

7/26/1973

OREGON
ENVIRONMENTAL QUALITY
COMMISSION MEETING
MATERIALS



State of Oregon
**Department of
Environmental
Quality**

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AGENDA

Environmental Quality Commission Meeting

July 26, 1973

City Council Chambers, City Hall

411 Eighth Street, Medford, Oregon

9:00 a.m.

- A. Minutes of June 29, 1973, EQC Meeting (Chairman)
- B. Project Plans for June 1973 (Weathersbee)
- C. Open Public Forum (Public)
- D. Impact of New Legislation on DEQ Programs (Staff Report) (Spies)
- E. Tax Credit Applications (Sawyer)
- F. USA Interim Sewerage Program (Sawyer)
- G. Parking Facilities (Downs)
 - a. Proposed Portland State University 150-space Parking Facility
 - b. Proposed Valley River Center, 872-Space Parking Facility
 - c. Proposed Habitat Sylvan Hills 1422-Space Parking Facility, Washington County
 - d. Proposed Eugene Office Park 385-space Parking Facility
- H. Alsea Veneer, Lincoln County (Hearing Officer's Report on Appeal of Imposed Civil Penalty) (Burkitt-Silver)
- I. CWAPA Variances (Patterson)
- J. CWAPA Transfer to DEQ (Weathersbee)

2:00 p.m.

- K. Continuation of PUBLIC HEARING to Consider Adoption of Proposed Amendments to Oregon Administrative Rules, Chapter 340, Sections 25-255 through 25-290, PRIMARY ALUMINUM PLANTS (Skirvin)

ATTENDANCE LIST

KHS

Date: July 26, 1973

Environmental Quality Commission Meeting

Location: City Council Chambers, City Hall, Medford, Oregon

NAME

REPRESENTING

Wayne Shultz	Valley River Center
Richard Hansen	Valley River Center
Sidney M. Jones	Cleaner Environment
Helma M. Thompson	Citizen against the industrial
Arthur R. Kamm	Regional Development Center, S.O.C
Jean Davis	
Gilla Duck	myself
Sharon Caloy	
Byron Caloy	
Klara Mendel	Jacksonville
Colleen Calkerton	Medford
Jack Boster	Pyromal Inc
John Beeson	
Dennis Miller	Sandy State Co
Mr. & Mrs. Warren C. Westgarth	Dept. of Environmental Quality Portland
Mrs. L. W. Shingle	1445 - Kings Dr. Medford
Jessie Brown	Mrs. Viola Hatfield Group
Lavar Hansen	Eagle Point, Ore.
Forrest Bigger	
Kirk Riggo	

ATTENDANCE LIST

Date: July 26, 1973

Environmental Quality Commission Meeting

Location: City Council Chambers, City Hall, Medford, Oregon

NAME

REPRESENTING

LADD MC GURRY

J. H. FAXER

W. J. RICHARDS

Larry Chapman

Fred Hamilton

Grace N Pearson

Kenneth M. Osburn

Maree M. Bosworth

Helma M. Thompson

Jim Kadera

David M. Baker

Eunice Creech

W. J. Edwards

Cornelia Clement

Virgil Harper

R. G. Lucas

I Am Moore

Bruce P. CLARK, City Admin.

D. Marilyn Matheny

John Rupp

MENASHA CORP - North Bend

Jackson Co. North Bend

Comprehensive Health Planning

Jackson County Democratic Central Committee

Ad Hoc Citizens to Prisoners in Oregon

Citizen against being ⁱⁿ prison

The Oregonian

Lane Regional Air Pollution Authority

T. J.

Howard Commons

City of Tigar

Citizens against spray poisoning

FIRST NATIONAL BANK OF OR.

ATTENDANCE LIST

Date: July 26, 1973

Environmental Quality Commission Meeting

Location: City Council Chambers, City Hall, Medford, Oregon

NAME

REPRESENTING

Joel Wesselma	Bear Creek Valley S.A.
Howard Commons	Jackson County Assessor's Office
Oliver Starcher	
Otto C. Rohrbert	
Edgar Hout	Washington County
Gary Kachner	" " USA
Daniel O. Potter	Washington County
Byron Caloy	Griffin Creek Area
Sharon Caloy	
Jean Davis	Medford
Gilla Duerch	1355 Dutton Rd Engle COLUMBIA CUSTOM HOMES PORTLAND
William J. Edmrs	
Michael J. Doyle	HANNA NICKEL Smelting Co.
WILF J. TREMBLAY	HANNA NICKEL SMELTING CO.
H.G. KIMBALL	
RAY LAMBERG	3619 ROSS LANE MEDFORD
HARRY DEMARAY	18 N. MOLDOCAVE MEDFORD
LELAND ASCHER	LEAVITT BROTHERS - PORTLAND
Ray Hoadley	Jackson County Assessor
James R. Moore	Fordluck/Wold/Pegler

ATTENDANCE LIST

Date: July 26, 1973

Environmental Quality Commission Meeting

Location: City Council Chambers, City Hall, Medford, Oregon

NAME

REPRESENTING

Leslee Peyton

Forchuck-Wald-Peyton

Harry Wald

"

Paul Forchuck

"

Ralph D. Carter

Hanna Nickel Smelting

C. Lowell Lindstrom

" " "

Allen (Deatras)

Colleen (Calkerton)

County Rules

Artha S. Metz

Anthony Kethoy

C. Eric Hamrin

Jackson Vector Control Dist.

MINUTES OF THE FORTY-EIGHTH MEETING
of the
Oregon Environmental Quality Commission
July 26, 1973

The forty-eighth meeting of the Oregon Environmental Quality Commission was called to order by the Vice Chairman at 9:00 a.m. on Thursday, July 26, 1973, in the City Council Chambers, City Hall, 411 Eighth Street, Medford, Oregon. The Commission members present were Arnold M. Cogan, Vice Chairman, Paul E. Bragdon, Dr. Morris K. Crothers and Dr. Grace S. Phinney. Chairman B.A. McPhillips was unable to attend because of other commitments.

Participating staff members were Diarmuid F. O'Scannlain, Director; Ronald L. Myles, Assistant to the Director; E.J. Weathersbee and K.H. Spies, Deputy Directors; Harold L. Sawyer, Harold M. Patterson and Warren C. Westgarth, Division Administrators; H.H. Burkitt, F.A. Skirvin and M.J. Downs, Air Quality Control Engineers; B.J. Seymour, Information Director; Ray M. Johnson, AQC Program Executive; Donald K. Neff, Assistant District Engineer; Shirley Shay, Administrative Assistant; and Arnold B. Silver, Legal Counsel.

The Director announced to all persons present at the meeting that pursuant to the requirements of a new state law passed by the 1973 Legislature no smoking would be allowed in the Council Chambers during the meeting.

State Senator L.W. Newbry of Ashland was present and was introduced to the audience.

MINUTES OF THE JUNE 29, 1973 COMMISSION MEETING

It was MOVED by Dr. Phinney, seconded by Dr. Crothers and carried that the minutes of the forty-seventh meeting of the Commission held in Portland on June 29, 1973, be approved as prepared.

PROJECT PLANS FOR JUNE 1973

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried that the actions taken by the Department during the month of June 1973 as reported by Mr. Weathersbee regarding the following 78 domestic sewerage, 7 industrial waste, 10 air quality control and 13 solid waste management projects be approved:

Water Quality Division

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (78)</u>			
6-1-73	Coos Bay	Orchard Avenue sewer	Prov. app.
6-1-73	Reedsport	18th Street sewer	Prov. app.
6-1-73	Keizer Sewer Dist.	Chemawa Park Subd. sewers	Prov. app.
6-1-73	Portland	S.W. Grover St. sewer	Prov. app.
6-1-73	Medford	Rogue Valley Industrial Park sewer	Prov. app.
6-4-73	Deschutes County	Red Oaks Square Apt. complex septic tank, disinfection and drill hole disposal	Prov. app.
6-5-73	North Roseburg S.D.	Brentwood Manor Subd. sewers	Prov. app.
6-5-73	Canby	Oliver Addition #7 sewers	Prov. app.
6-5-73	Gresham	Penny Ridge No. II Subd. sewers	Prov. app.
6-5-73	Troutdale	Old Sweetbriar Farm-Phase II sewers	Prov. app.
6-6-73	USA (King City)	Summerfield pump station	Prov. app.
6-11-73	Hillsboro	Washington County Fairground sewer	Prov. app.
6-12-73	Clackamas County Service Dist. I	Collection sewers, Phase III Addendum II	Approved
6-12-73	USA (Forest Grove)	Trevor Downs Subd. sewers	Prov. app.
6-12-73	Hillsboro (Rock Cr.)	Beaumead Subd. sewers	Prov. app.
6-12-73	USA (Metzger)	S.W. 92nd sewer	Prov. app.
6-12-73	Portland	N.E. 14th Place and Columbia Blvd. sewer	Prov. app.
6-12-73	Canby	Sewer to serve Carlson property	Prov. app.
6-12-73	USA (Tigard)	2 sanitary sewer projects	Prov. app.
6-12-73	USA (Aloha)	3 sanitary sewer projects	Prov. app.
6-12-73	USA (Sherwood)	April Meadows Subd. sewers	Prov. app.
6-12-73	Gresham	New Columbia Village #2 sewers	Prov. app.
6-12-73	Gardiner San. Dist.	2 change orders for interceptor project	Approved
6-12-73	Inverness	Change Order #2, Unit 5-C	Approved
6-12-73	Wilsonville	Change Order #3, sewage treatment plant	Approved
6-14-73	Scappoose	Bella Vista Subd. sewers	Prov. app.
6-14-73	East Salem Sewage & Drainage Dist. I	Lancaster Estates #2 Subd. sewers	Prov. app.
6-14-73	McMinnville	Project No. 1973-3 sewer	Prov. app.
6-14-73	Bear Creek Valley Sanitary Auth.	TalentPatio Village sewers	Prov. app.
6-14-73	East Salem Sewage & Drainage Dist. I	Long Acres Subd. sewers	Prov. app.
6-14-73	Oregon City	Glenwood Subd. sewers	Prov. app.
6-14-73	Sunriver	Sunriver East-Business Park I sewers	Prov. app.
6-14-73	Hillsboro (Rock Cr.)	Eastwood Subd. sewers	Prov. app.
6-14-73	USA (Tigard)	Tigard Street Industrial Park sewer	Prov. app.
6-14-73	Albany	Sanitary sewer projects-- 73-10, 73-11, 73-15	Prov. app.
6-14-73	Eugene	2 projects: sewer reconstruction 6th & 7th Avenues, san. sewers near I-205 & Coburg Rd.	Prov. app.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects (78) cont.</u>			
6-14-73	Wilsonville	Charbonneau and Charbonneau II Subd. sewers	Prov. app.
6-14-73	Bay City	Change Orders #B-4, B-5 and A-5	Approved
6-18-73	Bear Creek Valley Sanitary Auth.	Preliminary plans of West Medford trunk sewer	Prov. app.
6-18-73	Green San. Dist.	Extensions of Main 1 and 2	Prov. app.
6-18-73	Tualatin	Navajo Hills II Subd. sewers	Prov. app.
6-18-73	Gresham	Charming Addition Subd. sewers	Prov. app.
6-18-73	Salem (Willow Lake)	Jan Ree East, Units 3 & 4 sewers	Prov. app.
6-18-73	Keizer Sewer Dist.	McLeod Park Subd. sewers	Prov. app.
6-18-73	Eugene	West Amazon Dr. san. sewer	Prov. app.
6-18-73	Ashland	Briggs Subd. #2 san. sewers	Prov. app.
6-18-73	USA (Metzger)	Washington Square Area 7 sanitary sewers	Prov. app.
6-18-73	Reedsport	Addendum #1, 18th Street sanitary sewer	Approved
6-18-73	Clackamas County Service Dist. I	Change Order #1 for Phase II interceptors	Approved
6-18-73	Portland	Change Order #4, Columbia Blvd. sewage treatment plant	Approved
6-19-73	Inverness	Revised plans, Inverness interceptor, Unit 5-C	Prov. app.
6-20-73	USA (Tigard)	Clydesdale Subd. sewers	Prov. app.
6-20-73	Lake Oswego	Greenwood Rd. san. sewer	Prov. app.
6-20-73	Waldport	Change Order #4, sewage treatment plant	Approved
6-20-73	Clackamas County Service Dist. I	2 change orders, Phase II, interceptors	Approved
6-25-73	Hillsboro	Cornell Place Subd. sewers	Prov. app.
6-25-73	Oak Lodge San. Dist.	Chapman Woods Subd. sewers	Prov. app.
6-25-73	USA (Metzger)	McKay Manor Subd. sewers	Prov. app.
6-26-73	Baker	"B" Street and 15th Street sewer (1973-1974 sewer, Phase I)	Prov. app.
6-28-73	Halsey	8 sanitary sewer extensions	Prov. app.
6-28-73	Salem (Willow Lake)	Nebraska Acres Subd. sewers	Prov. app.
6-28-73	Warrenton	Villa Del Mar sewers	Prov. app.

Industrial Projects

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
6-6-73	Mill City	Pacific Power & Light Co. Filter Backwash Treatment Facilities	Prov. app.
6-6-73	Albany	Simpson Timber Co. - Northwest Operations Log Pond Dam Modifications	Prov. app.
6-11-73	Rainier	Rainier Manufacturing Co. Lumber Spray Treatment System	Prov. app.

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Industrial Projects - cont.</u>			
6-11-73	Corvallis	Oregon Aqua Foods, Inc. Freshwater Rearing Facilities	Prov. app.
6-13-73	Dallas	Lautenbach (Fast) Dairy Farm Animal Manure Control & Disposal Facilities	Prov. app.
6-13-73	Dallas	Fast Feedlot - Animal Manure Control & Disposal Facilities	Prov. app.
6-18-73	John Day River Crossing	Pacific Gas Transmission Co.	Prov. app.
<u>Air Quality Control</u>			
<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
6-4-73	Douglas	I-5 Interchange Proposed review for impact upon noise	Req. add. inf.
6-4-73	Linn	Airport Expansion - Proposed review for impact on noise	Approval
6-6-73	Jackson	Rogue Valley Plywood, Inc. White City - Installation of Carter-Day baghouse unit and a Turco wooddust handling and firing system	Approved
6-8-73	Douglas	Permaneer Corporation, Dillard Installation of high pressure air system and modification to the #5 silo system and the elimination of three cyclones	Approved
6-15-73	Douglas	Drain Plywood Co., Drain Modification of wigwam waste burner and installation of veneer drier emission control system	Approved
6-20-73	Washington	Washington Square Proposal review for impact on noise	Req. add. control measures
6-21-73	Curry	Tamco, Inc., Gold Beach Installation of gas fired veneer drier and an emission control system	Approved
6-22-73	Jackson	Eugene F. Burrill Lumber Co. White City - modification of wigwam waste burner	Approved
6-25-73	Umatilla	Johns-Manville Products, Corp. McNary - Installation of PVC pipe plant and an emission control system	Approved
6-26-73	Douglas	Highway Widening - Proposal review for impact on noise	Approved

Solid Waste Management

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
6-4-73	Columbia Co.	Mickey's Landfill (existing garbage site) (operational plan for tire disposal)	Prov. app.
6-5-73	Polk Co.	Valsetz Disposal Site (existing garbage site-modified landfill)	Approved
6-7-73	Washington Co.	Lakeside Reclamation (existing demolition site)(operational plan for site expansion)	Prov. app.
6-12-73	Marion Co.	Brown Island Sanitary Landfill (existing garbage site)	Approved
6-12-73	Yamhill Co.	Whiteson Sanitary Landfill (new garbage site)	Prov. app.
6-15-73	Curry Co.	Rogge Lumber Co. (existing wood waste landfill)	Approved
6-15-73	Columbia Co.	Santosh Sanitary Landfill (existing garbage site)	Prov. app.
6-15-73	Multnomah Co.	Columbia Steel Castings Co. (existing industrial waste site)	Prov. app.
6-15-73	Columbia Co.	Reichold Chemical Co. (existing industrial waste site)	Prov. app.
6-22-73	Multnomah Co.	St. Johns Sanitary Landfill (existing garbage site)	Approved
6-20-73	Morrow Co.	Planning Interim Progress Report	Review & comment
6-25-73	Grant Co.	Planning Interim Progress Report	Review & comment
6-29-73	Yamhill Co.	Newberg Sanitary Landfill (existing garbage site)	Approved

OPEN PUBLIC FORUM

Mr. Cogan pointed out that in view of the fact that the Commission meets infrequently in the Medford area the members of the general public would be given the opportunity at this meeting to voice any environmental concerns they might have directly to the Commission members. It was pointed out further that time might not allow extensive discussion of all individual items but assurance was given that appropriate follow-up actions would be taken regarding questions or problems not answered or resolved at this meeting.

Mr. Harry M. Demaray of 18 North Modoc Ave., Medford, Oregon was the first person to make a statement. He expressed the opinion that there is need for improving the system for receiving public input at hearings. He asked that all hearings be held by the Commission members rather than by hearing officers and that they be held in the vicinity of the subject being heard.

He objected to what he classified as narrowly defined job qualifications for staff positions of DEQ.

Mr. Arthur R. Kraiman, Research Associate and representative of the Regional Development Center at Southern Oregon College, claimed that the lack of an informed citizenry makes both the identification and the solution of environmental problems difficult. He strongly recommended that district offices of DEQ be so located that they will be as close as possible to major community-wide environmental problems. He emphasized the importance of student interest and participation in identifying and solving such problems.

Mr. John Benson said he represented local sanitation but only as a private citizen. He requested information regarding the qualifications of the Commission members and asked about the reasoning for the difference between drain fields or subsurface sewage disposal systems and the requirements for disposal of wastes from animal feed lots and pasture land.

Mr. Weathersbee explained to Mr. Benson the difference in public health significance between the two types of wastes and mentioned briefly the department's program and efforts to control disposal of both domestic sewage and wastes from animals.

Mr. Dennis Allen Adams, resident of Ashland, complained about excessive dust and noise at his residence allegedly caused by the operations of the adjacent Parsons Pine Products and Big Foot Wood Products plants. He was advised by Mr. D'Scannlain that the Department staff would make an inspection to determine appropriate action.

Ms. Colleen Eatherton, who lives in a mobile home on a 2-1/2 acre lot adjacent to the city of Medford, asked if the Commission could do anything about a rock crushing operation on adjoining property. She said a contract had been signed by the owner for the crushing of 100,000 cubic yards of rock and that the crusher would be located only about 100 feet from her home. She did not know if the area had been zoned. She stated that she had not contacted the DEQ previously but had consulted with local authorities. She was assured that the Department staff would do everything within its jurisdiction to protect the environment.

Mr. Sidney M. Jones of Medford expressed concern about proposals set forth by the U.S. Forest Service in that agency's Environmental Draft Statement for the control of roadside and other brush in the Rogue River Basin by the use of herbicides. He asked that a protest be filed with the USFS about the proposed use of 2-4D and 2-4-5T. He claimed that some of the operations would be within the Medford city watershed. He objected to the proposal to maintain a buffer strip of only 10 feet and indicated it should be at least 25 feet. Dr. Westgarth advised Mr. Jones that DEQ is currently reviewing the Environmental Draft Statement and will do everything it can to assure protection of the environment.

Clara Wendt, Jacksonville City Councilwoman, mentioned the sewerage problem that has confronted the city of Jacksonville. She claimed that some of the letters which the city had sent to DEQ had not been answered in enough detail or within a reasonable period of time. Mr. Sawyer explained the background of the sewerage matter and the reason for the delay in getting certain information to the city. Mrs. Wendt also requested that the department make an inspection of the sanitary landfill located adjacent to the city of Jacksonville. She was assured that such an inspection would be made.

Byron Caloz, a young student from the Medford area, made some general comments on the subject of air pollution, recited some costs incurred by the average citizen because of air pollution, advocated the increased development and use of mass transportation and made a plea for more bicycle paths as a means of protecting the environment against pollution.

Mrs. Marie Bosworth expressed the grave concern which she, Thelma M. Thompson, Cornelia Clemens and others in the Medford area, have relative to the use of herbicides as proposed or practiced by the U.S. Forest Service, Bureau of Land Management, the county and others, and particularly the use of the herbicide "Agent Orange" which is a combination of 2-4D and 2-4-5T. She requested that an immediate decision be made to control the use of such materials by injunction or other means. Mr. John Vlastelicia of the Oregon office of EPA stated that no federal permit for experimental or regular use of this herbicide had been granted by EPA. Dr. Westgarth pointed out that the State Department of Agriculture also regulates the use of pesticides in Oregon and to the best of his knowledge no permit has been issued for use of Agent Orange in this state.

Miss Sharon Caloz read a short statement objecting to the practice of clear cutting and pointing out certain disadvantages of this method of timber harvesting such as soil erosion. She strongly recommended selective cutting in place of clear cutting. Mr. Cogan suggested that if she had not already done so she contact the U.S. Forest Service.

Mr. Ray Lamberg of 3619 Ross Lane, Medford, stated that he believes that the air quality in the Rogue Basin has not improved although good progress has been made in reducing the emissions from wigwam burners. He expressed concern about possible health effects of existing pollution and stated that he thinks more investigations should be made of the cumulative effects of particulates and other air contaminants.

Mr. Anthony Netboy, P.O. Box 420, Jacksonville, Oregon claimed that the dam construction by the U.S. Army Corps of Engineers is causing pollution in the Rogue River.

Although invited to do so by the Chairman no other persons asked to be heard during this part of the meeting.

Letters or written statements were received but not read from (1) Mr. and Mrs. O.E. Kellogg of 2180 Sardine Creek Road, Gold Hill, Oregon claiming that much logging does not comply with the requirements of the forest practices act, (2) from Zilla Dueck, 1355 Dutton Road, Eagle Point expressing concern about the supply of ground water and the ban on septic tanks in the Medford suburban area and (3) from Jean Davis of 3572 North Foothills, Medford regarding pesticides, testing of water and fluorides.

Mr. Cogan thanked all of the persons who had taken the time to prepare and submit statements pertaining to their concerns about environmental matters.

IMPACT OF NEW LEGISLATION ON DEQ PROGRAMS

Mr. Spies reviewed briefly a report prepared by the staff regarding the impact of 1973 legislation on DEQ programs. He mentioned specifically the new responsibilities which the department will have concerning sub-surface sewage disposal as a result of the passage of SB77 and alternate sewage disposal systems under HB2786. He discussed the increased authority granted by HB2436 and other bills which it is expected will qualify the DEQ to conduct the NPDES permit program in Oregon. Other bills pertaining to air quality control, solid waste management, pollution control bonds, law enforcement, and land conservation and development were also reviewed.

Although not discussed at the meeting the written report contains information regarding the biennial appropriation ('73-'75) and the authorized staffing for DEQ.

TAX CREDIT APPLICATIONS

Mr. Sawyer presented briefly the Department's evaluations and recommendations regarding the 27 tax credit applications covered by the following motion:

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

<u>Applicant</u>	<u>Appl. No.</u>	<u>Cost</u>	<u>% Allocable to Pollution Control</u>
Weyerhaeuser Co., North Bend	T-361	\$ 32,000.00	80% or more
Weyerhaeuser Co., North Bend	T-407	6,192.00	80% or more
Weyerhaeuser Co., North Bend	T-417	273,413.00	80% or more
Boise Cascade Corp., Joseph	T-419	56,500.26	80% or more
Boise Cascade Corp., Joseph	T-420	49,537.19	80% or more
Oregon Portland Cement, Lake Oswego	T-432	12,176.81	80% or more
Bend Aggregate & Paving Co., Bend	T-434	20,342.00	80% or more
E.R. Holmes, Independence	T-435	3,292.07	80% or more
Menasha Corp., North Bend	T-441	5,704.00	80% or more
Hanna Nickel Smelting Co., Riddle	T-442	37,295.63	80% or more
Hanna Nickel Smelting Co., Riddle	T-443	198,997.00	80% or more
Hanna Nickel Smelting Co., Riddle	T-444	1,122,430.13	80% or more
Hanna Nickel Smelting Co., Riddle	T-445	31,727.22	80% or more
Hanna Nickel Smelting Co., Riddle	T-446	29,179.14	80% or more
Continental Can Co., Portland	T-449	3,940.00	80% or more
Continental Can Co., Portland	T-450	19,696.00	80% or more
Continental Can Co., Portland	T-451	18,729.00	80% or more
Time Oil Co., Portland	T-454	60,723.00	80% or more
Mazama Timber Products, Goshen	T-456	23,021.07	80% or more
Mazama Timber Products, Walker	T-457	112,747.22	60% or more and less than 80%
J.C. Compton Co., McMinnville	T-458	156,254.50	80% or more
Oregon Steel Mills, Rivergate	T-467	175,876.29	100%*
Oregon Steel Mills, Rivergate	T-468	92,287.95	100%*
Oregon Steel Mills, Rivergate	T-469	546,525.81	100%*
Publishers Paper Co., Oregon City	T-472	2,475,220.00	80% or more
Publishers Paper Co., Newberg	T-473	616,229.00	80% or more
International Paper Co., Vaughn	T-475	100,283.25	80% or more

*Under 1967 Act

USA INTERIM SEWERAGE PROGRAM

Mr. Sawyer presented the staff report dated July 19, 1973 regarding the interim sewerage program of the Unified Sewerage Agency (USA). He said that because USA and Washington County have been unable to maintain a balance between the growth and development of the area and the capability to provide adequate sewage treatment and disposal, it is now necessary that the Commission (EQC) take immediate action either to maintain the existing interim facility plan and impose a sewer connection ban in the area for a period of perhaps 4 years or to approve a revised interim facility plan and greatly restrict sewer connections and building over the next 2 or more years. He recommended the latter.

In addition to the information contained in his written report, Mr. Sawyer stated that operation of the Oak Hills sewage treatment plant had been taken over by USA on July 5, 1973 and that the improvements to the Primate Center plant are expected to be completed in another month or so. He read into the record of the meeting a telegram from Mrs. Joan M. Brown supporting a continued ban on construction.

Mr. Eldon Hout, Washington County Commissioner, was present to represent USA. He reviewed briefly the history of the program development by USA. He then stated that they are not in disagreement with the basic goals of DEQ as set forth in the report presented by Mr. Sawyer but they question very seriously the particular quota system proposed for sewer connections. He said they do not argue with the figures of 1900 allowable connections for the Aloha system and 900 for Metzger but that the proposed monthly quotas of 65 and 30, respectively, for these two systems would result in a real hardship to the area.

In response to a question by Dr. Phinney Mr. Dan Potter, Washington County Administrative Officer, who was also present said if there were no quota system the remaining allowable connections would probably all be committed in about 1 year. In response to another question from the Commission members Mr. Hout stated that he was confident that the local officials could devise an acceptable alternative quota system proposal within a week. Mr. Sawyer explained the reasoning used in developing the quota system recommended in his report.

Mr. Bruce Clark, Administrator for the city of Tigard, supported the position stated by Mr. Hout. In addition he proposed that consideration be given to installing flow regulation facilities for effecting more uniform

flow to the sewage treatment plants as a way of increasing the number of allowable sewer connections.

Mr. Larry Sprecher, Beaverton City Manager, was the next person to make a statement regarding this matter. He proposed that an annual rather than a monthly quota system be adopted and asked that time be allowed to work out such a compromise. He stressed the value or importance of orderly growth and suggested that it might be advisable in some cases to increase temporarily the level of allowable pollution in order to permit proper planning and development. For example, he believes it necessary to provide housing nearby to the new Washington Square commercial development in Washington County in order to keep automobile travel to a minimum and thereby control air pollution.

Mr. Robert B. Rogers, President of the Home Builders Association of Metropolitan Portland, read a letter dated July 25, 1973 from that organization. He said they appreciate the problem of water quality control and certainly do not advocate the discharge of raw sewage into streams. He requested, however, that if sewer hookups are to be limited (1) local government, in cooperation with the home building industry, be permitted to establish priorities for allocation of the permits, (2) time be allowed to consider interim solutions for presentation to the Commission, and (3) a public hearing be held in the Portland area for presentation of the priority system and interim solutions to the Commission.

Mr. James Moore, attorney for Habitat Sylvan Hills Development and former Beaverton City Mayor, spoke against the proposed monthly quota system. He contended that it would not be equitable to use the last allowable sewer connections only a few days before the Durham plant would be in operation, that early development would make more assessed value of property available for tax purposes, that the monthly quotas would make it impossible for large projects to qualify at all, and that consequently there would be serious effects on the housing industry and supply.

Mr. Hout then suggested that the Commission continue the ban or embargo for another 3 weeks to allow them time to work out a compromise quota system.

After further discussion it was MOVED by Dr. Crothers, seconded by Mr. Bragdon and carried that the Director's recommendations in this matter be adopted but with changes to condition No. 2, namely that the revised interim program proposed by USA for the Beaverton Creek-Rock Creek drainage basins be approved subject to the following conditions:

- (1) No additional connections to the Oak Hills Plant shall be made without specific Department of Environmental Quality approval. The plant shall be modified and operated as necessary to perform within standards. Irrigation disposal of effluent shall be implemented immediately if land can be obtained in the vicinity.
- (2) Until quota bases have been approved by the Commission for permitting additional connections to the sewers tributary to the Aloha Plant and Metzger Plant no additional sewer connection permits shall be issued for any properties served by sewers connected to treatment plants located in the Fanno and Beaverton-Rock Creek drainage basins.
- (3) No additional connections to sewers tributary to the Beaverton sewage treatment plant shall be committed without specific DEQ approval. Connections to sewers in Beaverton tributary to the Aloha plant can be permitted subject to quotas approved by the Commission for the Aloha plant. Connections to sewers tributary to the Metzger system can be permitted subject to quotas approved for that system.
- (4) The expanded Somerset West plant shall be operated and maintained by USA.

The revised interim program proposed by USA and conditionally approved by the above motion is as follows:

- (1) Allow Tektronix to maintain its present plant in operation until 1977.
- (2) Maintain the Oak Hills plant at present loading until 1977.
- (3) Reduce the load on the Sunset plant from the present approximate 1.2 MGD to 0.8 MGD by diverting flow to Aloha via the Cedar Mill trunk sewer which is to be completed this fall and maintain this reduced loading until 1977. Make such other modifications as are necessary to insure that interim effluent quality standards are met.
- (4) Allow continued growth in the area to utilize remaining Aloha plant capacity by late 1975. The remaining capacity, assuming items (1), (2) and (3) above are met, is presently estimated at 1900 single family

unit equivalents. In late 1975 when the Durham plant is completed, an estimated 1.2 MGD of waste flow from Beaverton can be diverted from the Aloha plant to the Durham plant, thus making the equivalent of approximately 3,000 additional connections theoretically available to the Aloha plant.

- (5) Allow the modified and improved Primate Center plant to continue in operation until 1977. (Modifications to this plant will be completed in another month or so for improving effluent quality and eliminating summer discharges.)
- (6) Allow interim expansion of the Somerset West plant to accommodate additional residential development and provide service to two planned new Beaverton School District schools and to the Portland Community College Rock Creek Campus, such expansion to be accomplished with all effluent disposed of by land irrigation during the summer months and with increased flow to Rock Creek only during wet weather months.

It was agreed by the Commission members that if at all possible a decision regarding a compromise quota system would be made by them on August 13, 1973, and if not then at the September Commission meeting.

PARKING FACILITIES

(a) Portland State University 150-space Parking Facility:

Mr. Downs read the staff report dated July 18, 1973 covering the department's review and evaluation of the application submitted by PSU for construction of a 150-space surface parking facility on the block bounded by S.W. 12th, S.W. 13th, S.W. Montgomery and S.W. Market Streets, Portland. He said it is the recommendation of the Director that the proposed 150-space parking facility be approved for construction with the following conditions:

- (1) The 117-space parking facility on Block 239 be closed prior to opening the 150-space facility.
- (2) The modified parking guideline be implemented such that required increases in parking supply be confined to off-campus sites.

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

(b) Valley River Center 872-space Parking Facility:

Mr. Downs presented the staff report dated July 19, 1973 covering the department's review and evaluation of the application submitted by the Valley River Center for construction of an 872-space parking facility at the Valley River Center in Eugene. He said it is the recommendation of the Director that the proposed 872-space facility be approved for construction according to the plans and specifications submitted.

Mr. Wayne Shields was present to represent the applicant. He stated the proposed facility is to serve two department stores and 64 other shops and is based on 5.66 parking spaces/1000 square feet of store area. He said they have the wholehearted support of mass transit, that they would very much prefer to convert part of the 34 acres of parking to other more productive uses, that normally the parking facilities are used only to 50 to 60% of capacity, and that there are about 3 times each year when the facilities are overloaded and some cars have to be parked along the access roads. He estimated that 30% of their trade comes from outside the metropolitan and mass transit area.

Mr. Cogan announced that he was opposed to the Director's recommendation in this matter because it provides no incentive or requirement for mass transit usage and therefore he recommended that it not be adopted until a more balanced approach for mass transit and automobile usage be developed for this project.

It was MOVED by Dr. Crothers and seconded by Dr. Phinney that the Director's recommendation regarding the Valley River Center application be approved. The vote was Dr. Crothers - Aye, Mr. Bragdon - Aye, Dr. Phinney - No, and Mr. Cogan - No. The motion failed to pass because of a tie vote.

Mr. O'Scannlain suggested that the staff review this matter further and that it be resubmitted at the next Commission meeting.

Mr. Cogan thanked the city of Medford for the privilege of holding this meeting in the Council Chambers.

The meeting was then recessed at 12:00 noon and reconvened at 1:30 p.m.

(c) Habitat Sylvan Hills 1422-space Parking Facility:

Mr. Downs reviewed the staff report dated July 19, 1973 covering the department's evaluation of the application submitted by Forchuk/Wold/Peyton Builders and Developers for construction of a 1,422-space parking facility to serve the Habitat Sylvan Hills 1412-person residential development located between Sunset Highway and S.W. Barnes Road near the intersection of S.W. Miller Road in east Washington County. He stated that the Director's recommendation is that the July 9, 1973 application for this parking facility be approved for construction according to the plans and specifications submitted, with the condition that the developers Forchuk/Wold/Peyton, provide the Department with an acceptable transit plan and implementation time schedule to service Habitat Sylvan Hills with mass transit when it opens, such plan and time schedule to be submitted no later than October 25, 1973.

Mr. James Moore, Attorney, was present to represent the applicant. He stated the developers are most agreeable to either of the two alternatives for mass transit that are available.

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

(d) Eugene Office Park 385-space Parking Facility:

Mr. Downs presented the staff report dated July 23, 1973 covering the department's review and evaluation of the application submitted by Moran Construction, Inc. for construction of a 385-space parking facility to serve Phase I of a proposed office park development adjacent to the Valley River Center, Eugene, with Phase I consisting of 114,000 square feet of office space with 285 parking spaces and 6,000 square feet of food service center space with 100 parking spaces. He stated that the Director's recommendation is that the Commission authorize the Director to approve the plans and specifications for the 385-space parking facility for construction as soon as an acceptable plan and implementation time schedule have been submitted to the Department providing incentives for employees and tenants of the Eugene Office Park to utilize mass transit.

Mr. Harry Seabold was present to represent the applicant. He said they would want to meet with the DEQ staff as soon as possible to learn about the guidelines for developing such a plan and time schedule.

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

ALSEA VENEER

Mr. Burkitt presented the staff report regarding the Alsea Veneer plant located about one mile south of Yachats. He stated that on March 9, 1973 the department had assessed a \$250 civil penalty against the company for violations of wigwam burner emission limitations, that the company subsequently requested a public hearing, that Mr. Silver had been appointed hearings officer, that the company and department had later stipulated to all facts with the exception of consideration of the company's financial circumstances, and that Mr. Silver's report was attached which concluded that the \$250 civil penalty was valid and levied according to law.

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried that as recommended by the Director the Hearings Officer's proposed order be adopted and entered by the Commission.

CWAPA VARIANCES

Mr. Patterson reviewed briefly the department's evaluations and recommendations regarding the variances granted by CWAPA and covered by the following three motions:

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried that as recommended by the Director the CWAPA variance 73-5 issued to Publishers Paper Company be approved as issued.

It was MOVED by Dr. Crothers, seconded by Mr. Bragdon and carried that as recommended by the Director the CWAPA variance 73-4 issued to Dennis Melstrom for operation of a proposed modified wigwam burner at the Sandy Shake Company mill be approved as issued.

It was MOVED by Dr. Phinney, seconded by Dr. Crothers and carried that as recommended by the Director the CWAPA variance 73-6 to the inhabitants of Columbia County be approved but with item No. 3 amended to require specific application to and written approval from the department prior to conducting land clearing operations in excess of two acres.

Mr. A. Jay Ahlborn, Columbia County Commission, was present and spoke in favor of approval of CWAPA variance 73-6. He stated that the county has an area of 676 square miles and a population of only 30,000, one-third of which has no garbage collection services.

CWAPA TRANSFER TO DEQ

The audit report for the former Columbia Willamette Air Pollution Authority (CWAPA) was not available and so this matter was deferred until the next Commission meeting.

CONTINUATION OF HEARING RE: ALUMINUM PLANT RULES

The Public Hearing held by the Commission on June 29, 1973 was continued on July 26, 1973 beginning at 2:00 p.m. in the Council Chambers of the Medford City Hall with Vice Chairman Arnold M. Cogan presiding and members Paul E. Bragdon, Dr. Maurice K. Crothers and Dr. Grace S. Phinney in attendance. Chairman B.A. McPhillips was unable to attend.

All testimony presented orally at both sessions was recorded on tape.

The first person to appear and be heard was Mr. Jack Doan, Vice President of Martin Marietta and General Manager of that company's Reduction Division. He introduced Dr. Michael Treshow, Professor of Biology, University of Utah, who had been retained by Martin Marietta to evaluate the possible effects on orchard crops of fluoride emissions from the aluminum plant at The Dalles. He said his observations in 1963 revealed typical fluoride symptoms on such sensitive plant species as the "Chinese" apricot, Italian prune and several gladiolus varieties within a two-mile radius of the aluminum plant but that since 1964 fluoride injury to crops, native plant species and ornamental plants in The Dalles area has been negligible and insignificant. He claimed it is now impossible to find any fluoride-induced symptoms on even the most sensitive plants anywhere in The Dalles area.

In response to questions from the Commission members Dr. Treshow stated that humans are roughly 1,000 times more tolerant to fluorides than are sensitive plants, that after fluoride emissions are discontinued plants will resume normal growth and development within a period of weeks or possibly days, that with the controls of fluoride emissions now in effect at The Dalles aluminum plant the production of aluminum and orchard crops in The Dalles area are compatible, that in using the term "negligible" he means less than one-half of one percent of the leaf tissue of the most sensitive species would be affected, and that in his opinion the damages awarded in recent court cases involving The Dalles aluminum plant were not justified.

The next person introduced by Mr. Doan was Dr. Melvin Carter, Professor of Statistics at Brigham Young University. He had been retained by Martin Marietta to evaluate studies conducted by Oregon State University to assess possible effects of fluorides on sweet cherry fruit set and to conduct independent statistical analyses of the data. He said that based on his statistical analysis and review of the work conducted by OSU, the work conducted in the Martin Marietta Orchards and his familiarity with reported ambient air fluoride levels in The Dalles in recent years it is his opinion that the fluoride levels in the orchard area in recent years have not had an adverse effect on sweet cherries.

Following questioning of Dr. Carter by the Commission members, Mr. Doan presented a fairly complete explanation of the aluminum reduction process used by Martin Marietta at The Dalles and described the control systems which have been installed to reduce atmospheric emissions from the plant. He stated that operation and maintenance of the control systems is a big job and requires the full time services of 26 people including engineers and technicians.

He said that Martin Marietta Aluminum Company must oppose adoption of the proposed regulations because neither the need for nor the practicability of obtaining the proposed emission levels has been established. He claimed that it would be impossible for The Dalles plant to comply, that they cannot meet the requirement for submitting an implementation program within 180 days, that they could not meet the compliance deadline of January 1, 1976, and that they do not resist adoption of the proposed regulations in order to avoid expense but because they can not meet them at their plant.

In response to a question by Dr. Crothers Mr. Doan said he feels they could meet a 5 pound standard based on total fluorides but not the proposed one pound standard.

Upon questioning by Mr. O'Scannlain it was brought out that based on samples collected during the past 2 years the long-term average for total fluoride emissions at The Dalles plant has been 2.2 pounds per ton of aluminum produced with monthly values ranging from a low of 0.7 pound to a maximum of 5.8 pounds.

The question of hooding of the cells was brought up by Mr. Cogan. Mr. Doan then introduced Dr. Warren Peterson, manager of reduction technology for Martin Marietta. He presented information supplied by Wesley C.L. Hemeon, a recognized authority on this particular subject. According to Mr. Hemeon it is not only difficult but literally impossible to put a hood on a vertical stud Soderberg cell such as is used at The Dalles.

To answer questions raised by Dr. Crothers regarding the cost and difficulty of getting adequate emission data Mr. Joe Byrne of Martin Marietta was called upon by Dr. Peterson. He described the problems involved in getting representative samples of the extremely large volumes of air which are emitted from the numerous outlets and the problems of analyzing them for minute concentrations of contaminants. This was followed by a discussion by Mr. Skirvin, Mr. O'Scannlain and Mr. Byrne concerning the problem of obtaining meaningful monthly average values for the fluoride emissions from the plant.

The final witness for Martin Marietta was Mr. Douglas Ragen, Attorney with the law firm of Miller, Anderson, Nash, Yerke and Wiener, Portland. He proceeded to analyze and summarize certain of the testimony presented at the hearing on June 29, 1973 and at this continued hearing for the purpose of showing whether or not the proposed rules and standards are practicable, reasonably attainable, and based upon presently available technology. He commented on the oral or written statements made by F.A. Skirvin, Dr. Aaron J. Teller, Joseph Schulein, Wesley C.L. Hemeon, Arden Shenker, representatives of Martin Marietta, representatives of AMAX and Dr. T.T. Facticeau.

He stated that Dr. O.C. Compton, a horticulturist from Oregon State University, who has conducted extensive studies in The Dalles area holds the opinion that the aluminum plant is not causing damage to sweet cherry production. He stated further that Curtis Mumford, an agricultural economist also from OSU, has made a study of production data and has been unable to find any adverse effect on sweet cherry production which he could attribute to the aluminum plant.

Mr. Ragen concluded his statement by saying that he believes it clearly shows the reasons why the proposed amendments to Oregon's regulations governing the primary aluminum industry must be rejected by the company.

Dr. Crothers commented that he was really favorably impressed by what the company has accomplished in reducing its atmospheric emissions and based on the testimony presented he thinks the plant is already meeting a 2 pound/ton standard. He said he was also impressed by the fact that there is probably very little economic damage being done in The Dalles area and obviously no damage to humans.

There was then further discussion regarding the problem of determining "monthly average" emission values.

The final witness at the continued hearing in Medford was Mr. Harry Helton, Plant Manager of the Reynolds Metals Plant at Troutdale. He discussed further the problem of measuring fluoride emissions and expressing them on a basis of monthly average. He pointed out that the proposed standards say specifically that the emissions shall not exceed 1 pound of fluoride per ton of aluminum produced on a monthly average basis which means this value shall not be exceeded in any single month whereas the figure of 2.2 pounds given for The Dalles plant was a long-term arithmetical average for a 26-month period, not for single month. In response to a question by Mr. O'Scannlain Mr. Helton stated that at the Reynolds aluminum plant in Troutdale the corresponding long-term arithmetical average is somewhere in the neighborhood of twelve pounds per ton.

As a result of these discussions Mr. Cogan instructed the staff to review the particular wording of this standard and propose any changes that might be indicated.

Mr. O'Scannlain directed the staff to review all the testimony and analyze all of the presentations and report back at the next meeting of the Commission.

There being no one else who wished to be heard in this matter the hearing was adjourned by Mr. Cogan at 4:45 p.m.

MINUTES OF THE FORTY-SEVENTH MEETING
of the
Oregon Environmental Quality Commission

The forty-seventh meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 8:30 a.m. on Friday, June 29, 1973, in the Second Floor Auditorium, Public Service Building, 920 S.W. 6th Avenue, Portland, Oregon. All Commission members including B. A. McPhillips, Chairman, Arnold M. Cogan, Dr. Morris K. Crothers, Dr. Grace S. Phinney and Paul E. Bragdon were present.

Participating staff members were Diarmuid F. O'Scannlain, Director; E. J. Weathersbee and K. H. Spies, Deputy Directors; Harold L. Sawyer and Harold M. Patterson, Division Administrators; Barbara J. Seymour, Information Director; F. A. Skirvin and M. J. Downs, Air Quality Control Engineers; and R. P. Underwood and Rob Haskins, Legal Counsel.

The Chairman announced to all persons present at the meeting that pursuant to the requirements of a new state law which had been signed recently by the Governor no smoking would be allowed during the meeting.

MINUTES OF THE MAY 29, 1973 COMMISSION MEETING

It was MOVED by Dr. Crothers, seconded by Mr. Cogan and carried that the minutes of the forty-sixth meeting of the Commission held in Portland on May 29, 1973, be approved as prepared.

PROJECT PLANS FOR MAY 1973

It was MOVED by Mr. Cogan, seconded by Dr. Phinney and carried that the actions taken by the Department during the month of May 1973 as reported by Mr. Weathersbee regarding the following 39 domestic sewerage, 10 industrial waste, 18 air quality control and 4 solid waste management projects be approved:

Water Quality Control

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
5-1-73	N. Umpqua S.D.	Oak Knolls Estates, 1st Addn. sewers	Prov. app.
5-1-73	Hillsboro (Rock Creek)	Airport extension, Ide. Park No. 3 Subd., 39th Ave., Harmony Vale Subd., sewers	Prov. app.
5-1-73	Sutherlin	Cascade Estates Subd. sewers	Prov. app.
5-1-73	Toledo	Cascadia Lumber Co. pump sta.	Prov. app.

Municipal Projects - continued

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
5-11-73	USA (Tigard)	Grant St. sewer ext.	Prov. app.
5-11-73	Multnomah County	Space Industrial Park sewer	Prov. app.
5-11-73	The Dalles	C.O. #7 & 8 - STP Contract	Approved
5-11-73	Tri City S.D.	C.O. #1 - STP Contract	Approved
5-11-73	Inverness	C.O. #1 - Interceptor Proj. 5-C	Approved
5-11-73	Clackamas County S.D. #1	Phase I-Clack. County sewage Collection System	Prov. app.
5-11-73	Eugene	First Avenue sewer	Prov. app.
5-16-73	Clackamas County S.D. #1	Echo Hollow Rd. sewer, Adden.No.1 Phase I- Collection system	Approved
5-16-73	Baker	Alpine KOA Campground sewer	Prov. app.
5-16-73	USA	Sherwood Trunk and effluent Irrigation System	Prov. app.
5-17-73	Portland	STP Laboratory	Prov. app.
5-17-73	Springfield	Robbin Park Subd.	Prov. app.
5-21-73	Canby	O-Me-Co., Inc. Subd. sewer	Prov. app.
5-21-73	USA (Aloha)	Hillsboro Jr. Hi sewer	Prov. app.
5-21-73	Prineville	Sewage Pump Sta. & river crossing	Prov. app.
5-25-73	Clackamas County S.D. #1	Addenda #1 & 2, Phase 2 - Collection System	Prov. app.
5-25-73	Portland	S.W. 45th, S.W. 24th, S.E. Rex St. sewers	Prov. app.
5-25-73	USA (Durham)	Durham STP - 20.0 MGD activated sludge secondary treatment plus nutrient removal	Prov. app.
5-25-73	Yachats	Yachats STP - 0.150 MGD activated sludge, secondary treatment with disinfection and an ocean outfall	Prov. app.
5-25-73	Springfield	Daisy Street and Corriea Subd. sewers	Prov. app.
5-25-73	Salem (Willow Lake)	Industrial Way, N.E. sewer	Prov. app.
5-25-73	Bay City	C.O. & B-3 - STP Contract	Approved
5-30-73	White City S.D.	Tropic Isles Subd. sewers	Prov. app.
5-30-73	Sutherlin	Orchard Lane Subd. sewer	Prov. app.
5-30-73	Clackamas County	Phase III - Collection system	Prov. app.
5-30-73	BCVSA (White City)	Cascade Village No. 5 sewers	Prov. app.
5-30-73	Oregon City	Shenandoah Subd. sewers	Prov. app.
5-31-73	Lafayette	Lone Oak Addn. sewers	Prov. app.
5-31-73	Gresham	C.O. #10, Contr. 1 & C.O. #3 Contr. 2 - STP Project	Approved

Industrial Projects (10)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
4-30-73	Jacksonville	Teunis Roeloffs Farm, animal waste facilities	Prov. app.
5-1-73	South Poe Valley	Al Grant Farm, animal waste facilities	Prov. app.
5-2-73	Portland	Pacific Power & Light Co., Lincoln Plant, filter backwash water clarification facilities	Prov. app.

Industrial Projects - continued

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
5-3-73	Klamath Falls	Stan Masten & Son Farm, animal waste facilities	Prov. app.
5-9-73	Portland	Kaiser Cement & Gypsum Corp. Pacific Building Materials Currey Street plant, waste water treatment & recirculation system preliminary concept	Prov. app.
5-10-73	Yoncalla	Darrell Payne Farm, animal waste facilities	Prov. app.
5-14-73	Eugene	Shell Chemical Company, truck wash waste water disposal system	Prov. app.
5-17-73	Portland	Ross Island Sand & Gravel Co., Albina plant, water clarifi- cation facility	Prov. app.
5-22-73	Portland	Union Carbide Corp., Ferro-alloys Div., recycling system for treated scrubber waters	Prov. app.
5-31-73	Salem	Portland General Electric Co., oil control program for gas turbine power plant	Prov. app.

Air Quality Control

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
5-1-73	Hood River	U. S. Plywood, Dee plant Installation of blower system and cyclone for handling sawdust and shaving materials	Approved
5-1-73	Multnomah	Pacific Supply Cooperative 75-space parking facility	Approved
5-2-73	Jackson	Medford Veneer and Plywood Corp. White City - modification of wood- dust handling system & installation of Carter-Day baghouse	Approved
5-2-73	Coos	Georgia Pacific Corp., Coquille New small log chipping stud mill to replace existing stud mill	Approved
5-7-73	Douglas	U. S. Plywood, Rifle Range Road plant, Roseburg - Installation of two (2) Carter-Day baghouses to control sanderdust emissions from the Kimwood and the Yates- American sander systems.	Approved
5-7-73	Malheur	J. A. Albertson, Nyssa Installation of 300 hp diesel fired boiler and a grain air lift.	Approved

Air Quality Control - continued

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
5-8-73	Lane	Foo's Restaurant 80-space parking facility	Approved
5-8-73	Lane	The Stables Night Club 348-space parking facility	Approved
5-8-73	Lane	Tomhison Apartments 106-space parking facility	Approved
5-8-73	Lane	State of Oregon Eugene Motor Pool - Relocation of 100 space parking facility	Approved
5-8-73	Lane	National Guard Armory Addition of 56-spaces to park- ing facility	Approved
5-10-73	Josephine	Rough & Ready Lumber Co. Cave Junction - Installation of small log sawmill	Approved
5-10-73	Curry	Tamco, Inc., Gold Beach Installation of veneer drier	Denied pending submission of further information on control of drier emissions
5-16-73	Umatilla	Eastern Oregon Farming Alfalfa dehydration, NC 149	Conditional Approval
5-16-73	Umatilla	Pendleton Grain Growers Seed and vegetable cleaning and storage	Approved
5-21-73	Klamath	Gilchrist Timber Co., Gilchrist Installation of fly ash collector system on two (2) hog fuel boilers, replacement of steam turbine I.D. drives with electric motors, installation of new dampers, etc.	Approved
5-29-73	Multnomah	Pacific Northwest Bell 302-space parking structure	EQC approved with conditions
5-29-73	Washington	Washington Square, Inc. 5219-space parking facility	EQC prohibited

Solid Waste Management

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
5-2-73	Lane County	Sharps Creek Transfer Facility (New transfer station)	Prov. app.
5-7-73	Lane County	Day Island Sanitary Landfill (Existing Sanitary Landfill)	Approved
5-11-73	Lane County	Action Plan Interim Progress Rpt.	Review & comment
5-31-73	Wheeler County	Action Plan Interim Progress Rpt.	Review & comment

ELECTION OF VICE CHAIRMAN

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried that Mr. Cogan be elected to serve as Vice Chairman of the Commission.

OREGON CUP AWARD SCREENING COMMITTEE

Barbara Seymour presented information regarding the formation and purpose of the Oregon CUP Award program and submitted the names of the following persons as nominees for membership on the Oregon CUP Award Screening Committee: Ms. Judy Irons of the Oregon Environmental Council representing ENVIRONMENT: Mr. Herbert Lundy, Editorial Page Editor, The Oregonian, representing the PUBLIC: Mr. Clinton Boehringer, AFL-CIO, and Mr. Dean Killion, President, AFL-CIO, representing LABOR: and Mr. Storrs Waterman of Pennwalt Corporation, representing INDUSTRY.

It was MOVED by Dr. Crothers, seconded by Mr. Cogan and carried that Ms. Judy Irons, Mr. Herbert Lundy, Mr. Clinton Boehringer, Mr. Dean Killion and Mr. Storrs Waterman be appointed members of the Oregon CUP Award Screening Committee.

They replace Mrs. Vera Springer, Mrs. Alice Northway, Mr. Ed Whelan, Mr. Joe Edgar and Mr. Don Frisbee as members of the Committee.

PARKING FACILITIES

At the May 29, 1973 Commission meeting an application from Washington Square, Inc., to construct a 5,219 space parking facility at Progress was denied. The Corporation was advised, however, that the Commission at its June meeting would be willing to consider a new properly conditioned application for construction of a minimum number of parking spaces needed to allow the two department stores (Sears and Meier & Frank) to open as planned in August, 1973.

In the meantime a revised application had been filed by Washington Square, Inc. for a 1,997-space parking facility to serve the Sears and Meier & Frank stores which will have a combined floor area of 363,612 square feet or about one-third of the center's total ultimate store floor area.

Mr. Downs presented the Department's evaluation of the new application.

Mr. Frank Orrico, President, was present to represent the corporation.

After a discussion of the developer's plans for public transit, for control of surface drainage from the parking area, and for inclusion of other commercial buildings in the shopping center, it was MOVED by Mr. Cogan, seconded by Dr. Phinney and carried that as recommended by the Director the June 15, 1973 application of Washington Square, Inc., for the 1,997-space parking facility be approved for construction according to the plans and specifications submitted with the application, with the following conditions:

- (1) Those portions of the paved area identified in the plans and specifications not specifically identified for parking be prohibited from use by any vehicle other than construction vehicles.
- (2) The number of spaces available for parking be reduced in direct proportion to increasing transit patronage to the Washington Square Shopping Center.

Mr. McPhillips commended Mr. Orrico for the cooperation given by the Washington Square, Inc., in working out solutions to its environmental problems.

Note: The agenda item pertaining to the proposed parking facilities for the Valley River Center, Eugene, was deferred until the next Commission meeting in order to allow more time for evaluation of the application.

WATER QUALITY STANDARDS AMENDMENTS

At the May 29, 1973 Commission meeting certain amendments, after public hearing, were approved to the water quality standards contained in OAR Chapter 340, Division 4, Subdivision 1.

Mr. Sawyer explained that when the approved amendments were being processed for filing with the Secretary of State it was noted that in subsection (12) of OAR 340-41-025 the word "flood" had inadvertently been omitted as the last word of that sentence and that consequently the amendments were being resubmitted with this correction for final approval and adoption at this meeting.

It was MOVED by Dr. Crothers, seconded by Mr. Cogan and carried that with the addition of the word "flood" as the last word in the sentence contained in subsection (12) of OAR 340-41-025 the amendments approved at the May 29, 1973 Commission meeting be reapproved with said correction.

TAX CREDITS

Mr. Skirvin presented the Department's evaluations and recommendations regarding the 5 tax credit applications covered by the following motions:

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

<u>Appl. No.</u>	<u>Applicant</u>	<u>Cost</u>
T-368	Midland-Ross Corp., Portland	\$ 17,720
T-369	Midland-Ross Corp., Portland	162,093
T-371	Midland-Ross Corp., Portland	60,740
T-372	Midland-Ross Corp., Portland	77,800

It was MOVED by Mr. Cogan, seconded by Dr. Phinney and carried that tax credit application T-370 submitted by the Midland-Ross Corp. be denied.

COLUMBIA WILLAMETTE AIR POLLUTION AUTHORITY

Mr. O'Scannlain reviewed the action taken by the Commission at its May 29, 1973 meeting regarding the status of the Columbia Willamette Air Pollution Authority. He reported that no commitments were received from the City of Portland and Multnomah County by the June 10, 1973 deadline but a resolution was received from the City by letter dated June 14 and from the County by letter dated June 18, 1973. Both entities resolved to negotiate for (1) a temporary continuation of CWAPA through an equally shared City-County contribution now estimated to be in the amount of \$22,500; and (2) a permanent solution to the continuation of the air pollution control program in the Portland metropolitan area with significant participation of the respective jurisdictions.

Mr. O'Scannlain said that two important questions remain unanswered, namely, what specifically is to happen to CWAPA at the end of the temporary period for which funds have been pledged and will all of the member counties agree to function within CWAPA under the proposed conditions?

Mr. Ben Padrow, Multnomah County Commissioner and Acting Chairman of CWAPA, reviewed the recent history of CWAPA's problems including the PGE Harborton turbine power plant hearings. He said that reluctantly he had come to the

conclusion that in view of the conditions which now exist DEQ should take over CWAPA and further that PGE should submit an application to DEQ for a permit to construct and operate the proposed Harborton turbine power plant.

In response to a question from Mr. McPhillips, Mr. Padrow said the County of Multnomah would be willing to sign over to DEQ any share the county might have in the assets of CWAPA.

Miss Mildred Schwab, Portland City Commissioner and member of CWAPA Board of Directors, admitted that CWAPA would be unable to finish the PGE hearing and therefore suggested that DEQ proceed immediately to handle this matter. She pointed out that CWAPA has not yet been officially dissolved and asked that EQC outline how local participation would be effected under DEQ administration of the program. She suggested that DEQ require the approval of the local city and county planning commissions before taking specific action. She indicated the city would want to be assured of local participation before signing over to DEQ its interest in the assets of CWAPA.

Mr. Fred Stefani, Clackamas County Commissioner and recent Chairman of CWAPA, read a letter dated June 28, 1973, and signed by all three Clackamas County Commissioners giving their full support to transfer of CWAPA authority to DEQ. He offered the cooperation of Clackamas County in this matter.

Mr. Fred Foshaub, Chairman of the Columbia County Board of Commissioners, stated that Columbia County supports the transfer of CWAPA authority to DEQ but desires to be represented in the transfer and to participate in an advisory capacity in the future program. He said the County would be willing to sign an agreement to dissolve CWAPA and to transfer its assets to DEQ.

Mr. Eldon Hout, Chairman of the Washington County Board of Commissioners, also supported the termination of CWAPA and the transfer of authority to DEQ. He gave several reasons for the county's taking this position, one of which was that a single-purpose agency can no longer function adequately and give proper protection to the environment. He recited the county's past efforts for air quality control. He indicated that Washington County would be willing to sign over to DEQ all CWAPA assets.

Dr. Crothers said it should definitely be understood that DEO is not anxious to take over the responsibility of administering the CWAPA program and that it is sincerely hoped that some arrangement can be worked out so that local involvement can be continued in a form that is more than just an advisory committee.

Several persons indicated that the local involvement should definitely include elected local governmental officials.

After considerable discussion it was MOVED by Mr. Cogan, seconded by Dr. Crothers and carried that the Commission reaffirm its action taken at the May 29, 1973 meeting regarding CWAPA and that active steps be taken with the elected officials of the four counties and the city of Portland to provide for a continuation of effective local participation.

It was MOVED by Dr. Crothers, seconded by Mr. Cogan and carried that all presently effective CWAPA rules be adopted as temporary rules of the EQC and that all presently effective permits and compliance schedules issued or promulgated by CWAPA be ratified and confirmed by the EQC.

The following order was then signed by the Director:

ORDER

The Environmental Quality Commission (EQC) confirms its May 29, 1973, Order that it undertake a program of administration and enforcement of the air quality control program in the territory of the Columbia-Willamette Air Pollution Authority (CWAPA), effective July 1, 1973; and

EQC finds that it is necessary for the public interest and the interest of the parties concerned that all presently effective CWAPA rules be adopted as temporary rules of the EQC for the purposes of administering and enforcing the air quality control program in CWAPA's territory, effective July 1, 1973, and that if such rules were not adopted immediately EQC's administration and enforcement of the air quality control program in CWAPA's territory could not be commenced on July 1, 1973.

THEREFORE, EQC HEREBY ORDERS that all presently effective CWAPA rules be and they hereby are adopted as temporary rules of the EQC for the purposes of administering and enforcing the air quality control program in CWAPA's territory; and

EQC HEREBY FURTHER ORDERS that all presently effective permits and compliance schedules issued or promulgated by CWAPA be and they hereby are ratified and affirmed by EQC for the purposes of administering and enforcing the air quality control program in CWAPA's territory.

Dated this 29th day of June, 1973.

OREGON ENVIRONMENTAL QUALITY COMMISSION

By _____
Director, Oregon Dept. of Environmental Quality

It was MOVED by Dr. Phinney, seconded by Dr. Crothers and carried that in the matter of the proposed Harborton turbine power plant PGE be instructed to submit a new application to DEQ for review and approval.

PUBLIC HEARING RE: PROPOSED ALUMINUM PLANT RULES

Proper notice having been given as required by state law and administrative rules the public hearing in the matter of adoption of proposed amendments to Oregon Administrative Rules (OAR) Chapter 340, Division 2, Subdivision 5, Sections 25-255 to 25-290, PRIMARY ALUMINUM PLANTS was called to order by Chairman McPhillips at 10:15 a.m. on Friday, June 29, 1973, in the Second Floor Auditorium of the Public Service Building, 920 S.W. 6th Avenue, Portland, Oregon. All Commission members were in attendance.

Mr. Skirvin presented a brief description of the aluminum reduction process as practiced in the two existing aluminum reduction plants in Oregon. He then reviewed the staff report dated June 21, 1973 pertaining to the proposed revisions to the Primary Aluminum Plant Regulations. The report together with 11 attachments and a copy of the proposed amendments have been made a part of the Department's permanent files in this matter.

- Among other things the proposed amended regulations would require that:
- (1) Total gaseous fluoride emissions from all sources not exceed a monthly average of 0.3 pound of fluoride ion per ton of aluminum produced.
 - (2) Total of all fluoride material emissions from all sources not exceed a monthly average of 1.0 pound of fluoride ion per ton of aluminum produced.
 - (3) Total particulate matter emissions from all sources not exceed a monthly average of 8.0 pounds per ton of aluminum produced.
 - (4) Visible emissions from any source not exceed 10 percent opacity (Ringlemann 0.5) at any time.
 - (5) All new plants comply with above requirements within 60 days after start of operation.
 - (6) All existing plants comply as soon as practicable and in accordance with a program and implementation plan submitted within 180 days of effective date of the amended rules and pursuant to a time schedule to be established by the DEQ but in no case later than January 1, 1976.

Mr. Skirvin read into the record the following three letters:

- (1) From Al Myers, Mayor of Gresham, dated June 26, 1973, urging that only reasonable standards be adopted which will permit continued operation of Reynolds Metals Co. plant at Troutdale.
- (2) From Robert Rispler, Chairman of Reynolds School District No. 7, dated June 27, 1973, urging adoption of standards which will protect health of citizens, which will be within capability of today's technology, and which may reasonably be expected to permit present plants to continue operation.
- (3) From Allen Townsend, farmer, dated June 27, 1973, claiming that emissions from Reynolds Metals Co. plant at Troutdale do not harm his berry crops and urging that standards be adopted which can be met by said plant.

During the hearing a letter dated June 27, 1973, was received from State Senator Vern Cook expressing the hope that separate standards for older existing aluminum plants will be adopted. He expressed concern that the proposed standards might not be attainable. He said that "unreachable standards are in many ways worse than no standards at all as the delicate balance between economics and environment is breached."

Mr. Jack Doan, Vice President of Martin-Marietta Aluminum, was introduced by Fredric A. Yerke, Attorney, and made a brief opening statement for that company in connection with the operation of the aluminum plant at The Dalles. He said his experience is in operation management and that other company representatives including Lars Rysdal, Joseph L. Byrne and Warren S. Peterson were present to help answer questions.

He said that the plant at The Dalles has an outstanding record of achievement, that some \$10,000,000 have been spent to-date in reducing atmospheric emissions, that eminently successful controls and techniques have been developed, and that the current emission controls are among the best in the world. He said further that he did not want to take a stand against environmental regulation but that he must oppose the amendments proposed by DEQ because they do not show the need for such strict limitations or the practicality of their being attained. He claimed that adoption of these standards would have extremely serious effects on their company.

Mr. George M. Walters, Executive Vice President of Reynolds Metals Company, read a brief opening statement for that company. He stated that adoption of the proposed standards would pose grave, if not fatal, problems for their operations in Oregon. He said they could not meet the standards and do not know of any plant with practical technology now available that could meet them. He reported that the company is prepared to spend some \$15 million for a new emissions control system at the Troutdale plant but it will not be good enough to meet the proposed standards so they are reluctant to spend such a large sum of money when it will not comply with all requirements. He expressed the opinion that more reasonable standards could be agreed upon which would provide the protection needed for the environment and which would still be attainable by the aluminum industry. He said they do not want to have to shut the Troutdale plant down and he did not think the people of Oregon want them to shut it down.

Mr. Peter Keppler, Attorney, appeared and made a brief opening statement for AMAX Aluminum Company, Inc. He said AMAX is planning to build an aluminum reduction plant at Warrenton and hopes to make application to DEQ for a permit this fall or about September 1, 1973. He claimed that if the proposed standards are adopted AMAX could not meet them but that they could meet a standard of 1.42 pounds of total fluoride per ton of aluminum produced. He said in their later testimony they would argue for (1) an increase in the total fluoride emission limitation from 1.0 to at least 1.42#/ton of aluminum produced, (2) elimination of distinction between gaseous and total fluorides, that is, elimination of the 0.3# gaseous fluoride limitation, (3) clarification of the testing procedures and (4) increase from 60 days to 120 days after start-up of new plant for compliance with emission standards.

In response to an inquiry by Mr. Cogan, he said they intend to start construction of the Warrenton plant next year and to have it in operation by early 1976.

The next person to make a statement was Mr. Arden E. Shenker, Attorney, representing the Wasco County Fruit and Produce League of The Dalles, Oregon.

He read a 21-page statement. He supported the 0.3# gaseous fluoride limitation, the 1.0# total fluoride limitation and the 10% opacity limitation. He objected to the 8.0# particulate limitation and to the use of monthly averages of test results, claiming that in both instances they are not strict enough. He also opposed the January 1, 1976 deadline for compliance by existing plants. He asked that it be changed to January 1, 1975.

After he had completed the reading of his written statement Mr. Shenker said he did not intend to make any further statement at this hearing. In response to a question by Dr. Crothers he expressed the opinion that the aluminum plant at The Dalles would be compatible with the agricultural interests there if it were made to comply with the standards proposed by DEQ and the amendments thereto which he had suggested. He also expressed the opinion that such standards would be enforceable.

Mr. Ray Ralonde, Staff Assistant for the Oregon Environmental Council, read a prepared statement for that organization. Having worked in both aluminum plants in Oregon, he commented on the working conditions in the pot rooms. He also commented about effects of fluorides on humans, plants and animals as reported in the literature. He concluded his 4-page statement by indicating that OEC enthusiastically supports the proposed standards as presented by the DEQ and encourages their adoption by the EQC.

The hearing was recessed for lunch at 12:05 p.m. and reconvened at 1:30 p.m.

Dr. T. T. Facticeau of Oregon State University then made a brief oral statement regarding the research studies which have been conducted by OSU of effects of fluorides on sweet cherries, peaches and apricots. He stated that cherry sets are affected by hydrogen fluoride (HF) and fluoride sprays. He indicated the most critical time is during the bloom. When asked by Mr. Cogan if he had any correlation between emissions from the aluminum plant at The Dalles and the damage to fruit production he replied that unfortunately he did not have such data. He said that based on studies conducted by the University it appeared that a concentration of 1.0 microgram of fluoride per cubic meter of air during the bloom season may be the limit. He expressed the opinion that the plant could be compatible with the fruit producing interests at The Dalles.

Chairman McPhillips expressed great disappointment that after all of this time and research work that has been done there is still no accurate or definite correlation between aluminum plant emissions and fruit damage.

Nancy Stevens read a 1-page statement for the Coalition for Clean Air endorsing the proposed standards. She questioned the January 1, 1976 deadline for compliance by existing plants, indicating that it should be earlier.

Mr. Glenn Otto, State Representative from District 23 of East Multnomah County, read a 2-page statement commenting on the value of Reynolds Metals Co. plant at Troutdale to the surrounding area and urging that the proposed standards be relaxed sufficiently to permit the Reynolds plant to continue in operation.

Mr. Joseph Schulein, consulting professional chemical engineer and formerly faculty member at OSU, presented a 3-page statement. He said he is convinced that the proposed standards are technologically attainable but at least in certain cases may not be economically attainable. He indicated that an old plant built in the 1940's with no consideration for atmospheric emissions controls might have to be completely rebuilt in order to comply but he thought that in such a case if it is causing no damage to the environment it should not be required to comply with such strict standards. On the other hand if more restrictive standards are needed in a particular area to solve a special problem he thought such standards should be established. He therefore suggested that the Commission consider adopting quite liberal levels or standards, to be tempered in each case by more stringent requirements as found necessary for environmental protection.

Mr. Raymond Rooth, Consulting Engineer from Oslo, Norway, and Vice President of Engineering, Industrial Gas Cleaning and Ventilation, Marct & Company, presented a statement for the Martin Marietta Company. He said that based on his many years of experience the proposed emission standards for gaseous F and total F cannot be achieved by an existing vertical stud soderberg plant such as the Martin Marietta plant at The Dalles and that today's state of technology will not allow meeting the proposed standards in the immediate future. He submitted copies of his analysis which supported his statement. He reported that the strictest requirements for any European aluminum plant is 2.0# total fluoride per ton of aluminum produced and that is for a new plant that is not yet in operation.

Mr. Cogan asked what would be required to meet the standards proposed by DEQ and he replied there is no practical way to meet them.

Mr. Harry Helton, Manager of the Troutdale Aluminum Reduction Plant of Reynolds Metals Company, read a 21-page statement for that company. He explained the four basic steps in making aluminum products, namely, (1) the mining of aluminum ore (Bauxite)(most of the supply of this raw material for the Troutdale plant comes from Jamaica), (2) extraction of aluminum oxide (alumina) from the Bauxite (for the Troutdale plant this is accomplished in either Texas or Jamaica), (3) reduction of alumina to aluminum by electrolytic process (performed at Troutdale), and (4) casting and fabrication of aluminum into useable forms.

He showed models of aluminum reduction pots similar to those used at Troutdale. He used the models to help explain the operation and maintenance of the reduction process and the sources of fluoride emissions.

He described the changes and controls undertaken over the years at the Troutdale plant which had been built in 1942 and enlarged in 1970. He stated that with the present controls the fluoride emissions have been reduced to about 10# per ton of aluminum produced which is considerably more than the proposed standard of only 1.0 pound per ton. He claimed, however, that even with the present level of emissions no environmental damage is being caused in the area surrounding the Troutdale plant.

Mr. Helton then explained why it would be impossible for their plant to meet the proposed standards.

Next he reported that the company is prepared to spend an additional \$15,000,000 to effect approximately a 50% reduction in total fluoride emissions from the Troutdale plant if the Commission adopts standards which will permit the Company to continue to operate the plant after such improvements have been made. He claimed that it is economically feasible to reduce the fluoride emissions from the present level of 10#/ton down to about 5.4#/ton of aluminum produced. He asked that since the plant emissions do not currently cause any damage the Commission adopt standards which will allow the Company to make the proposed improvements and continue to operate the plant. He said it is unthinkable for the Commission to adopt emission standards calculated to terminate the plant's operation.

Dr. Delbert C. McCune, Plant Physiologist at the Boyce Thompson Institute for Plant Research, presented a short 2-page statement in support of the claim made by Reynolds Metals Company that its fluoride emissions at the Troutdale plant are not damaging vegetation. He said during his investigation made 2 days ago he did not observe any injury that could be attributed to fluoride on any of the species of plants prevalent in the area. He said even the several species of highly susceptible conifers in the area showed no injury.

He stated that based on his field investigation and his review of the company's air monitoring data he believes that the approximate 50% reduction in fluoride emissions proposed by the company "would result in: first, a reduction in the probability that concentrations of hydrogen fluoride that are injurious to vegetation could occur; and second, a reduction in accumulation of fluoride by forage and its potential hazard to cattle."

Dr. John W. Suttie, Professor of Biochemistry at the University of Wisconsin, read a 2-page statement in behalf of the Reynolds Metals Co. plant relative to effects on animal life in the vicinity of Troutdale. He said in his opinion grazing animals are adequately protected from adverse effects of fluoride ingestion if the yearly average forage fluoride concentrations do not exceed 40 ppm and if excessively high short-term exposures do not occur during the year. He reported that during 1970 and 1972 all 20 areas sampled in the vicinity of the Troutdale plant were within this guideline, in 1971 one area exceeded it and so far in 1973 2 areas exceed it. He expressed the opinion that the reduction in fluoride emissions proposed by the company would result in forage fluoride concentrations which would pose no hazard to livestock production or animal health.

In response to a question he stated that the present levels, most of which are in the range of 25 to 35 ppm with only 4 exceeding 50 ppm, should not cause any economic effect, only some teeth markings. He said fluoride in milk is not a problem.

Letters or short statements in support of the continued operation of the Reynolds Metals Co. aluminum plant at Troutdale and urging the adoption by the Commission of reasonable and attainable emission standards were read into the record by the following four persons:

- (1) Mr. Lee Irvin, Publisher of the Gresham Outlook and Sandy Post newspapers.
- (2) Mr. Robert Bryant, Executive Vice President of the Greater Gresham Area Chamber of Commerce.
- (3) Mr. Lee E. Caldwell, Sub-district Director of the United Steelworkers of America representing 550 employees at the Reynolds Metals Co. Troutdale plant and 400 employees at the Martin Marietta The Dalles plant. (He said that separate standards for new and existing plants might be advisable.)
- (4) Mr. James Patrick, President Sandy Area Chamber of Commerce.

In addition to the above, Dr. Hauton B. Lee, Superintendent of the Reynolds School District presented a brief oral statement also in full support of the continued operation of the Troutdale Aluminum Plant.

The next person to make a statement was Mr. C. C. Gordan, Professor of Botany, University of Montana. He had been invited to make a statement by the Clatsop County Environmental Council with expenses paid for by the Environmental Defense Fund. He said that in general he supports the proposed standards but thinks that they should be stricter for new plants. He claimed that 12 ppm of fluoride in forage will accumulate high fluoride levels in wild animals because they do not urinate as much as domestic animals, that at the Intalco aluminum plant in the state of Washington fluoride levels in forage of 23 ppm average and 50 ppm maximum caused animal damage and the company paid damages, and that there is an aluminum plant in Sweden which does meet the 1.0 pound total fluoride/ton of aluminum produced standard.

Mr. Robert Sturges, Mayor of Troutdale; Mr. Oren W. Olin, Mayor of Fairview; and Mr. Chester R. Morrow, Troutdale Service Station Operator, each appeared and presented statements in support of the continued operation of the Troutdale aluminum plant.

Anne Naab, President of the Astoria-Clatsop Chapter of the League of Women Voters, read a short statement supporting the standards proposed by DEQ and urging their adoption by the EOC.

Mr. Peter Keppler, Attorney, then read a 17-page statement for the AMAX Aluminum Company. He concluded his statement with the following summary:

1. AMAX will engage in open planning and solicit public review and comment with respect to our plans for the proposed Warrenton aluminum reduction plant.
2. Proven and demonstrated technology does not exist for collecting and treating exhaust gases from primary aluminum reduction plants so that total fluoride emissions not exceed a monthly average of 1.0 pounds of fluoride ion per ton of aluminum produced. Using what we believe to be the best available technology, we have determined that we will be able to operate the proposed Warrenton plant at an emission level which will not exceed 1.5 pounds of total fluoride per ton of aluminum produced on a monthly average.
3. No basis exists for separately controlling and measuring particulate and gaseous fluoride. The separate limitation for gaseous fluoride emissions contained in the proposed regulations should be deleted.
4. The definition of monthly average in Section 25-260 of the proposed regulations must be amended to take into account the statistical variability inherent in any test procedure.
5. New primary aluminum reduction plants constructed and operated after January 1, 1973 should be given 120 days to come into full compliance with the regulations.

Mr. Stanley Dempsey of AMAX said that although their present plans do not include it they will, if necessary, install a secondary emission control system.

The hearing was then adjourned by the Chairman at 5:30 pm. Because there were others who wished to make statements the Chairman announced that the hearing would be continued at the next meeting of the Commission which is scheduled to be held in Medford at the City Hall on Thursday, July 26, 1973.

Copies of the written statements or letters submitted by the above witnesses have been made a part of the Department's permanent files in this matter as have copies of the following additional correspondence which was not read into the record:

Letter dated June 27, 1973 from State Senator Vern Cook.

Letter dated June 27, 1973 from Allan Hart, Attorney, Reynolds Metals.

Letter dated June 29, 1973 from Elmer Sturm, Berry Grower

Statement dated June 29, 1973 from Joan Norris, Field Director for
Tri-County New Politics

Letter and petition dated June 27, 1973 from Douglas M. Rogers, Attorney
for Martin Marietta

Letter dated June 22, 1973 from Douglas M. Ragen, Attorney

Letter from L. R. Matton to Oregon Environmental Council

Statement from Jack Buckner, President Local Union 330, United
Steelworkers of America.



DEPARTMENT OF ENVIRONMENTAL QUALITY

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TOM McCALL
GOVERNOR

DIARMUID F. O'SCANLAIN
Director

Memorandum

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. B, July 26, 1973, EQC Meeting
Project Plans for June, 1973

During the month of June, 1973, staff action was taken relative to plans, specifications and reports as follows:

Water Quality Control

1. Seventy-eight (78) domestic sewage projects were reviewed:
 - a) Provisional approval was given to:
 - 62 Plans for sewer extensions
 - 1 Plan for sewage treatment works improvements.
 - 1 Plan for sewage lift station.
 - b) Approval without conditions given to:
 - 3 Change orders for sewage treatment plant projects.
 - 11 Change orders for sewer systems.
2. Seven (7) Industrial waste treatment plans were reviewed:
 - a) Provisional approval given to:
 - 2 Animal Waste Facilities
 - 5 Miscellaneous projects:
 - 1) PP&L filter backwash treatment (Mill City)
 - 2) Log Pond dam modifications (Simpson Timber Co., Albany)
 - 3) Lumber spray treatment (Rainier Mfg., Rainier)
 - 4) Freshwater fish rearing facilities (Aqua-Foods, Corvallis)
 - 5) River crossing (Pacific Gas Transmission Co. John Day River)

Air Quality Control

1. Ten (10) Project plans, reports or proposals were reviewed:
 - a) Approval given to:
 - 2 Noise Impact Review
(Linn County Airport Expansion)
(Douglas County Highway Widening)
 - 2 Wigwam Burner Modifications
(Drain Plywood, Douglas County - Modification of wigwam waste burner and installation of veneer drier emission control system)
 - 2 Emission Control Systems
(Tamco, Inc., Curry County - Installation of gas fired veneer drier and an emission control system)
(Eugene F. Burrill Lumber Co. - Jackson County - modification of wigwam waste burner)
 - 1 Installation of high pressure air system and modification to the #5 silo system and the elimination of three cyclones.
(Permaneer Corporation, Douglas County)
 - 1 Installation of Carter-Day baghouse unit and a Turco wooddust handling and firing system.
(Rogue Valley Plywood, Inc. - Jackson County)
 - b) Additional Information requested:
 - 1) I-5 Interchange - Douglas County
(Proposed review for impact upon noise)
 - 2) Washington Square - Washington County
(Proposed review for impact on noise control measures)

Solid Waste Disposal

1. Thirteen (13) Project plans were reviewed.
 - a) Approval given:
 - 3 Sanitary Landfill - Operational Plan
 - Brown Island Sanitary Landfill - Polk County
(existing garbage site)
 - St. Johns Sanitary Landfill - Multnomah County
(existing garbage site)
 - Newberg Sanitary Landfill - Yamhill County
(existing garbage site)
 - 1 Modified Landfill - Operational Plan
Valsetz Disposal Site - Polk County
(existing garbage site-modified landfill)
 - 1 Wood Waste Landfill - Operational Plan
Rogge Lumber Co. - Curry County
(existing wood waste landfill)

Solid Waste Disposal

b) Provisional approval given to:

2 Industrial Waste Facilities

Columbia Steel Castings Co. - Multnomah County
(existing industrial waste site - letter authorization
operational plan)

Reichold Chemical Company - Columbia County
(existing industrial waste site - letter authorization
operational plan)

2 Sanitary Landfill

Whiteson Sanitary Landfill - Yamhill County
(new garbage site - operational plan)

Santosh Sanitary Landfill - Columbia County
(existing garbage site - operational plan)

1 Demolition Site

Lakeside Reclamation (existing) - Washington County
(Operational plan for site expansion)

1 Landfill



Mickey's Landfill - Columbia County
(existing garbage site - operational plan for tire
disposal)

c) Review and comment given:

2 SWM Action Plan Interim Progress Reports
(Morrow and Grant Counties)

Director's Recommendation

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


 DIARMUID F. O'SCANNLAIN

Attachments:

PROJECT PLANS

Water Quality Division

During the month of June, 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 (78)</u>			
6-1-73	Coos Bay	Orchard Avenue sewer	Prov. approval
6-1-73	Reedsport	18th Street sewer	Prov. approval
6-1-73	Keizer Sewer Dist.	Chemawa Park Subd. sewers	Prov. approval
6-1-73	Portland	S. W. Grover St. sewer	Prov. approval
6-1-73	Medford	Rogue Valley Industrial Park sewer	Prov. approval
6-4-73	Deschutes County	Red Oaks Square Apt. complex septic tank, disinfection and drill hole disposal	Prov. approval
6-5-73	North Roseburg S.D.	Brentwood Manor Subd. sewers	Prov. approval
6-5-73	Canby	Oliver Addition #7 sewers	Prov. approval
6-5-73	Gresham	Penny Ridge No. II Subd. sewers	Prov. approval
6-5-73	Troutdale	Old Sweetbriar Farm-Phase II sewers	Prov. approval
6-6-73	USA (King City)	Summerfield pump station	Prov. approval
6-11-73	Hillsboro	Washington County Fairground sewer	Prov. approval
6-12-73	Clackamas County Service Dist. I	Collection sewers, Phase III Addendum II	Approved
6-12-73	USA (Forest Grove)	Trevor Downs Subd. sewers	Prov. approval
6-12-73	Hillsboro (Rock Cr.)	Beaumead Subd. sewers	Prov. approval
6-12-73	USA (Metzger)	S. W. 92nd sewer	Prov. approval

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
6-12-73	Portland	N. E. 14th Place and Columbia Blvd. sewer	Prov. approval
6-12-73	Canby	Sewer to serve Carlson property	Prov. approval
6-12-73	USA (Tigard)	2 sanitary sewer projects	Prov. approval
6-12-73	USA (Aloha)	3 sanitary sewer projects	Prov. approval
6-12-73	USA (Sherwood)	April Meadows Subd. sewers	Prov. approval
6-12-73	Gresham	New Columbia Village #2 sewers	Prov. approval
6-12-73	Gardiner San. Dist.	2 change orders for interceptor project	Approved
6-12-73	Inverness	Change Order #2, Unit 5-C	Approved
6-12-73	Wilsonville	Change Order #3, sewage treatment plant	Approved
6-14-73	Scappoose	Bella Vista Subd. sewers	Prov. approval
6-14-73	East Salem Sewage & Drainage Dist. I	Lancaster Estates #2 Subd. sewers	Prov. approval
6-14-73	McMinnville	Project No. 1973-3 sewer	Prov. approval
6-14-73	Bear Creek Valley Sanitary Auth.	Talent Patio Village sewers	Prov. approval
6-14-73	East Salem Sewage & Drainage Dist. I	Long Acres Subd. sewers	Prov. approval
6-14-73	Oregon City	Glenwood Subd. sewers	Prov. approval
6-14-73	Sunriver	Sunriver East-Business Park I sewers	Prov. approval
6-14-73	Hillsboro (Rock Cr.)	Eastwood Subd. sewers	Prov. approval
6-14-73	USA (Tigard)	Tigard Street Industrial Park sewer	Prov. approval
6-14-73	Albany	Sanitary sewer projects-- 73-10, 73-11, 73-15	Prov. approval
6-14-73	Eugene	2 projects: sewer reconstruction 6th & 7th Avenues, sanitary sewers near I-105 and Coburg Road	Prov. approval

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
6-14-73	Wilsonville	Charbonneau and Charbonneau II Subd. sewers	Prov. approval
6-14-73	Bay City	Change Orders #B-4, B-5 and A-5	Approved
6-18-73	Bear Creek Valley Sanitary Auth.	Preliminary plans of West Medford trunk sewer	Prov. approval
6-18-73	Green San. Dist.	Extensions of Main 1 and 2	Prov. approval
6-18-73	Tualatin	Navajo Hills II Subd. sewers	Prov. approval
6-18-73	Gresham	Charming Addition Subd. sewers	Prov. approval
6-18-73	Salem (Willow Lake)	Jan Ree East, Units 3 & 4, sewers	Prov. approval
6-18-73	Keizer Sewer Dist.	McLeod Park Subd. sewers	Prov. approval
6-18-73	Eugene	West Amazon Dr. san. sewer	Prov. approval
6-18-73	Ashland	Briggs Subd. #2 san. sewers	Prov. approval
6-18-73	USA (Metzger)	Washington Square Area 7 sanitary sewers	Prov. approval
6-18-73	Reedsport	Addendum #1, 18th Street sanitary sewer	Approved
6-18-73	Clackamas County Service Dist. I	Change Order #1 for Phase II interceptors	Approved
6-18-73	Portland	Change Order #4, Columbia Blvd. sewage treatment plant	Approved
6-19-73	Inverness	Revised plans, Inverness interceptor, Unit 5-C	Prov. approval
6-20-73	USA (Tigard)	Clydesdale Subd. sewers	Prov. approval
6-20-73	Lake Oswego	Greenwood Rd. san. sewer	Prov. approval
6-20-73	Waldport	Change Order #4, sewage treatment plant	Approved
6-20-73	Clackamas County Service Dist. I	2 change orders, Phase II, interceptors	Approved
6-25-73	Hillsboro	Cornell Place Subd. sewers	Prov. approval
6-25-73	Oak Lodge San. Dist.	Chapman Woods Subd. sewers	Prov. approval

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
6-25-73	USA (Metzger)	McKay Manor Subd. sewers	Prov. approval
6-26-73	Baker	"B" Street and 15th Street sewer (1973-1974 sewer, Phase I)	Prov. approval
6-28-73	Halsey	8 sanitary sewer extensions	Prov. approval
6-28-73	Salem (Willow Lake)	Nebraska Acres Subd. sewers	Prov. approval
6-28-73	Warrenton	Villa Del Mar sewers	Prov. approval

WATER POLLUTION CONTROL

INDUSTRIAL PROJECTS - JUNE 1973

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
6/6/73	Mill City	Pacific Power & Light Co. Filter Backwash Treatment Facilities	Prov. Approval
6/6/73	Albany	Simpson Timber Co. - Northwest Operations Log Pond Dam Modifications	Prov. Approval
6/11/73	Rainier	Rainier Manufacturing Co. Lumber Spray Treatment System	Prov. Approval
6/11/73	Corvallis	Oregon Aqua Foods, Inc. Freshwater Rearing Facilities	Prov. Approval
6/13/73	Dallas	Lautenbach (Fast) Dairy Farm Animal Manure Control & Disposal Facilities	Prov. Approval
6/13/73	Dallas	East Feedlot Animal Manure Control & Disposal Facilities	Prov. Approval
6/18/73	John Day River Crossing	Pacific Gas Transmission Company	Prov. Approval

7/10/73
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AP-9 PROJECT PLANS, REPORTS, PROPOSALS FOR AIR QUALITY CONTROL
DIVISION FOR JUNE, 1973

<u>DATE</u>	<u>LOCATION</u>	<u>PROJECT</u>	<u>ACTION</u>
4	Douglas	<u>I-5 Interchange</u> Proposed review for impact upon noise	Request Add'l information
4	Linn	<u>Airport Expansion</u> Proposed review for impact on noise	Approval
6	Jackson	<u>Rogue Valley Plywood, Inc.</u> White City - Installation of Carter-Day baghouse unit and a Turco wood-dust handling and firing system	Approved
8	Douglas	<u>Permaneer Corporation, Dillard</u> Installation of high pressure air system and modification to the #5 silo system and the elimination of three cyclones.	Approved
15	Douglas	<u>Drain Plywood Co., Drain</u> Modification of wigwam waste burner and installation of veneer drier emission control system.	Approved
20	Washington	<u>Washington Square</u> Proposal review for impact on noise	Request Additional control measures
21	Curry	<u>Tamco, Inc., Gold Beach</u> Installation of gas fired veneer drier and an emission control system	Approved
22	Jackson	<u>Eugene F. Burrill Lumber Co.</u> White City - modification of wigwam waste burner	Approved
25	Umatilla	<u>Johns-Manville Products, Corp.</u> McNary - Installation of PVC pipe plant and an emission control system	Approved
26	Douglas	<u>Highway Widening</u> Proposal review for impact on noise	Approved

PROJECT PLANS
SOLID WASTE MANAGEMENT DIVISION

During the month of June 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>
- 4	Columbia Co.	Mickey's Landfill (existing garbage site) (operational plan for tire disposal)	Prov. approval
- 5	Polk Co.	Valsetz Disposal Site (existing garbage site-modified landfill) <i>OPERATIONAL PLAN</i>	Approved
- 7	Washington Co.	Lakeside Reclamation (existing demolition site) (operational plan for site expansion)	Prov. approval
- 12	Marion Co.	Brown Island Sanitary Landfill (existing garbage site) <i>OPERATIONAL PLAN</i>	Approved
- 12	Yamhill Co.	Whiteson Sanitary Landfill (new garbage site) <i>OPERATIONAL PLAN</i>	Prov. approval
- 15	Curry Co.	Rogge Lumber Co. (existing wood waste landfill) <i>OPERATIONAL PLAN</i>	Approved
- 15	Columbia Co.	Santosh Sanitary Landfill (existing garbage site) <i>OPERATIONAL PLAN</i>	Prov. approval
- 15	Multnomah Co.	Columbia Steel Castings Co. (existing industrial waste site) <i>LETTER AUTHORIZATION-OPERATIONAL PLAN</i>	Prov. approval
- 15	Columbia Co.	Reichold Chemical Co. (existing industrial waste site) <i>LETTER AUTHORIZATION-OPERATIONAL PLAN</i>	Prov. approval
- 22	Multnomah Co.	St. Johns Sanitary Landfill (existing garbage site) <i>OPERATIONAL PLAN</i>	Approved
20	Morrow Co.	Planning Interim Progress Report	Review & comment
25	Grant Co.	Planning Interim Progress Report	Review & comment
- 29	Yamhill Co.	Newberg Sanitary Landfill (existing garbage site) <i>OPERATIONAL PLAN</i>	Approved



DEPARTMENT OF ENVIRONMENTAL QUALITY

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TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. C, July 26, 1973, EQC Meeting

Open Public Forum

Since Commission meetings are held infrequently in the Medford area it is thought desirable that the public be given an opportunity to voice their concerns directly to Commission members.

Time will not allow extensive discussion of individual items, but the people can be assured that appropriate follow-up action will be taken regarding questions or problems raised that cannot be answered or resolved at the meeting.

The open forum session will be substantially publicized in the Medford area prior to the meeting.


DIARMUID F. O'SCANNLAIN

EJW:vt
7/18/73



DEPARTMENT OF ENVIRONMENTAL QUALITY

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TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. D, July 26, 1973, EQC Meeting
Impact of New Legislation on DEQ Programs

This item will be presented orally at the EQC meeting.

Ed Weatherman
for DIARMUID F. O'SCANNLAIN

EJW:vt
7/18/73

IMPACT OF NEW LEGISLATION ON DEQ PROGRAMS

Several bills passed by the 1973 Oregon Legislature will have major impacts on the powers, responsibilities and activities of the EQC and DEQ during the '73-'75 biennium.

Of these bills the one which created the most interest and caused the most controversy was SB77. It had been drafted prior to the start of the session by the Law Improvement Committee in response to HJR52 passed by the 1971 Legislature. Its primary purpose was to revise, reorganize, consolidate and clarify the laws of the state pertaining to environmental quality, particularly ORS Chapters 449, 459 and 467.

Among other things SB77 makes a clear distinction between the Commission and the department. Formerly, the department consisted of the Commission, the director and their employees. Now it consists only of the director and the personnel employed in the department. The department functions under the Commission in the executive-administrative branch of the government.

SUB-SURFACE SEWERAGE PROGRAM

The sections of SB77 which caused the most controversy were those which transferred from the State Health Division to EQC and DEQ the responsibility for controlling and regulating subsurface sewage disposal including a new state-wide permit program governing the installation, repair or modification of subsurface sewage disposal systems. Although these particular sections of the bill do not become effective until January 1, 1974, the transfer of the responsibility actually takes effect on October 5, 1973, ninety days after the end of the session. During this interim period from October 5, 1973 to January 1, 1974 the department will operate under the provisions of ORS 449.150 (Section 121 of SB77) which specify that all waste water or sewage from any plumbing system shall be discharged into a sewerage system, septic tank system or other disposal system approved by the department. Also prior to January 1, 1974 the Commission is authorized under ORS 449.081 (Section 114 of SB77) to adopt rules establishing minimum requirements for the disposal of sewage and the operation and maintenance of sewage disposal systems.

It is proposed that prior to October 5, 1973 the Commission adopt emergency regulations governing the installations of subsurface sewage disposal systems, such regulations to serve during the interim and until permanent regulations can be promulgated.

The new permit program for installation of subsurface sewage disposal systems and also the continuation of the present licensing program for sewage disposal service businesses are to be self-supporting, that is, they are to be financed entirely by fees (\$30 for installation and \$15 for alteration, repair or extension permits, and \$50 annually for business licenses).

The biennial budget bill approved by the Legislature (HB5090) includes \$607,585 for direct costs and \$70,000 for administrative overhead for this program. The Legislature also authorized 18 new positions in the department (1 program executive, 14 sanitarians and 3 secretaries) and in addition granted authority to the department to contract with local governmental units (Section 119a. of SB77) to have them perform certain functions under this program. It is hoped that such contracts or agreements can be made with local government in most of the counties. The law requires that the department designate an appropriate official in each county who shall be authorized to receive applications for permits. It requires further that except under certain conditions the permit shall be either issued or denied within 20 days of receipt of the application (Section 213 of SB77).

Under specified conditions (Section 216 of SB77) the Commission is authorized to limit or prohibit the construction of subsurface sewage disposal systems in a given area.

ALTERNATE SEWAGE DISPOSAL SYSTEMS

Closely related to the subsurface sewage disposal program is another new program pertaining to "alternate sewage disposal systems" which are defined as those systems for the sanitary disposal of sewage which employ prefabricated and preassembled package sewage plants.

HB 2786 requires that the Commission adopt standards governing the installation, operation, maintenance and inspection of such systems and further that it establish a schedule of permit fees such that this program also will be self-supporting.

This bill becomes effective October 5, 1973. After that date no person may install an "alternate sewage disposal system" without a permit from the department. Under this law the department will have 60 days after the receipt of an application to either issue or deny the permit, except in those cases in which a National Pollutant Discharge Elimination System (NPDES) permit is required.

WATER QUALITY CONTROL

HB2436 which had been introduced at the request of DEQ amends the state's water pollution control statutes and provides the additional authority needed to qualify the state to conduct the NPDES permit program in Oregon. Specifically it clarifies the permit issuing authority of the director, limits the duration of any permit to 5 years, authorizes the Commission by rule to establish effluent limitations and to take any and all other actions necessary to be performed by the state to implement the Federal Water Pollution Control Act, and increases the criminal and civil penalties to maximums of \$25,000 and \$10,000, respectively per violation per day for violation of any lawful rule, standard or order of the Commission or any permit issued by the department. (Also see Sections 24 and 25 of SB77.)

In order to handle the increased workload of the state's water quality control program and particularly to implement the NPDES program and other requirements of the 1972 Federal Water Pollution Control Act, the Legislature (HB5090) approved the 10 new positions which had been recommended by the Governor in his budget plus 8 additional positions contained in a supplemental request. These 18 new positions were approved on the assumption that they would be fully funded through an increase in the federal program grant received annually from EPA.

AIR QUALITY CONTROL

In the appropriation bill (HB5090) the department was authorized beginning July 1, 1973 to take over the staff and assume the responsibilities of the Columbia Willamette Air Pollution Authority. The amount of \$895,075 (\$117,414 from general funds, \$126,637 from fees and \$651,024 from federal funds) was approved and 27 staff positions were authorized for this purpose.

Of the 10 new positions recommended by the Governor for handling the increased workload of the state's air quality control program 8 were approved by the Legislature and 2 of the existing positions were transferred to a new motor vehicle inspection program.

The appropriation bill included the amount of \$3,454,430 and a total of 83 positions for the establishment by the Department of a new Motor Vehicle Emission Control Inspection Program in Clackamas, Columbia, Multnomah and Washington Counties. An appropriation of \$1 million from the State Motor Vehicle Account was approved to get the program started with the remainder to be financed by inspection fees. HB2802 had been introduced to provide the authority for establishment of a fee schedule adequate to cover these program costs but unfortunately it was not approved by the Legislature.

SOLID WASTE MANAGEMENT

SB293 which had been introduced at the request of the department amends the laws pertaining to disposal of environmentally hazardous wastes. It authorizes the Commission and department under certain conditions to declassify environmentally hazardous wastes and to acquire through condemnation real property to be used for disposal of environmentally hazardous wastes. It authorizes the department to use money from the Pollution Control Fund for purchase of real property or in an emergency for disposal of environmentally hazardous wastes. It imposes liability for damages caused by improper disposal of such wastes upon the person directly responsible for them.

The Legislature approved the Governor's recommended budget for solid waste management, including one new position for furthering the development of the state's environmentally hazardous waste management program. This position is to be financed with federal funds.

In addition, it approved a supplemental request of \$60,000 (SB445) from general funds to finance 3 other new positions for the conduct of a new public information and promotional program for recycling of solid waste.

Also an increase of \$50,000 in the federal fund limitation was approved to finance with a federal grant a special study by the Governor's office of the effects of the bottle bill (beverage container law) passed by the 1971 Legislature.

POLLUTION CONTROL BONDS

HB2438, another bill requested by the department, increases from \$100 million to \$160 million the amount of pollution control bonds that can be sold by the state and from \$30 million to \$55 million the amount of grants that may be made to local government for planning and construction of sewage treatment works and solid waste management projects. It also made sewerage systems eligible for such loans and grants. The amount of any individual grant is still limited to 30% of the project cost.

To handle the debt service for this increased bond authorization the appropriation bill includes \$5,241,920 from the general fund compared with only \$305,317 in general funds for the previous biennium. However, no new loans or grants can be made by the department from these funds without special approval of the State Emergency Board because the Legislature placed a limitation of \$1 on the loans and grants for both sewerage works and solid waste management projects. A limitation of \$144,852 was approved for planning, including \$100,000 for a study by the Umpqua Port Commission of the feasibility of using solid waste as fuel for production of energy.

LAW ENFORCEMENT

SB387 authorizes the Commission to institute proceedings at law or in equity to enforce compliance with requirements of ORS Chapter 449 without necessity of prior notice or administrative proceedings. In the past it has been contended by some attorneys that all administrative procedures should be exhausted before legal action is instituted by the Commission. This point is now clarified.

The increased criminal and civil penalties for violation of water pollution laws, rules, standards or orders have previously been mentioned.

SB294 authorizes the Commission to take action against sanitary districts, sanitary authorities, county service districts and metropolitan service districts to force them to finance construction of urgently needed sewerage facilities. The action consists of applying to the circuit court for an order compelling the local governmental unit to call a bond election or, if necessary, to sell self-liquidating bonds without voter approval. Previously, this authority applied only to municipalities.

LAND CONSERVATION AND DEVELOPMENT

One of the most widely discussed bills of the 1973 session was SB100 relating to land use. It establishes a Land Conservation and Development Commission (LCDC) consisting of seven members appointed by the Governor. It also creates a Department of Land Conservation and Development which includes the Commission, a director and their employees.

The Commission is authorized to designate as activities of state-wide significance the planning and siting of public transportation facilities, public sewerage systems, water supply systems, solid waste disposal sites, and public schools. It is authorized further to recommend to a Joint Legislative Committee on Land Use, which is also established by SB77, additional activities of state-wide significance as well as areas of critical state concern.

It will be the responsibility of the LCDC to establish state-wide planning goals and state-wide planning guidelines, to review comprehensive plans prepared by cities and counties for conformance with state-wide planning goals, to coordinate planning efforts of state agencies, and to prepare pertinent ordinances and regulations, particularly for the designated activities of state-wide significance and the following specific areas of critical state concern: (1) lands adjacent to freeway interchanges, (2) estuaries, (3) tidelands, marshes and wetlands, (4) lakes and lakeshores, (5) wilderness, recreational and outstanding scenic areas, (6) beaches, dunes and coastal headlands, (7) flood plains and areas of geologic hazard, (8) unique wildlife habitats, and (9) agricultural lands.

Comprehensive plans prepared by cities and counties, among other things, must preserve the quality of the air, water and land resources and recognize the public need for healthful, safe, aesthetic surroundings and conditions.

After the LCDC has approved state-wide planning goals and guidelines for the designated activities of state-wide significance no person shall undertake or initiate such an activity without first obtaining from the LCDC a planning and siting permit.

From this brief outline of the provisions of SB100 it is readily apparent that DEQ will play a major role and will be deeply involved in the activities and program of the LCDC. For example, it will be the responsibility of DEQ to review and comment on all permit applications submitted to LCDC and to coordinate with LCDC its own permit activities concerning public sewerage systems and solid waste disposal sites.

DEQ will need to participate in the development of state-wide planning goals and guidelines and in recommending and considering additional activities of state-wide significance and areas of critical state concern. DEQ will also need to work with and assist local governmental units in the development of their comprehensive plans.

In addition to the above involvement DEQ will also be directly concerned with land conservation and development through its responsibilities in regulating subsurface sewage disposal as previously discussed and in maintenance of national air quality standards including complex sources such as new commercial, industrial and residential developments and others involving increases in demand for electricity and heat, motor vehicle traffic, and production of solid waste.

BIENNIAL APPROPRIATION

The Ways and Means Subcommittee which made a detailed study of the Governor's recommended budget and the department's proposed activities for the '73-'75 biennium expressed concern about the significant growth of the department and about problems related to the undertaking of new programs such as subsurface sewage disposal, motor vehicle emission control inspections and the take-over of the duties of CWAPA. Because of this concern the Subcommittee directed the Executive Department to make a study of DEQ and based on that study to submit to the Emergency Board recommendations on organization, procedures, personnel classifications and other pertinent related matters.

Table 1 is a summary of the amounts approved by the Legislature for the following categories or major programs of the department: Air Quality Control, Regional Air Quality Control, Motor Vehicle Inspection, Water Quality Control, Subsurface Sewage Disposal, Solid Waste Management, Administration, Laboratory Services, Field Services and Bond Debt Service. The funds are broken down between the State General Funds, Other Funds such as fees, and Federal Funds. For purposes of comparison the estimated expenditures for the '71-'73 biennium and the Governor's recommended budget are also shown.

It will be noted that the operating budget of the department shows an increase in general funds of only about \$527,000 (from \$3,044,552 to \$3,571,515). Most of this increase is for Water Quality Control (\$124,737), Solid Waste Management (\$163,983), Lab Services (\$172,407) and Field Services (\$370,088). The amount of general funds for Administration is reduced by \$378,957 with such funds being replaced by other funds (fees and federal indirect costs).

The big increase in other funds (\$4,822,987) is from fees for air contaminant discharge permits, sub-surface sewage disposal permits and motor vehicle emission control inspections.

In the total budget including debt service the major increase in both the general fund and other fund appropriations are due to the debt service for the pollution control bonds.

Table 2 is a summary of the staff positions covered by the '73-'75 appropriation showing comparisons with the '71-'73 biennium and the Governor's recommended budget for '73-'75.

Table 1

DEQ BUDGET

		<u>General Funds</u>	<u>Other Funds</u>	<u>Federal Funds</u>	<u>Total</u>
AQC	(1)	570,309	- 0 -	140,096	710,405
	(2)	996,993	156,483	123,025	1,276,501
	(3)	624,251	207,110	125,121	956,482
Reg. AQC	(1)	211,966	- 0 -	- 0 -	211,966
	(2)	291,134	- 0 -	- 0 -	291,134
	(3)(a)	115,315	- 0 -	356,986	472,301
	(b)	117,414	126,637	651,024	895,075
	(c)	232,729	126,637	1,008,010	1,367,376
M. Veh. Insp.	(1)	- 0 -	- 0 -	- 0 -	- 0 -
	(2)	- 0 -	2,000,000	- 0 -	2,000,000
	(3)	- 0 -	3,304,430	- 0 -	3,304,430
WQC	(1)	503,919	- 0 -	266,919	770,838
	(2)	637,317	- 0 -	572,016	1,209,333
	(3)	628,656	- 0 -	785,229	1,413,885
Sub. Sew. Disp.	(1)	- 0 -	- 0 -	- 0 -	- 0 -
	(2)	- 0 -	- 0 -	- 0 -	- 0 -
	(3)	- 0 -	607,585	- 0 -	607,585
SWM	(1)	228,253	- 0 -	28,923	257,176
	(2)	343,524	- 0 -	33,610	377,134
	(3)	392,236 ⁽⁴⁾	512	84,567 ⁽⁵⁾	477,315
Administration	(1)	616,326	- 0 -	60,330	676,656
	(2)	482,574	324,277	39,760	846,611
	(3)	237,389	533,823	39,760	810,952
Lab. Serv.	(1)	476,924	- 0 -	127,963	604,887
	(2)	846,639	- 0 -	104,614	951,253
	(3)	649,331	- 0 -	104,887	754,218
Field Serv.	(1)	436,855	- 0 -	17,095	453,950
	(2)	864,617	- 0 -	17,849	882,466
	(3)	806,943	42,890	17,849	867,692

DEQ BUDGET (continued)

		<u>General Funds</u>	<u>Other Funds</u>	<u>Federal Funds</u>	<u>Total</u>
Total	(1)	3,044,552	- 0 -	641,326	3,685,878
	(2)	4,462,798	2,480,760	890,874	7,834,432
	(3)	3,571,515	4,822,987	2,165,423	10,559,925
Debt Serv.	(1)	305,317	5,009,633	- 0 -	5,314,950
	(2)	3,488,648	8,641,402	- 0 -	12,130,050
	(3)	5,241,920	10,465,760	- 0 -	15,707,680
Grand Total	(1)	3,349,869	5,009,633	641,326	9,000,828
	(2)	7,951,446	11,122,162	890,874	19,964,482
	(3)	8,813,435	15,288,747	2,165,423	26,267,605

- (1) 1971-1973 estimated expenditures
- (2) Governor's recommended budget for 73-75
- (3) 73-75 budget approved by Legislature (a) for 2 air quality regions
(b) for CWAPA takeover by DEQ
- (4) Includes \$60,000 for recycling program
- (5) Includes \$50,000 for bottle bill study

Table 2

DEQ STAFF

	<u>71-73*</u>		<u>73-75</u>			
			<u>Recom. by Gov.</u>		<u>Appr'd by Leg.</u>	
AQC	24	(19.75)	34	(31.20)	30	(27.2)
- Regional	0	0	0	0	27	(26.6)
WQC	25	(21.21)	35	(33.50)	43	(41.50)
- Sub. S.D.	0	0	0	0	18	(13.96)
SWM	10	(7.63)	11	(11.00)	14	(13.83)
Adm.	21	(17.50)	24	(24.00)	24	(22.5)
Lab. Serv.	27	(20.96)	34	(26.87)	31	(25.3)
Field Serv.	22	(13.17)	31	(27.13)	31	(26.4)
MVI	129	(100.22)	169	(153.70)	218	(197.29)
					83	
					301	

* As of 1-1-73



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TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

To: Environmental Quality Commission
From: Director
Subject: Agenda Item E, July 26, 1973, EQC Meeting
Tax Credit Applications

Attached are review reports on 27 Tax Credit Applications. These applications and the recommendations of the Director are summarized on the attached table.

E. Weatherman
for DIARMUID F. O'SCANNLAIN

WEG:ahe

July 18, 1973

Attachment

1. Summary of 27 Tax Credit Relief Applications
2. Individual Tax Relief Application Review Reports

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>
Weyerhaeuser Company Wood Products Manufacturing	T-361	Double strand, round link conveyor	\$ 32,000	80% or more	Issue
Weyerhaeuser Company Wood Products Manufacturing	T-407	Concrete floor and curb under plywood lathe area	6,192	80% or more	Issue
Weyerhaeuser Company Wood Products Manufacturing	T-417	Hydraulic barker effluent treatment facility	273,413	80% or more	Issue
Boise Cascade Corporation Joseph Plant	T-419	Hydraulic log carriage to eliminate steam shotgun	56,500.26	80% or more	Issue
Boise Cascade Corporation Joseph Plant	T-420	Regenerative fly-ash collector system	49,537.19	80% or more	Issue
Oregon Portland Cement Co.	T-432	System for monitoring particulates in exhaust stack from Kilns 2 & 3	12,176.81	80% or more	Issue
Bend Aggregate & Paving Co.	T-434	Dust control system	20,342	80% or more	Issue
E. R. Holmes	T-435	Small holding lagoon	3,292.07	80% or more	Issue
Menasha Corporation	T-441	Boiler stack emission sensing & recording system	5,704	80% or more	Issue
Hanna Nickel Smelting Co.	T-442	Dust control system for treating emissions from Daybins	37,295.63	80% or more	Issue
Hanna Nickel Smelting Co.	T-443	Dust control system for treating emissions from Crusher House	198,997	80% or more	Issue

<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>
Hanna Nickel Smelting Co.	T-444	Fume and dust control system	\$1,122,430.13	80% or more	Issue
Hanna Nickel Smelting Co.	T-445	New hood and duct work added to existing dust control system associated with Skiphoist No. 1	31,727.22	80% or more	Issue
Hanna Nickel Smelting Co.	T-446	Air compressor and 300 hp motor	29,179.14	80% or more	Issue
Continental Can Company	T-449	Treatment system for removing particulates & soluble gases in Line No. 7	3,940	80% or more	Issue
Continental Can Company	T-450	Treatment system for removing particulates & soluble gases in Lines Nos. 1, 2, & 3	19,696	80% or more	Issue
Continental Can Company	T-451	Treatment system for removing particulates & soluble gases in Lines Nos. 4, 5, & 6	18,729	80% or more	Issue
Time Oil Company Oregon Division	T-454	Waste water collection system for petroleum tank water draws, truck loading rack, & pump house wastes	60,723	80% or more	Issue
Mazama Timber Products Co. Goshen Plant	T-456	Wood waste residue processing, handling, and storage system	23,021.07	80% or more	Issue
Mazama Timber Products Co. Walker Plant	T-457	Wood waste residue processing, handling, and storage system	112,747.22	60% or more and less than 80%	Issue
J. C. Compton Company	T-458	Dust collecting system for portable hot-mix asphalt plant	156,254.50	80% or more	Issue

<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>
Oregon Steel Mills Div. of Gilmore Steel Corp. Rivergate Plant	T-467	Secondary settling pond	\$175,876.29	100%*	Issue
Oregon Steel Mills Div. of Gilmore Steel Corp. Rivergate Plant	T-468	"Scale pit" consisting of large reinforced concrete tank constructed on piling	92,287.95	100%*	Issue
Oregon Steel Mills Div. of Gilmore Steel Corp. Rivergate Plant	T-469	Fume control system for arc furnace	546,525.81	100%*	Issue
Publishers Paper Company Oregon City Division	T-472	Secondary treatment system	\$2,475,220	80% or more	Issue
Publishers Paper Company Newberg Division	T-473	Secondary treatment system	616,229	80% or more	Issue
International Paper Company Long-Bell Division Vaughn Branch	T-475	1) compartmented solids settling tanks 2) steam vat condensate evaporation & percolation pond 3) diversion channel 4) compartmented concrete gravity oil-water separators	100,283.25	80% or more	Issue

*Under the 1967 Act, the entire cost is certified upon determining that the principal purpose for installing a claimed facility is for pollution control

WEG:ahe

July 18, 1973

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

1. Applicant

Weyerhaeuser Company
Wood Products Manufacturing Division
P. O. Box 389
North Bend, Oregon 97459

The applicant owns and operates a wood products manufacturing complex on Coos Bay at North Bend, Oregon in Coos County.

2. Description of the Claimed Facility

The facility consists of a double strand, round link conveyor with flights installed to replace a belt conveyor which was spilling bark to the waters of Coos Bay. The drive is a Western Gear Model D58A. The conveyor delivers bark from the Nicholson Barker conveyor to the bark hog with virtually no spillage into the waters of Coos Bay. The conveyor is approximately 36 feet long by 6 feet wide. The work was included as part of a general improvement project in the barker area of the plant.

The claimed facility was completed and put into operation in June 1971. Certification is claimed under the 1969 Act.

Facility cost: \$32,000 (documentation was provided).

3. Evaluation of Application

Installation of the claimed facility was completed to comply with existing Department of Environmental Quality Waste Discharge Permit condition no. 2.

Prior to installation, bark spilled from the belt conveyor into the waters of Coos Bay. With the claimed facility there is virtually no spillage. The company claims that although the spillage of bark had considerable effect on the condition of debris in the water the value of the bark reclaimed is negligible and offers no return on the investment other than pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the facilities claimed in Application T-361, such certificate to bear actual cost of \$32,000, with 80% or more of the cost allocable to pollution control.

W. D. Leshner

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

1. Applicant

Weyerhaeuser Company
Wood Products Manufacturing Division
P. O. Box 389
North Bend, Oregon 97459

Weyerhaeuser owns and operates a Wood Products manufacturing complex on Coos Bay at North Bend, Oregon in Coos County.

2. Description of Claimed Facility

The claimed facility consists of a concrete floor and curb, approximately 50 feet by 100 feet, under the plywood lathe area. The concrete floor slopes to two sumps. Two Enpo-Cornell, model 1600 heavy duty, 1/3 Hp, submersible pumps are installed in the sumps. They pump to a 1,000 gallon existing holding tank. The tank is fitted to discharge to tank trucks. Controls, piping and electrical equipment have been provided.

The claimed facility was completed and put into service in December 1971. Certification is claimed under the 1969 Act with 80% or more of the cost allocated to pollution control.

Facility cost: \$6,192 (documentation provided).

3. Evaluation of Application

Installation of the claimed facility was initiated to correct a problem that occurs at plywood veneer lathes. Hydraulic oil leaks or spills from the lathe hydraulics piping from time to time. Before the facility was installed, this oil leaked from eight hydraulic units through the floor to the Coos Bay Estuary. The amount is unknown, but it would be of considerable impact on the water quality in this area. Since installation of the facility all of the hydraulic oil is collected and properly disposed of.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the claimed facility in Application T-407, such certificate to bear the actual cost of \$6,192 with 80% or more of the cost allocable to pollution control.

W. D. Leshner

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

1. Applicant

Weyerhaeuser Company
Wood Products Manufacturing Division
Post Office Box 389
North Bend, Oregon 97459

The applicant owns and operates a wood products manufacturing complex on Coos Bay at North Bend, Oregon in Coos County.

2. Description of Claimed Facility

The hydraulic barker effluent treatment facility consists of:

- a. Existing sump and modified pump at raw waste collecting points. Pump is Cornell vertical sump pump, Model 6 HN VS7-1/2-8, Serial #3428 with 15 HP 875 RPM General Electric motor.
- b. 6-inch diameter pressure main to convey waste from pump station to clarifier.
- c. 50-foot diameter reinforced concrete clarifier constructed on site with:
 - 1) EIMCO clarifier, Serial number 72801-01, scraper mechanism driven with a Westinghouse 1/2 HP electric motor.
 - 2) One Model KS-9 Komline-Sanderson plunger-type sludge pump, Model HJS 56Y, with variable speed drive.
 - 3) One Model 305 E Marlo scum pump, Serial 462669 with 2 HP U.S. Syncrogear motor, Model F2XCL-3, Serial B4376866.
 - 4) One 6-inch diameter screw conveyor 10 feet long driven by 1 1/2 HP General Electric motor.
- d. One EIMCO continuous vacuum filter, Serial 80622-01-AL with 6 ft. face length and 6 ft. diameter drum driven by 3/4 HP U.S. varidrive motor with:
 - 1) One Sutorbilt blower, Fuller Company GTAX, size 510 HPW-V, Number A 81765 driven by 30 HP 1770 RPM General Electric motor, Serial GF 227 1438.

- 2) One silencer, Delta P. Inc. Cutlog WSD-3 1/2 PE 970, part 66-119-0-6.
- 3) One Krogh pump, 71713, driven by 3 HP 1755 RPM G. E. motor to remove condensate from vacuum receiver.
- 4) The material picked up on the drum is dumped on the cake conveyor which transfers the cake (bark fines) to a Peerless bin. The cake conveyor is a belt conveyor 18 inches wide that is driven by a 2 HP U.S. motor, 1740 RPM, Model F 1502-03-27.
- 5) The bark fines are stored in the Peerless bin until loaded into dump truck and hauled away for land fill.

Items 1, 2 and 3 are installed in an elevated house with the motor control center and related controls required for the operation.

The facility functions to remove settleable solids from the waste water which is pumped into the clarifier. The clarified waste waters are returned to the Coos Bay Estuary. The facility is operated continually.

Other improvements included in this application include:

- a. A round link chain flight conveyor 40 ft. long was installed under the west outside log deck for cleanup and pollution control. This conveyor is driven by a 7 1/2 HP Westinghouse motor, 870 RPM, Serial 7011, through A D 52 Western gear, ratio 40 to 1.
- b. A round link chain flight conveyor 90 ft. long was installed under the east outside log deck for cleanup and pollution control. This conveyor is driven by a 7 1/2 HP Westinghouse motor, 1745 RPM, Serial 7009, through A D 52 Western gear, ratio 60 to 1.
- c. A concrete slab was poured on a portion of the plant site bulkhead dock under the east outside log deck. The spillage collected on the slab is cleaned up and put in the sawmill waste wood conveyor system.

The claimed facility was completed September 1972 but was placed in operation January 1971, before final completion.

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

Facility cost: \$273,413 (documentation was provided).

3. Evaluation of Application

Installation of the claimed facility was required by the DEQ (permit condition). Prior to the installation of the clarifier and auxiliary equipment 9,053 pounds of bark fines per day were discharged to Coos Bay. The clarifier removes 90% of these fines from the effluent. The other improvements included in this application contribute to cleanup of debris and keep debris from reaching the waters of Coos Bay.

The annual income derived from the value of reclaimed materials is said to be \$4,000.00, contributing very little to offsetting the annual operating expense of \$43,500.00. Thus the only benefits derived from the claimed facilities are pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the claimed facilities in Application T-417, such certificate to bear the actual cost of 273,413 with 80% or more of the cost allocable to pollution control.

WDL:mjb

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

1. Applicant

Boise Cascade Corp.
Joseph Plant
P. O. Box 610
LaGrande, OR 97850

The applicant operates a sawmill and steam generating facility for the manufacture of lumber at Joseph, Oregon.

This application was received February 20, 1973. A copy of the report of the boiler stack emission compliance tests was received June 25, 1975.

2. Description of Facility

The claimed facility is a Tryone-Berry hydraulic log carriage to eliminate the steam shotgun. The facility is described to consist of the following:

1. Tryone-Berry Model SM-290, hydraulic log carriage
2. Cable drive system
3. Hydraulic pressure system and control panel
4. Electric motors and control system

The facility was completed and placed in service in March, 1972.

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

Facility costs: \$56,500.26 (Accountant's certification was provided)

3. Evaluation of Application

Stack emissions from the company's two (2) hog fuel boilers were in excess of the emission limitations set by regulations. The company developed an approved compliance program that called for the installation of the facility claimed in this application and the facility claimed in Tax Application T-420. The Department approved the plans and specifications prior to construction and has inspected and approved the complete installation.

This facility was installed in order to eliminate the steam shotgun and to reduce the required steaming load on the boiler. This was a necessary step and, in conjunction with the fly-ash collection facility described in Tax Application T-420, enabled the company to attain operating conditions whereby the boiler stack emissions were brought within the emission limitations set by regulations.

The company has furnished tests results that demonstrate that this facility (along with that claimed in application T-420) does operate satisfactorily and has reduced particulate emissions to the atmosphere by approximately 36 lb/hr or 150 Tons/year.

It is concluded that this facility does operate as planned and does reduce the emission of particulate matter to the atmosphere.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$56,500.26 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-419.

RAR:sb
7/2/73

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

1. Applicant

Boise Cascade Corp.
Joseph Plant
P. O. Box 610
LaGrande, OR 97850

The applicant operates a sawmill and steam generating facility for the manufacture of lumber at Joseph, Oregon.

This application was received February 20, 1973. A copy of the report of the boiler stack emission compliance tests was received June 25, 1973.

2. Description of Facility

The claimed facility is a regenerative fly-ash collector system which reduced particulate emissions to the atmosphere. The facility is described to consist of the following:

1. (2) - Breslove regenerative fly-ash collectors
2. Smoke detectors
3. Foundations and structural work
4. Necessary electrical control system

The facility was completed and put into service in November, 1972.

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

Facility costs: \$49,537.19 (Accountant's certification was provided).

3. Evaluation of Application

Stack emissions from the company's two (2) hog fuel boilers were in excess of the emission limitations set by regulations. The company developed an approved compliance program that called for the installation of the facility claimed in this application and the facility claimed in Tax Application T-419. The Department approved the plans and specifications prior to construction and has inspected and approved the complete installation.

This facility processes the exhaust gases from the two hog fuel boilers and removes and collects the ash and the unburned wood particulate matter. The fly-ash is then separated from the wood char material and disposed of in an approved landfill while the wood char material is recycled back into the boiler along with the other wood fuel.

The company has furnished test results that demonstrate that with this facility (along with that claimed in application T-419) does operate

satisfactorily and has reduced particulate emissions to the atmosphere by approximately 36 lb/hr. or 150 Tons/year.

It is concluded that this facility does operate as planned and does reduce the emission of pollutants to the atmosphere.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$49,537.19 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-420.

RAR:sb
7/2/73

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

1. Applicant

Oregon Portland Cement Company
111 S. E. Madison Street
Portland, OR 97214

The applicant produces and ships cement and agricultural limestone. The plant is located at 145 N. State Street, Lake Oswego, Oregon 97034.

2. Description of Claimed Facility

The claimed facility is described to be a system for monitoring particulates in the exhaust stack from Kilns 2 and 3 and consists of a Bailey UB 5010 A Light Source, Bailey UB 5020A Bolometer, Vane-type velometer, a thermocouple and a 3-pen L & N Speedmax M Strip chart recorder.

The claimed facility was completed May 10, 1972.

Certification must be made under the 1969 Act with 100% of the cost being claimed as allocable to pollution control.

Facility cost: \$12,176.81 (Accountant's certification was provided.)

3. Evaluation of Application

The claimed facility was required by and constructed according to plans reviewed and approved by the Columbia-Willamette Air Pollution Authority. The facility was intended to provide a method of monitoring opacity of the exhaust gases from Kilns 2 and 3 from within the central control room. CWAPA has indicated that the claimed facility is achieving its intended purpose.

It is concluded that the claimed facility was installed and is operated to control air pollution and that 100% of its cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$12,176.81, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-432.

Date 7/13/73

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

1. Applicant

Bend Aggregate & Paving Co.
Route 2, Box 435
Bend, OR 97701

The applicant owns and operates two stationary hot-mix asphaltic concrete paving plants about four miles N.W. of Bend near Tumalo, Oregon.

2. Description of Claimed Facility

The claimed facility is described to be a dust control system consisting of a 12' diameter cyclone, an 8' diameter by 24' long horizontal scrubber, and a stainless steel 35,000 c.f.m. wet fan. (An existing exhaust stack which was relocated and reused, is not claimed in this application.)

The claimed facility was completed on December 28, 1972.

Certification must be made under the 1969 Act with 100% of the cost being claimed as allocable to pollution control.

Facility cost: \$20,342.00 (Accountant's certification was provided).

3. Evaluation of Application

The claimed facility was constructed according to plans reviewed and approved by the Department. The facility was intended to control dust emissions from the larger asphalt plant (4000 pounds per batch) operated at this site by the applicant. The claimed facility is achieving its intended purpose.

It is concluded that the claimed facility was installed to control air pollution and that 100% of its cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$20,342.00, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-434.

FAS:sb
7/13/73

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

1. Applicant

Mr. E. R. Holmes
Route 1, P. O. Box 151
Independence, Oregon 97351

The applicant owns and operates a hog ranch on Parker Road near Independence in Polk County.

2. Description of Claimed Facility

The claimed facility consists of a small holding lagoon, a two horsepower pump, a 5.5 acre-ft. holding lagoon and a 2-inch plastic pipe which connects the two lagoons.

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

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

Facility Cost: \$3,292.07 (Cost documentation was provided)

3. Evaluation of Application

Prior to the construction of the facility, all liquid drainage from the hog barn ran into a small creek near the barn. With the claimed facility, all liquid wastes are contained, collected and pumped to a holding pond where it evaporates. Investigation reveals the facility well designed and well operated. No odors were apparent at the time of investigation.

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 \$3,292.07 with 80% or more of the cost allocated to pollution control be issued for the facilities claimed in tax application No. T-435.

Date 6/21/73

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

1. Applicant

Menasha Corporation
P. O. Box 329
North Bend, OR 97459

The applicant operates a paper-board plant and a steam generating facility with two (2) hog fuel boilers at North Bend, Coos County, Oregon.

This application was received April 3, 1973.

2. Description of Claimed Facility

The claimed facility is a boiler stack emission sensing and recording system and consists of the following:

1. (2) Bailey Bolometer sensing and recording units.
2. (1) Bailey Oxygen and Combustionables Analyzer and recorder.

The facility was completed and placed in service in February, 1972.

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

Facility costs: \$5,704.00 (Accountant's certification was provided).

3. Evaluation of Application

This system continuously senses and records opacity and oxygen and carbon dioxide conditions in the exhaust gases from each of the two (2) hog fuel boilers.

This system accomplishes two purposes, namely:

1. The boiler operators have a continuous and timely source of information regarding the boiler firing conditions and, thereby, are able to control the boiler operation
2. Management has a permanent printed record whereby the competency and efficiency of the individual boiler operators and the overall boiler operation can be checked to assure operation in compliance with emission standards.

Tax Application T-441
June 21, 1973
Page 2

It is concluded that this installation does furnish a needed means of monitoring the boiler operations and, when properly used and administered, does serve to reduce air contaminants emitted from the boiler stacks.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$5,704.00 with 80% or more of the costs allocated to pollution control be issued for the facility claimed in Tax Application T-441.

RAR:sb
6/21/73

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

1. Applicant

Hanna Nickel Smelting Company
P. O. Box 85
Riddle, OR 97469

The applicant produces ferronickel, an alloy consisting of 50% nickel and 50% iron, from a laterite ore at a smelter located about four miles west of Riddle, Oregon.

2. Description of Claimed Facility

The claimed facility is described to be a dust control system for treating emissions from the Daybins. The facility consists of a Mikro Pul baghouse, a Westinghouse fan and motor, hoods, ducts and associated electrical and structural materials.

The claimed facility was completed and put into service in February, 1972.

Certification must be made under the 1969 Act with 100% being claimed as allocable to pollution control.

Facility cost: \$37,295.63 (Accountant's certification was provided).

3. Evaluation of Claimed Facility

The claimed facility which is an addition to an existing dust control system was installed as a part of an emission reduction program approved by the Department of Environmental Quality. The emissions from the claimed facility have been determined to be below the levels projected in the approved control proposal.

The dust collected by the claimed facility, which is returned to the process, has an estimated annual value of \$300.00. The annual operating cost of the claimed facility (including depreciation) is estimated to be \$12,310.51. Thus, the claimed facility experiences an operating loss of about \$12,010.51 annually.

It is concluded that the claimed facility was installed and is operated to control air pollution and that 100% of its cost is allocable to pollution control.

Tax Application T-442
Page 2

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$37,295.63, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-442.

FAS:sb
7/13/73

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

1. Applicant

Hanna Nickel Smelting Company
P. O. Box 85
Riddle, Oregon 97469

The applicant produces ferronickel, an alloy consisting of 50% nickel and 50% iron, from a laterite ore at a smelter located about four miles west of Riddle, Oregon.

2. Description of Claimed Facility

The claimed facility is described to be a dust control system for treating emissions from the Crusher House. The facility consists of a Rees baghouse, fan, motors, hoods, ducts and associated electrical and structural materials.

The claimed facility was completed and put into service in February, 1971.

Certification must be made under the 1969 Act with 100% being claimed as allocable to pollution control.

Facility cost: \$198,997.00 (Accountant's certification was provided.)

3. Evaluation of Claimed Facility

The claimed facility, which is an addition to an existing dust control system, was installed as a part of an emission reduction program approved by the Department of Environmental Quality. The emissions from the claimed facility have been determined to be below the levels projected in the approved control proposal.

The dust collected by the claimed facility, which is returned to the process, has an estimated annual value of \$1,900.00. The annual operating cost of the claimed facility (including depreciation) is estimated to be \$42,390.64. Thus the claimed facility experiences an operating loss of about \$40,490.64 annually.

It is concluded that the claimed facility was installed and is operated to control air pollution and that 100% of its cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$198,997.00, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-443.

FAS:sb
7/13/73

Date 6/13/73

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

1. Applicant

Hanna Nickel Smelting Company
P. O. Box 85
Riddle, Oregon 97469

The applicant produces ferronickel, an alloy consisting of 50% nickel and 50% iron, from a laterite ore at a smelter located about four miles west of Riddle, Oregon.

2. Description of Claimed Facility

The claimed facility is described to be a fume and dust control system for initially developing data necessary to design the Oremelter dust control system and subsequently treating the Ferrosilicon Furnace emissions. The claimed facility consists of an American Air Filter baghouse, a fan and motor, duct work, dust pump, air heaters, air dryer, sub-station, and associated electrical and structural materials.

The claimed facility was completed and placed into service in March, 1972.

Certification must be made under the 1969 Act with 100% being claimed as allocable to pollution control.

Facility cost: \$1,122,430.13 (Accountant's certification was provided).

3. Evaluation of Claimed Facility

The claimed facility, which was installed as a part of an emission reduction program approved by the Department of Environmental Quality, has been used to develop data for designing the Oremelter control system. When the Oremelter control system is completed in early 1974, the claimed facility, excluding the air heaters, will be used to replace an existing fume control system on the Ferrosilicon Furnace. The air heaters will remain with Oremelter No. 1 and will become a part of that control system. Including the air heaters in this application means that they can not be claimed in any later application.

Presently, the material collected by the claimed facility is returned to the process. The increase in the amount of Oremelter dust collected as a result of installing the claimed facility amounts to an estimated \$10,000.00 per year. When the claimed facility becomes the Ferrosilicon Furnace control system, the material collected will be discarded. The annual operating cost of the claimed facility (including depreciation) is estimated to be \$218,839.04. Thus, during both the initial and final operating phases, the claimed facility does not appear economically attractive.

It is concluded that the claimed facility was installed and is operated to control air pollution and that 100% of its cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$1,122, 430.13, with 80% or more of its cost allocable to pollution control, be issued for the facility claimed in Tax Application T-444.

FAS:sb
7/13/73

Date 7/13/73

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

1. Applicant

Hanna Nickel Smelting Company
P. O. Box 85
Riddle, OR 97469

The applicant produces ferronickel, an alloy consisting of 50% nickel and 50% iron, from a laterite ore at a smelter located about four miles west of Riddle, Oregon.

2. Description of Claimed Facility

The claimed facility is described to be new hood and duct work which was added to an existing dust control system associated with Skiphoint No. 1.

The claimed facility was completed and put into service in August, 1972.

Certification must be made under the 1969 Act with 100% being claimed as allocable to pollution control.

Facility cost: \$31,727.22 (Accountant's certification was provided).

3. Evaluation of Claimed Facility

The claimed facility, which collects and conveys dust from Skiphoint No. 1 to two existing baghouses, was installed as a part of an emission control program approved by the Department of Environmental Quality. The emissions from the Skiphoint No. 1 control system, after installing the claimed facility, have been determined to be at the level projected in the approved proposal. (The baghouses were existing units and are not a part of any tax credit application.)

The dust collected by the Skiphoint No. 1 control system is returned to the process. The value of the additional dust collected, as a result of installing the claimed facility, is estimated to be \$1,300 per year. The annual operating cost of the claimed facility is estimated to be \$2,884.29 (based on depreciation only). Thus, the claimed facility experiences a minimum operating loss of \$1,584.29 annually.

It is concluded that the claimed facility was installed and is operated to control air pollution and that 100% of its cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$31,727.22, with 80% or more allocable to pollution control be issued for the facility claimed in Tax Application T-445.

Date 7/13/73

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

1. Applicant

Hanna Nickel Smelting Company
P. O. Box 85
Riddle, OR 97469

The applicant produces ferronickel, an alloy consisting of 50% nickel and 50% iron, from a laterite ore at a smelter located about four miles west of Riddle, Oregon.

2. Description of Claimed Facility

The claimed facility is described to be an air compressor (Serial No. K326212A-2CX) and a 300 horsepower motor (Serial No. 96331).

The claimed facility was completed and put into service in August, 1972.

Certification must be made under the 1969 Act with 100% being claimed as allocable to pollution control.

Facility cost: \$29,179.14 (Accountant's certification was provided).

3. Evaluation of Claimed Facility

The claimed facility was installed as an addition to an existing plant-wide compressed air system containing 3 similar compressors. The applicant claims that the claimed facility was needed to fulfill the compressed air requirements of pollution abatement equipment to be installed as a result of its approved emission reduction program. Several of the baghouses to be used in the program do require compressed air during the bag cleaning cycle.

No claim is made for any compressed air distribution system or the 3 previously existing compressors. No saleable or reuseable material is directly associated with the claimed facility.

It is concluded that the claimed facility was installed and is operated to control air pollution and that 100% of its cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$29,179.14, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-446.

Date July 13, 1973

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

1. Applicant

Continental Can Co.
10200 N. Lombard
Portland, OR 97203

The applicant manufactures metal or composite cans for foods, beverages, motor oil, antifreeze, paint, etc. at the above address.

2. Description of Claimed Facility

The claimed facility is described to be a treatment system for removing particulates and soluble gases generated by the soldering of metal cans in Line No. 7. The facility consists of a single rotoclone (type W, model A, size 14), complete with necessary duct work, hoods, associated electrical equipment and plumbing.

The facility was completed and put into service in July, 1969.

Certification must be made under the 1969 Act with 100% being claimed as allocable to pollution control.

Facility cost: \$3,940.00 (Accountant's certification was provided.)

3. Evaluation of Application

The claimed facility was constructed according to plans reviewed and approved by the Columbia-Willamette Air Pollution Authority. The facility was intended to control particulates and soluble gases from the Line No. 7 soldering operation. The Regional Authority has indicated that the facility is achieving its intended purpose.

No salable or reuseable material is derived from the claimed facility.

It is concluded that the claimed facility was installed and is operated to control air pollution and that 100% of its cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$3,940.00, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-449.

Date July 13, 1973

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

1. Applicant

Continental Can Co.
10200 N. Lombard
Portland, OR 97203

The applicant manufactures metal or composite cans for foods, beverages, motor oil, antifreeze, paint, etc. at the above address.

2. Description of Claimed Facility

The claimed facility is described to be a treatment system for removing particulates and soluble gases generated by the soldering of metal cans in Lines No. 1, 2 and 3. The facility consists of three rotoclones, one for each line, (type W, size 14) complete with necessary duct work, hoods, electrical equipment and plumbing.

The facility was completed and placed into service in May 1971.

Certification must be made under the 1969 Act with 100% being claimed as allocable to pollution control.

Facility cost: \$19,696.00 (Accountant's certification was provided).

3. Evaluation of Application

The claimed facility was constructed according to plans reviewed and approved by the Columbia-Willamette Air Pollution Authority. The facility was intended to control particulates and soluble gases from the Lines No. 1, 2 and 3 soldering operations. The Regional Authority has indicated that the facility is achieving its intended purpose.

No salable or reuseable material is derived from the claimed facility.

It is concluded that the claimed facility was installed and is operated to control air pollution and that 100% of its cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$19,696.00, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application No. T-450.

Date July 13, 1973

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

1. Applicant

Continental Can Co.
10200 N. Lombard
Portland, OR 97203

The applicant manufactures metal or composite cans for foods, beverages, motor oil, antifreeze, paint, etc. at the above address.

2. Description of Claimed Facility

The claimed facility is described to be a treatment system for removing particulates and soluble gases generated by the soldering of metal cans in Lines No. 4, 5 and 6. The facility consists of three rotoclones, one for each line, (type W, model B, size 14) complete with necessary duct work, hoods, electrical equipment and plumbing.

The facility was completed and placed into service in March, 1972.

Certification must be made under the 1969 Act with 100% being claimed as allocable to pollution control.

Facility cost: \$18,729.00 (Accountant's certification was provided.)

3. Evaluation of Application

The claimed facility was constructed according to plans reviewed and approved by the Columbia-Willamette Air Pollution Authority. The facility was intended to control particulates and soluble gases from the Lines No 4, 5 and 6 soldering operations. The Regional Authority has indicated that the facility is achieving its intended purpose.

No salable or reuseable material is derived from the claimed facility.

It is concluded that the claimed facility was installed and is operated to control air pollution and that 100% of its cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$18,729.00, with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application No. T-451.

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

1. Applicant

Time Oil Company
Oregon Division
12005 N. Burgard Street
Portland, Oregon 97203

The applicant leases and operates an oil and chemical storage and distribution terminal at the above address in Multnomah County.

2. Description of the Claimed Facility

The facility consists of a waste water collection system for petroleum tank water draws and truck loading rack and pump house wastes, terminating at a slop storage tank at the Bell Oil Terminal operation and at the Northwest Oil Terminal operation.

The facility also consists of a Fram Portable Oil/water separator which processes oily waste waters from the slop tanks, discharging treated water to a newly constructed sewer line to the City of Portland Sanitary Sewer.

The claimed facility was completed December 1, 1972 and placed in operation March 16, 1973.

Certification is claimed under the 1969 act with 80% or more of the cost allocated to pollution control.

Facility Cost: \$60,723 (documentation was provided).

3. Evaluation of Application

Installation of the Claimed Facility was required by the Department of Environmental Quality (Permit Condition). Prior to installation, wastes were allowed to spill on the sand in the tank farm area causing the contamination of storm run off to the drainage ditches in the area. With the Claimed Facility all oily waste waters are collected, separated and disposed of to Waste Oil collectors operating in this area. The company has been cooperative in installing the facilities and has in addition to this work, constructed at their ship dock a concrete pad and drain to a shore slop tank to minimize the possibility of oil spills to the river during unloading of tanker cargo.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certification be issued for the claimed facilities in Application T454, such certificate to bear the actual cost of \$60,723 with 80% or more of the cost allocable to pollution control.

W. D. Leshner

Date 6/19/73

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

1. Applicant

Mazama Timber Products, Inc.
P. O. Box 37
Creswell, OR 97426

The applicant operates a veneer plant at Goshen, Lane County, Oregon.

This application was received April 17, 1973. The report from the Lane Regional Air Pollution Authority was received May 24, 1973.

2. Description of Claimed Facility

The claimed facility is a wood waste residue processing, handling and storage system installed to eliminate operation of the wigwam waste burner and is described to consist of the following;

1. Knife hog
2. Hog fuel storage bins
3. Conveyors and metal detector
4. Electrical control system and panel
5. Necessary foundations, etc.

The facility was completed and placed in operation in January, 1969.

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

Facility costs: \$23,021.07 (Accountant's certification was provided).

3. Evaluation of Application

The Lane Regional Air Pollution Authority reported that they did require the company to phase-out all operation of the wigwam waste burner. The company elected to make this installation as a means of compliance and the installation was approved by the Authority. The Authority has inspected the completed installation and the company has phased-out operation of the wigwam waste burner.

The installation enables the company to collect the mill's wood waste residues, process them in the knife hog when necessary and transport them to the storage bins where they are held for eventual truck shipment and utilization as hogged fuel.

It is concluded that this installation does operate satisfactorily and did reduce air pollution by enabling the company to phase-out all operation of the wigwam waste burner as required by the Authority. The company, in

Tax Application T-456

6/19/73

Page 2

accordance with cost data submitted in this application, will not be able to earn any return on this investment.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$23,021.07 with 80% or more of the costs allocated to pollution control be issued for the facility claimed in Tax Application T-456.

RAR:sb

6/19/73

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

1. Applicant

Mazama Timber Products, Inc.
P. O. Box 37
Creswell, OR 97426

The applicant operates a veneer plant at Walker, Lane County, Oregon.

This application was received on April 17, 1973. The report from the Lane Regional Air Pollution Authority was received May 24, 1973.

2. Description of Claimed Facility

The claimed facility is a wood waste residue processing, handling and storage system installed to eliminate operation of the wigwam waste burner and is described to consist of the following:

1. Hammer hog
2. Hog fuel storage bins
3. Conveyor and metal detector
4. Electrical control system, motors and panel
5. Necessary foundations, etc.

The facility was completed and placed in service in June, 1969.

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

Facility Costs: \$112,747.22 (Accountant's certification was provided).

3. Evaluation of Application

The Lane Regional Air Pollution Authority reported that they did require the company to phase-out all operation of the wigwam waste burner. The company elected to make this installation as a means of compliance. The Authority did not review or approve the plans and specifications for this installation prior to construction. The Authority has inspected the completed installation and the company has phased-out all operation of the wigwam waste burner.

This was designed to collect, process and store the wood waste residues produced by the mill operations. The processed wood residues are shipped out by truck and eventually utilized as hogged fuel.

This facility, as originally installed and placed in operation in June, 1969, had a cost of \$67,616.72. However, the facility did not work properly and extensive modifications, at an additional cost of \$45,130.50,

were made during the summer of 1969. The final modified installation operated satisfactorily.

It is concluded that this facility, as modified, does work satisfactorily and did enable the company to reduce air pollution by the phase-out of all operation of the wigwam waste burner. However, since plans and specifications for this installation were not submitted to the Authority for review and approval prior to construction and since there obviously were some original design faults that prevented proper operation of the system and which resulted in rework and modification at an increased cost of \$45,130.50, it seems reasonable to infer that had proper procedures been followed for this new construction, design deficiencies might have been uncovered and the excess rework and modification cost could have been prevented or substantially reduced. Therefore, only 60% of the total installation cost of \$112,747.22 are recommended for Pollution Control Certification.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the costs of \$112,747.22 with 60% or more and less than 80% of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-457.

Date 7/13/73

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

1. Applicant

J. C. Compton Company
P. O. Box 86
McMinnville, OR 97128

The applicant operates two portable asphalt paving plants throughout Oregon.

2. Description of Claimed Facility

The claimed facility is described to be a dust collecting system for the applicant's portable Standard Steel Corporation hot-mix asphalt plant. The facility consists of a Dustex baghouse (Model No. RA-15-60) a knockout box, a fan (New York Blower, Series 4c, Size 541RTOK) and fan motor (Caterpillar D-353 engine).

The claimed facility was completed in April, 1972, and put into service in June, 1972.

Certification is claimed under the 1969 Act with 95% allocable to pollution control.

Facility cost: \$156,254.50 (Accountants certification was provided).

3. Evaluation of Claimed Facility

The claimed facility, which was included in the purchase of a new asphalt plant, has been source tested and found to be in compliance with the Department's regulations regarding emissions from hot-mix asphalt plants.

The applicant has indicated that there is a necessity to provide a draft on the aggregate dryer. To do this without providing dust control would have cost about \$7,800. The applicant considered this requirement when determining that 95% of the cost of the claimed facility was allocable to pollution control.

The dust collected by the claimed facility not only can be fed to the asphalt mix but is a required part of the mix up to a specified percentage range, generally about 3 to 7% of the mix. The operating experience with the claimed facility has varied from using all of the collected dust to rejecting various portions thereof. The presence of "surplus" dust is dependent upon both the rock source and rock crushing operation. When "surplus" dust has been rejected the procedure has included mixing the dust with water and burying the resulting slurry.

Tax Application T-458
7/13/73

The claimed facility represents collection and treatment well above that necessary to collect dust to meet mix requirements.

It is concluded that the claimed facility was installed and is operated to control air pollution and that 95% of its cost is allocable to pollution control.

4. Director's Recommendations

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$156,254.50, with 80% of more allocable to pollution control, be issued for the facility claimed in Tax Application T-458.

FAS:sb
7/13/73

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

1. Applicant

Oregon Steel Mills
Division of Gilmore Steel Corporation
Rivergate Plant
5200 NW Front Avenue
Portland, Oregon 97210

The applicant, a corporation, owns and operates a steel plate mill at Rivergate Industrial Park in Multnomah County using iron pellets produced on site by Midrex as raw material.

2. Description of Claimed Facility

The claimed facility is a secondary settling pond 150 feet by 200 feet by 14 feet deep. The pond is constructed with reinforced concrete sides. The bottom is gravel on sand. Two underground pipe lines, one from the melt shop and one from the rolling mill, discharge to the secondary settling pond from the Oregon Steel Mills. An open flume from Midrex's pond also overflows to the claimed facility. There is a baffle in the pond at the inlet point. There is also a baffle and boom at this outlet of the pond. The pond outlet structure is equipped with an endless belt vertical oil skimmer. The outfall line from the secondary settling basin has an effluent control and measuring flume. The point of discharge to the vortex is at elevation minus 20 feet. It is a 36 inch diameter asbestos bonded, asphalt lined corrugated pipe protected on the river bottom rock rip rap and concrete bags.

The claimed facility was placed in operation in July, 1969. Certification is claimed under the 1967 act with 100% of the cost allocated to pollution control.

Facility Cost: \$175,876.29 (Accountant's certification is attached to the application).

3. Evaluation of Application

Installation of the claimed facility was incorporated in original construction of the plant as a part of the waste water treatment system. It serves both the Midrex Pelletizing Plant and the Oregon Steel Mills. The facility is owned by Oregon Steel Mills. Removal efficiency of iron oxide and Hematite ore fines is about 98%. (Removal of approximately 8,200 pounds per day). There is no value in the material removed, thus there is no return on the investment in these facilities except pollution control.

Appl. T-467

Date 7-16-73

The facility is performing as designed. Periodic removal of solids from this secondary settling pond is required and the corporation adequately attends to this.

4. Director's Recommendation

It is recommended that a pollution Control Facility certificate be issued for the facility claimed in application T-467; such certificate to bear the actual cost of \$175,876.29 with certification granted under the 1967 act.

W. D. Leshner
July 16, 1973

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

1. Applicant

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

The applicant owns and operates a steel plate mill in the Rivergate industrial area in Multnomah County, using iron pellets produced on site by Midrex as raw material.

2. Description of Claimed Facility

The claimed facility is a "scale pit" consisting of a large reinforced concrete tank constructed on piling. Inside dimensions are 14 feet wide by 22 feet long by 34 feet deep. Water and scale enter through a flume which runs under part of the rolling mill equipment. Effluent water from the scale pit is screened and enters a sump. Two vertical sump pumps pump the water from the sump to a large settling pond (settling pond not part of this application).

The claimed facility was placed into operation in October, 1969. Certification is claimed under the 1967 act with 100% allocated to pollution control.

Facility Cost \$92,287.95 (accountant's certification was submitted).

3. Evaluation of the Application

Installation of the claimed facility was incorporated in the original construction of the plant. The facility removes mill scale from plant waste water before further treatment. This section of the waste water treatment facilities removes 900 tons per year of material from the effluent. The material has a recycle value of \$10,575.00 per year, however, the annual operating costs plus depreciation exceed this figure. Thus, there is no return on this investment.

The facility is performing as designed.

AppI T-468

Date 7/16/73

4. Director's Recommendation

It is recommended that a Pollution Control Facility certificate be issued for the facilities claimed in application T-468; such certificate to bear the actual cost of \$92,287.95, with certification granted under the 1967 act.

W. D. Lesher

Date 7/13/73

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

1. Applicant

Oregon Steel Mills
Division of Gilmore Steel Corporation
5200 N. W. Front Ave.
Portland, OR 97210

The applicant produces carbon steel plate by arc melting metallized iron pellets, casting molten steel into slabs and rolling slabs into sheet. The plant is located at 14400 North Rivergate Blvd., Portland, Oregon, 97203.

2. Description of Claimed Facility

The claimed facility is described to be a fume control system for the arc furnace. The facility consists of hoods, ducts, fans, a large baghouse, screw conveyor and a slurry pump.

The claimed facility was completed and put into service July, 1969.

Certification is claimed under the 1967 Act. (Information provided in the application indicates that the facility is eligible for certification under the 1967 Act.)

Facility cost: \$546,525.81 (Accountant's certification was provided).

3. Evaluation of Claimed Facility

The claimed facility was installed as a part of the plant during original construction. (At that time, the Columbia-Willamette Air Pollution Authority did not require submission of plans for review and approval.)

The facility was intended to control emissions from the arc furnace operation. The Regional Authority has indicated that the facility is achieving its intended purpose.

The material collected, which amounts to about 6 tons per day of iron oxide, is returned to the Midland-Ross metal pellet making process. Due to impurities in the collected material and the effort involved in blending it back into the process, the value of the collected material is considered to be zero. The applicant does not receive any form of credit for the collected material.

It is concluded that the principal purpose for installing and operating the claimed facility is to control air pollution.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$546,525.81, be issued for the facility claimed in Tax Application T-469.

FAS:sb
7/13/73

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

1. Applicant

Publishers Paper Co.
Oregon City Division
419 Main Street
Oregon City, Oregon 97045

The applicant owns and operates a pulp and paper mill at the above location in Clackamas County.

2. Description of Claimed Facility

Secondary treatment system consisting of an aerated lagoon, an outfall line and diffuser, a pump station and pressure line from the mill to the lagoon, two smaller pump stations to convey bleach and recovery effluent to the main pump station, and related equipment.

The claimed facility was completed and placed in operation in June 1972.

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

Claimed Cost: \$2,475,220 (Documentation was provided)

3. Evaluation of Application

The claimed facility completes the comprehensive waste water treatment and control program which was initiated in about 1965 with the requirement to collect wastes and install primary treatment. All wastes now receive secondary treatment after primary treatment and chemical recovery. The system is functioning as designed and is in compliance with permit requirements.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the actual cost of \$2,475,220 with 80% or more allocated to pollution control be issued for the facilities claimed in Application T-472.

Harold L. Sawyer
ak

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

1. Applicant

Publishers Paper Co.
Newberg Division
P. O. Box 70
Newberg, Oregon 97132

The applicant owns and operates a pulp and paper mill at the south end of Wynoski Street in Newberg, Yamhill County.

2. Description of Claimed Facility

Secondary treatment system consisting of modification of existing ponds to function as aerated lagoons, and construction of an outfall line to the river.

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

The claimed facility was completed and placed in operation in May 1972.

Claimed Cost: \$616,229 (Documentation was provided)

3. Evaluation of Application

The claimed facility completes the major waste treatment facilities for this mill. The facilities are well operated and in compliance with permit requirements.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the actual cost of \$616,229 with 80% or more allocated to pollution control be issued for the facilities claimed in Application T-473.

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

1. Applicant

International Paper Company
Long-Bell Division - Vaughn Branch
Post Office Box 308
Veneta, Oregon 97487

The applicant owns and operates a plywood and planed lumber mill at Vaughn, Oregon in Lane County.

2. Description of Claimed Facility

The claimed facility consists of the following four facilities:

- 1) A series of two compartmented solids settling tanks followed by a series of three open settling ponds used for the disposal of glue waste waters.
- 2) A 1,200,000-gallon steam vat condensate evaporation and percolation pond.
- 3) A diversion channel and a series of three manually operated control gates to allow Noti Creek to by-pass the log pond at all times except periods of high creek flows when some of the creek flow must pass through the log pond.
- 4) Two compartmented concrete gravity oil-water separators which remove oil from waste waters generated in the mechanical shop and from steam cleaning operations.

The claimed facilities were placed in operation in October 1972.

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

Facility cost: \$100,283.25 (accountant's certification was submitted).

3. Evaluation of Application

- 1) Prior to the construction of the glue waste tanks and ponds, the glue waste water was discharged to a single pond which overflowed during winter weather conditions. The claimed tanks and ponds were constructed to contain the glue waste waters at all times of the year. However, the two compartment tanks are now part of a total glue waste water recirculation system and the three glue waste ponds are used as emergency ponds in case of a breakdown in the recirculation system.

- 2) Prior to construction of the 1,200,000-gallon steam vat condensate holding pond, the condensate was discharged into the log pond which overflows during the winter. With the condensate holding pond the waste waters are contained year around and are evaporated away.
- 3) Prior to construction of the diversion channel and related control gates, Noti Creek flowed through the log pond at all times of the year. With the diversion channel the log pond waters are contained at all times except during periods of high creek flows when the creek is again diverted through the log pond.
- 4) Prior to construction of the oil-water separators the oily water was discharged directly to Noti Creek. With the claimed separators the oil is removed and burned in the powerhouse.

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 \$100,283.25 with 80% or more of the cost allocated to pollution control be issued for the facilities claimed in Application No. T-475.



ENVIRONMENTAL QUALITY COMMISSION

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MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. F, July 26, 1973, EQC Meeting

USA Interim Sewerage Program

Background

At the Commission meeting on April 30, 1973, a report was presented regarding the status of sewerage facilities construction in Washington County by the Unified Sewerage Agency. At that time, the Commission approved revised implementation schedules for major master plan facilities as follows:

1. Fanno Creek Basin

Complete Durham plant by July 1975.

(Will provide for elimination of Beaverton, Cedar Hills, Fanno Creek, Metzger, Tigard, King City, Tualatin, Southwood Park, Peerless Truck and Trailer and Sherwood Plants)

An EPA construction grant in the amount of \$17,118,750 has been received. Bids should be opened in September with construction commencing thereafter. As a result of the grant delays, a late fall 1975 completion could now be projected.

2. Beaverton - Rock Creek Basin

Accelerate Rock Creek Plant completion from 1979 to December 1977.

(Will allow elimination of Tektronix, Sunset, Oak Hills, Primate Center, Aloha and Somerset West Plants)

The Commission also approved the Director's recommendation to require USA to immediately further evaluate the facilities in the Beaverton Creek Basin and propose a revised plan for control of connections pending completion of master plan facilities in 1977. The original interim facility plan required elimination of the Sunset, Tektronix and Oak Hills Plants by the end of 1974. However, it was apparent that this matter required reevaluation.

Present Situation

USA staff has provided the requested information regarding the Beaverton Creek - Rock Creek Basins. In summary, the situation is as follows:

1. Growth in the area has greatly exceeded master plan and interim facility plan projections.
2. If the Sunset, Tektronix, and Oak Hills Plants are to be eliminated by the end of 1974 with the waste treated at the Aloha Plant as presently required by the interim facility plan, it will be necessary to immediately impose a total ban on additional connections to sewers tributary to the Aloha Plant in order to preserve capacity to handle the load. In fact, elimination of all 3 plants today would overload the Aloha Plant until present load from Beaverton

could be diverted to Durham in late 1975. The practical effect of requiring elimination of the Sunset, Tektronix and Oak Hills Plants prior to 1977 will be to impose a total building ban in the area for a period of 4 years from now until late 1977.

3. The Beaverton Plant is presently loaded to capacity with excess wastes being diverted to Aloha and Metzger.
4. The Primate Center and Somerset West Plants were originally projected to stay in operation until 1979. Both are loaded to capacity at present.

The USA staff has preliminarily proposed the following program for the Beaverton - Rock Creek Basin to get from today until 1977:

1. Allow Tektronix to maintain their present plant in operation until 1977.
2. Maintain Oak Hills Plant at present loading until 1977.
3. Maintain Sunset Plant at reduced loading until 1977. This plant is not performing reliably at present. It is therefore proposed to reduce the loading from approximately 1.2 MGD to 0.8 MGD by diversion of waste to Aloha via the Cedar Mill trunk which will be completed this fall. The plant will also be modified as necessary to insure that interim effluent quality standards are met.
4. Allow continued growth in the area to utilize remaining Aloha Plant capacity by late 1975. The presently estimated remaining capacity, assuming Items 1, 2 and 3 are approved, would be 1900 single family unit equivalents. In late 1975 when Durham is complete, an estimated 1.2 million gallons per day of waste from Beaverton will be diverted from the

Aloha Plant to the Durham Plant, thus making the equivalent of approximately 3,000 connections theoretically available in the Aloha Plant.

5. Allow the Primate Center to maintain their plant in operation until 1977 as originally proposed.
6. Allow an interim expansion of the Somerset West Plant to accommodate additional residential development and provide service to 2 planned new Beaverton School District Schools. Sewerage service can also be provided by this facility for the Portland Community College Rock Creek Campus which is currently in the planning stages. Such expansion can be accomplished with all effluent disposed of by land irrigation during the summer months. An increased quantity of treated effluent would be discharged to Rock Creek during wet weather months.

Evaluation

The Department evaluation of the USA proposal is as follows:

1. The Tektronix Plant can be operated within present standards until 1977 without any worsening of water quality in Beaverton Creek.
2. The Oak Hills Plant has not been operated in a satisfactory manner up to this time. This plant will either have to be modified to achieve satisfactory performance or phased out at the earliest practicable date.
3. The proposal to reduce the loading at the Sunset Plant and make modifications as necessary to insure satisfactory operation should result in some improvement in the water quality of Cedar Mill Creek.

4. The Aloha Plant was recently expanded and upgraded to improve effluent quality. Diligent operation should permit this plant to be loaded to its design capacity without worsening of water quality in Beaverton Creek. Limitation of new connections to not more than 65 per month for the next 2 years with some adjustment in the following 2 years will be necessary to prevent overloading however.
5. The Primate Center Plant is presently being upgraded to improve effluent quality and eliminate the discharge during summer months.
6. The proposed expansion of the Somerset West Plant will result in an increased discharge during wet weather winter months. There would be no summer discharge. No significant deterioration in wet weather water quality in Rock Creek is expected over the 4-year period as a result of the proposal.

Conclusions

1. USA and Washington County have been unable to maintain a balance between growth and development and capability to treat the resulting sewage within the framework of USA's interim facility plan. As a result, a critical decision point has been reached which necessitates immediate action by this Commission to either maintain the existing interim facility plan and impose an immediate connection ban in the area for a period of perhaps 4 years or to approve a revised interim facility plan and greatly restrict sewer connections and building over the next 2 or more years. It would have been more desirable to consider this matter at a meeting in the Portland area, however, action should not be delayed. Further consideration at the next meeting in the Portland area may be desirable.

2. Under the circumstances that exist today, the proposal of the USA staff generally provides a reasonable program for bridging the gap between now and 1977 in the Beaverton Creek - Rock Creek Basins. The program will of necessity greatly restrict growth in the area over the next two years but will not necessitate the severe hardships of a total ban on new construction as long as the plants can be continuously operated and maintained within interim standards.

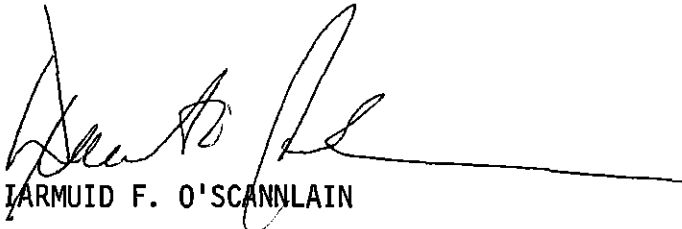
Director's Recommendation

It is recommended that the interim program for the Beaverton Creek - Rock Creek drainage basins as proposed by the USA staff be approved subject to the following conditions.

1. No additional connections to the Oak Hills Plant shall be made without specific Department of Environmental Quality approval. The plant shall be modified and operated as necessary to perform within standards. Irrigation disposal of effluent shall be implemented immediately if land can be obtained in the vicinity.
2. Effective immediately, commitment of additional connections to sewers tributary to the Aloha Plant (by issuance of specific sewer connection permits) shall be permitted on a monthly quota basis with release of each month's quota subject to continued satisfactory performance of the plant. An initial quota of 65 units/month will be allowed with future quotas subject to adjustment based on periodic re-evaluation of available plant capacity.

3. No additional connections to sewers tributary to the Beaverton Sewage Treatment Plant shall be committed without specific Department of Environmental Quality approval. Connections to sewers in Beaverton tributary to the Aloha Plant can be permitted subject to the Aloha Plant quota set forth above. Connections to sewers tributary to the Metzger system can be permitted subject to quotas established for that system.
4. The expanded Somerset West Plant shall be operated and maintained by USA.

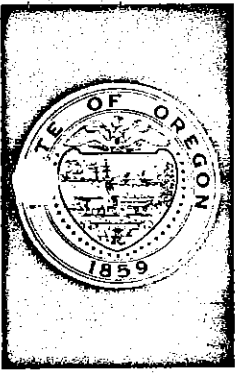
It is also recommended that a similar monthly quota of connections be established for the Metzger system (Fanno Creek Basin) to prevent overloading prior to completion of the Durham Plant. An initial quota of 30/month for this system is proposed based on capacity information provided by USA.



DIARMUID F. O'SCANNLAIN

HLS:ak

July 19, 1973



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

MEMORANDUM

TO: Environmental Quality Commission

From: Director

Subject: Agenda Item No. I, April 30, 1973, EQC Meeting

Unified Sewerage Agency, Washington County - Sewerage
Facilities Construction Program

Background

On September 26, 1969, the Environmental Quality Commission issued an order prohibiting further sewer connections to all sewage plants in the Tualatin Basin until satisfactory progress could be made toward implementing a master plan for solution of the water quality problems in the basin. Some 25 sewage treatment plants were located on the Tualatin River and its tributaries, nearly all of which lies within Washington County. During the 1960's this was the most rapidly growing area in the state and the increased waste loads plus low stream flows exceeded the assimilative capacity of streams within the basin creating health hazards and nuisance conditions. A master plan was developed by Washington County to provide for interceptor lines that would consolidate the waste at fewer locations where advanced treatment would be provided. In order to accommodate growth and development within the basin during the implementation period, an implementation schedule for the Tualatin Basin Sewerage Master Plan including an interim facility plan was developed. This schedule was approved by the Department of Environmental Quality on January 22, 1970.

On December 19, 1969, the Environmental Quality Commission held a

hearing on proposed Water Quality Standards for the Tualatin Basin. These standards were adopted January 30, 1970. The implementation plan for the standards, which was adopted as administrative policy was by reference tied to the master plan implementation schedule.

On February 3, 1970, the Unified Sewerage Agency was created by the voters of Washington County. The Agency has the primary responsibility of implementing the master plan. On April 21, 1970, \$36 million in bonds were approved for implementation of the master plan. In general the implementation program was developed to meet the following guidelines:

- 1) Permanent plants should meet water quality standards before the low stream flow period of 1974.
- 2) Intermediate range interim facilities (5 to 9 year life) should be improved so as to meet basin standards during the low flow summer months if possible within the framework of reasonable expenditure.
- 3) Short ranged interim facilities (4 years life or less) should be maintained with minimum investment in improvements so as to meet interim treatment standards.

Under this program, further degradation of water quality in the basin would be stopped and immediate improvement in some areas would be initiated. Under the proposed facility completion schedules, Water Quality Standards would not be met in the most intensively developed Fanno Creek and Upper Beaverton Creek Basins and in the main stem of the Tualatin River until the summer and fall of 1974. The Lower Beaverton Creek Basin would not be brought into compliance with standards until 1979.

A system of interties and interim expansions have been completed to allow maximum utilization of interim facilities

The essence of the presently approved implementation program and interim facility plan is summarized as follows:

Permanent Sewage Treatment Plants

Banks)	Upgrade to meet Water Quality Standards by
Gaston)	adding land disposal system prior to
Laurelwood Academy)	low flow season of 1974.
Hillsboro (West Side)		Complete plant expansion and expand irrigation disposal system to meet standards prior to low flow 1974.
Rock Creek (Hillsboro)		Expand and upgrade on an interim basis to meet standards by end of 1974. Further major expansion by 1979.
Forest Grove		Expand and upgrade to meet standards by June 1973.
Durham		Construct new major plant to meet standards by October 1972.

Intermediate Range Interim Facilities

Aloha (Major interim plant)		Expand and upgrade and maintain in service until phase out in 1979 by connection to expanded Rock Creek plant.
Primate Center		Improve treatment and go to summer land disposal until elimination in 1979.

Somerset West Improve plant and go to summer land disposal until elimination in 1979.

Short Range Interim Plants

Uplands Eliminate by end of 1971 by connection to Sunset Valley. (done)

Sunset Valley)

Tektronix)

Oak Hills)

Hillsboro Jr. High School)

Cedar Hills)

Beaverton)

Fanno Creek)

Metzger)

Tigard)

Peerless Truck & Trailer)

King City)

Southwood Park)

Sherwood)

Tualatin)

Eliminate by connection to Durham Plant prior to the low flow period of 1974.

Cornelius Eliminate by connection to Forest Grove.

On May 15, 1970 following successful formation and funding of the Unified Sewerage Agency, the ban on sewer connections was lifted on all existing plants having reserve treatment capacity. Other plants undergoing modifications had the ban lifted upon completion of such work.

provided it was completed prior to the low flow season 1971. Waste Discharge Permits were issued to all plants in the basin. Limitations were placed on effluent quality with the expectation that many of these plants would be phased out by the end of 1973. These waste discharge permits now need to be renewed.

Evaluation of Progress

Since formation of the Unified Sewerage Agency considerable progress has been made in the area of interceptor design and construction, interim plant expansion and upgrading and interties to increase flexibility of operation. Plans have been approved for first phase expansion of the Hillsboro Rock Creek Plant by the City of Hillsboro. The plans for the Durham Plant are presently being reviewed. Plans for the Forest Grove Plant expansion and the Cornelius-Forest Grove Intertie are also complete. However, the time schedule originally proposed in USA's implementation and financial plan is more than one year behind schedule at the present time. Construction has not yet started on the Durham Plant and related interceptors, the Hillsboro Rock Creek Plant or the Forest Grove expansion and intertie.

At least two reasons given for these delays are (1) the timing of formation of the Agency and the subsequent bond authorization election made it impossible to meet the 1970 construction requirements, and (2) the federal funding and receipt of grant monies coupled with the long-term Congressional action on the Federal Water Quality Act of 1972 are producing further delays. Also, there was some initial delay in site selection for the Durham Plant.

At the present time there is considerable uncertainty with regard to funding the federal grant portion of the approved projects, making it impossible to predict a construction schedule. The most optimistic schedule would require at least two more low flow seasons for operation of most of the interim facilities with construction extending to the summer of 1975.

The Federal Water Pollution Control Act Amendments of 1972 and implementation of this Act have significantly altered the construction grant program. Grants now must be 75%. Projects where construction is initiated without Federal Grant Program approval are disqualified from obtaining grants later. Projected funding is curtailed and no grant offers are being made at present due to an EPA freeze on funds. It is becoming highly doubtful whether any grants will be awarded within the next six or more months. EPA is altering the requirements which applicants must meet so frequently that it is becoming questionable whether anyone could qualify for a grant even if funds were released. This poses severe problems for all Oregon projects including those of USA.

The delays experienced to date have taken their toll in increased project costs. The \$36 million dollar bond issue approved by USA in 1970 was adequate to fund the ten year master plan construction program with the assistance of 30% federal grants. Today, most of that \$36 million is necessary to fund the same ten year program with the aid of 75% grants. Increased costs resulting from further delays may make it necessary to go back to the voters for more money.

Proposed Revised Construction Schedules

USA has provided DEQ with a proposed revision in major facility construction schedules as follows:

<u>Facility</u>	<u>Cost</u>	<u>Days to complete after receipt of Grant</u>	<u>Completion Date if Grant is offered by 7/1/73</u>
Durham Plant	\$14,046,375	730	7/75
Interceptors to Durham Plant	2,122,000	440	9/74
Cedar Mill Trunk	603,000	150	12/73

<u>Facility</u>	<u>Cost</u>	<u>Days to complete after receipt of Grant</u>	<u>Completion Date if grant is offered by 7/1/73</u>
Forest Grove Expansion	1,687,000	365	7/74
Cornelius-Forest Grove Intertie	331,600	270	4/74
Rock Creek Interim Expansion (by Hillsboro)	1,190,000	390	8/74

A number of other related interceptor projects with one-year construction schedules are also ready to proceed.

USA also has initiated initial work to accelerate the further expansion of the Rock Creek Plant and related interceptors from 1979 to 1977.

Interim Facility Evaluation

The delays experienced to date raise serious questions relative to capability of interim facilities to accommodate growth trends in the basin.

USA has provided DEQ with their evaluation of interim facility capacity available to accommodate new development. The detailed evaluation is complex due to the interties between plants. In general, USA's evaluation can be summarized as follows:

If construction of the plant is initiated immediately, and if the Rock Creek Plant expansion is accelerated from 1979 to 1977, and if the Sunset plant is allowed to continue operating at a somewhat reduced steady state loading rate.

at its present design efficiency until 1977, then, projected normal growth and development can be accommodated with minimal need for curtailment. If construction does not begin immediately on the Durham Plant, or if the Sunset Plant must be taken off line as soon as possible or if growth begins to exceed projection, severe building curtailments will be necessary.

DEQ's assessment of available interim plant capacities is perhaps less optimistic than is USA's. The treatment plants are being pushed to operate at the upper limits of design capacity. The projection of USA for the Fanno Creek Basin appears reasonable. The Metzger and Fanno Creek Plants are performing well. Assuming the growth rate projections are realistic and the Durham Plant is placed under construction immediately, the Metzger Plant should have capacity to handle the projected growth.

The DEQ staff is, however, very concerned about the Beaverton Creek Basin. The only plant which has any significant capacity for new connections is the Aloha Plant. If the Sunset, Tektronix and Oak Hills Plants are to be eliminated before the end of 1974 in accordance with the interim facility plan, most of the capacity in the Aloha system will essentially be utilized thus necessitating a significant building curtailment in the area. Water Quality Standards in the Upper Beaverton Creek Drainage Basin would not be met, however, until 1975 or later when the Durham Plant is completed and the Cedar Hills and Beaverton Plants can be eliminated. In order to avoid the building curtailment, USA would like to maintain the Sunset Plant in operation until 1977.

The Aloha Plant is presently experiencing operational problems which require immediate action to correct. The Sunset Plant also is

not performing properly due to both physical and operational problems. As a result, it is considered necessary to proceed with plans to eliminate the Sunset Plant as soon as possible unless a plan can be submitted to modify the plant to improve performance and reliability such that an approval can be granted for its continued use.

Evaluation of Water Quality

A recent survey of conditions in the Beaverton Creek drainage shows that degradation of water quality and violation of standards still exist as in past years. Such degradation and standards violations can be expected to occur until all plants discharging to Beaverton Creek are eliminated through implementation of the master plan. Similar conditions can be expected in the Fanno Creek Basin. However, pending completion of master plan facilities, it is very critical that existing plants be operated within their design capabilities and at peak efficiency so as to prevent a worsening of present water quality conditions.

Summary and Conclusions

1. Considerable progress has been made toward implementation of Master Plan facilities even though delays have been encountered.
2. Further progress is presently blocked by new EPA grant requirements and failure of EPA to release promised funds and award grants so construction can begin.
3. Water Quality Standards in the Tualatin Basin will continue to be violated until Master Plan facilities are completed and all discharges to the Tualatin River tributaries are eliminated. By diligent operation of existing facilities and limitation of new connections to stay within design capacities, further degradation of water quality can be prevented.

4. Correction of operational problems at some facilities is needed. In particular, sludge disposal at most plants is a problem which requires immediate attention.

Director's Recommendations

The Director's recommendations are as follows:

1. The general revised implementation schedule for Master Plan facilities should be approved. This includes delay of completion of the Durham Plant until July 1975 and acceleration of the Rock Creek Plant to December 1977. Deadlines for phase out of interim plants must be adjusted accordingly.
2. If the Durham Plant is not placed under construction by July 1, 1973, USA should be required to immediately develop and submit to DEQ a program for curtailment of building in the Fanno Creek Basin so as to assure that treatment facilities are not overloaded.
3. USA should be required to immediately further evaluate the facilities in the Beaverton Creek Basin and propose a revised plan for control of connections pending completion of the Master Plan facilities in 1977.

Such program and plan should evaluate and present alternatives which include phasing out the Sunset, Oak Hills, and Tektronix Plants and improving and maintaining one or more of the plants in operation under reduced loading condition until 1977.
4. Renewal Waste Discharge Permits should be issued immediately for all sewage treatment plants in the Tualatin Basin. Conditions of these permits should require greatly improved monitoring and reporting of operations including sampling of

the stream quality above and below each discharge. Permits should allow connections only where demonstrated capacity exists and should also clearly allow DEQ to prohibit or curtail connections to any plant where violations occur or where it appears that permit conditions and standards may not be met.

5. USA should be required to submit to DEQ within 60 days a detailed interim plan for handling and disposal of sludge from all treatment plants within the Agency.



DIARMUID F. O'SCANNLAIN

HLS:ak

April 19, 1973

SUGGESTED RESOLUTION FOR ENVIRONMENTAL QUALITY COMMISSION:
(4/30/73)

The Environmental Quality Commission at its meeting April 30, 1973, in Salem, Oregon, goes on record as deploring the failure of the U.S. Environmental Protection Agency to release sewage treatment plant construction funds for projects long scheduled for construction. EPA's position appears to be unduly legalistic and fails to recognize that Oregon could lose one entire construction year with consequent increased costs and would be forced to impose a building ban on one of the fastest growing areas of the state. The Environmental Quality Commission urges that EPA issue interim regulations and authorization to meet this critical situation for Oregon and all other states.

The Commission hereby instructs the Director of the Department of Environmental Quality to continue vigorous efforts toward achieving a release of such funds.



DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5395

TOM McCALL
GOVERNOR

MEMORANDUM

DIARMUID F. O'SCANNLAIN
Director

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. G(a), July 26, 1973, EQC Meeting
Proposed Portland State University 150-space Parking Facility

Background

At the July 27, 1972, meeting of the EQC, the Commission deferred action upon the application of Portland State University to construct a parking facility for 160 cars near the Stadium Freeway on the P. S. U. campus in downtown Portland. The Commission requested that Portland State University complete an in-depth review of its current parking policy and requirements prior to further Commission action on the proposed parking facility.

On July 9, 1973, the Department received a letter from Portland State University delineating the results of an extensive transportation study undertaken by the University and requesting Commission action on a proposed 150-space parking facility.

Portland State University proposes to construct a 150-space surface parking facility on the block bounded by S. W. Twelfth,

S. W. Thirteenth, S. W. Montgomery and S. W. Market Streets. The site is presently occupied by a 90-space surface parking facility. Construction of the proposed facility will increase the parking supply on the site by 60 spaces ($150-90 = 60$).

The University further proposes to close a 117-space parking facility it operates on the block bounded by S. W. Harrison, S. W. Hall, S. W. Tenth and S. W. Eleventh Streets. This closure in conjunction with the proposed construction will result in a net decrease of 57 parking spaces on the campus ($60-117 = -57$). The University parking space inventory on-site will be reduced from 2,232 to 2,175 spaces.

In addition, the University has agreed to modify the present planning guideline of providing one parking space on campus for each three full-time equivalent (FTE) students. Under the modified guideline, the 1:3 ratio will be maintained by including off-site (park-and-ride) as well as on-site parking controlled by the University. The present off-site parking capacity is presently 1,400 spaces. Thus, the total parking supply will be 3,575 spaces ($2,175 + 1,400 = 3,575$) upon completion of the proposed project. Parking supply required by the modified guidelines is shown below:

<u>Year</u>	<u>FTE Students</u>	<u>Req. Parking by 1:3 Ratio</u>	<u>Campus Parking</u>	<u>Off-Campus Parking</u>	<u>Total Park.</u>
1973	9,348	3,116	2,175	1,400	3,575
1980	11,417	3,810	2,175	1,635	3,810

As can be seen, if the University increases its present off-campus parking supply by 235 spaces, it can meet the 1:3 ratio through 1980.

Discussion

The parking facility construction and closure proposed by Portland State University will meet the requirements of the Portland Transportation Control Strategy that the present supply of parking in downtown Portland not be increased.

The modified parking guideline proposed by the University will meet the requirements of the Portland Transportation Control Strategy if the increased parking required by the 1:3 ratio is provided off-campus through 1980.

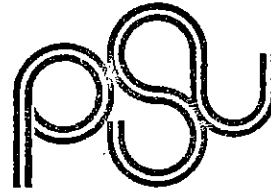
Director's Recommendation:

The Director recommends that the proposed 150-space parking facility be approved for construction with the following conditions:

1. The 117-space parking facility on Block 239 be closed prior to opening the 150-space facility.
2. The modified parking guideline be implemented such that required increases in parking supply be confined to off-campus sites.


DIARMUID F. O'SCANNLAIN

MJD:c
7/18/73



July 6, 1973

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED
JUL 10 1973

AIR QUALITY CONTROL

PORTLAND
STATE
UNIVERSITY
p.o. box 751
portland, oregon
97207
503/229-3738

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

Subject: Request for Permit to Improve Parking Lot
Portland State University

physical plant

Gentlemen:

On July 25, 1972, representatives of Portland State University appeared before the Environmental Quality Commission to gain a construction permit to proceed with the improvement and expansion of a surface parking facility located on Block B, Portland Addition, bounded by S.W. Market and Montgomery Streets and S.W. 12th and 13th Avenues. The site is within the boundaries of Portland State University, and the improvement had been previously approved by the City of Portland Planning Commission by issuance of a conditional use permit.

The Environmental Quality Commission reviewed the DEQ staff recommendations against the improvement and deferred action. The Commission requested that the University restudy its parking and transportation plans in light of emerging environmental programs, City of Portland planning for the downtown area, and other pending developments. The University was to return to the Commission when this study was complete and the application would be reconsidered.

A study was commissioned in September, 1972, and several in-depth field analyses were conducted in September and October, 1972. In addition, evaluations of the planning of others was reviewed, and discussions were held with various City agencies and their consultants concerning these matters.

In January, 1973, the University's consultant published a report with recommendations for revisions to the policies and guidelines for parking and transportation. Since January these recommendations and others have been considered by many groups within the University.

A copy of the University's study is enclosed for review. Additional copies are available upon request.

Significant findings of the report include data which do not support previous contentions that significant surplus parking capacity exists

in the general vicinity of the University. The report also indicates that the site of the proposed facility is not in excess of 1975 air quality standards, although areas immediately adjacent do exceed standards. Indications are that much of this excess is not attributable to automotive traffic in the area, but due to meteorological conditions which exist from time to time. Conditions can develop wherein the intersection of S.W. 12th and Market can measure three times the CO concentration compared to the CWAPA monitoring site at S.W. Broadway and Burnside, while the 12th and Market intersection has but one-third the traffic measured at Broadway and Burnside. Wind conditions are considered as the cause.

After review of the study, the University has reaffirmed its previous planning guidelines of locating parking facilities at the perimeter of the campus, rather than in the central areas. The proposed project is intended to accomplish that goal. However, at the time of first application the University intended, through the improvement, to expand the capacity of the facility from its present 90 spaces to 150 spaces, which would have yielded a net gain of 60 spaces to the University inventory of 2,232 spaces. After consideration by various University groups, it is now intended that existing facilities of equal or greater capacity will be removed from parking to offset the increase which this improvement would provide. Therefore, the University proposes to close its facility on Block 239, bounded by S.W. Harrison and Hall Streets and S.W. 10th and 11th Avenues. This closure will eliminate 117 spaces, or provide for a net decrease of 57 spaces after the proposed improvement. The University parking space inventory on-site would be reduced from 2,232 to 2,175 spaces.

Additionally, the University has committed itself to continuing the remote parking operation which it has pioneered, and to explore ways and means of revitalizing that program and expanding it. The University has initiated with the City Traffic Engineer a request to remove on-street parking on S.W. Market and Clay Streets from S.W. 4th Avenue west to S.W. 13th Avenue and the redesignation of those roadways to three traffic lanes in order to facilitate the movement of traffic on those major arterials and remove the impedance of curb parking. A desirable effect of this reduction in on-street supply should be an increased usage of remote parking availability or public transportation. The City Traffic Engineer has endorsed the University request and has asked the Mayor's Office to approve the plan for August 20, 1973, implementation.

Student groups within the University are pursuing projects which will encourage use of remote parking and public transportation. All new students enrolling this Fall Quarter will be exposed to transportation alternatives and encouraged to adopt them.

During previous consideration of the University's request by both CWAPA and DEQ, and in various planning publications which have emerged in recent months, much was made of the University's planning guideline of providing


July 6, 1973

one parking space for each three full-time equivalent (FTE) students. Delew Cather, in its programs for the downtown city, suggested parking supply factors related to building area. Application of those factors to the actual building area of the University would, in fact, provide greater supply than the 1:3 guideline.

The University, after much deliberation, has agreed to modify that planning guideline so that the supply generated on the 1:3 ratio will include off-site as well as on-site parking controlled by the University; or, in other words, the parking supply to be provided on-campus will be discounted by the supply available through University-controlled off-campus lots. This off-campus capacity is presently 1,400 spaces, although 400 spaces sited at the Westgate Theater property in Beaverton appears in jeopardy because of other construction adjacent to that lot. The University is seeking additional sites, including the area under the west end of the Fremont bridge and others.

In light of these positive actions by the University to implement changes in transportation patterns and to hold the line on parking supply provided on-site, it is respectfully requested that we be given the permission necessary to proceed with the proposed improvement, and in time so that the work can be accomplished before September 25, 1973.

Very truly yours,



W. C. Neland, Director
Physical Plant

WCN:prl

Encl.

cc: W.T. Lemman, Jr.



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. G(b), July 26, 1973, EQC Meeting
Proposed Valley River Center, 872-Space Parking Facility

Background:

On June 1, 1973, the Department received a letter from the Lane Regional Air Pollution Authority delineating their analysis of and recommendations for the proposed addition of 872 parking spaces to the Valley River Center Shopping Center in Eugene.

Valley River Center proposes to construct 872 additional parking spaces to serve patrons of two new department stores and some smaller specialty shops which are being added to Valley River Center.

The Department requested additional information concerning the proposed project and in a letter dated June 25, 1973, Valley River Center granted an extension of time for the Department, Valley River Center and Lane Transit District to obtain this information.

On July 3, 1973, the Department, LRAPA, Valley River Center, Lane Transit District and Lane Council of Governments met to discuss means by which additional transit service and incentives could be developed for Valley River Center.

Lane Transit District presently has four lines serving Valley River Center. LTD estimates that approximately 1350 person trips daily are made to Valley River Center. This is approximately 5% of the total person trips daily to Valley River Center. LTD indicates that the Valley River Center lines are heavily patronized.

On July 17, 1973, the Department received a letter from Valley River Center providing additional information on new transit service and transit use incentives. Valley River Center reported that Lane Transit District has decided to extend bus operating schedules until 10:00 p.m. at night and add at least one new line to Valley River Center.

Valley River Center has also developed a program to promote use of the transit system as outlined below:

1. Valley River Center advertising sections in local newspapers will provide information to show how a person may ride a bus to Valley River Center.
2. Valley River Center will meet with individual store owners to determine methods by which employees may be encouraged to ride the bus to Valley River Center.
3. Valley River Center will purchase bus tokens in bulk lots at reduced rates. Display cards will be provided in each store to inform the customers that tokens are available at reduced rates.

Discussion:

The Lane Regional Board of Directors have recommended that the proposed parking facility construction be allowed to proceed because the impact upon air quality will not be sufficient to cause violations of present air quality standards.

The Department agrees with the LRAPA analysis that the construction of the proposed parking facility will not cause violations of present air quality standards. However, the Department is concerned about the apparent upward trend in carbon monoxide levels in Eugene

illustrated in Figure 1 and the level of construction activity in the Valley River Center area shown below:

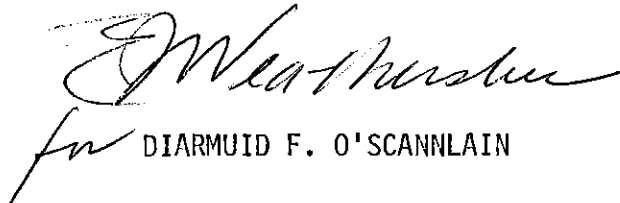
<u>PROJECT</u>	<u>PARKING SUPPLY</u>
1. Valley River Center	3,619
2. Valley River Center (expansion)	872
3. Valley River Inn (under construction)	481
4. Eugene Office Park (proposed)	<u>285</u>
	5,257

A large area surrounding the Valley River Center project is identified in the Eugene-Springfield Metropolitan Area 1990 General Plan as an "opportunity area". Opportunity areas are defined as "...land area of existing unique characteristics suitable for large scale developments or redevelopments...". Thus, the Department is encouraging the expansion of transit service to this area and development and implementation of positive incentive programs by developers for increasing transit patronage. Further, the Department will request Lane Council of Governments, Lane Transit District and Lane Regional Air Pollution Authority to undertake an air quality/mass transit planning effort for this area immediately to ensure maintenance of air quality standards and adequate transit service.

Director's Recommendation:

The Director recommends that the proposed 872-space parking facility be approved for construction according to the plans and specifications submitted, with the following condition:

1. Valley River Center develop and implement the transit ridership incentive programs outlined in its letter of July 12, 1973 attached.


for DIARMUID F. O'SCANNLAIN

Attachments:

Figure 1

7/12/73 Valley River Center letter
5/30/73 LRAPA letter

MJD:h 7/19/73

EUGENE CAMS CARBON MONOXIDE DATA 1971-73

ELEVENTH AND WILLAMETTE STREETS

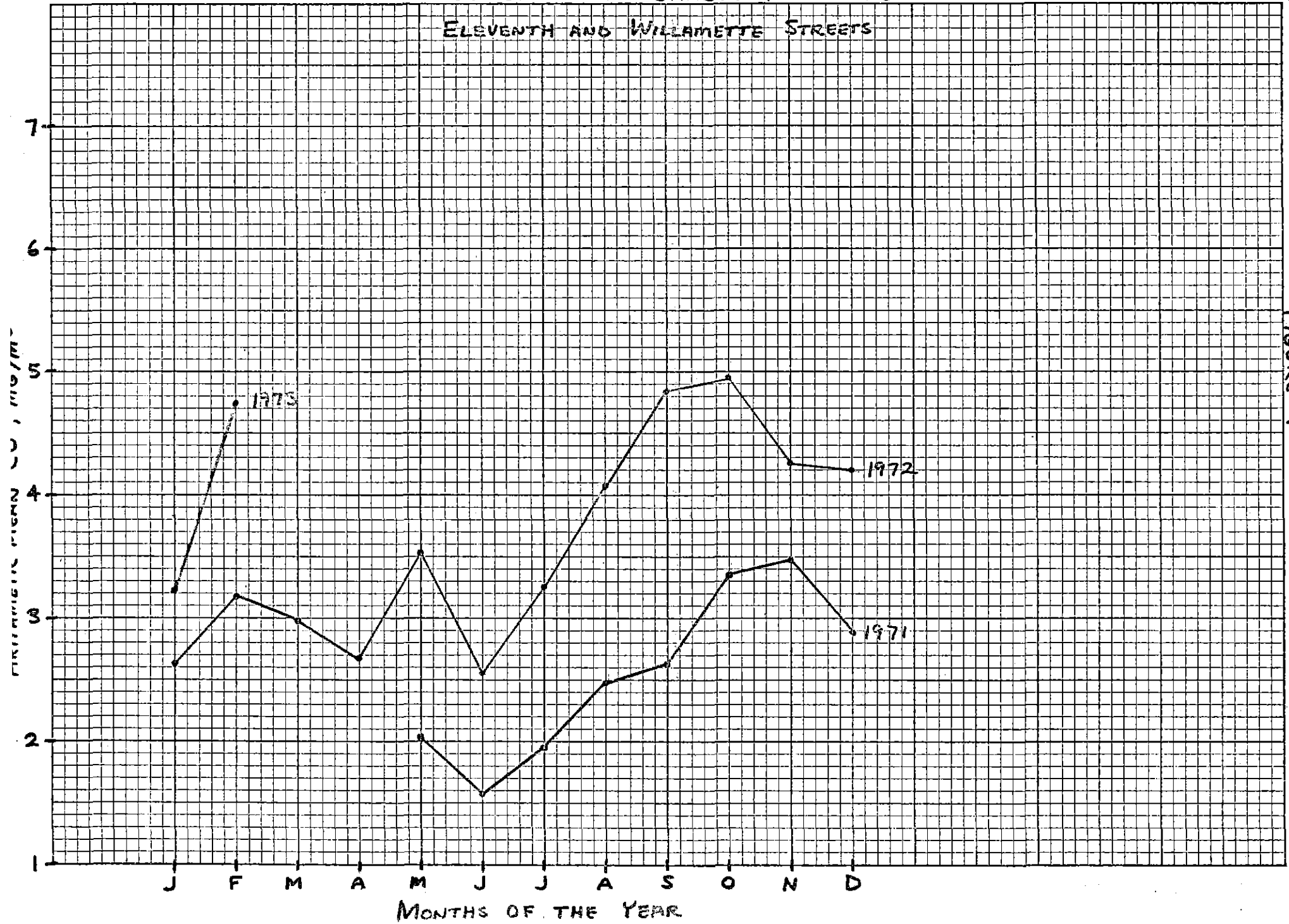


FIGURE 1



EXECUTIVE OFFICES
EUGENE, OREGON 97401
PHONE 342-6556

July 12, 1973

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

Dear Mr. O'Scannlain:

We have recently submitted an environmental impact study to you with regard to the expansion of Valley River Center. Our plans are to add two department stores and some smaller specialty stores in this expansion. Under existing agreements with Meier & Frank and J.C. Penney's we must provide and maintain a parking ratio of 5.66 parking stalls for each 1,000 square feet of leasable space; this requirement is part of all of our leases.

We are proposing to add 872 additional parking stalls to Valley River Center. These stalls will provide the additional parking requirements for the construction of the addition to Valley River Center. Since most of the construction shall occur on the existing parking area, we will have to replace an additional 503 parking stalls which will be eliminated by these buildings. Presently we have 3,619 parking places; the additional 872 places will provide 4,491 parking places and will provide the minimum parking required under our previous agreements. Enclosed is a layout of the expanded center.

Mr. Downs of your department called a meeting on Tuesday, July 3. Attending this meeting were members of the Lane Council of Governments; Mr. Fred Dyer, manager of the Lane Transit District, and his assistant; my partner, Mr. H.A. Andersen; our shopping center manager, Mr. Richard Hansen, and myself. Mr. Downs asked what we are doing to encourage mass transit use.

In reviewing our past association, I feel there has been a cooperative atmosphere between Lane Transit District and Valley River Center. When Valley River first opened, we encouraged Lane Transit to provide bus service to the Center. As part of this program Valley River Center purchased advertising on the buses.

Just prior to the new Transit buses being placed into use Valley River was asked to display a bus for inspection by the general public. This bus was placed in the center of the mall, and many thousands of people had the opportunity to sit in this modern bus and to have their questions answered. Each store was provided with new bus schedules for their customers' and employees' uses.

Mr. Diarmuid O'Scannlain
Department of Environmental Quality
Page 2
July 12, 1973

With the additional buses the Lane Transit District was able to direct additional service to Valley River in about October, 1972. Since that time I believe the number of riders on these lines has been equal to that on any within the system.

Approximately three months ago Mr. Dyer, Mr. Hansen and Mr. Jerry Schmidt of Advertising Services, the agency handling Lane Transit District, met at Mr. Hansen's suggestion. The purpose of this meeting was to discuss more ways to increase the number of Valley River customers and employees who ride the bus.

A major problem exists in that the bus service ends at 6:00 p.m. and does not operate on Sundays. Valley River Center is open until 9:00 p.m. daily and also on Sundays. Mr. Dyer indicated that he hoped to extend service to 10:00 p.m. and on Sundays in the near future.

To further increase the number of riders we suggested that additional bus lines feed directly into Valley River before going to the downtown area so that transferring could be eliminated.

Also during this meeting there was general discussion of promotional activities that Lane Transit District and Valley River Center could initiate. It was our impression that we all agreed that when the increased scheduling occurred, we should start our campaign.

After Mr. Dyer's and Mr. Hansen's meeting, Mr. Hansen met with the Board of Directors of the Valley River Merchants Association concerning use of the transit system. This Board consists of representatives of the two major department stores plus four other small merchants. This Board indicated a strong desire to work with the Lane Transit District in this project. Since our meeting with Mr. Downs, Mr. Hansen has again met with the local management of Meier & Frank and J.C. Penney's and has discussed the concern of the D.E.Q. in the promotion of customer usage of the transit system. Both have again indicated a desire to cooperate.

In the past few days Mr. Dyer has notified us that the bus operations will be increasing to 10:00 p.m., and an additional bus line will be directed to Valley River Center.

It is to our benefit to encourage people to use the transit system. During peak periods we often do not have sufficient parking to handle the customers who desire to park in close. There are also many people who do not own automobiles who desire to shop at Valley River.

To help promote the use of the transit system we have established the following program to encourage bus ridership: first, in our advertising sections we shall provide information to show how a person may ride a bus to Valley River; this will be on a continuing basis. With the coming of extended bus service we shall meet with each store owner to encourage their employees to use this service. We know there are many employees who find the schedules and bus routes difficult for them to use. We shall seek the employees' suggestions on scheduling and bus routes and any other information that would make it easier for them to use the bus. This information shall be forwarded to the Lane Transit District.

Mr. Diarmuid O'Scannlain
Department of Environmental Quality
Page 2
July 12, 1973

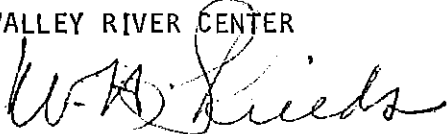
The Lane Transit District allows a discount on bulk purchases of bus tokens of \$1,000.00. We shall, by August 1, 1973, make an initial purchase of tokens. We shall make display cards for each store to use which will inform the customers that tokens are available at a special price.

In the past both the Lane Transit District and Valley River Center have worked together. I wish to assure you that in the future we shall continue to cooperate with the Lane Transit District to encourage bus usage.

I hope that you will act favorably on our request for the additional parking to expand our shopping center. The ratios that are set forth are the minimum ratios we must maintain if we are to expand.

Sincerely yours,

VALLEY RIVER CENTER



W. H. Shields

WHS/kpc

cc: Mr. Mike Downs, Department of Environmental Quality
Mr. Fred Dyer, Lane Transit District
Lane Regional Air Pollution Authority, Mr. Vern Adkinson

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

May 30, 1973



Michael Downs
Air Quality Control
Department of Environmental Quality
1234 S.W. Morrison
Portland, Oregon 97205

Dear Mike:

At the meeting of our Board of Directors on May 29, 1973, the following parking facilities were discussed:

1. Valley River Center, Eugene, Oregon

The proposed construction is 1040 short-term parking spaces to accommodate the shoppers who will be attracted by the addition of 187,000 square feet of gross floor area.

Carbon monoxide emissions from automobiles in the 0.2 mile square area surrounding the Delta Freeway-Goodpasture Island Road interchange have been projected to be 0.89 tons per day after completion of the addition. This is well below the 1.8 tons per day which is necessary for violation of the primary ambient air standard.

Ventilation along the river is good and should, under ordinary conditions, readily disperse the carbon monoxide.

Our Board of Directors feels that construction of this lot will not cause the quality of the air in the area to deteriorate to a dangerous level and therefore recommends approval of construction.

2. Courthouse and Federal Office Building, Eugene, Oregon

The proposed construction is for 148 spaces on the half-block east of High Street, between 6th and 7th Avenues. The building will occupy the adjacent block west of High Street. The lot will consist of 70 spaces for government vehicles, 20 spaces for visitors, and 58 spaces for employees.

Michael Downs
May 30, 1973
Page 2

Carbon monoxide emissions from automobiles in the 0.2 mile square area have been projected to be 1.66 tons per day after completion of the project in October, 1974. This is slightly below the 1.8 tons per day which is necessary for violation of the primary ambient air standard.

Employee parking has been limited to encourage the use of mass transit. There is no access to the lot from 6th and 7th Avenues to prevent the unnecessary slowing of traffic.

Our Board of Directors feels that construction of this lot will not cause the quality of the air in the area to deteriorate to a dangerous level and therefore recommends approval of construction.

I have not included a copy of the EI's as Mr. Patterson of your office has indicated that you have already received a copy. We received our copy on April 20, 1973.

Sincerely,



David M. Baker
Assistant Engineer

DMB:jd



DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. G(c), July 26, 1973, EQC Meeting
Proposed Habitat Sylvan Hills 1422-Space Parking
Facility, Washington County

Background:

On July 9, 1973, the Department received an application from Forchuck/Wold/Peyton Builders and Developers to construct 1422 parking spaces in conjunction with the construction of a planned unit residential development known as Habitat Sylvan Hills.

Habitat Sylvan Hills is to be a 711-unit, 1412 person, residential community located between Sunset Highway and S. W. Barnes Road near the intersection of S. W. Miller Road in east Washington County. Figure 1 illustrates the general location of the project.

On July 12th and 13th, the Department met with representatives of the project developers to discuss the Department's concern that adequate mass transit service be available at Habitat Sylvan Hills when it is opened.

On July 13, 1973, the Department received a copy of a letter sent by the project developers to the Tri-Met Board of Directors requesting that Tri-Met provide adequate transit service to Habitat Sylvan Hills. To date, the Tri-Met Board has not officially responded to this request. A copy of the letter is attached.

Discussion:

The Department is concerned that projects, such as Habitat Sylvan Hills, are provided with adequate mass transit service such that project residents will not be forced to make every trip outside the project by automobile, especially trips to downtown Portland. Further, the Department is concerned that the site chosen for such projects not preclude the opportunity for providing transit service by locating in areas where it is not feasible to provide service.

At the present time, Tri-Met's Cedar Mill line operates on Barnes Road within 1/2 mile of the proposed project. Representatives of the project developers and presumably Tri-Met are presently studying the feasibility of extending the Cedar Mill or other lines to loop through the project. One disadvantage of using the Cedar Mill line is that riders would be taken west, approximately 1 1/2 miles out of their way, before turning east towards downtown Portland.

Another, possibly more attractive alternative, involves the construction of exclusive bus pull out lanes in conjunction with small kiss-and-ride parking lots and a pedestrian overpass on Sunset Highway at S. W. 76th Avenue. This proposed express bus stop is approximately 1/4 mile from the Habitat Sylvan Hills site. The developer would probably have to provide shuttle bus service to the express bus stop for its residents in order to make the bus service on Sunset Highway a viable alternative to automobile trips.


The Washington County Board of Commissions has officially adopted the Sunset Highway kiss-and-ride express bus stop plan and requested the Oregon State Highway Division to proceed with its development in lieu of the freeway interchange OSHD had originally proposed for S. W. 76th and Sunset Highway. A copy of the Washington County proposal is attached.

On July 19, 1973, the Department sent a letter to the OSHD supporting the Washington County proposal and requesting early action by OSHD to implement it.

Director's Recommendation:

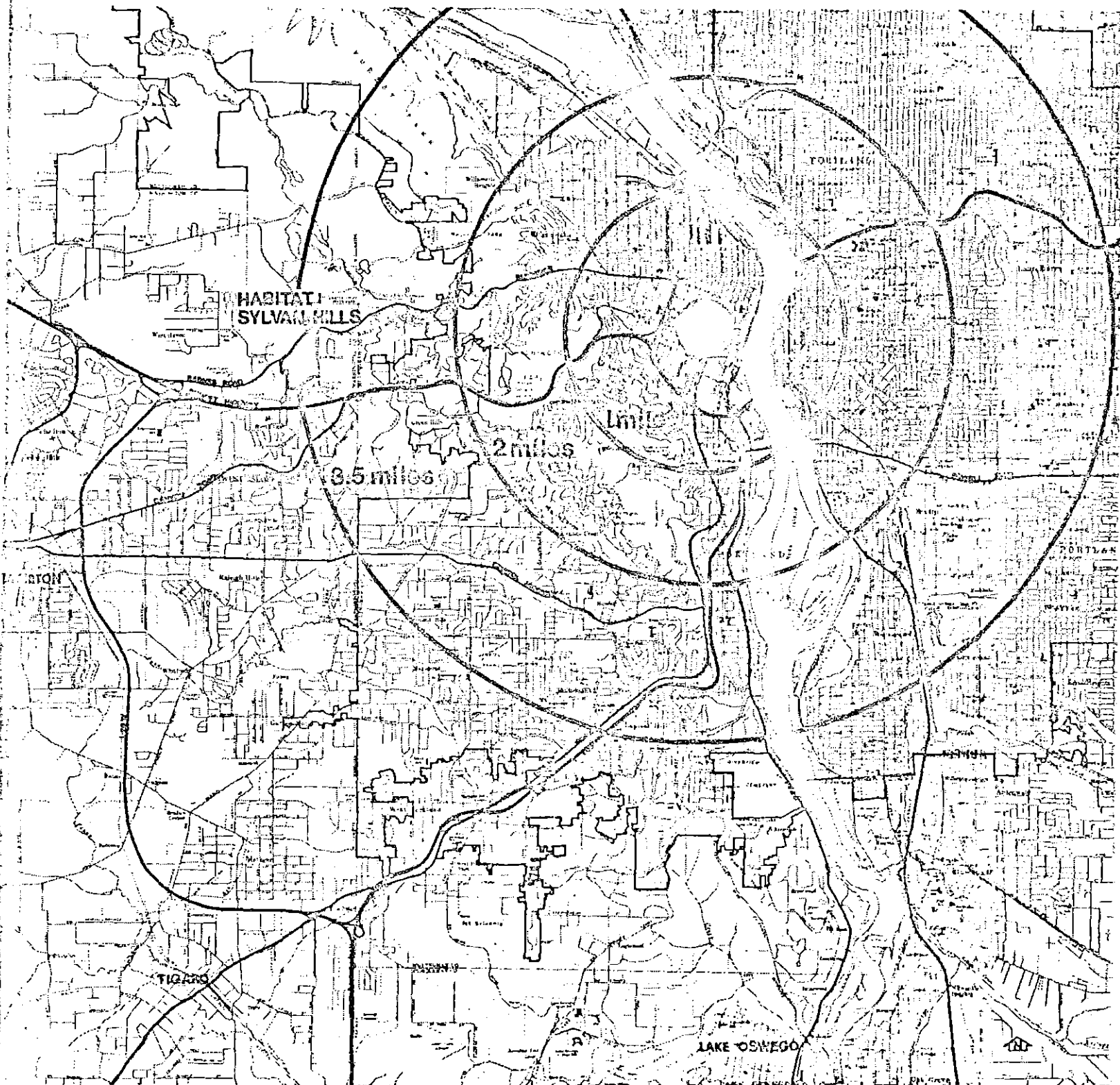
In view of the fact that the location chosen for Habitat Sylvan Hills is apparently in proximity to feasible mass transit alternatives, the Director recommends that the July 9, 1973 application be approved for construction according to the plans and specifications submitted, with the following condition:

1. The developers, Forchuk/Wold/Peyton, provide the Department with an acceptable transit plan and implementation time schedule to service Habitat Sylvan Hills with mass transit when it opens. The plan and time schedule will be submitted no later than October 26, 1973.


for DIARMUID F. O'SCANNLAIN

Attachments: Figure 1, Map
N/C
Letter dated 7/13/73
Washington County staff report

FIGURE 1



June 14, 1973

TO: Washington County Board of Commissioners
Washington County Planning Commission

FROM: Martin R. Cramton, Jr., Planning Director
Arthur J. Schlack, Senior Planner

SUBJ: PROPOSED AUSTIN ROAD (S.W. 76th AVENUE) SUNSET HIGHWAY INTERCHANGE
STAFF REPORT

PURPOSE

The purpose of this study is to evaluate the proposed designed interchanges for Austin Road which are currently being considered by the Oregon State Highway Department, and to identify recommendations which Washington County can convey to Environmental Section of the State Highway Department to be incorporated into their evaluation of the proposed facility.

HISTORY

The Oregon State Highway has for some time considered a project to provide fully controlled ingress and egress to that portion of Sunset Highway between the Beaverton-Tigard Highway Interchange and the Canyon Road-Tualatin Valley Highway Interchange. A plan was prepared for a split diamond type interchange and frontage roads to serve all of the public roads in the area, as well as the cemetery, and a draft environmental statement was issued to obtain input from local jurisdictions and interested citizens.

Analysis of the proposed interchange and subsequent alternatives revealed two major problems. One, the cost of providing a full interchange was more than could be programmed for in the foreseeable future, and two, the cost-benefit ratio of the proposed project was questionable.

CURRENT STATUS

Recently representatives of the Environmental Section of the Oregon State Highway Department contacted the staff of the Washington County Planning Department for information and comment on revised interchange proposals for the Austin Road area which they were in the process of evaluating and drafting an Environmental Impact Statement.

PROPOSED ALTERNATIVE INTERCHANGES

Alternative Plan A:

A controlled access and frontage road system which provides for an acceleration and de-acceleration lanes on the north and south sides of the Sunset Highway at Austin Road. Access to the cemetery is provided via an acceleration - de-acceleration lane. No provision is provided for to accommodate north-south movements across Sunset Highway to link the established and future residential communities. The estimated cost of Plan A is \$655,000.00.

Alternative Plan B:

A split diamond type interchange and frontage road system providing service to all public roads in the area, and the cemetery. A vehicular overpass is provided east of Austin Road providing for north-south movements across Sunset Highway. The estimated cost of Plan B is \$3,575,000.00.

STAFF FINDINGS

- A. Left turn movements from Sunset Highway have been eliminated by the Oregon State Highway Department.
- B. Sunset Highway is the major facility providing access to downtown Portland in Washington County. This facility, which has a design capacity of 90,000 average daily trips, is rapidly reaching its maximum potential as its current loadings are reaching 55,000 average daily trips; and a peak hour, peak direction volume of 4,500 vehicles. Additional information from the Oregon State Highway Department indicates that Sunset Highway is operating at capacity in the east bound lanes, east of the Canyon Road-Tualatin Valley Highway Interchange, and that the entire facility will be at capacity within three years.
- C. South of the Sunset Highway the subject area is developed as a single family residential community. Access to the Sunset Highway is provided through the residential district on local residential streets which meander through the residential area. Right turn traffic movements are permitted on to, or from the Sunset Highway.
- D. The subject area north of Sunset Highway contains a cemetery, sporadic single family residential units in the Austin Road area, and a large amount of undeveloped land. However, the Habitat development which has been approved by Washington County for 711 housing units will be under construction this fall. This new community located at the northern extension of Austin Road was approved upon condition that access to the development could not utilize Sunset Highway and Austin Road.
- E. Forest Park Estates, a proposed planned unit development encompassing approximately 775 acres is located north of the Cornell Road. The development of this property and other large parcels in this vicinity will be seeking access to downtown Portland and the City of Beaverton. The two arterials serving this area, Cornell and Barnes Road, are two lane facilities with a vehicle design capacity of 8400 ADT (average daily traffic). Traffic counts indicate approximately 8500 to 9000 vehicles are using these arterials currently which indicates that facilities are operating beyond their capabilities.

Preliminary study has been given to possibility of connecting Cornell Road to Barnes Road using the existing Miller Road alignment and then southerly to the Sunset Highway via a new roadway intersecting in the vicinity of Austin Road (SW 76th). However, access restrictions placed upon the approval of the Habitat Development precludes the development of a collector or arterial through this property and thereby limits the feasibility of providing for the extension of Miller Road.

- F. The citizens of Washington County in their report, Goals, dated September 1972, stated the transportation goal of the County should be:

"To establish a balanced, efficient and convenient transportation system providing for safe, pleasant and economical movement of people and goods which implements the Land Use Plan and is developed with environmental, aesthetic and social impacts as major locational determinants."

- G. Washington County's projected population by 1990 ranges from 307,000 to 370,000 people based upon a balanced or bedroom community. At present about 80% of Washington County residents working outside of the County commute to Portland. Assuming this percentage and present car occupancy of 1.3 persons, approximately 44,100 cars would commute to Portland by 1990 requiring an additional 11 to 21 freeway lanes in peak directions. It would be impractical to provide these lanes in view of the geographical environmental, social and economical constraints which are operating in our community.
- H. The proposed public transit system implemented by Tri-Met for Washington County will include park and ride stations and exclusive transit lanes which will provide opportunity to increase accessibility to downtown Portland without additional freeway lanes.

STAFF RECOMMENDATION

Based on the staff's review and findings, we recommend that alternative Interchange Plans A and B be discarded in favor of Plan C, which is described as:

Alternative Plan C:

A frontage road system providing access to a Kiss and Ride Station located at Austin Road, which is serviced by a diamond type acceleration and deceleration lanes which is utilized for the exclusive use of public transit vehicles only. Vehicular access to and from Sunset Highway would be eliminated from existing and developing residential neighborhoods.

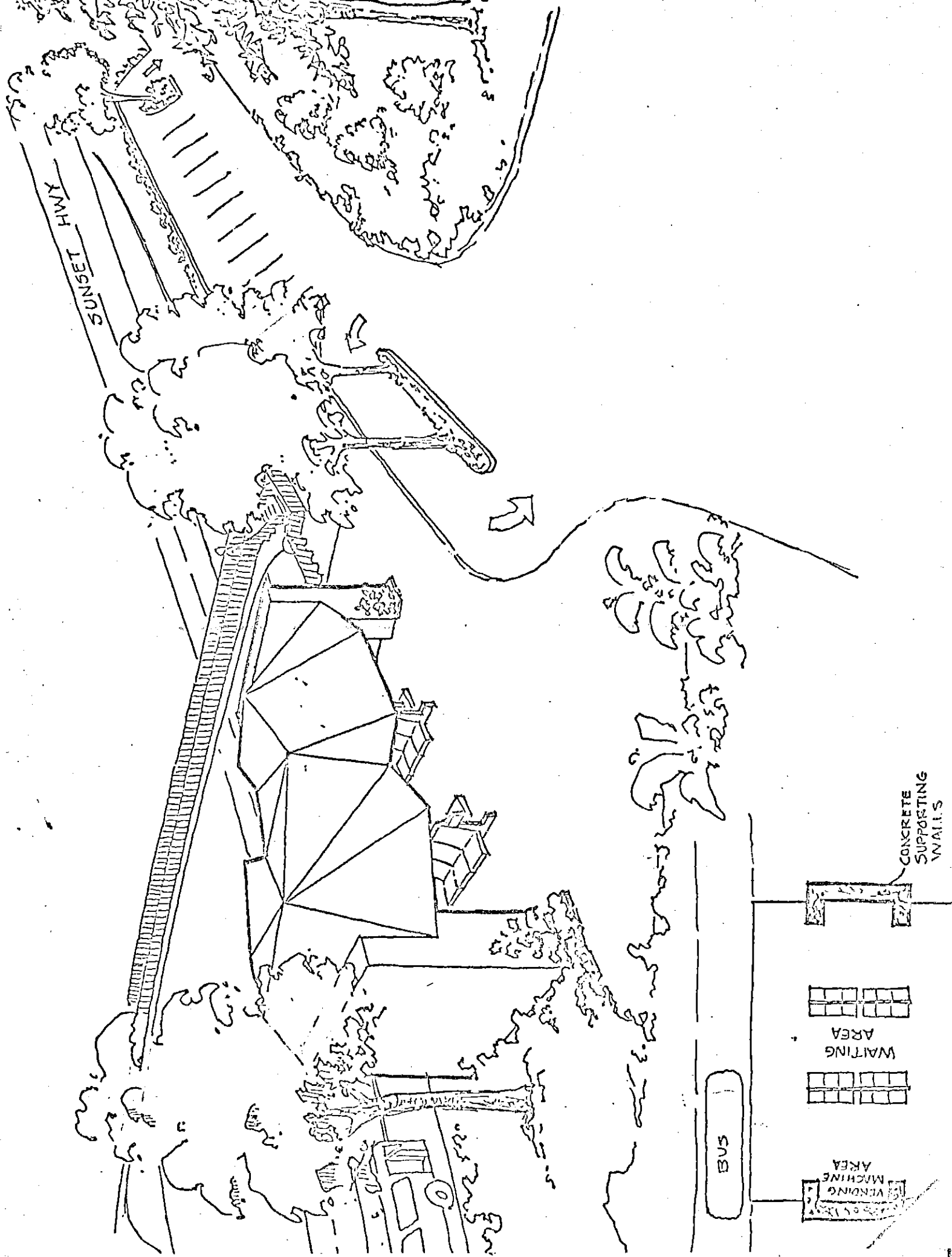
The Kiss and Ride Station would include a sheltered pedestrian waiting structure on the north and south sides of Sunset Highway and be linked by a pedestrian overpass. Pedestrian shelters may include benches, food concessions, newspapers and public service informational areas.

Alternative Plan C recognizes the following:

- A. The limited carrying capacity of the Sunset Highway corridor due to natural, physical and economical constraints for automobile service.
- B. The need to provide a total transportation system for the residents of Washington County, including public transit.
- C. The need to maintain the carrying capacity of Sunset Highway by limiting the number of ingress and egress points to the freeway.
- D. The close proximity of the Beaverton-Tigard and Canyon Road-Tualatin Valley Highway Interchanges to the proposed facility.
- E. The need to provide a choice in the mode of transportation from residential neighborhoods to the Portland Central Business District which is convenient, expedient, economical, and dependable.

- F. The need to plan and program facilities that will compliment and service the proposed public transit system to be implemented by Tri-Met;
- G. The excellent suitability of Sunset Highway for the provision of "Kiss and Ride" Stations as elements of a total transportation system providing a choice in the modes of travel for the citizens of Washington County; and
- H. The investment in further developing and augmenting freeway systems, and the exclusion of public transit facilities as augmentation facilities will continue a reliance on the automobile and lead to a continuation of urban sprawl.

MRC:lh



FORCHUK/WOLD/PEYTON

Builders and Developers

1303 Southwest 16th Avenue • Portland, Oregon 97201 • Telephone: (503) 222-9591

July 13, 1973

Mr. William E. Roberts
Chairman
Board of Directors
Tri-Met
c/o B and D Development Company
Jackson Tower
806 Southwest Broadway
Portland, Oregon 97205

Dear Sir:

A new residential community is to be provided in Eastern Washington County on the southwesterly slopes of the west hills overlooking the Tualatin Valley, a community of the size and density to justify the inclusion of facilities and services necessary to enhance the livability of the entire development and minimize the need for the inhabitants to seek off-site services. In keeping with this concept, we have conceived on-site, convenient circulation that accomodates the Tri-Met public transportation system to promote an alternative transportation mode in lieu of private automobiles to downtown Portland.

"Habitat Sylvan Hills" is a 711-unit, 1412 person, residential community located between the Sunset Highway and Southwest Barnes Road near the intersection of Southwest Miller Road. Separate systems of roads, bicycle lanes and pedestrian paths connect amenities and services consisting of parks, green ways, picnic sites, parking areas, recreation and entertainment facilities, administration building, community center, dry cleaners, laundries, beauty salon and a gourmet market.

Washington County has approved our project. Our financing has been secured. We anticipate a construction start of August 1973. It is our intention to have it completed and fully occupied by fall of 1975.

We will provide adequate ingress and egress at a controlled intersection, a loop road through the community of a design to accomodate large buses, level bus stop locations and convenient pedestrian waiting shelters.

Mr. William E. Roberts
July 13, 1973
Page Two

We hereby request support and formal action by the Tri-Met Board of Directors to commit adequate numbers of express buses on a frequent recurring schedule to and through this community to accomodate the concentrated number of residents. Your favorable and expeditious consideration of this request will be greatly appreciated.

Sincerely,

Harry Wold

HW/er

Enclosure - 1

cc - Tri-Met Board of Directors
Department of Environmental Quality
Mr. Edward Wagner, Tri-Met
Mr. Thomas S. King, General Manager, Tri-Met

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

PARKING FACILITY
NOTICE OF CONSTRUCTION AND APPLICATION FOR APPROVAL

To Construct or Modify an Air Contaminant Source

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

Business Name: Habitat Sylvan Hills Phone: 222-9591

Address of Premises: 7400 S.W. Barnes Road City: Portland Zip: 97225

Nature of Business: Apartment development

Responsible Person to Contact: Harry Wold Title: Partner - Joint Venture
Paul S. Forchuk Partner - Joint Venture

Other Person Who May Be Contacted: Leslie Peyton Title: Partner - Joint Venture

Corporation Partnership Individual Government Agency

Legal Owner's Address: 1303 S.W. 16th City: Portland Zip: 97201

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

segmented parking areas adjacent to living units. Four types: (1) open space, (2) double deck, (3) under building, and (4) carports.

Estimated Cost: Parking Facility Only: \$500,000
'75

Estimated Construction Date: July '73 - July Estimated Operation Date January 1974

Name of Applicant or Owner of Business: Paul S. Forchuk/Harry Wold/Leslie Peyton dba Forchuk/Wold/Peyton a joint venture

Title: Owners Phone: 222-9591

Signature: *Leslie Peyton* Date: July 9, 1973

Applicability: This Notice of Construction Requirement Pertains

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

RECEIVED
JUL 9 1973

Grid _____ N/C _____



DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 5395

TOM McCALL
GOVERNOR

MEMORANDUM

DIARMUID F. O'SCANNLAIN
Director

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. Gd, July 26, 1973, EQC Meeting
Proposed Eugene Office Park 385-space Parking Facility,
Eugene

Background

On July 24, 1973, the Department received a letter from Lane Regional Air Pollution Authority delineating their analysis of and recommendation for the proposed Eugene Office Park 385-space parking facility.

Moran Constructors, Inc. proposes to construct an office park, in two phases, adjacent to the Valley River Center. Figure 1 illustrates the project site. Phase I will include 114,000 square feet of office space with 285 parking spaces, plus a 6,000 square foot food service center with 100 parking spaces. Phase II, to be constructed in one to three years, will include 76,000 square feet of office space with 190 parking spaces.

The subject of this staff report is consideration of Phase I as recommended by LRAPA. The LRAPA Board has set aside consideration of Phase II until a later date.

The project site is currently served by mass transit with service to downtown Eugene available on a 15-minute headway schedule. Significant neighborhood populations can reach the area by bus without transfer, with travel times of from 10 to 40 minutes on two lines serving the area on alternating 30-minute headways. The site has a potential for generating significant transit patronage.

Discussion

The Lane Regional Board of Directors have recommended that the proposed parking facility construction be allowed to proceed because the impact upon air quality will not be sufficient to cause violations of present air quality standards.


The Department agrees with the LRAPA analysis that the construction of the proposed parking facility will not cause violations of present air quality standards. However, the Department is concerned about the apparent upward trend in carbon monoxide levels in Eugene illustrated in Figure 2 and the level of construction activity in the Eugene Office Park area shown below:

<u>Project</u>	<u>Parking Supply</u>
1. Valley River Center	3,619
2. Valley River Center (expansion)	872
3. Valley River Inn (under construction)	481
4. Eugene Office Park (proposed)	<u>385</u>
	5,357

A large area surrounding the Eugene Office Park project is identified in the Eugene-Springfield Metropolitan Area 1990 General Plan as an "opportunity area". Opportunity areas are defined as "...land area of existing unique characteristics suitable for large scale developments or redevelopments...". Thus, the Department is encouraging the expansion of transit service to this area and development and implementation of positive incentive programs by developers for increasing transit patronage. Further, the Department will request Lane Council of Governments, Lane Transit District and Lane Regional Air Pollution Authority to undertake an air quality/mass transit planning effort for this area immediately to ensure maintenance of air quality standards and adequate transit service.

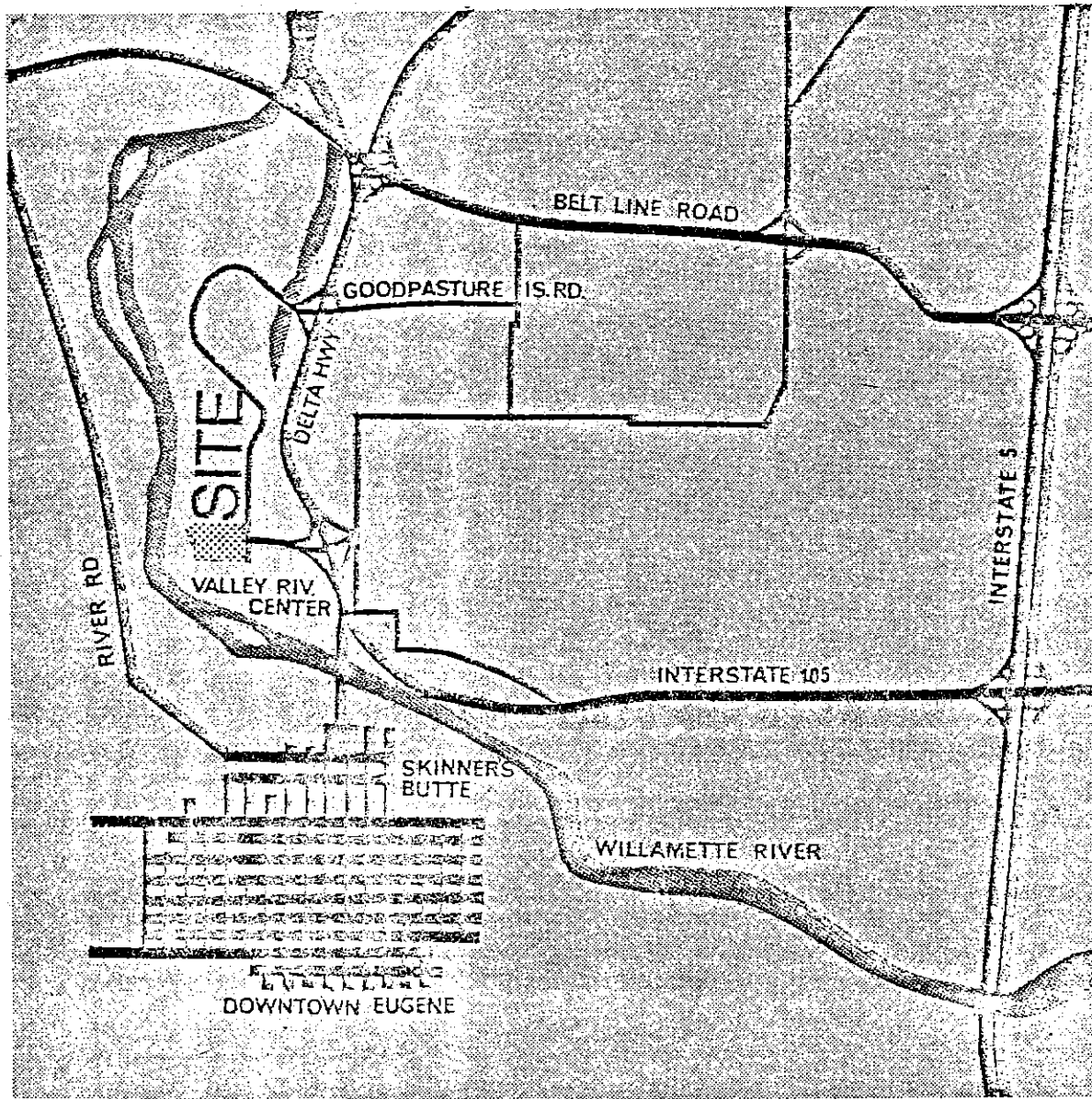
Director's Recommendation

The Director recommends that the Commission authorize the Director to approve the plans and specifications for the 385-space parking facility for construction as soon as an acceptable plan and implementation time table has been submitted to the Department providing incentives for employees and tenants of Eugene Office Park to utilize mass transit.

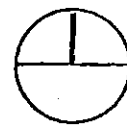

for DIARMUID F. O'SCANNLAIN

MJD:c

7/23/73



0 1 2 3 4 5000 FT.



VICINITY MAP

FIG. 1

EUGENE CAMS CARBON MONOXIDE DATA 1971-73
ELEVENTH AND WILLAMETTE STREETS

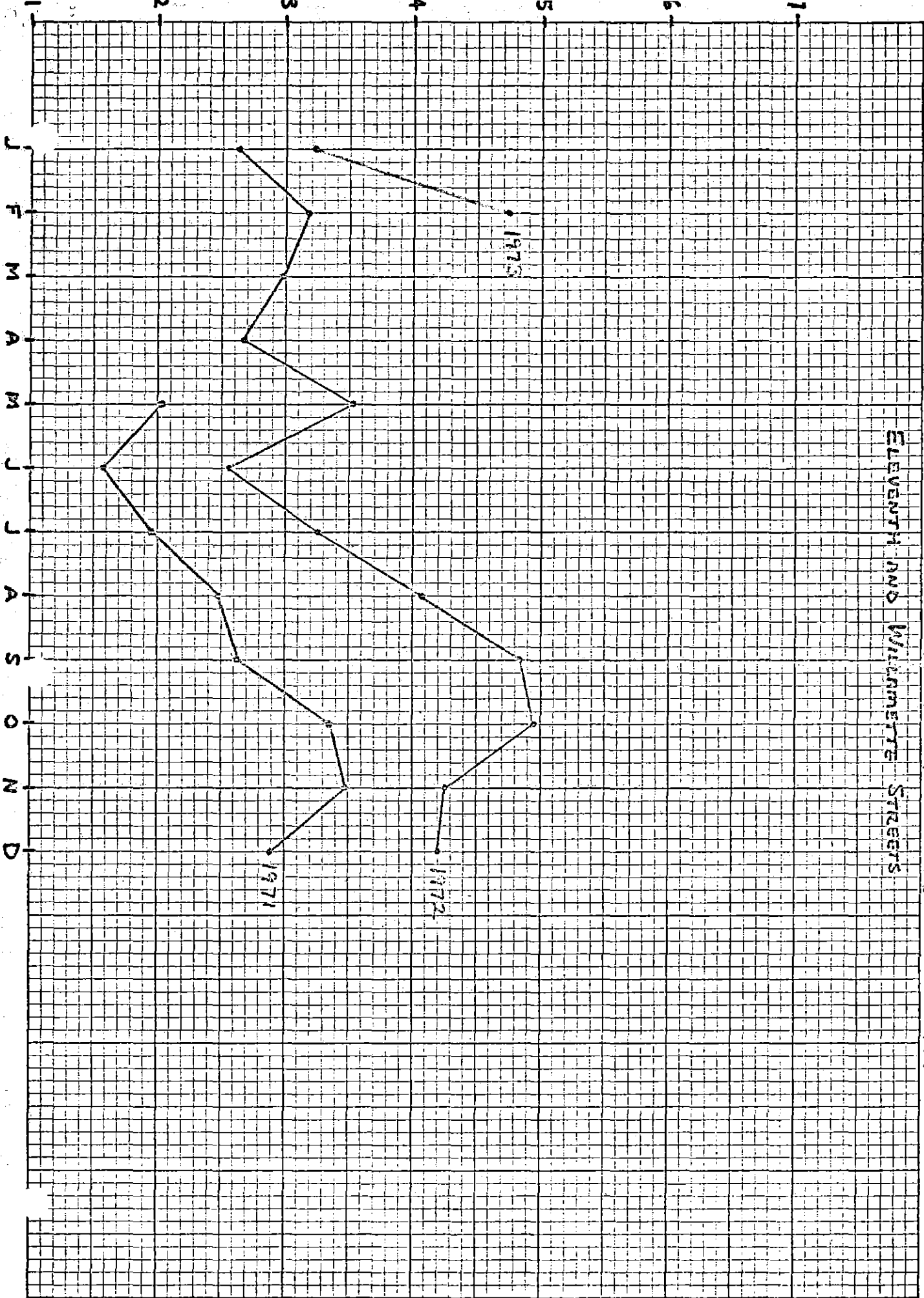


Figure 2

LANE REGIONAL AIR POLLUTION AUTHORITY
Route 1, Box 739, Eugene, Oregon 97402

PARKING FACILITY CONSTRUCTION NOTICE

- To Construct, Install, or Substantially Modify Any Parking Facility of 50 Vehicles or More
- (1) Business Name: Moran Constructors Inc. (503) Phone 228-8669
- (2) Mailing Address: 200 S. W. Market Street, Suite 451 City: Portland Zip 97201
- (3) Nature of Business: Developers - Engineering - Constructing
- (4) Responsible Person to Contact: Harry C. Seabold Title: Project Manager
- (5) Other Person Who May be Contacted: John F. Lewis Title: VP - Sales
- (6) Corporation Partnership Individual Government Agency
- (7) Present Legal Owner: Nils B. Hult (Option Holder: Moran Constructors Inc.)
- (8) Legal Owner's Address: 401 East 10th City: Eugene Zip 97401
- (9) Location of Proposed Construction (Parking Facility): Lot 19 of Debrick Gardens as platted and recorded in Volume 4, Page 101, Lane County, Oregon Plat Records in Lane County, Oregon. West of Goodpasture Island Road - Opposite Valley River Center.
- (10) Number of Parking Spaces Phase I- 385 Class* II
- (11) Approximate number of cars per day that will use facility Phase II- 190 1875
- (12) Are these spaces required by zoning ordinance Yes
- (13) Estimated Cost of Parking Facility \$ 400,000.
- (14) Estimated Construction Date: September, 1973 Estimated Construction Completion Phase I - Sep. '77
Phase II 1975 - 1978
- (15) Name of Applicant or Owner of Business: Moran Constructors, Inc.
- (16) Title: Harry C. Seabold, Project Manager Phone: Eugene 343-8847 (agent's #)
- (17) Signature: By [Signature] Date: July 10, 1973

NOTE: A Notice to Proceed must be received prior to commencing construction. Further technical information may be requested within 30 days of Notice of Construction receipt in order to evaluate whether the proposed construction is capable of complying with air pollution regulations.

*Classes of Facilities (defined):

- Class I: Class I are short-term parking facilities used primarily by, but not limited to, patrons of retail and wholesale stores, motels, hotels, medical/dental establishments, churches, entertainment establishments, banks, public buildings, etc.
- Class II: Class II are long-term parking facilities used primarily by, but not limited to, people who commute to work.
- Class III. Class III are residential parking facilities used primarily by, but not limited to, apartment dwellers.



DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 5395

TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item H, July 26, 1973, EQC Meeting

Assessment of \$250.00 Civil Penalty Against Chester
Clark dba Alsea Veneer, Lincoln County, SIC 2434

Background

Chester Clark dba Alsea Veneer operates a small veneer manufacturing plant located about one mile south of Yachats on the Forest Development Road #1460. An unmodified wigwam waste burner is located and operated at the mill site.

The Department, by letter posted by certified mail dated September 7, 1972, notified the company of observed violations of the wigwam waste burner emission limitations, OAR, Chapter 340, Section 25-020.

On March 9, 1973, the Department assessed a civil penalty of \$250 against the company for listed observations of violations of the wigwam waste burner emission limitations.

Pursuant to notice, the company requested a hearing. Arnold B. Silver was appointed as Hearing's Officer to hear this matter.


The Department and company stipulated to all facts with the exception of whether or not the Department considered the financial circumstances of the company in imposing a penalty.

After consideration of the record, stipulation, and written agreement, the Hearing's Officer entered a proposed order imposing a \$250.00 civil penalty against the company.

This matter is before the Commission to affirm, modify or deny the proposed order of the Hearing's Officer.

Director's Recommendation

It is recommended that the Hearing's Officer's proposed order be adopted and entered by the Commission.


for DIARMUID F. O'SCANNLAIN

Attachment: Hearing's Officer's Report

RAR:c

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION

FOR THE STATE OF OREGON

In the Matter of Assessment) HEARINGS OFFICER'S PROPOSED
of Civil Penalties to Chester) FINDINGS OF FACT, CONCLUSIONS
Clark, dba ALSEA VENEER) OF LAW AND ORDER

To: The Environmental Quality Commission
From: Arnold B. Silver, Hearings Officer for
The Environmental Quality Commission

This matter was considered upon the written Stipulation of Chester Clark, dba Alsea Veneer, hereinafter termed Respondent, and Diarmuid F. O'Scannlain, Director of Department of Environmental Quality, hereinafter termed Department, and, additionally, Respondent's written argument as submitted by his attorney. An opportunity to submit proposed findings was offered to the parties. Counsel for Respondent submitted proposed findings for consideration. The Department of Environmental Quality was represented by Robert L. Haskins, Assistant Attorney General; the Respondent was represented by Kurt Carstens, Attorney at Law, Newport, Oregon.

The parties stipulated to all relevant facts and the admissability of all exhibits. I, therefore, find all possible issues are removed from consideration, with the exception of the one to be discussed. I further find that all facts and exhibits referred to in the Stipulation or file herein are true and correct.

SOLE REMAINING ISSUE

Did the Department adequately consider the factor of economic and financial conditions of Alsea Veneer in imposing a civil penalty in the sum of \$250.

From the exhibits, stipulation, argument and record presented, I make the following Findings of Fact:

FINDINGS OF FACT

1. Respondent owns and operates a small veneer manufac-

turing plant near Waldport, Oregon.

2. No one outside of Respondent's immediate family owns or has owned any interest in the business. Thus, the income earned and expenses incurred by Alsea Veneer remain within the immediate family of Respondent.

3. Respondent and Department entered into a Stipulation and Consent Order on April 5, 1972, whereby respondent was to cease operation of his wigwam waste burner on or before June 30, 1972. Respondent did not cease operation of this burner on or before June 30, 1972.

4. Violation of a final order of the Environmental Quality Commission issued pursuant to ORS 449.815 is subject to a civil penalty of \$100 to \$500 a day.

5. Department and Respondent met on or about September 18, 1972 to discuss Respondent's failure to comply with the terms of the Environmental Quality Commission order. At that time, the Department suggested other alternatives to ceasing operation of respondent's burner, such as burner modification, landfill disposal and sale of wood waste.

6. July and August contain 31 days each. The Department was authorized to impose a civil penalty of up to \$500 a day for violation of the final order of the Environmental Quality Commission. Rule 12-015(3). Therefore, through September 18, 1972, Respondent could have been liable for a maximum of \$40,000 (80 days x \$500 a day), or a minimum of \$29,000 (28 working days x \$500 a day). Department did not impose a penalty of either \$40,000 or \$29,000.

RAR
✓ 10-13

7. The Department considered Respondent's alternatives regarding his burner. These alternatives included: selling his wood waste to Georgia-Pacific, repairing his burner or investigating landfill disposal.

8. Respondent did not sell his wood waste to Georgia-

Pacific and neither did he repair his burner, cease its operation, or dispose of waste into a landfill. All of the foregoing constituted economic and financial factors considered by the Department and suggested to the Respondent.

9. The Department observed Respondent operating his burner in violation of applicable rules on August 29, 1972, October 13, 1972, November 2, 1972 and December 1, 1972. The Department was authorized to impose a civil penalty of up to \$500 a day for each violation. Respondent could have been liable for the sum of \$2,000 (4 violations at \$500 each).

10. Respondent could have been totally liable for civil penalties to the Department in the sum of \$42,000 maximum or \$31,000 minimum. The Department, however, only imposed a civil penalty in the sum of \$250.

ULTIMATE FINDING OF FACT

The Department adequately considered Respondent's economic and financial conditions imposing a civil penalty of \$250.

From the foregoing Findings of Fact, I make the following Conclusions of Law:

CONCLUSIONS OF LAW

1. The provisions of ORS 449.970 including subsection (2)(c) have been adequately considered by the Department. In addition, the Department has adequately considered OAR Chapter 340, Rule 12-015.


2. The civil penalty imposed upon respondent in the sum of \$250. is valid and levied pursuant to law.

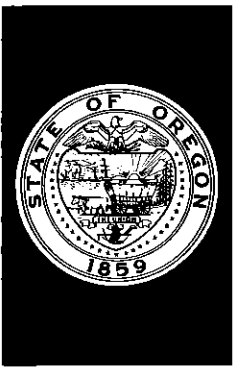
PROPOSED ORDER

The civil penalty imposed by the Department on March 9, 1973, in the sum of \$250 against Respondent is affirmed, and should be collected forthwith. Respondent is ordered to make

payment to the Department within ten (10) days after the
Environmental Quality Commission enters its final order.

DATED this 18 day of JUNE , 1973.


ARNOLD B. SILVER
Hearings Officer
Environmental Quality Commission



DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 5395

TOM McCALL
GOVERNOR

MEMORANDUM

DIARMUID F. O'SCANNLAIN
Director

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. Ia, EQC Meeting, July 26, 1973
CWAPA Variance No. 73-5; Publishers Paper Co.

Background

Publishers Paper Co. operates a plywood plant at 6637 S. E. 100th Ave., Portland, Oregon. The plant includes veneer dryer capacity to supply stock for the plywood production. Additional dryer capacity is needed to maintain an adequate supply of material to the plywood plant.

In a letter dated April 13, 1973, Publishers Paper Co. requested a variance from CWAPA to install and operate additional dryer capacity not in compliance with CWAPA rules. At the same time Publishers Paper agreed to have installed and tested a Coe Manufacturing Co. pilot model condenser unit on one stack of the new dryer to determine if this control method can provide a measure of control sufficient to comply with CWAPA rules.

On December 15, 1973, CWAPA adopted a compliance schedule for Publishers Paper Co. requiring compliance with CWAPA rules for the emissions of veneer dryers and other emissions of the entire plywood manufacturing plant operation on or before December 31, 1974. This variance does not abrogate or otherwise diminish the effect of any portion of the compliance schedule.

On June 15, 1973, CWAPA granted a variance to Publishers Paper subject to the following conditions:

1. This variance shall in no way effect the order made and entered by the Board of Directors on December 15, 1972, in the matter of Publishers Paper Company, Portland Division, said order relating to control of particulate matter emissions and veneer dryers.

2. Publishers Paper Co. will notify the Authority of the start-up date of the dryer herein authorized and the pilot model air pollution control equipment.

3. On or before October 15, 1973, Publishers Paper Co. will notify the Authority when the pilot air pollution control equipment has been installed and is ready to be evaluated for compliance with the visible emission standard described in Oregon Administrative Rules, Chapter 340, Division II, Section 25-315 adopted April 2, 1973.

4. On or before December 1, 1973, Publishers Paper Co. will complete a minimum of two source tests on the inlet and outlet exhaust of the condenser type pilot model control equipment. The

test method, procedures, location and equipment operating parameters are to be approved by the Authority prior to testing.

5. A copy of the source test results are to be submitted to the Authority within 30 days after completion of each test.

6. On or before December 31, 1973, Publishers Paper Co. will submit a written report to the Authority describing the results of the test program including advantages and disadvantages, maintenance problems of the pilot model control equipment including the disposal method proposed for the condensible hydrocarbons.

The variance and reference materials have been forwarded for the Director's review and Commission action. The variance is for a period of time not to extend beyond December 31, 1973.

Analysis

The variance is properly conditioned and meets the Department review criteria. EQC standards on veneer dryers state that compliance shall be met as soon as practicable but not later than December 31, 1974. The effective compliance schedule insures that the emissions from the new dryer will be in compliance by that date. In addition the test of the Coe Manufacturing condenser unit provides reasonable opportunity to test equipment designed to meet the established EQC standards.

Director's Recommendation

The Director recommends that CWAPA variance 73-5 to Publishers Paper Co. be granted as issued.

A handwritten signature in cursive script, appearing to read "E. O'Scannlain".Handwritten initials "for" in cursive script.

DIARMUID F. O'SCANNLAIN

LDB:c

7/23/73



COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

28 June 1973

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

Attention: Mr. Dairmud O'Scannlain, Director

Subject: CWAPA Variance No. 73-5
Publishers Paper Co.

BOARD OF DIRECTORS

Fred Stefani, Chairman
Clackamas County

A. J. Ahlborn
Columbia County

Ben Padrow
Multnomah County

Mildred Schwab
City of Portland

Burton C. Wilson, Jr.
Washington County

Richard E. Hatchard
Program Director

Gentlemen:

Please find enclosed a copy of CWAPA Variance No. 73-5 which we request be reviewed by your Department and presented to the Environmental Quality Commission for their approval. Also enclosed to assist in your review are the following documents:

- a. Letter, Publishers Paper, 13 April 1973.
- b. CWAPA staff Memorandum, 9 May 1973.
- c. Minutes, CWAPA Board of Directors, 18 May 1973 (Excerpt)
- d. CWAPA Staff Memorandum, 8 June 1973.
- e. Minutes, CWAPA Board of Directors, 15 June 1973 (Extract)

Very truly yours,

R. E. Hatchard
Program Director

REH:jlj
Enclosures

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

In the Matter of:

Variance to

PUBLISHERS PAPER CO.

No. 73-5

VARIANCE INCLUDING

FINDINGS AND ORDER

FINDINGS

I

By letter dated 13 April 1973, Publishers Paper Co. petitioned for a variance to construct and operate a veneer dryer, not in compliance with Columbia-Willamette Air Pollution Authority Rules 33-060(1), said dryer to be part of the Portland Division located at 6637 SE 100th Avenue, Portland, Oregon.

II

As a part of said construction, Publishers Paper Co. proposes to install a pilot model of a condenser on one exhaust stack from said dryer for experimentation purposes for the control of emissions from veneer dryers.

III

Bona fide experiments in the control of veneer dryer emissions should be encouraged.

CONCLUSIONS

Pursuant to the provisions of ORS 449.880 and Columbia-Willamette Air Pollution Authority 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 of fact and conclusion, the Board of Directors makes the following:

ORDER

NOW THEREFORE, IT IS HEREBY ORDERED that a VARIANCE from the provisions of Rules 21-010 through 21-035 (notice of construction), Title 32 (emission standards) and Title 22 (permits) be granted to Publishers Paper Co. for construction and operation of a veneer dryer as a part of the Portland Division located at 6637 SE 100th Avenue, Portland, Oregon, for a period of time not beyond 31 December 1973 subject to the following conditions:

1. This variance shall in no way effect the order made and entered by the Board of Directors 15 December 1972 in the matter of Publishers Paper Company, Portland Division, said order relating to control of particulate matter emissions and veneer dryers.
2. Publishers Paper Co. will notify the Authority of the start up date of the dryer herein authorized and the pilot model air pollution control equipment.
3. On or before 15 October 1973, Publishers Paper Co. will notify the Authority when the pilot air pollution control equipment has been installed and is ready to be evaluated for compliance with the visible emission standard described in Oregon Administrative Rules, Chapter 340, Division II, Section 25-315 adopted 2 April 1973.
4. On or before 1 December 1973, Publishers Paper Co. will complete a minimum of two source tests on the inlet and outlet exhaust of the condenser type pilot model control equipment. The test method, procedures, location and equipment operating parameters are to be approved by the Authority prior to testing.
5. A copy of the source test results are to be submitted to the Authority within 30 days after completion of each test.
6. On or before 31 December 1973, Publishers Paper Co. will submit a written report to the Authority describing the results of the test program including advantages and disadvantages, maintenance problems of the pilot model control equipment including the disposal method proposed for the condensible hydrocarbons.

Entered at Portland, Oregon, the 15th day of June 1973.


Chairman

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

9 May 1973

MEMORANDUM

TO: Board of Directors

FROM: R. E. Hatchard, Program Director

SUBJECT: Variance Request - Portland Division, Publishers Paper Veneer Driers

BOARD OF DIRECTORS

Francis J. Ivancie, Chairman
City of Portland

Fred Stefani, Vice-Chairman
Clackamas County

Burton C. Wilson, Jr.
Washington County

Ben Padrow
Multnomah County

A.J. Ahlborn
Columbia County

Richard E. Hatchard
Program Director

Dear Board Members:

On 13 April 1973 the Portland Division of Publishers Paper Company requested a variance from the authority Rules (copy attached). The purpose of the request is to allow Publishers Paper Co. to install additional veneer drier capacity at their S.E. Portland plant and to install and test air pollution control equipment that ultimately may be used to control other veneer drier emissions.

The proposed installation consists of a 20 section, 6 deck, steam heated veneer drier and a pilot model condenser type air pollution control equipment. The productive capacity of the new veneer drier is approximately 8,000 sq. ft. 3/8" plywood per hour or a 50% increase of existing veneer drier capacity.

The air pollution problem usually associated with veneer driers is described as a visible "blue haze". The blue haze emitted is primarily hydrocarbons that have vaporized from the wood as it is heated and dried. The pilot condenser to be tested for air pollution control is based on the principle that the hydrocarbons that create the visible emissions will condense at lower than stack temperature. A portion of the total stack exhaust (one stack) will be directed through the condenser and by controlling condenser temperature it is anticipated sufficient hydrocarbons will condense that compliance may be attained. Although the authority staff is not aware of similar installations used to control veneer drier emissions, such condensers are commonly used in other industries. Based on our experience with other industries and typical veneer drier emissions we would anticipate some reduction in hydrocarbon emissions; however, to adequately evaluate this type of device for controlling veneer drier emissions we believe a testing program should be conducted to quantify the actual emissions at various temperatures and an evaluation should be made concerning potential maintenance problems and the disposal method for the collected hydrocarbons.

At the 15 December 1972 meeting, the CWAPA Board of Directors adopted a compliance schedule for the existing veneer drier at Publishers Paper which is as follows:

1. 1 July 1973 submit in writing, a report describing the methods of veneer drier control investigated including a statement of advantages and disadvantages in each such method and a description of the method selected for control of veneer driers and a statement as to why the method so 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 driers.

3. 1 July 1974 Publishers Paper Company, Portland Division, shall submit a written report to the Authority summarizing the then current status of the completion of the control program and that compliance with Columbia-Willamette Air Pollution Authority Rules will be attained by 31 December 1974.

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

If the pilot model is not successful in bringing the veneer drier emission in compliance with the Authority Rules, Publishers Paper has agreed to control the new veneer drier emissions in the time period specified in the existing compliance schedule.

The Authority staff has thoroughly reviewed the variance request and based on the attached criteria and information contained in this report, the Authority staff recommends a variance from the Authority Rules for the new veneer drier as it pertains to Notice of Construction procedures, emission standards and permit to be issued 1 July 1973 with the following conditions:

1. Variance period to terminate 31 December 1973.
2. Publishers Paper will notify the staff of the startup date for the new veneer drier and pilot air pollution control equipment.
3. On or before 15 October 1973 Publishers Paper will notify the Authority the pilot air pollution control equipment has been installed and is ready to be evaluated for compliance with the visible emission standard described in AOR, Chapter 340, Division 2, Section 25-315 adopted 2 April 1973.
4. On or before 1 December 1973, Publishers Paper will have completed a minimum of two source tests on the inlet and outlet exhaust of the condenser type control equipment. The test methods, procedures, location and equipment operating parameters are to be approved by the Authority prior to testing.

Board of Directors

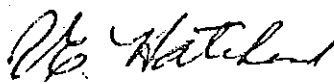
Page 3

10 May 1973

5. A copy of the source test results are to be submitted to the Authority within 30 days after completion of each test.

6. On or before 31 December 1973 Publishers Paper will submit a written report to the Authority describing the results of the test program including advantages, disadvantages, maintenance problems of the pilot control equipment including the disposal method proposed for the condensible hydrocarbons.

Respectfully submitted,



R. E. Hatchard
Program Director

REH:whs
Attachment

Publishers Paper, Portland Division

Mr. Hanson reported that Publishers Paper Company has requested a variance from the CWAPA rules to allow them to install additional veneer drier capacity at their SE Portland plant and to install and test air pollution control equipment that ultimately may be used to control other veneer drier emissions. If the pilot model of the air pollution control equipment they wish to test does not control the veneer drier emissions, Publishers Paper will control the new veneer drier under the compliance schedule adopted by the Board of Directors in

December 1972. He stated it was the staff recommendation that the variance be granted, subject to the specific conditions as outlined in the staff memorandum of 9 May 1973, for a period terminating 31 December 1973. The conditions of the variance are acceptable to Publishers Paper. Mr. Hanson stated also that the Advisory Committee had considered this variance request at their 10 May 1973 meeting, and recommended to the Board of Directors that the request be granted. Publishers Paper Company has stated they are the first company to try this new approach to controlling veneer drier emissions.

Mr. Larry Frey, Publishers Paper Company, stated that he had nothing to add to Mr. Hanson's report.

In answer to Commissioner Schwab's inquiry, Mr. Hanson stated that the quantity, by weight, of emissions from veneer driers was not great; the problem is that they are visible emissions. After discussion, Commissioner Padrow stated he believed that the residents of the area who may be affected by actions of the Board should be notified of the variance request.

Commissioner Padrow moved and Commissioner Schwab seconded a motion to delay action on this variance request until the citizens of the area have been notified. The motion was passed with a two to one vote, with Commissioner Stefani casting the dissenting vote.

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

*Excerpt from 18 May '73
Board Meeting*

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

BOARD OF DIRECTORS

Francis J. Ivancie, Chairman
City of Portland

Fred Stefani, Vice-Chairman
Clackamas County

Burton C. Wilson, Jr.
Washington County

Ben Padrow
Multnomah County

A.J. Ahlborn
Columbia County

Richard E. Hatchard
Program Director

8 June 1973

MEMORANDUM

TO: R. E. Hatchard, Program Director

FROM: George Voss, Public Information Director

SUBJECT: Notification of all possibly interested persons in Publishers Paper Company, Portland Division, variance request

The following measures were taken to inform any possibly interested persons of the variance request by Publishers Paper Company, scheduled for hearing 15 June 1973.

1. The area of possible influence was designated as within a radius of one-quarter mile from the veneer plant site after discussion with the engineering staff of CWAPA. This was established as lying within 96th Avenue on the west, 103rd Avenue on the east, Yukon Street on the north and SE Flavel Avenue on the south.

2. Even though outside the boundary, a Lutheran nursing home on the east was included in making the mailing.

3. Letters (copy attached) were sent to the following on 23 May:

- a. Anyone who had ever complained about any air pollution problem concerning Publishers Paper Company, Portland Division, to CWAPA, either written or verbal
- b. All individuals living within the above area, with addresses determined from consulting Coles Metropolitan Household Directory, current issue

(individuals not identified by name in the directory were sent same letter, first class postage, address to resident.)



COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

29 May 1973

BOARD OF DIRECTORS

Fred Stefani, Chairman
Clackamas County

A. J. Ahlborn
Columbia County

Ben Padrow
Multnomah County

Mildred Schwab
City of Portland

Burton C. Wilson, Jr.
Washington County

Richard E. Hatchard
Program Director

All persons who have reason to think they may be affected by emissions from veneer driers at Publishers Paper Company plant at 6637 SE 100th Avenue are requested to take one of the two actions listed below. Underlying this request is a meeting of the Columbia-Willamette Air Pollution Authority Board of Directors to be held June 15, 1973, at 9:30 a.m., in the Portland Water Service Building Auditorium, 1800 SW 6th Avenue, Portland.

One of the subjects of the meeting is discussion of a variance for Publishers Paper Company's veneer driers which will permit the company to test a new method of controlling blue haze from a new veneer drier. If this method is found to be a good means of controlling such emissions, it will be installed on existing driers now in use at this site.

Your views and opinions on this variance are solicited.

The two actions you should take are: (1) Attend the meeting and make your views known to the CWAPA Board of Directors; or (2), if you cannot attend the meeting, write or phone your opinion before June 15, 1973, to

Columbia-Willamette Air Pollution Authority
1010 NE Couch, Portland, Oregon 97232
Phone: 233-7176

50

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

The following persons have called to voice their opinion concerning
Publisher's Paper veneer drier emissions and the variance for testing a new
method of controlling the blue haze:

Mr. Albert C. Bowen

6023 S.E. 100th - Mr. Bowen stated he has lived in the area for 12 years and he
doesn't work for Publishers. He says he rarely notices the blue
haze and what he smells of the emissions, he "kind of likes it."
He has no objection to the variance.

Mr. Charles Morris

10302 S.E. Flavel Court - Mr. Morris does not want the variance issued. He doesn't
believe in experimentation because if the new control device does
not work the residents will have to suffer from their mistake.
He says that he has had previous experience with Publishers in
regard to their sander dust problem and he feels they did not take
care of that problem. He recommends that the equipment should be
capable of handling the problem, for sure, before it is installed.

Mr. Gary Addington

7306 S.E. 103rd Ave - Is not opposed to issuing a variance. Said he thinks the
authority's procedure in this case is great. Very happy that
something is being done on existing units.

Douglas G. Peterson
9982 SE French Acres Dr.

Is in favor of granting variance

Mrs Shirley Colt

10324 S.E. Flavel Court - Asked for information on length of time required to
install controls. Said would discuss matter with husband and
"let us know."

Publishers Paper Variance

14 June 1973

Fred Elsasser
4210 N.E. Shaver, Apart. 4
288-6813

Mr. Elsasser owns 15 acres in Sagamore Heights and 39 acres in Tax Lot 17, near Publishers Paper. He feels whatever Publishers Paper does, will affect his property value. The property address is 7835 S.E. 105th. He feels that the Board has no legal authority to grant or deny this variance request because he was not notified of the hearing and received no background information on which to base an opinion. He states his rights are in the 14th Amendment and that no decision can be made on this variance until he, as a property owner affected by the decision, has an opportunity to review information and make a statement. He is unable to attend the hearing on 15 June.

(I told him of our efforts to mail notices to residents in the area and that a public hearing notice was in the paper, but he feels this is not sufficient and he should have been personally contacted)

Suzy

June 13, 1973

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

ATTENTION: Mr. George L. Boss

Gentlemen:

Because of work commitments we are unable to attend this meeting and express our views in person, however, we would like to take advantage of the option outlined in your recent letter and voice our opinion via this letter.

As residents affected by the blue haze from the veneer driers at Publishers Paper Company, we would like to advise this Board we are opposed to any expansion of the driers or testing of new equipment on a new drier, supposedly for the purpose of controlling such emissions.

It has been our experience in the five years we have lived in this area that the control of pollution from this mill has been very lax. We cannot realize that any better control will be put on larger driers or new driers which, if constructed, would increase the problem much more than what is now existing.

It is difficult to understand this testing procedure cannot be done on a much smaller scale without construction of new facilities for the purpose of testing their effectiveness.

Yours truly,

Shirley and Gary Colt

Gary and Shirley Colt
10324 S. E. Flavel Ct.
Portland, Oregon 97266

ROUTING	
To	Noted by
<i>EC</i>	
<i>WH</i>	
<i>EC</i>	
From:	
Action:	

RECEIVED
JUN 14 1973

RECEIVED
JUL 1 1973

Portland Oregon
June 12, 1973

Dear Sirs;

We have been notified that Publishers Paper Company intends a text control of collection on new drop-in installed.

Why can't they control collection on those already in use before going out more collection?

You should see the fine layer of plywood in wood that we have in our area from Publishers.

2:

The wood smell - I don't mind, kind of pleasant, like an old wood work room.

But the accident from down there is something else:

Ed rather says than control the existing areas before expanding and adding to the problems.

Sincerely;

Roy E Johnson
May 2, Johnson

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

BOARD OF DIRECTORS MEETING
9:30 a.m., Friday, 15 June 1973
Auditorium, Portland Water Service Bldg.

Present:

Board of Directors: Fred Stefani, Chairman
A. J. Ahlborn
Ben Padrow
Mildred Schwab

EXTRACT

Staff:

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

Publishers Paper, Portland Division

Mr. Hatchard reviewed the request made by Publisher Paper, Portland Division, at the 18 May Board of Directors meeting, as outlined in a memorandum to the Board dated 9 May 1973. Action on this request was postponed by the Board until the 15 June meeting in order to give the staff time to notify the residents in the area of Publishers Paper Company's request for variance from Authority rules to enlarge their veneer dryer capacity and install experimental air pollution control equipment. This variance, if granted, would have no effect on the schedule of compliance adopted by the Board of Directors on 15 December 1972 which requires emissions from the veneer dryers to be in full compliance with Authority rules by 31 December 1974.

Mr. Hatchard reviewed a memorandum dated 8 June 1973 which outlined the activities undertaken by the staff to inform the citizens in the area of the Publishers Paper variance request. He stated the majority of the replies from citizens were in favor of granting the variance.

Mr. E. E. Lentz, a resident near the Publishers Paper, Portland Division plant, made a statement complaining about the large quantities of oil smoke and wood smoke from Publishers Paper which drifts over his property a high percentage of the time.

Mrs. Robert Blue, also a resident in the neighborhood of Publishers Paper, stated that her family and neighbors are adversely affected by the large quantities of fallout and smoke from Publishers Paper Company.

Mr. Peter Schnell of Publishers Paper Company pointed out that his company is completing installation of baghouses which will bring the sawdust emissions into compliance with Authority Rules. He added that the boilers are now in compliance with the rules and the emissions from the veneer dryers are to be in compliance by 31 December 1974 under the schedule of compliance adopted by the Board. He pointed out that if the experimental air pollution control equipment, part of the variance request, was successful, compliance of the veneer dryer emissions might be attained prior to the 31 December 1974 date.

In answer to Commissioner Schwab's inquiry, Mr. Schnell stated that if the variance is granted, the increase in the blue haze or wood smoke will be small. These emissions may be controlled by the experimental equipment to be installed and if they are not, they must be in compliance with Authority rules by 31 December 1974.

After considerable further discussion, Commissioner Padrow moved, Commissioner Schwab seconded and the motion carried to grant a variance to Publishers Paper Company, Portland Division, to install additional veneer dryer capacity and to install and test air pollution control equipment that ultimately may be used to control other veneer dryer emissions, this variance subject to the conditions as outlined in the staff memorandum of 9 May 1973.

Columbia County Open Burning

Mr. Hatchard reviewed a memorandum dated 14 June 1973, copies of which were distributed to the Board members, concerning a variance to Columbia County from domestic burning and land clearing burning rules of CWAPA. He stated it was the recommendation of the staff that this variance be granted subject to the conditions as outlined in the 14 June memorandum. If the variance is granted, such open burning in Columbia County would comply with the current DEQ open burning rules and help alleviate the solid waste disposal problem in Columbia County.

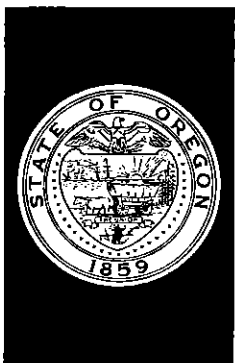
Commissioner Ahlborn moved, Commissioner Schwab seconded and the motion carried to grant a variance to Columbia County for open burning as outlined in the 14 June 1973 memorandum.

Sandy Shake Company

Wayne Hanson reviewed a memorandum dated 12 June 1973, copies of which had been distributed to the Board members, which outlined the request from Sandy Shake Company for a variance to operate a modified wood waste burner at their mill in Sandy, Oregon. He stated that after reviewing the overall environmental affects of this variance request, the staff concluded that complete utilization of wood waste produced at this plant is not feasible at this time, and of the alternatives investigated by Sandy Shake Company and considering all environmental aspects, the proposed modified wood waste burner appears to be the most feasible solution with the least effect on the total environment. The staff recommends that the variance be granted for the period 30 June 1973 to 30 June 1974 to Sandy Shake Company to operate a modified wood waste burner subject to the conditions outlined in the memorandum dated 12 June 1973.

Mr. Dennis Melstrom, owner, Sandy Shake Company, stated that he has worked very hard to obtain the best burner possible.

After discussion, Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to grant the variance to Sandy Shake Company subject to the conditions as outlined in the 12 June 1973 memorandum.



DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 5395

TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No.Ib , EQC Meeting, July 26, 1973
CWAPA Variance No. 73-4 Sandy Shake Co.

Background

Sandy Shake Co. operates a shake and shingle mill approximately three miles east of Sandy, Oregon. The mill phased out a wigwam waste burner in 1971 and started producing cedar tow on a continuous basis. At the present time the mill produces approximately 30-35 bales of cedar tow plus 7 units of wood waste per day. The operator has made a good faith effort to market this by-product but has been unsuccessful and the material has accumulated around the mill and has been termed a fire hazard by the fire authorities.

A letter dated June 9, 1973, from Dennis Melstrom, owner of Sandy Shake Company, to CWAPA requested a variance to operate a modified wigwam waste burner to dispose of the waste. A variance was granted by CWAPA to Dennis Melstrom on June 15, 1973, subject to the following conditions:

1. Petitioner will submit for Authority staff review and comment detailed plans and specifications for the proposed burner, prior to construction or installation.

2. The modified burner is to be constructed and operated in accordance with criteria and requirements of Oregon Administrative Rules, Chapter 340, Section 25-005 to 25-025.

3. Petitioner will cease operation of the burner when notified by Authority that a condition of air pollution "alert", "warning", or "emergency", exists as described in Chapter V, Title 51 of Authority rules.

4. On or before May 30, 1974, petitioner will submit a written report to the Authority which will include:

a. Any significant change in operation of the burner including quantity of material burned, nature of the material burned, hours of operation and mechanical condition of the burner.

b. Any progress or development related to further utilization of the wood waste burned or alternate means of disposal or compliance with Authority rules.

5. The Authority recognizes petitioner may request another variance prior to the termination date hereof based upon past performance of the burner and compliance with the variance conditions and overall environmental conditions then prevailing and in keeping with the policy of the Authority concerning modified wood waste burners, the Authority may grant or deny another variance.

The variance and reference materials have been forwarded for the Director's review and Commission action. The variance is for a period of time not to extend beyond June 30, 1974.


Analysis

The variance granted meets all of the Department review criteria. The proposed modified wigwam waste burner operation is consistent with EQC rules and policies.

The variance is properly conditioned and will protect the air quality.

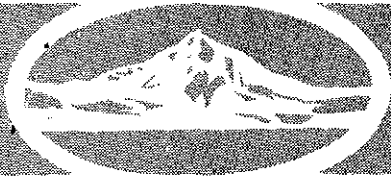
Director's Recommendation

The Director recommends that CWAPA variance 73-4 to Dennis Melstrom be approved.


for DIARMUID F. O'SCANNLAIN

LDB:c

7/20/73



COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

28 June 1973

BOARD OF DIRECTORS

Fred Stefani, Chairman
Clackamas County

A. J. Ahlborn
Columbia County

Ben Padrow
Multnomah County

Mildred Schwab
City of Portland

Burton C. Wilson, Jr.
Washington County

Richard E. Hatchard
Program Director

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

Attention: Mr. Dairmuid O'Scannlain, Director

Subject: CWAPA Variance No. 73-4
Sandy Shake Co.

Gentlemen:

Please find enclosed a copy of CWAPA Variance No. 73-4 which we request be reviewed by your Department and presented to the Environmental Quality Commission for their approval. Also enclosed to assist in your review are the following documents:

- a. Letter, Sandy Shake Co., June 9 1973.
- b. CWAPA Staff Memorandum, 12 June 1973
- c. Minutes, CWAPA Board of Directors, 15 June 1973 (Extract)

Very truly yours,

R. E. Hatchard
Program Director

REH:jlj
Enclosures



COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

28 June 1973

BOARD OF DIRECTORS

Fred Stefani, Chairman
Clackamas County

A. J. Ahlborn
Columbia County

Ben Padrow
Multnomah County

Mildred Schwab
City of Portland

Burton C. Wilson, Jr.
Washington County

Richard E. Hatchard
Program Director

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

Attention: Mr. Dairmuid O'Scannlain, Director

Subject: CWAPA Variance No. 73-4
Sandy Shake Co.

Gentlemen:

Please find enclosed a copy of CWAPA Variance No. 73-4 which we request be reviewed by your Department and presented to the Environmental Quality Commission for their approval. Also enclosed to assist in your review are the following documents:

- a. Letter, Sandy Shake Co., June 9 1973.
- b. CWAPA Staff Memorandum, 12 June 1973
- c. Minutes, CWAPA Board of Directors, 15 June 1973 (Extract)

Very truly yours,



R. E. Hatchard
Program Director

REH:jlj
Enclosures

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

In the Matter of:

Variance to Dennis Melstrom
dba SANDY SHAKE CO.

No. 73-4

VARIANCE INCLUDING
FINDINGS AND CONCLUSIONS

FINDINGS

I

By letter dated 9 June 1973 Dennis Melstrom, dba Sandy Shake Co., Sandy, Oregon, has petitioned for a variance from Rule 21-015(2), 21-020, 32-030, 32-045 and 32-055 to construct and operate a modified burner for disposal of wood waste products from the shake and shingle mill located approximately three miles east of Sandy, Oregon.

II

In early 1971, the petitioner discontinued the use of a wigwam waste burner to achieve compliance with Authority Rules and acquired hogging equipment with associated bins, balers, conveyers and buildings to be used for hogging and baling of the cedar wood waste materials for sale.

III

The petitioner has been unable to dispose of the baled cedar tow and currently has approximately 3,000 bales on hand and produces 30 to 40 bales each operating day in addition to approximately 15 units of other wood wastes per day.

IV

The accumulation of the wood waste materials creates an extreme fire hazard and the State Fire Marshal has informed the petitioner that the mill will be shut down unless the fire hazard is removed.

V

Disposal of said wood waste other than by burning in a modified burner is impractical and there is no adequate solid waste disposal site within a reasonable distance; the marketers of wood waste products are unable to sell the waste products generated by the plant; the cost and consideration of the wood waste products in compliance with Columbia-Willamette Air Pollution Authority rules is prohibitive.

VI

To deny the requested variance and require strict compliance with the rules of Columbia-Willamette Air Pollution Authority would result in substantial curtailment or closing down of the business because no alternative method of disposing of the wood waste is available.

CONCLUSIONS

Pursuant to the provisions of ORS 449.880 and Columbia-Willamette Air Pollution Authority 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 of fact and conclusion, the Board of Directors makes the following:

ORDER

NOW THEREFORE, IT IS HEREBY ORDERED that a VARIANCE from the provisions of Rules 21-015(2), (Specifications showing compliance with the rules), 21-020 (approval in compliance with rules), 32-030 (particulate matter weight standards), 32-045 (process weight emission limitations) and 32-055 (particulate matter size standard) be granted to Dennis Melstrom, dba Sandy Shake Co. to construct and

operate a modified waste burner for a period of time not beyond 30 June 1974,
subject to the following conditions:

1. PETITIONER will submit for Authority staff review and comment detailed plans and specifications for the proposed burner, prior to construction or installation.
2. The modified burner is to be constructed and operated in accordance with criteria and requirements of Oregon Administrative Rules, Chapter 340, Section 25-005 to 25-025.
3. PETITIONER will cease operation of the burner when notified by Authority that a condition of air pollution "alert", "warning", or "emergency", exists as described in Chapter V, Title 51 of Authority rules.
4. On or before 30 May 1974, PETITIONER will submit a written report to the Authority which will include:
 - (a) any significant change in operation of the burner including quantity of material burned, nature of the material burned, hours of operation and mechanical condition of the burner.
 - (b) Any progress or development related to further utilization of the wood waste burned or alternate means of disposal or compliance with Authority rules.
5. The Authority recognizes PETITIONER may request another variance prior to the termination date hereof based upon past performance of the burner and compliance with the variance conditions and overall environmental conditions then prevailing and in keeping with the policy of the Authority concerning modified wood waste burners, the Authority may grant or deny another variance.

Entered at Portland, Oregon, the 15th day of June, 1973.


Chairman

June 9, 1973

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

Gentlemen:

This is a request for a variance for my shake mill at Sandy, Oregon. For over two years we have not been able to burn our waste, so we have been attempting to dispose of it in any way possible. I put in a cedar tow baler at an approximate cost of \$7,000.00 and now cannot sell the bales. I have tried bundling and selling firewood and have sold very little of it. I have tried contacting barkdust yards, and have mentioned putting in a hog and giving the material to them free -- with no takers! They say our material has too many fines, and there is no acceptable method to chop cedar bark. I give away wood now to anyone who wants it, but all they do is pick up the large pieces and leave the smaller ones, leaving a large mess and creating a tremendous fire hazard.

I have been stock piling my waste material on my property at the rate of 15 units a day, and this also creates a tremendous fire hazard and a possible water pollution problem. I have approximately 3,000 bales of cedar tow on hand and produce 30 to 40 bales a day and have no market for this. Right now I am having to furnish a full-time cat to move the waste around and also a truck to haul it and the men to operate these vehicles.

I feel the only solution available to me at this time is to burn it. We will extend every effort to acquire the most pollution-free type of burner available on the market right now, and in fact might be able to meet your standards. I will be investing \$13,500 in the burner and about another \$7,000 in allied equipment to get the burner installed properly.

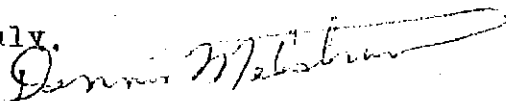
The state fire marshall has inspected the premises, and said if I don't clean it up in the very near future he will close me down. My last year's payroll was just over \$180,000.00. This amount would be lost to the community if we cannot cure our waste problem, because we are either going to be shut down as a fire hazard or be totally buried in waste.

ROUTING	
To	Noted by
6614	WH
7B	
From:	
Action:	

Page Two

If there are any further questions, feel free to call me.
All haste would be appreciated.

Yours truly,



Dennis Melstrom, Owner
Sandy Shake Company
Phone: 668-11002

97-55

Dennis Melstrom
Sandy Shake Co.
Sandy, Oregon 97055

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

12 June 1973

BOARD OF DIRECTORS

Fred Stefani, Chairman
Clackamas County

A. J. Ahlborn
Columbia County

Ben Padrow
Multnomah County

Mildred Schwab
City of Portland

Burton C. Wilson, Jr.
Washington County

Richard E. Hatchard
Program Director

MEMORANDUM

TO: Board of Directors

FROM: R. E. Hatchard, Program Director

SUBJECT: Variance Request - Sandy Shake Company

Dear Board Members:

The following pertains to a request for a variance from the Columbia-Willamette Air Pollution Authority Rules 21-015(2), 21-020, 32-030, and 32-055 by the Sandy Shake Company, Sandy, Oregon.

Background

Sandy Shake Company operates a small shake mill approximately three miles east of Sandy, Oregon. The mill is situated on 17.5 acres, employs thirteen people and manufacturers about seventy squares of shakes per day. Sandy Shake is basically surrounded by dense vegetation and timber and has an access road to U.S. Highway 26 on its eastern boundary. The nearest private residences of which there are three, are one quarter of a mile from the mill and not within sight.

In early 1971, Sandy Shake Company discontinued use of its wigwam waste burner to achieve compliance with the Authority Rules. A baler was purchased to handle cedar tow which was eventually marketed. Mill ends were deposited on the property.

Since the later part of 1971, the company has been unable to market the cedar tow on a continuous basis. Currently the mill is producing 30-35 bales of cedar tow and seven units of wood waste per day. This material is being piled on the plant site limiting movement around the mill and increasing the fire hazard potential daily. The State Forestry Department has recently contacted the mill regarding the fire danger associated with this large accumulation of waste materials.

As outlined in the attached variance request from Sandy Shake Co. dated 9 June 1973, efforts to dispose of both types of waste materials have proven unsuccessful. Cedar tow has been shipped to nurseries as far as Iowa only to be rejected on the basis of the high content of fines. In addition, no acceptable landfill sites are within feasible hauling distance and the cost of a conventional incinerator would be prohibitive for a mill of this size.

Recommendations

The Authority staff has reviewed the overall environmental effects of this variance request and concluded:

1. Complete utilization of all wood waste produced at this plant is not feasible at this time.
2. Of the alternatives investigated by the company, and considering all environmental aspects, the proposed modified wood waste burner appears to be the most feasible solution with the least affect on the total environment.

Unfortunately, adequately designed incineration devices capable of meeting the Authority particulate emission standards are not readily available nor competitively priced with modified wood waste burners designed for mills the size of Sandy Shake Co. It is the Authority staff opinion that the modified wood waste burner proposed by Sandy Shake Company is designed in such a manner that air contaminant emissions will be minimal.

Based upon the submitted information and the above considerations, the Authority staff recommends a variance from the Authority Rules be granted to Sandy Shake Company for the period of 30 June 1973 to 30 June 1974 with the following conditions:

1. Sandy Shake Company will submit for the Authority staff review and comment, detailed plans and specifications for the proposed burner prior to installation.

2. The modified burner is to be constructed and operated in accordance with the criteria and requirements of the State of Oregon.

3. Sandy Shake Company will cease operation of the burner when notified by the Authority staff the condition of air pollution "Alert", "Warning", or "Emergency" exists as described in Chapter V, Title 51 of the Authority Rules.

4. On or before 30 May 1974, Sandy Shake will submit a written report to the Authority which will include:

- a. Any significant change in operation of the burner, including quantity of material burned, nature of the material burned, hours of operation and mechanical condition of the burner.
- b. Any progress or development as related to further utilization of the wood waste burned or alternate means of compliance.

Respectfully submitted,



R. E. Hatchard

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

BOARD OF DIRECTORS MEETING
9:30 a.m., Friday, 15 June 1973
Auditorium, Portland Water Service Bldg.

Present:

Board of Directors: Fred Stefani, Chairman
A. J. Ahlborn
Ben Padrow
Mildred Schwab

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

EXTRACT

Publishers Paper, Portland Division

Mr. Hatchard reviewed the request made by Publisher Paper, Portland Division, at the 18 May Board of Directors meeting, as outlined in a memorandum to the Board dated 9 May 1973. Action on this request was postponed by the Board until the 15 June meeting in order to give the staff time to notify the residents in the area of Publishers Paper Company's request for variance from Authority rules to enlarge their veneer dryer capacity and install experimental air pollution control equipment. This variance, if granted, would have no effect on the schedule of compliance adopted by the Board of Directors on 15 December 1972 which requires emissions from the veneer dryers to be in full compliance with Authority rules by 31 December 1974.

Mr. Hatchard reviewed a memorandum dated 8 June 1973 which outlined the activities undertaken by the staff to inform the citizens in the area of the Publishers Paper variance request. He stated the majority of the replies from citizens were in favor of granting the variance.

Mr. E. E. Lentz, a resident near the Publishers Paper, Portland Division plant, made a statement complaining about the large quantities of oil smoke and wood smoke from Publishers Paper which drifts over his property a high percentage of the time.

Mrs. Robert Blue, also a resident in the neighborhood of Publishers Paper, stated that her family and neighbors are adversely affected by the large quantities of fallout and smoke from Publishers Paper Company.

Mr. Peter Schnell of Publishers Paper Company pointed out that his company is completing installation of baghouses which will bring the sawdust emissions into compliance with Authority Rules. He added that the boilers are now in compliance with the rules and the emissions from the veneer dryers are to be in compliance by 31 December 1974 under the schedule of compliance adopted by the Board. He pointed out that if the experimental air pollution control equipment, part of the variance request, was successful, compliance of the veneer dryer emissions might be attained prior to the 31 December 1974 date.

In answer to Commissioner Schwab's inquiry, Mr. Schnell stated that if the variance is granted, the increase in the blue haze or wood smoke will be small. These emissions may be controlled by the experimental equipment to be installed and if they are not, they must be in compliance with Authority rules by 31 December 1974.

After considerable further discussion, Commissioner Padrow moved, Commissioner Schwab seconded and the motion carried to grant a variance to Publishers Paper Company, Portland Division, to install additional veneer dryer capacity and to install and test air pollution control equipment that ultimately may be used to control other veneer dryer emissions, this variance subject to the conditions as outlined in the staff memorandum of 9 May 1973.

Columbia County Open Burning

Mr. Hatchard reviewed a memorandum dated 14 June 1973, copies of which were distributed to the Board members, concerning a variance to Columbia County from domestic burning and land clearing burning rules of CWAPA. He stated it was the recommendation of the staff that this variance be granted subject to the conditions as outlined in the 14 June memorandum. If the variance is granted, such open burning in Columbia County would comply with the current DEQ open burning rules and help alleviate the solid waste disposal problem in Columbia County.

Commissioner Ahlborn moved, Commissioner Schwab seconded and the motion carried to grant a variance to Columbia County for open burning as outlined in the 14 June 1973 memorandum.

Sandy Shake Company

Wayne Hanson reviewed a memorandum dated 12 June 1973, copies of which had been distributed to the Board members, which outlined the request from Sandy Shake Company for a variance to operate a modified wood waste burner at their mill in Sandy, Oregon. He stated that after reviewing the overall environmental affects of this variance request, the staff concluded that complete utilization of wood waste produced at this plant is not feasible at this time, and of the alternatives investigated by Sandy Shake Company and considering all environmental aspects, the proposed modified wood waste burner appears to be the most feasible solution with the least effect on the total environment. The staff recommends that the variance be granted for the period 30 June 1973 to 30 June 1974 to Sandy Shake Company to operate a modified wood waste burner subject to the conditions outlined in the memorandum dated 12 June 1973.

Mr. Dennis Melstrom, owner, Sandy Shake Company, stated that he has worked very hard to obtain the best burner possible.

After discussion, Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to grant the variance to Sandy Shake Company subject to the conditions as outlined in the 12 June 1973 memorandum.



DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 5395

TOM McCALL
GOVERNOR

MEMORANDUM

DIARMUID F. O'SCANNLAIN
Director

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. 1c, EQC Meeting, July 26, 1973

CWAPA Variance No. 73-6 Inhabitants of Columbia County,
Open Burning

Background

The Commissioners of Columbia County informed CWAPA through public meetings, early this year, that the residents of Columbia County had expressed the existence of an earnest need to allow open burning of domestic wastes and land clearing debris. A major concern was that haul distances to available land fills were too great for a large percentage of county residents. On June 15, 1973, CWAPA granted a variance to the inhabitants of Columbia County subject to the following conditions:

1. Effective July 1, 1973, domestic burning be permitted in all areas of Columbia County subject to any rules or regulations of fire protection agencies.

2. Effective July 1, 1973, open burning of rubbish from commercial, industrial and governmental sources is prohibited in all areas of Columbia County.

3. Effective January 1, 1974, open burning for land clearing purposes be permitted in all areas of Columbia County subject to any rules or regulations of fire protection agencies.

4. All other open burning remains subject to the existing rules of Columbia-Willamette Air Pollution Authority, Oregon Administrative Rules promulgated by the Environmental Quality Commission and rules or regulations of fire protection agencies.

The variance and reference materials have been forwarded for the Director's review and Commission action. The variance is for a period of time not to extend beyond June 30, 1974.

Analysis

The variance is conditioned to protect the air quality and provides a reasonable time in which to review the regulations. The Department has funded the Metropolitan Service District, assisted by their consultants, COR-MET Engineers, and in cooperation with CRAG to develop a solid waste management action plan for Multnomah, Clackamas, Columbia, and Washington counties to be completed by January 1, 1974. This plan is expected to provide a basis for a comprehensive review of the waste disposal alternatives and open burning regulations in the Columbia Willamette area.

Director's Recommendation

The Director recommends that CWAPA variance 73-6 to the inhabitants of Columbia County be approved with item #3 amended to require specific application to and written approval from the Department prior to conducting land clearing operations in excess of two acres.

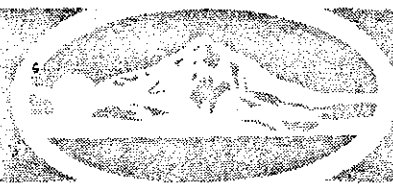
It would be the Department's intention to carefully evaluate this matter and apply appropriate rule changes if warranted by the expiration date of this variance (June 30, 1974).



DIARMUID F. O'SCANNLAIN

LDB:c

7/24/73



COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

28 June 1973

BOARD OF DIRECTORS

Fred Stefani, Chairman
Clackamas County

A. J. Ahlborn
Columbia County

Ben Padrow
Multnomah County

Mildred Schwab
City of Portland

Burton C. Wilson, Jr.
Washington County

Richard E. Hatchard
Program Director

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

Attention: Mr. Dairmuid O'Scanlain, Director

Subject: CWAPA Variance No. 73-6

Gentlemen:

Please find enclosed a copy of CWAPA Variance No. 73-6 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, CWAPA, 19 April 1973
- b. CWAPA Staff Memorandum, 14 June 1973
- c. Minutes, CWAPA Board of Directors, 15 June 1973 (Extract)

Very truly yours,

R. E. Hatchard
Program Director

REH:jlj
Enclosures

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED
JUN 28 1973

AIR QUALITY CONTROL

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

In the Matter of:

INHABITANTS of
COLUMBIA COUNTY, OREGON

}
}
}

No. 73-6

VARIANCE INCLUDING
FINDINGS AND CONCLUSIONS

FINDINGS

Due to the lack of development of solid waste disposal sites and/or methods in Columbia County, it is necessary to grant a variance to the inhabitants thereof to permit open burning for disposal of certain classes of materials.

CONCLUSIONS

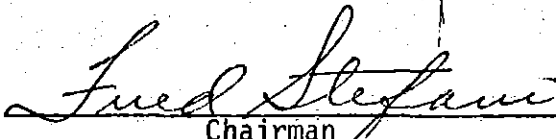
Pursuant to the provisions of ORS 449.880 and Columbia-Willamette Air Pollution Authority Rules, Title 23, Columbia-Willamette Air Pollution Authority has the power to grant the requested variance and said variance should be granted for a limited period of time, subject to certain conditions hereinafter set forth. Based upon the foregoing finding of fact and conclusion, the Board of Directors makes the following:

ORDER

NOW THEREFORE, IT IS HEREBY ORDERED that a VARIANCE from the provisions of Columbia-Willamette Air Pollution Authority Rules governing open burning be granted the inhabitants of Columbia County to permit disposal of certain solid waste materials by open burning, for a period of time not beyond 30 June 1974, subject to the following conditions:

1. Effective 1 July 1973, domestic burning be permitted in all areas of Columbia County subject to any rules or regulations of fire protection agencies.
2. Effective 1 July 1973, open burning of rubbish from commercial, industrial and governmental sources is prohibited in all areas of Columbia County.
3. Effective 1 January 1974, open burning for land clearing purposes be permitted in all areas of Columbia County subject to any rules or regulations of fire protection agencies.
4. All other open burning remains subject to the existing rules of Columbia-Willamette Air Pollution Authority, Oregon Administrative Rules promulgated by the Environmental Quality Commission and rules or regulations of fire protection agencies.

Entered at Portland, Oregon, the 15th day of June 1973.


Chairman

COLUMBIA-WILLAMETTE
AIR POLLUTION AUTHORITY
1010 N. E. COUCH STREET
PORTLAND, OREGON 97232
PHONE (503) 233-7175

19 April 1973

A. J. Ahlborn, Commissioner
Columbia County Courthouse
St. Helens, Oregon 97051

ROUTING	
To	Noted by
From:	
Action:	

Dear Commissioner Ahlborn:

In reviewing the Columbia-Willamette Air Pollution Authority program in Columbia County and progress being made toward achieving compliance with regional, state and federal air quality requirements, it is our staff opinion considerable progress has been accomplished by the commercial and industrial firms in Columbia County and compliance should be achieved within the allowable time.

However, a continuing problem exists throughout Columbia County in the development of adequate disposal facilities and alternatives for the disposal of vegetation material from residences and landclearing operations.

Considering all environmental aspects, it would be appropriate for the Board of Directors of the Columbia-Willamette Air Pollution Authority to review this situation as it pertains to the rules on open burning. The staff submits the following recommendations for consideration:

1. For the period 1 July 1973 to 1 January 1975, domestic open burning be permitted in all areas of Columbia County similar to that presently allowed in the Clatskanie, Vernonia rural fire protection district and the other rural areas of Columbia County.

The cut-off date of 1 January 1975 is necessary to meet compliance with the Oregon State Implementation Plan as submitted to the Federal government. We would further suggest prior to 1 January 1975, the situation be reviewed and based upon the facts known at that time, a realistic program to achieve compliance with the Federal requirements be implemented.

2. Effective 1 January 1974, open burning for landclearing purposes be permitted in all areas of Columbia County. Although disposal of landclearing material is a critical problem in some areas of Columbia County, the delayed effective date of 1 January 1974 is necessary because of existing landclearing contracts.

A. J. Ahlborn
Page 2
23 April 1973

3. Effective 1 July 1973, open burning from commercial, industrial and governmental sources is prohibited in all areas of Columbia County. This change is necessary to achieve compliance with Department of Environmental Quality regulations.

4. All other open burning would be subject to the existing rules of the Authority and requirements of the State of Oregon including rural fire protection regulations.

5. Prior to adoption of any changes in open burning rules, the proposed changes should be thoroughly reviewed with the fire permit issuing agencies in Columbia County.

Very truly yours,

REH
R. E. Hatchard
Program Director

REH:whj

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY

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

14 June 1973

BOARD OF DIRECTORS

Fred Stefani, Chairman
Clackamas County

A. J. Ahlborn
Columbia County

Ben Padrow
Multnomah County

Mildred Schwab
City of Portland

Burton C. Wilson, Jr.
Washington County

Richard E. Hatchard
Program Director

MEMORANDUM

TO: Board of Directors

FROM: R.E. Hatchard, Program Director

SUBJECT: Variance - Open burning in Columbia County

Dear Board Members:

At its 27 April 1973 meeting the CWAPA Board of Directors authorized the staff to draft rule revisions concerning open burning in Columbia County as outlined in the attached letter dated 19 April 1973.

Due to the PGE combustion turbine permit hearing, this matter was not heard by the Board at its May meeting. In order that this program may proceed as proposed, the staff recommends that the Board grant Columbia County a variance of CWAPA Rules, Sections 33-010 Domestic Burning and 33-015 (2) Land Clearing Burning, with the following conditions:

1. The variance be granted until 1 July 1974, which will allow adequate time for formal rule revisions.
2. Effective 1 July 1973, domestic open burning be permitted in all areas of Columbia County similar to that allowed in the Clatskanie and Vernonia rural fire protection districts and other rural areas of Columbia County.
3. Effective 1 January 1974, open burning for landclearing purposes be permitted in all areas of Columbia County.
4. Effective 1 July 1973, open burning from commercial, industrial and governmental sources is prohibited in all areas of Columbia County.
5. All other open burning would be subject to the existing rules of the Authority and requirements of the State of Oregon including rural fire protection regulations.

Board of Directors

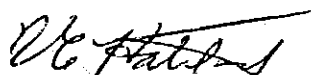
Page 2

14 June 1973

6. Prior to adoption of formal rule revisions of open burning, the proposed changes should be thoroughly reviewed with the fire permit issuing agencies in Columbia County.

If this variance is granted, such open burning in Columbia County would comply with the current DEQ open burning rules.

Respectfully submitted,



R. E. Hatchard

REH:tbj

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

BOARD OF DIRECTORS MEETING
9:30 a.m., Friday, 15 June 1973
Auditorium, Portland Water Service Bldg.

Present:

Board of Directors: Fred Stefani, Chairman
A. J. Ahlborn
Ben Padrow
Mildred Schwab

EXTRACT

Staff:

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

Publishers Paper, Portland Division

Mr. Hatchard reviewed the request made by Publisher Paper, Portland Division, at the 18 May Board of Directors meeting, as outlined in a memorandum to the Board dated 9 May 1973. Action on this request was postponed by the Board until the 15 June meeting in order to give the staff time to notify the residents in the area of Publishers Paper Company's request for variance from Authority rules to enlarge their veneer dryer capacity and install experimental air pollution control equipment. This variance, if granted, would have no effect on the schedule of compliance adopted by the Board of Directors on 15 December 1972 which requires emissions from the veneer dryers to be in full compliance with Authority rules by 31 December 1974.

Mr. Hatchard reviewed a memorandum dated 8 June 1973 which outlined the activities undertaken by the staff to inform the citizens in the area of the Publishers Paper variance request. He stated the majority of the replies from citizens were in favor of granting the variance.

Mr. E. E. Lentz, a resident near the Publishers Paper, Portland Division plant, made a statement complaining about the large quantities of oil smoke and wood smoke from Publishers Paper which drifts over his property a high percentage of the time.

Mrs. Robert Blue, also a resident in the neighborhood of Publishers Paper, stated that her family and neighbors are adversely affected by the large quantities of fallout and smoke from Publishers Paper Company.

Mr. Peter Schnell of Publishers Paper Company pointed out that his company is completing installation of baghouses which will bring the sawdust emissions into compliance with Authority Rules. He added that the boilers are now in compliance with the rules and the emissions from the veneer dryers are to be in compliance by 31 December 1974 under the schedule of compliance adopted by the Board. He pointed out that if the experimental air pollution control equipment, part of the variance request, was successful, compliance of the veneer dryer emissions might be attained prior to the 31 December 1974 date.

In answer to Commissioner Schwab's inquiry, Mr. Schnell stated that if the variance is granted, the increase in the blue haze or wood smoke will be small. These emissions may be controlled by the experimental equipment to be installed and if they are not, they must be in compliance with Authority rules by 31 December 1974.

After considerable further discussion, Commissioner Padrow moved, Commissioner Schwab seconded and the motion carried to grant a variance to Publishers Paper Company, Portland Division, to install additional veneer dryer capacity and to install and test air pollution control equipment that ultimately may be used to control other veneer dryer emissions, this variance subject to the conditions as outlined in the staff memorandum of 9 May 1973.

↙ Columbia County Open Burning

Mr. Hatchard reviewed a memorandum dated 14 June 1973, copies of which were distributed to the Board members, concerning a variance to Columbia County from domestic burning and land clearing burning rules of CWAPA. He stated it was the recommendation of the staff that this variance be granted subject to the conditions as outlined in the 14 June memorandum. If the variance is granted, such open burning in Columbia County would comply with the current DEQ open burning rules and help alleviate the solid waste disposal problem in Columbia County.

Commissioner Ahlborn moved, Commissioner Schwab seconded and the motion carried to grant a variance to Columbia County for open burning as outlined in the 14 June 1973 memorandum.

Sandy Shake Company

Wayne Hanson reviewed a memorandum dated 12 June 1973, copies of which had been distributed to the Board members, which outlined the request from Sandy Shake Company for a variance to operate a modified wood waste burner at their mill in Sandy, Oregon. He stated that after reviewing the overall environmental affects of this variance request, the staff concluded that complete utilization of wood waste produced at this plant is not feasible at this time, and of the alternatives investigated by Sandy Shake Company and considering all environmental aspects, the proposed modified wood waste burner appears to be the most feasible solution with the least effect on the total environment. The staff recommends that the variance be granted for the period 30 June 1973 to 30 June 1974 to Sandy Shake Company to operate a modified wood waste burner subject to the conditions outlined in the memorandum dated 12 June 1973.

Mr. Dennis Melstrom, owner, Sandy Shake Company, stated that he has worked very hard to obtain the best burner possible.

After discussion, Commissioner Padrow moved, Commissioner Ahlborn seconded and the motion carried to grant the variance to Sandy Shake Company subject to the conditions as outlined in the 12 June 1973 memorandum.



DEPARTMENT OF ENVIRONMENTAL QUALITY

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TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

MEMORANDUM


To: Environmental Quality Commission.
From: Director
Subject: Agenda Item No. J, July 26, 1973, EQC Meeting

CWAPA Transfer to DEQ

Mr. Arthur Seto, Division of Audits, will present the audit and inventory report on the former Columbia-Willamette Air Pollution Authority (CWAPA).

The inventory includes office furniture and fixtures, and scientific and technical equipment with an estimated total value of \$290,000. Additionally, fourteen (14) Multnomah County vehicles are assigned to personnel for carrying out official duties.

The audit report is not yet fully completed. All confirming replies for accounts receivable will not be in the hands of the auditor at the time of this report. Thus the interim report will be based on certain projections and estimates. A final written report will be forwarded to the Department upon completion of the audit.


for DIARMUID F. O'SCANNLAIN

WEG:ahc
7-24-73



DEPARTMENT OF ENVIRONMENTAL QUALITY

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TOM McCALL
GOVERNOR

DIARMUID F. O'SCANLAIN
Director

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No.K, July 26, 1973, EQC Meeting

Continuation of PUBLIC HEARING to Consider Adoption
of Proposed Amendments to Oregon Administrative Rules,
Chapter 340, Sections 25-255 through 25-290, PRIMARY
ALUMINUM PLANTS

The Public Hearing commenced on June 29, 1973 was recessed before testimony of Martin Marietta Aluminum and possibly others could be given. The hearing will be continued to receive additional testimony pertinent to proposed amendments of the primary aluminum plant regulations.

Director's Recommendation

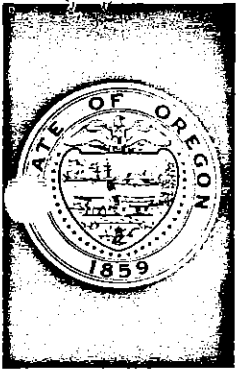
It is recommended by the Director that OAR, Chapter 340, Sections 25-255 through 25-290 be amended as proposed in the attached proposed amended regulations, with such further amendments as may be deemed appropriate after consideration of information developed as a result of this hearing.


DIARMUID F. O'SCANLAIN

EJW:vt
7/18/73

Attachments:

- (1) Staff report given at June 29, 1973 EQC Meeting
- (2) Proposed amended regulations pertaining to Primary Aluminum Plants



DEPARTMENT OF ENVIRONMENTAL QUALITY

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TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. H, June 29, 1973, EQC Public Hearing
Proposed Revisions to Primary Aluminum Plant Regulations

Background

The Environmental Quality Commission at its October 25, 1972, meeting authorized the scheduling of this hearing for the purpose of receiving testimony relevant to proposed amendments to the Primary Aluminum Plant Regulations, OAR, Chapter 340, Sections 25-255 through 25-290. The materials presented at the October 25, 1972, meeting are appended hereto and made a part of the record of this hearing. Draft standards were proposed at that time which would limit emissions from all aluminum plants to 0.3 pounds of gaseous fluoride ion per ton of aluminum produced, 1.0 pound of total fluoride ion per ton of aluminum produced and 8.0 pounds of total particulate per ton of aluminum produced.

Since being authorized to conduct this hearing, the Department has met with representatives of Reynolds Metals Company, Martin Marietta Aluminum and Amax Aluminum Company. In addition, Martin Marietta Aluminum and Reynolds Metals Company submitted comprehensive

detailed reports commenting on the technical feasibility of meeting the proposed standards. Amax Aluminum Company did not submit a technical evaluation of the proposed standards. The Department also submitted the October 25, 1972, draft of the proposed amendments to the Environmental Protection Agency for evaluation. EPA expressed doubt that the proposed standards could be met by existing plants and indicated that it would be difficult for new, well-controlled plants to meet the standards. The information submitted to the Department by the aluminum companies and EPA are appended hereto and made a part of the record of this hearing. In essence, the aluminum companies have claimed that the draft standards proposed on October 25, 1972, could not be met at existing facilities. It should be noted, however, that monitoring data recently submitted to the Department by Martin Marietta Aluminum reported individual total fluoride emission test results of 0.68 and 0.99 lb. F⁻/ton Al for a monthly average of 0.835 lb. F⁻/ton Al during February, 1973, and 0.86 and 1.20 lb. F⁻/ton Al for a monthly average of 1.03 lb. F⁻/ton Al during April, 1973. In addition, Amax stated in its letter of May 11, 1973, that the plant they propose to build at Warrenton will be capable of operating at an emission level which will not exceed 1.5 lbs. of fluoride ion per ton of aluminum produced as a monthly average.

As of May 14, 1973, the only other comments received by the Department from any source other than those mentioned above are letters from Mr. Arden Shenker and Dr. Aaron J. Teller which are attached hereto and made a part of the record of this hearing. Mr. Shenker expressed agreement with the fluoride levels proposed on October 25, 1972, and indicated a preference for maximum limits on a daily basis which he said he would suggest at a later date. (The limits on a daily basis would be in addition to the proposed limits based on monthly averages.) Dr. Teller suggested that total fluoride emissions be restricted to 0.5 to 0.6 pound of water soluble fluoride (WSF) per ton of aluminum produced. (According to EPA, 0.5 to 0.6 pound WSF per ton of aluminum is equivalent to 0.526 to 0.632 pound of total fluoride per ton of aluminum.)

After considering the submittals from the industry, EPA and others, the Department has prepared the proposed amendments under consideration today. The proposed amendments, which are attached, have been prepared by enclosing language to be deleted from the existing regulations in brackets, [], and underlining new or added language. The Department concludes that the fluoride emission limits proposed will likely require technical advancements beyond the existing demonstrated control methods or generally accepted current state of the art. A major concern of the Department is to require low enough emission levels which ensure with reasonable certainty that no damage to Oregon people, animals, or plant life will occur.

The presently proposed amendments are essentially the same as those that were under consideration on October 25, 1972, except that the opacity of visible emissions from any source is now proposed to be limited to 10% (Ringelmann 0.5) instead of 20% (Ringelmann 1.0) as is required by the existing regulations and as originally proposed in the October 25, 1973, draft. The presently proposed standards would require new plants to meet all of these emission limits within 60 days after completing potroom start-up. Existing plants would be required to file and have accepted by the DEQ specific compliance schedules for meeting all of the proposed emission limits, but the completion time as proposed, could not extend beyond January 1, 1976. Monitoring and reporting requirements would be essentially the same as at present.

A new Section 25-270 is proposed to allow even more stringent standards if found necessary after due consideration of special seasonal or area problems and determination of total assimilative capacity of any given area. Thus, the proposed amendments are intended to provide for adequate protection of the environment and for other beneficial uses of the resources of any area within the State of Oregon.

Discussion

The presently proposed amendments will limit the total quantities of fluoride materials and particulates from all emission sources at primary aluminum plants.

The limits to be imposed on new plants (those plants constructed and operated after January 1, 1973) are the same as

the limits to be imposed on existing plants (those plants constructed and operated on or before January 1, 1973). However, existing plants are given a time to comply, but new plants must immediately comply.

The fluoride limits proposed include 0.3 pound gaseous fluoride ion and 1.0 pound total fluoride ion (gaseous F plus particulate F) emitted from all sources in pounds per ton of aluminum produced. Fluoride emissions are of concern due to their potential adverse effects on sensitive plant and animal life. Gaseous fluorides are of particular concern because of their known adverse effects on sensitive plant life.

At plants which use pre-baked anodes, such as the Reynolds Metals Company plant at Troutdale, the major air contaminant sources include the aluminum reduction pots, the potrooms and the anode bake plant. (The cast house, cryolite recovery plant and fluoride materials handling processes at Troutdale will be evaluated as minor sources of both F⁻ and particulate emissions.) At vertical stud Soderberg facilities, such as the Martin Marietta Aluminum plant at The Dalles, the major fluoride and particulate sources are the pots and the potrooms. (The cast house and the fluoride materials handling processes at The Dalles will be evaluated as minor sources of both F⁻ and particulate emissions.)

Summary and Conclusions

1. The magnitudes of all limitations contained in these proposed amended regulations were developed with the intent of arriving at restrictive levels which would be achievable by application of the best attainable control technology and which would ensure that no damage occurs to Oregon people, animals or plant life.

2. The magnitudes of the fluoride limitations were based on reducing the average emissions reported by Martin Marietta from their secondary system by approximately 50 percent. Specific control procedures would include high efficiency collection and treatment of pot exhaust gases resulting in essentially negligible emissions from the primary system, careful scheduling and regulating of potroom activities thereby minimizing open pot time and maximizing high efficiency control, and an adequate secondary treatment system for controlling potroom emissions. The magnitudes of the particulate limitations were based on information reported in the literature and Department observations of emissions at aluminum plants. Also, some of the fluoride and particulate emission data recently reported by Martin Marietta Aluminum have, at times, been below the proposed levels. For all of the above reasons, it has been concluded that new plants should be capable of complying with the proposed emission limits on a continuous basis.

3. Monitoring data submitted indicate that although the Martin Marietta aluminum plant at The Dalles, Oregon, has on occasion reported fluoride emissions below the proposed levels, this plant presently is not capable of routinely complying with the proposed numerical F⁻ and particulate limits of Section 25-265.

4. Monitoring data and other information submitted indicate that the Reynolds Metals Company plant at Troutdale, Oregon, will have to significantly reduce emissions of both fluorides and particulates to meet the proposed limitations of Section 25-265 for existing plants and will have considerable difficulty in complying.

5. With due consideration of special seasonal, topographical or meteorological problems and total assimilative capacity of any given area as provided for under the new Section 25-270, the proposed regulations should allow for adequate protection of the environment and for other beneficial uses of area resources for any area within the State.

Director's Recommendation

It is recommended by the Director that OAR, Chapter 340, Sections 25-255 through 25-290 be amended as proposed herein, with such further amendments as may be deemed appropriate after consideration of information developed as a result of this hearing.



for DIARMUID F. O'SCANNLAIN

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY CONTROL DIVISION

May 1973

Proposed
Amendments to OAR, Chapter 340, Division 2

OAR, Chapter 340, Division 2, Sections 25-255 through 25-290 is proposed to be amended as follows:

25-255 STATEMENT OF PURPOSE.

In furtherance of the public policy of the state as set forth in ORS 449.765, it is hereby declared to be the purpose of the Commission in adopting the following regulations to:

- (1) Require, in accordance with a specific program and time table for each operating primary aluminum plant the highest and best practicable collection, treatment and control of atmospheric pollutants emitted from primary aluminum plants through the utilization of technically feasible equipment, devices and procedures necessary to attain and maintain desired air quality.
- (2) Require effective monitoring and reporting of emissions, ambient air levels of fluorides, fluoride content of forage and other pertinent data. The Department will use these data, in conjunction with observation of conditions in the surrounding areas, to develop emission and ambient air standards and to determine compliance therewith.
- (3) Encourage and assist the aluminum industry to conduct a research and technological development program designed to reduce emissions, in accordance with a definite program, including specified objectives and time schedules.

- (4) Establish standards which based upon presently available technology, are reasonably attainable with the intent of revising the standards as needed when new information and better technology are developed.

25-260

DEFINITIONS.

- (1) All Sources - Means sources including, but not limited to, the reduction process, alumina plant, anode plant, anode baking plant, cast house, and collection, treatment and recovery systems.
- (2) Ambient Air - The air that surrounds the earth, excluding the general volume of gases contained within any building or structure.
- (3) Anode Baking Plant - Means the heating and sintering of pressed anode blocks in oven-like devices, including the loading and unloading of the oven-like devices.
- (4) Anode Plant - Means all operations directly associated with the preparation of anode carbon except the anode baking operation.
- (5) Commission - Means Environmental Quality Commission.
- (6) Cured Forage - Means hay, straw, ensilage that is consumed or is intended to be consumed by livestock.
- (7) Department - Means Department of Environmental Quality.
- (8) Emission - Means a release into the outdoor atmosphere of air contaminants.
- (9) Emission Standard - Means the limitation on the release of a contaminant or multiple contaminants to the ambient air.

- (10) Fluorides - Means matter containing fluoride ion.
- (11) Forage - Means grasses, pasture and other vegetation that is consumed or is intended to be consumed by livestock.
- (12) Monthly Average - Means the arithmetic average of all test results obtained during any calendar month.
- [(12)] (13) Particulate Matter - Means a small, discrete mass of solid or liquid matter, but not including uncombined water.
- [(13)] (14) Primary Aluminum Plant - Means those plants which will or do operate for the purpose of or related to producing aluminum metal from aluminum oxide (alumina).
- [(14)] (15) Pot Line Primary Emission Control Systems - Means the system which collects and removes contaminants prior to the emission point. If there is more than one such system, the primary system is that system which is most directly related to the aluminum reduction cell.
- [(15)] (16) Regularly Scheduled Monitoring - Means sampling and analyses in compliance with a program and schedule approved pursuant to Section [25-275] 25-280.
- [(16)] (17) Standard Dry Cubic Foot of Gas - Means that amount of the gas which would occupy a cube having dimensions of one foot on each side, if the gas were free of water vapor at a pressure of 14.7 P. S. I. A. and a temperature of 60°F.

25-265 EMISSION STANDARDS.

- [(1)] Visible emissions from all sources shall not exceed twenty (20) percent opacity (Ringelmann 1).]

- (1) The exhaust gases from each primary aluminum plant shall be collected and treated as necessary so as not to exceed the following minimum requirements:
 - (a) The total of gaseous fluoride emissions from all sources shall not exceed a monthly average of 0.3 pound of fluoride ion per ton of aluminum produced.
 - (b) The total of all fluoride material emissions from all sources shall not exceed a monthly average of 1.0 pound of fluoride ion per ton of aluminum produced.
 - (c) The total of organic and inorganic particulate matter emissions from all sources shall not exceed a monthly average of 8.0 pounds per ton of aluminum produced.
 - (d) Visible emissions from any source shall not exceed ten (10) percent opacity (Ringlemann 0.5) at any time.
- (2) Each primary aluminum plant constructed and operated on or before January 1, 1973, shall proceed promptly with a program to comply as soon as practicable with [this] these regulations. A proposed [schedule of compliance] program and implementation plan shall be submitted by each plant to the [Commission] Department not later than one hundred and eighty (180) days after the effective date of [this] these amended regulations. After receipt of the proposed [schedule] program and implementation plan, the [State] Department shall establish a schedule of compliance for each plant. Such schedule shall include the dates by which [full] compliance [must] shall be achieved but, in no case, shall full compliance be later than January 1, [1975] 1976.
- (3) Each primary aluminum plant constructed and operated after January 1, 1973, shall be in full compliance with these regulations no

later than 60 days after completing potroom start-up and shall maintain full compliance thereafter.

25-270

SPECIAL PROBLEM AREAS.

The Department may require more restrictive emission limits than the numerical emission standards contained in Section 25-265 for an individual plant upon a finding by the Commission that the individual plant is located or is proposed to be located in a special problem area. Such more restrictive emission limits for special problem areas may be established on the basis of allowable emissions per ton of aluminum produced or total maximum daily emissions to the atmosphere, or a combination thereof, and may be applied on a seasonal or year-round basis.

[25-270]

25-275

HIGHEST AND BEST PRACTICABLE TREATMENT AND CONTROL REQUIREMENT.

[Notwithstanding the specific emission limits set forth in Section 25-265 of these regulations, in] In order to maintain the lowest possible emissions of air contaminants, the highest and best practicable treatment and control currently available shall in every case be provided[.], but this section shall not be construed to allow emissions to exceed the specific emission limits set forth in Section 25-265.

[25-275]

25-280

MONITORING

(1) Each primary aluminum plant constructed and operated on or before January 1, 1973, shall submit, within sixty (60) days.

after [an] the effective date of [this] these amended regulations, a detailed monitoring program. The proposed program shall be subject to revision and approval by the [Commission] Department. The program shall include regularly scheduled monitoring for emissions of gaseous and particulate fluorides and total particulates. A schedule of measurement of fluoride levels in forage and ambient air shall be submitted. The program shall be placed in effective operation within ninety (90) days after approval by the Department.

- (2) [Necessary sampling and analysis equipment shall be ordered or otherwise provided for within thirty (30) days after the monitoring program has been approved in writing by the Commission. The equipment shall be placed in effective operation in accordance with the approved program within ninety (90) days after delivery.] Each primary aluminum plant proposed to be constructed and operated after January 1, 1973, shall submit a detailed preconstruction and post-construction monitoring program as a part of the air contaminant discharge permit application. The monitoring program shall be subject to revision and approval by the Department. The program shall be placed in effective operation in accordance with the Department approval.

[25-280]

25-285

REPORTING.

- (1) Unless otherwise authorized in writing by the [Commission] Department, data shall be reported by each primary aluminum plant within thirty (30) days of the end of each calendar month for each source and station included in the approved monitoring program as follows:
 - (a) Ambient air: Twelve-hour concentrations of gaseous fluoride in ambient air expressed in micrograms per cubic meter of air.
 - (b) Forage: Concentrations of fluoride in forage expressed in ppm of fluoride on a dried weight basis.
 - (c) Particulate emissions: Results of all emission sampling conducted during the month for particulates, expressed in grains per standard dry cubic foot, in pounds per day, and in pounds per ton of aluminum produced. The method of calculating pounds per ton shall be as specified in the approved monitoring programs. Particulate data shall be reported as total particulates and percentage of fluoride ion contained therein.
 - (d) Gaseous emissions: Results of all sampling conducted during the month for gaseous fluorides. All results

shall be expressed as hydrogen fluoride in micrograms per cubic meter [on a volume basis] and pounds per day of hydrogen fluoride.

- (e) Other emission and ambient air data as specified in the approved monitoring program.
 - (f) Changes in collection efficiency of any portion of the collection or control system that resulted from equipment or process changes.
- (2) Each primary aluminum plant shall furnish, upon request of the [Commission] Department such other data as the [Commission] Department may require to evaluate the plant's emission control program. Each primary aluminum plant shall immediately report abnormal plant operations which result in increased emission of air contaminants.
- (3) [Prior to construction, installation or establishment of a primary aluminum plant, a notice of construction shall be submitted to the Commission.] No person shall construct, install, establish or operate a primary aluminum plant without first applying for and obtaining an air contaminant discharge permit from the Department. Addition to, or enlargement or replacement of, a primary aluminum plant or any major alteration [therein] thereof shall be construed as construction, installation or establishment.

[25-285 SPECIAL STUDIES.

- (1) Special studies, covering the areas in subparagraphs (a), (b) and (c) of this subsection shall be conducted at each primary aluminum plant.
 - (a) Emissions of particulates from all sources within the plant, including size distribution and physical and chemical characteristics where feasible, and a separation of fluoride and non-fluoride particulate.
 - (b) Plume opacity from all sources within the plant, including its relationship to grain loading, particulate characteristics, particulate emissions in pounds per ton of production and stack characteristics.
 - (c) Emissions of sulfur dioxide, hydrocarbons, carbon monoxide, chlorine and chlorides, oxides of nitrogen, ozone, water vapor, and fluorides from all sources.
- (2) Each primary aluminum plant shall submit a program for conducting the aforesaid special studies to the Commission for approval within sixty (60) days after the effective date of this regulation.
- (3) The results of the special studies shall be submitted to the Commission not later than eighteen (18) months after approval of the special studies program.]

[25-290 REVISION OF EMISSION STANDARDS.

- (1) A public hearing may be called on or before ninety (90) days after submission of the results of the special studies to evaluate the special studies, current technology and adequacy

of these regulations and to make revisions to the regulations as necessary.

- (2) The Commission may, after public hearing, establish more restrictive regulations for new primary aluminum plants or for plants that expand existing facilities. Data documenting projected emissions and changes in or effects upon air quality that would result from the construction or expansion, must be submitted to the Commission, together with plans and specifications, in accordance with Section 25-280 (3).]