prior to the construction of the claimed facility, all liquid drainage from the milking area, stall barns, and holding areas was uncontrolled and was able to drain into Gales Creek. With the claimed facility, animal wastes are collected in the concrete tank from which it is pumped out onto agricultural fields for disposal. Investigation reveals the facility is well designed and well operated. No problems have been observed since implementation of the facility.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$5,309.00 with 80% or more of the cost allocated to pollution control be issued for the facilities claimed in Tax Application No. T-415.

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

1. Applicant

Boise Cascade Corporation  
T & BM - Wood Products Division  
P.O. Box 610  
La Grande, Oregon 97850

The applicant owns and operates a large plywood and studmill in Elgin in Union County, Oregon.

2. Description of Claimed Facility

The claimed facility is a plywood glue wastewater recirculation system consisting of collection troughs and pans, a 1300 gallon collection sump with screens, a 770 gallon storage tank, pumps (3), and related piping and controls.

The claimed facility was placed in operation March, 1972.

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

Facility cost: \$10,109.00 (Accountant's certification was submitted)

3. Evaluation of Application

Prior to the implementation of the claimed facility, glue washdown waters were pumped to two settling ponds upon the hill south of the mill site. After settling, the glue wastewater was spray irrigated onto land owned by the applicant. During the spring runoff, the ground in the land disposal area would be saturated and most of the glue wastewaters would flow overland to a slough which empties into the Grande Ronde River. With the claimed facility, the glue washdown waters, following screening, are used either in making new glue or are recycled to be used again as wash-water. Consequently, the glue wastewater system is closed with no discharge of glue wastewater whatsoever.

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 \$10,109.00 with 80% or more of the cost allocated to pollution control be issued for the facilities claimed in Tax Application No. T-421.

R. J. Nichols  
ak

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

---

1. Applicant

Miami Shingle & Shake Co.  
Route 1, Box 432  
Nehalem, OR 97131

The applicant operates a shingle and shake mill near Nehalem, OR.

This application was received February 20, 1973.

2. Description of Claimed Facility

The facility claimed in this application is described as a modification of a wigwam waste burner and consists of the following:

1. Top Damper
2. Under-fire and Over-fire air systems
3. Ignition system
4. Temperature recording system
5. Automatic control system

The claimed facility was completed and put into service in December, 1972.

Certification must be made under the 1969 Act, and the percentage claimed for pollution control is 100%.

Facility costs: \$22,500 (Cost verification was provided.)

3. Evaluation of Application

This facility was installed in accordance with an approved compliance program and approved plans and specifications.

The completed modified wigwam waste burner was demonstrated to the Department as being capable of continuous operation in compliance with OAR, Chapter 340, Section 25-020.

This modification to the wigwam waste burner has reduced emissions of particulate matter by an estimated 18 tons/year and CO emissions by 43 tons/year.

4. Conclusions

This facility does operate satisfactorily and did reduce emissions of particulate matter and CO by an estimated 61 tons/year.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$22,500 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-426.

R.A. Royer:sb

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

---

1. Applicant

Boise Cascade Corporation  
P. O. Box 610  
LaGrande, OR 97850

The applicant operates a sawmill and planing mill at Elgin, OR.

This application was received February 28, 1973.

2. Description of Claimed Facility

The facility claimed in this application is described as a modification of a wigwam waste burner and consists of the following:

1. Top Damper
2. Under-fire and Over-fire air systems
3. Ignition system
4. Temperature recording system
5. Automatic control system

The claimed facility was completed and put into service in December, 1972.

Certification must be made under the 1969 Act and the percentage claimed for pollution control is 100%.

Facility costs: \$38,100.45 (Accountant's certification was provided).

Evaluation of Application

This facility was installed in accordance with an approved compliance program and approved plans and specifications.

The completed modified wigwam waste burner was demonstrated to the Department as being capable of continuous operation in compliance with OAR, Chapter 340, Section 25-020.

This modification to the wigwam waste burner has reduced emissions of particulate matter by an estimated 456 tons/year and CO emissions by 1080 tons/year.



4. Conclusions

This facility does operate satisfactorily and did reduce emissions of particulate matter and CO by an estimated 1536 tons/year.

5. Directors Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$38,100.45 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-431.

R. A. Royer:sb