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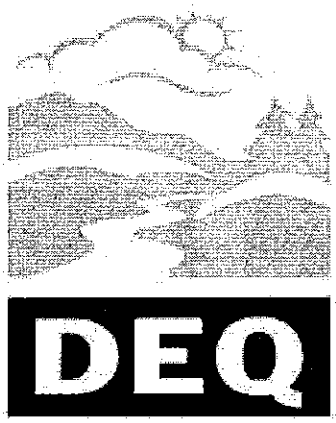
9/20/1974

OREGON
ENVIRONMENTAL QUALITY
COMMISSION MEETING
MATERIALS



State of Oregon
Department of Environmental Quality

[Tentative]

A G E N D A

ENVIRONMENTAL QUALITY COMMISSION

meeting of
September 20, 1974

Second Floor Auditorium, Public Service Building
920 S. W. Sixth Avenue, Portland, Oregon

9 a.m.

A. Minutes of September 4, 1974 Commission Meeting

B. August 1974 Program Activity Report

C. Tax Credit Applications

D. Oregon CUP Award Screening Committee Recommendations

1. Nomination
2. Renewals

NORTHWEST REGION

E. Glenmorrie Community Sewage Disposal, Clackamas County--Certification to the State Health Division As to Adequacy of Preliminary Sewer Plans and Schedule

F. Proposed Interim Policy for Approving New or Expanded Air Emission Sources in the Portland Metro Area

10:30 a.m. G. Oregon Portland Cement Plant, Lake Oswego--Public Informational Hearing

AIR QUALITY

H. Ambient Air Standard for Lead--Status Report

I. Union Oil Company--Variance Request

J. Authorization for Public Hearing to Adopt Rules for Indirect Sources (Complex Sources)

LAND QUALITY

K. Adoption of Temporary Rules Pertaining to Standard Specifications for Homogeneous Perforated Bituminized Fiber Pipe for Septic Tank Disposal Fields

WATER QUALITY

L. Fishhawk Lake Recreation Club--Bond Request for Private Sewage Treatment System

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The Commission will meet for breakfast at 7:30 a.m. in the River Room, Congress Hotel.

No-host luncheon at Noon, Congress Hotel, back dining room.

ENVIRONMENTAL QUALITY COMMISSION

Attendance Record

Meeting of September 20, 1974 in Portland, Oregon

Name	Organization	Address
RICHARD D. BACH	ATTY	PUBLIC SERVICE BLDG - PORTLAND
Carl N. Petterson	Northwest Nat. Gas Co.	123 NW Flanders St.
James R. Moore	ATTY	Standard Plaza Portland, Ore
[illegible]	[illegible]	[illegible]
[illegible]	Glenmorrie Corp	2145 S. Glenmorrie Dr.
JOHN VLASTELICIA	EPA/OREGON	1234 SW Morrison, PDX
Chuck Clinton	DEQ	
Dan Pallat	Midland - Ross	P.O. Box 03165 Port. 97203
W Ross Dey	" "	"
Barbara Burton	DEQ	1010 NE Couch
Dave Hobson	Atty	621 S.W. Alder
E R Friess	Union Oil Co	Los Angeles
R.R. Runge	Union Oil Co	Los Angeles
W. Hitchcock	Port of Portland	PO 3529
Richard Meeker	The Oregonian	1320 SW BROADWAY
William A Headlee	—	1874 Glenmorrie L.O.
WARREN OLIVER	—	1534 S. CHERRY LN. L.O.
Barbara Lucas	LWV of Portland	7325 SW 3rd
Maxine MacColl	LWV of Portland	2620 S.W. Georgian Pl.
Jerry Harper	Weyerhaeuser Co	Springfield, Ore
George Tsongas	OEC, NEDC	2922 NW 53rd Dr. Portland
Roger A Uhrig	Columbia Independent Refining	200 S.W. Market St
Richard P. Waterman	Resident & Glenmorrie	1515 S. Cherry Lane Lake Oswego, Ore. 97034

D. L. SAMUELSON	UNION OIL Co.	PORTLAND
John Moran	Portland Steel Mill	1505 Steel Plaza Portland
Judith Fagg	League of Women Voters	Lake Oswego
[illegible]	Oregon Portland Cement	Portland
Emil Vandecar	Oregon Portl. cement.	Lake Oswego.
E. L. Miller	Oregon Portland Cement	Lake Oswego
M. F. Muench	Ore Port Cement	Lake Oswego
Russell [illegible]	Oregon Portland Cement	Lake Oswego
[illegible]	Glen Odell Cons. Engr	Portland
HEIDI McLEAN (MRS. J.W.)	RESIDENT NEAR OPC	LK. OSWEGO
Steve J Gunwalter	Dee Thomason Ford	Lake Oswego
J. Eugene POPMA	Resident near OPC	✓ ✓
Mr. & Mrs. John Dellett	Glenmorrie resident	2247 S. Glenmorrie Ln. Lake Oswego, Ore
Dean McCarger	Oregon Steel Mills	Portland

MINUTES OF THE SIXTIETH MEETING

of the

OREGON ENVIRONMENTAL QUALITY COMMISSION

September 4, 1974

Public notice having been given to the news media, other interested persons and the Commission members as required by law, the sixtieth meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 8 a.m. on Wednesday, September 4, 1974, in the 13th Floor Conference Room of the Port of Portland, Lloyd Building, Portland, Oregon.

Commission members present were B. A. McPhillips, Chairman, Dr. Morris K. Crothers, Mrs. Jacklyn L. Hallock, Dr. Grace S. Phinney, and Ronald M. Somers.

The Department was represented by Director Kessler R. Cannon; Deputy Director Ronald L. Myles; Assistant Directors Frederick M. Bolton (Enforcement), Wayne Hanson (Air Quality), Harold L. Sawyer (Water Quality), and Kenneth H. Spies (Land Quality); Regional Administrators Verner J. Adkison (Midwest), Richard P. Reiter (Southwest), and E. Jack Weathersbee (Northwest); staff members John E. Core, Dr. Robert L. Gay, Thomas Guilbert, John M. Hector, John F. Kowalczyk, Harold M. Patterson, Barbara J. Seymour, Shirley G. Shay, Fredric A. Skirvin, Paul M. Stolpman, R. Dennis Wiancko, and Dr. Warren C. Westgarth; Chief Counsel Raymond P. Underwood and Assistant Attorney General Robb Haskins.

Representing EPA Region X, Oregon Operations Office, was Director John J. Vlastelicia.

MINUTES OF THE JULY 19, 1974 COMMISSION MEETING

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to approve the minutes of the fifty-ninth meeting of the Commission, held in Salem on July 19, 1974.

PROGRAM ACTIVITY REPORT FOR THE MONTH OF JULY 1974

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to give

confirming approval to staff actions, as reported by Mr. Myles, regarding the 78 domestic sewage, 7 industrial waste, 32 air quality control, and 10 solid waste management projects:

Water Quality Control - Northwest Region (24)

Date	Location	Project	Action
6-25-74	USA (Tigard)	Lake Terrace sanitary sewers	Prov. app.
6-25-74	USA (Sunset)	Sanitary sewer relocation for Sunset Science Park	Prov. app.
6-25-74	Hillsboro (Westside)	West Side trunk system, Schedules E and F	Prov. app.
7-1-74	Salem (Willow)	Sanitary sewers in Barnes Road S.E. from Sunnyside Road to Commercial Street via 10th Ave.	Prov. app.
7-3-74	Salem (Willow)	Sanitary sewers in Fabry Road, west of Commercial Street S.E.	Prov. app.
7-5-74	CCSD #1	Hillwood Subdivision sanitary sewers	Prov. app.
7-7-74	Hillsboro (Rock Creek)	Sanitary sewers for Country Squire's Estates	Prov. app.
7-8-74	Oak Lodge S.D.	Sanitary sewer lateral, B-O-14 extension	Prov. app.
7-9-74	Hillsboro	West Side sanitary sewer trunk Schedules A, B, C and D	Prov. app.
7-9-74	Gresham	Kellykrest Subdivision sanitary sewers	Prov. app.
7-9-74	USA (Aloha)	Town Center at Tanasbourne sanitary sewer extension	Prov. app.
7-10-74	USA (Forest Grove)	Rosearden Drive and Tualatin Valley Hwy. sanitary sewers	Prov. app.
7-10-74	USA (Aloha)	Aloha Park Housing sanitary sewers	Prov. app.
7-10-74	USA (Fanno Creek)	Montclair sanitary sewer relocation	Prov. app.
7-10-74	USA (Aloha)	S.W. Hart Road sanitary sewer	Prov. app.
7-11-74	Newberg	Southeast sanitary sewers, project number 126	Prov. app.
7-12-74	Gresham	South Down sanitary sewers	Prov. app.
7-12-74	USA (Fanno)	Royal Oaks Court sanitary sewers	Prov. app.
7-12-74	CCSD #1	revised - Hillwood Subdivision sanitary sewers	Prov. app.
7-12-74	Troutdale	Fraley Heights sanitary sewers	Prov. app.
	Salem (Willow)	Dorchester Heights sanitary sewers	Prov. app.
7-17-74	Sandy	Longville Estates sanitary sewers	Prov. app.
7-18-74	USA (Metzger)	S.W. Davis Road sanitary sewers	Prov. app.
7-18-74	Salem (Willow)	Kanuku Street sanitary sewers	Prov. app.

Water Quality Control - Water Quality Division (54)

Date	Location	Project	Action
7-2-74	Bend	Grit works and sludge dump station	Prov. app.
7-2-74	Umatilla	McNary interceptor sewer	Prov. app.
7-2-74	USA (Sunset)	STP modifications	Prov. app.
7-3-74	Boardman	Interim STP expansion (aerated lagoon)	Prov. app.
7-3-74	Toledo	Ollala Slough interceptor sewer	Prov. app.
7-8-74	USA (Aloha)	STP modifications & addenda 1, 2	Prov. app.
7-8-74	St. Helens	C.O. No. C-5, nutrient feed project	Approved
7-8-74	Prineville	Hidden Springs Subdivision sewers	Prov. app.
7-8-74	Springfield	Four sewer projects	Prov. app.
7-8-74	Eugene	Woodhaven Subdn, Phase II sewers	Prov. app.
7-8-74	Veneta	Forest Hills Subdivision sewers	Prov. app.
7-8-74	Toledo	Toledo High School sewer	Prov. app.
7-8-74	Warrenton	Add No. 1 - East Warrenton Int.	Approved
7-9-74	Bly S.D.	Barnes Valley Road sewers	Prov. app.
7-9-74	Harrisburg	La Salle Street sewers	Prov. app.
7-9-74	Ashland	Briggs Subdivision sewers	Prov. app.
7-11-74	Eugene	Four sewer projects	Prov. app.
7-12-74	Eugene	Warren Street sewer	Prov. app.
7-12-74	Sutherlin	Croade Loma Subdivision sewers	Prov. app.
7-18-74	Eugene	2 sewer projects	Prov. app.
7-19-74	NTCSA	C.O. #B-1 & B-2 Sch. IV C.O. #B-1 & B-2 Sch. III	Approved Approved
7-19-74	Lakeview	Lift station and force main, Hay School	Prov. app.
7-26-74	BCVSA	Prune Street sewer	Prov. app.
7-26-74	Springfield	Sanitary sewer project S-132, North A Street	Prov. app.
7-29-74	Winston	Winston STP outfall reconstruction	Prov. app.
7-29-74	Portland	Addenda No. 1 & 2 Col. Blvd., Outfall Project	Approved
7-29-74	Springfield	Debra Drive sewers	Prov. app.
7-29-74	Pendleton	C.O. #1 - Mt. Hebron Int.	Approved
7-29-74	Bend	Holliday Park subdn sewers	Prov. app.
7-29-74	Coos Bay	Sewer separation project	Prov. app.
7-30-74	Hermiston	Sanitary sewer between Quince and Pine	Prov. app.
7-30-74	USA (Sunset)	Addendum #2 STP Improvements	Prov. app.
7-30-74	Wasco County	Pine Hollow development report	Prov. app.
7-30-74	Grants Pass	Central Avenue interceptor	Prov. app.
7-31-74	NTCSA	C.O. A-1 & B-1, Sch. II; C.O. B-3, B-4 & B-5, Sch. IV	Approved
7-31-74	Bly S.D.	Smith commercial development sewer	Prov. app.
7-31-74	Metolius	Sewage collection and treatment plans 5.5 Ac. sewage lagoon plus effluent disinfection and irrigation	Prov. app.
7-31-74	Jordan Valley	Sewage collection and treatment works 8.4 Ac sewage lagoon plus effluent disinfection and irrigation	Prov. app.

Water Quality Control - Industrial Projects (7)

Date	Location	Project	Action
6-25-74	Lane County	Pape Brothers, Inc. wastewater control facilities	Prov. app.
6-27-74	Benton County	Western Pulp Products Co. wastewater control facilities	Prov. app.
7-2-74	Columbia County	Kaiser Gypsum Co., Inc. sludge disposal operation	Prov. app.
7-5-74	Washington County	Harvey O. Kempema animal waste facilities	Prov. app.
7-5-74	Washington County	Merle A. Peters animal waste facilities	Prov. app.
7-16-74	Washington County	Ernest Rieben animal waste facilities	Prov. app.
7-17-74	Washington County	Charles L. Vuylsteke animal waste facilities	Prov. app.

Air Quality Control - Northwest Region (4)

Date	Location	Project	Action
7-10-74	Multnomah County	Blue Bell Potato Chip Company installation of a potato chip fryer and a necessary odor control system	Approved
7-16-74	Multnomah County	Chevron Asphalt Company installation of a 5,000 barrel storage tank for asphalt emulsion	Approved
7-16-74	Multnomah County	Nicolai Company control of wood dust from two cyclones	Approved
7-29-74	Multnomah County	Reynolds Metals Company control of emissions from carbon bake furnaces utilizing wet electrostatic precipitators	Approved

Air Quality Control - Air Quality Division (28)

Date	Location	Project	Action
7-1-74	Douglas County	International Paper hogged fuel boiler modification	Approved
7-3-74	Lake County	Louisiana Pacific hogged fuel boiler installation	Approved
7-3-74	Coos County	Georgia Pacific boiler S.T. Report evaluation	Approved
7-5-74	Lake County	Louisiana Pacific green sawdust collection system and storage bins installation	Approved
7-5-74	Deschutes County	Brooks-Willamette installation of Coe Sander and Carter Day baghouse	Approved
7-8-74	Deschutes County	Brooks-Willamette installation of #4 dryer (particleboard) heated by boiler flue gas, controlled by rotoclone wet scrubbers	Approved
7-5-74	Deschutes County	Brooks Willamette installation of sanderdust boilers and Zern multiclone flyash collector	Approved

Air Quality Control - Air Quality Division (cont)

Date	Location	Project	Action
7-10-74	Clackamas County	Kruse Way - FAS 943	Add. info. req.
7-11-74	Jackson County	Robert Dollar Co. evaluate bark dryer source test report	Add. info. req.
7-15-74	Multnomah County	McDonald's Restaurant 63-space parking facility	Add. info. req.
7-16-74	Marion County	Oak Street Medical Center 21-sapce parking expansion	Prov. app.
7-16-64	Jackson County	Northwest Printed Circuits, Inc. construction of a printed circuit board manufacturing facility	Approved
7-17-74	Josephine County	Bate Plywood veneer dryer emissions control	Add. info. req.
7-19-74	Multnomah County	Goss Construction 190-space parking facility	Deferred action (EQC action)
7-19-74	Multnomah County	I-205 9.2 mile freeway section	Prov. app. (EQC action)
7-22-74	Multnomah County	Mt. Hood Mall 6,328-space parking facility	Add. info. req.
7-22-74	Jackson County	Carolina Pacific Carter Day baghouse filter	Approved
7-23-74	Josephine County	Carolina Pacific installation of two Carter Day baghouse filters	Approved
7-24-74	Lake County	Fremont Sawmill installation of hogged fuel house	Approved
7-24-74	Multnomah County	McCormick Dock, Inc. 500- space parking facility	Add. info. req.
7-24-74	Lake County	Fremont Sawmill WWB modification	Approved
7-25-74	Douglas County	Roseburg Shingle and Stud installation of woodwaste recovery system	Approved
7-26-74	Multnomah County	State of Oregon Human Resources Department 180-space parking facility	Prov. app.
7-30-74	Malheur County	Western Farmers Association installation of "dustless" hammermill	Approved
7-30-74	Multnomah County	Gresham Skate World 134-space parking facility	Prov. app.
7-31-74	Morrow County	Kinzua Corporation modification to existing hogged fuel boiler #1; installation of new propane and light oil-fired boiler (350 hp)	Approved
7-31-74	Marion County	The Old Garfield School Building 70-space parking facility	Prov. app.
7-31-74	Marion County	Salem Senior Center 94-space parking facility	Prov. app.

Land Quality - Northwest Region (6)

Date	Location	Project	Action
7-10-74	Multnomah County	Resource Recovery Byproducts new domestic waste processor (letter authorization)	Prov. app.
7-10-74	Clatsop County	Arch Cape County Service District new demolition landfill (letter authorization)	Prov. app.
7-11-74	Columbia County	Santosh Landfill existing domestic site dike construction plans	Prov. app.
7-18-74	Multnomah County	St. John's Blind Slough Expansion expansion of existing garbage sanitary landfill	Approved
7-22-74	Tillamook County	Publishers Paper Company existing industrial wood waste landfill	Prov. app.
7-23-74	Marion County	Woodburn Sanitary Landfill new garbage sanitary landfill construction plan amendment	Prov. app.

Land Quality - Solid Waste Management Division (4)

Date	Location	Project	Action
7-17-74	Wheeler County	Woodward Tire Disposal Site new industrial site (letter authorization)	Prov. app.
7-23-74	Coos County	Bohemia, Inc. Wilkin's Corner Landfill new industrial site construction and operational plans	Prov. app.
7-24-74	Umatilla County	Rahn's Sanitary Landfill existing domestic site operational plan	Prov. app.
7-31-74	Lane County	McKenzie Bridge Landfill existing domestic site amended operational plan	Approval

Commenting on the pending projects summary, also presented by Mr. Myles, Dr. Crothers asked staff whether the number of permits pending in the air and water quality program areas placed any burden on industry or the public. Mr. Hanson replied that in the air program, the burden was primarily on the staff, that although many permits were pending, all companies requiring permits had submitted applications and thus would not be in violation of operating without a permit. Mr. Sawyer stated that under public law 92-500, cities and industries requiring NPDES permits are immune from legal action until December 31, 1974, if no permit has been issued by that time. However, they could be subject to a citizen suit, which under the federal law could be filed.

Mr. Cannon noted that the Department is continuing to operate within the time frame permitted by the Environmental Protection Agency since all major permits will be issued by the end of the year and all others will be in draft form.

TAX CREDIT APPLICATIONS

Both Mr. McPhillips and Mr. Somers questioned the application for Clyde W. Miller's Heating Oils (T-542) since the facility, a steel reinforced retaining wall around a rectangular tank storage area, is required by the Coast Guard on all such facilities built near the water. Mr. Sawyer suggested withdrawing the application at the present time.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried that as recommended by the Director, pollution control facility tax credit certificates be approved for issuance to the following applicants (with the exception of T-542) for facilities claimed in their respective applications and with 80 percent or more of the claimed costs being allocable to pollution control:

Appl. No.	Applicant	Cost
T-560	Permaneer Corporation, Brownsville Division	$26,338.44
T-561	Permaneer Corporation, Brownsville Division	29,337.36
T-562	Permaneer Corporation, Brownsville Division	54,461.52
T-563	Permaneer Corporation, Brownsville Division	61,275.03

VARIANCE REQUEST--SWF PLYWOOD, MEDFORD

SWF Plywood, Fir-Ply Division, Medford, requested a variance to extend the time limit for complying with the veneer dryer emission standards from December 31, 1974 to May 1, 1975.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to approve the Director's recommendation that the company be granted a variance from Oregon Administrative Rules, Chapter 340, section 25-315(a), subject to the following conditions:

1. By no later than January 1, 1975, the permittee shall submit to the Department of Environmental Quality, for review and approval, plans and specifications for all necessary construction and/or modification work.
2. By no later than February 1, 1975, the permittee shall issue purchase orders for all major components to accomplish emission control and/or process modification work.
3. By no later than March 1, 1975, the permittee shall commence construction and/or installation of emission control equipment or process modification work.

4. By no later than May 1, 1975, the permittee shall complete construction and/or installation of emission control equipment or process modification work.

5. By no later than May 30, 1975, the permittee shall demonstrate that the three (3) veneer dryers can operate in continuous compliance with Condition 7 of their permit.

6. By no later than seven (7) days after accomplishing each item, 2 through 5 above, the permittee shall notify the Department of Environmental Quality in writing that the respective item is accomplished.

VARIANCE REQUEST--EDWARD HINES LUMBER COMPANY, HARNEY COUNTY

Edward Hines Lumber Company, Harney County, requested a variance from the prohibition against open burning of industrial wastes, specifically wood wastes unsuitable for further processing.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to approve the Director's recommendation that the company be granted a variance from Oregon Administrative Rules, Chapter 340, section 23-010(a), subject to the following conditions:

1. Burning shall be permitted during the period 1 November 1974 through 30 April 1975, 1 November 1975 through 30 April 1976 and 1 November 1976 through 31 December 1976.

2. Burning shall be limited to nine separate burn periods, each to encompass no more than three continuous days.

3. All burning shall comply with local fire permit regulations.

4. Burning of rubber, plastics or material likely to generate odors and/or dense smoke is prohibited.

5. Edward Hines Lumber Company shall notify the DEQ Bend office (phone 382-6446) and the Portland office (phone 229-5365) on the day preceding each of the nine burn periods.

This variance may be revoked upon findings of violation of any of the above conditions.

VARIANCE REQUEST--NORTHERN WASCO COUNTY REFUSE COLLECTORS, INC., THE DALLES

Northern Wasco County Refuse Collectors, Inc. requested a variance from the prohibition against commercial open burning within the boundaries of Special Control Areas in order to burn bulky, non-putrescible solid wastes which are difficult to landfill. The company is located approximately three miles south of The Dalles.

It was MOVED by Mr. Somers, seconded by Dr. Phinney and carried to approve the Director's recommendation that the company be granted a variance from Oregon Administrative Rules, Chapter 340, section 23-010(2) for a two-year period under the following conditions:

1. Burning shall be conducted during the period 1 November 1974 through 30 April 1975 and 1 November 1975 through 30 April 1976.
2. Burning shall be limited to three separate burn periods per year, to encompass no more than three continuous days each.
3. Burning shall be conducted at its present stockpile location in lieu of the wigwam waste burner.
4. Burning shall comply with all local fire permit regulations.
5. Burning days and hours must be approved by the Chief (Robert Wilson) of The Dalles Fire Department.
6. Burning of rubber, plastics, paints, solvents, or burning for the purpose of salvage is prohibited.
7. Wasco County Refuse Collectors shall notify the Department of Environmental Quality, Bend office (phone 382-6446) and the Portland office (phone 229-5365) on the day preceding each of the three annual burn periods.

This variance may be revoked upon findings of violation of any of the above conditions.

WEYERHAEUSER COMPANY, SPRINGFIELD--REPORT ON PROPOSED NPDES PERMIT

Mr. Sawyer presented the staff memorandum report dated August 16, 1974, regarding staff review of the waste handling improvements committed by Weyerhaeuser Company and the desires of the Commission as expressed at their meeting of July 19th in Salem. Staff proposed the following changes in the Weyerhaeuser (Springfield) draft permit: (1) expansion of Condition S1 to require a reduction of winter BOD limitations to a monthly average of 4000 pounds under normal operations, the new limitations to be achieved by June 1, 1976; and (2) Condition S8, which reflects the new 4000 lbs/day winter limitation required after June 1, 1976, contains a special provision which provides for slightly higher levels during abnormal conditions of dredging and extended periods of subfreezing weather.

The matter of the discharge levels achieved by the company and those contained in the proposed permit was discussed by the Commissioners with Mr. Sawyer. Mr. Cannon emphasized that in addition to the discharge levels proposed, the permit required the company to achieve the highest and best practicable treatment for their thermal discharge. He also assured the Commission that the results of the study under the direction of Dr. Westgarth would be made available to them.

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried to approve the Director's recommendation that the Department issue the proposed permit to Weyerhaeuser Company, Springfield.

SARAH LAND COMPANY

It was MOVED by Mr. Somers, seconded by Dr. Phinney and carried to approve the proposed Order and Judgment of the Hearings Officer to the effect that for violation of Oregon Administrative Rules, Chapter 340, sections 12-005 and 12-020, Donald Furtick and John Soreng, doing business as Sarah Land Company, shall pay to the Treasurer of the State of Oregon, $250 in accordance with the procedures set forth in ORS 468.135(5).

ADOPTION OF STATEWIDE RULES PERTAINING TO NOISE POLLUTION FROM INDUSTRIAL AND COMMERCIAL SOURCES

Mr. Hanson summarized the staff report recommendations for changes in the proposed rules. He noted that staff had not received any official public comments within the ten day period following the July 19th hearing, but many comments were received subsequent to that time and were the bases for many of the changes being proposed at this meeting.

With respect to the section on inaudible sounds, Dr. Crothers commented that it was his opinion that the Legislative Assembly did not intend the regulation of sounds that cannot be heard, that the statutes are concerned with the regulation of noise.

Mr. Hanson explained that the matter of noise easements was not included in the proposed rules specifically, that the philosophical implications in the concept required Commission guidance for staff, and further, that a public hearing would be required before noise easements could be included in the proposed rules. After Commission discussion on this subject, Dr. Crothers suggested that Mr. Underwood and the staff review all considerations pertinent to noise easements.

Mr. Somers MOVED to delete the word "maintaining" and substitute the words "repairing or replacing" in section 35-035(5)(h), and to add a new subsection as follows: 35-035(5)(m) Noise generated on property over which the affected industry owns a noise easement in which the easement is limited only to the affected industry and is limited in the number of dBAs that may be produced [subsequently changed to "perceived"] on the property at the time the easement was taken.

Following discussion, Mr. Somers withdrew the portion of his motion to add a new subsection.

It was MOVED by Dr. Crothers and seconded by Dr. Phinney to adopt the proposed rules. At Dr. Phinney's suggestion, the words "noise sensitive building" were substituted for "dwelling" in section 35-035(3)(b)(i). The change was adopted by unanimous consent.

Dr. Phinney seconded the previous motion by Mr. Somers to amend section 35-035(5)(h); motion carried.

The main motion as amended was voted upon and carried unanimously.

A copy of the rules as adopted and subsequently filed in the Office of Secretary of State is attached to and made a part of the official record.

LABISH VILLAGE, MARION COUNTY

Mr. Guilbert presented the Hearings Officer's report dated August 12, 1974.

It was MOVED by Mr. Somers, seconded by Dr. Phinney and carried to approve the conclusion of the Hearings Officer that the Director's recommendation was uncontroverted in the hearings record, and that the prohibition on subsurface sewage disposal system construction recommended by the Director would effectively accomplish the end of a general building moratorium pending sanitary sewer installation requested by the Director of Environmental Services for the Marion County Health Department.

CONTINUATION OF PUBLIC HEARING TO CONSIDER REPEALING EXISTING CIVIL PENALTY RULES AND ADOPTING NEW RULES PERTAINING TO A SCHEDULE FOR CIVIL PENALTIES, AND AMENDMENTS TO RULES PERTAINING TO PRACTICE AND PROCEDURE

The hearing on the above subject was commenced in Salem on July 16, 1974, and continued to September 4, 1974. Mr. Bolton summarized the staff memorandum report dated August 16, 1974, and presented an addendum which contained proposed amendments to the civil penalty and practice and procedure rules presented at the July 16th meeting.

It was MOVED by Mrs. Hallock, seconded by Mr. Somers and carried to adopt the amendments as proposed.

The Chairman then called for public testimony.

Mr. Douglas P. Sowles, representing Associated General Contractors, Portland, Oregon, suggested that in section 11-095 of the proposed rules on practice and procedure, after the words "as applicable", inserting the words "within thirty days of the date of hearing request", in order to give industry a definite time when a decision could be expected. Mr. Sowles expressed appreciation to Mr. Cannon and Mr. Bolton for working with his company on the revisions proposed. The Commissioners and staff did not believe that sufficient time would be allowed to arrive at a decision within the time frame proposed by Mr. Sowles, but stated that decisions would continue to be made on a timely basis.

At 10 a.m., Mr. Cannon announced that Governor McCall had arrived. The Governor had been asked to present the Oregon CUP to Chairman McPhillips. The Governor noted that Mr. McPhillips had served under eight governors in the 31 years he had been with the Sanitary Authority and the Environmental Quality Commission, and that Mr. McPhillips was the fifth recipient of an individual award. The Governor made the presentation "...with the great gratitude of a state that hasn't said enough about your contributions. No one has given more toward a better Oregon than Barney McPhillips."

The Chairman reconvened the hearing and called on Mr. Larry Williams, Executive Director, Oregon Environmental Council, Portland, Oregon. Mr. Williams stated that his organization was very pleased with the amendments made by the staff, particularly with respect to section 11-025 which he felt would facilitate understanding between the public and the Commission in the public hearing process.

Mr. Bolton then read the Director's recommendation that the existing rules on civil penalties and the existing rule on oil spill violations and certain rules on practice and procedure be repealed, and that the proposed rules as amended be adopted.

It was MOVED by Mrs. Hallock, seconded by Dr. Phinney and carried to adopt the proposed rules as amended (Dr. Crothers not present).

1975 COMMISSION MEETING SCHEDULE

It was MOVED by Mr. Somers, seconded by Dr. Phinney and carried to approve the proposed 1975 Commission meeting schedule.

Mr. Rudy Lachenmeier, Western Environmental Trade Association, who had not indicated he wished to testify in the civil penalties hearing, asked for and received permission to comment on the civil penalty rules, particularly section 12-045, and what he believed was a lack of statutory authority. Mr. Underwood responded and assured Mr. Lachenmeier that there was adequate statutory authority.

There was no further business, and the Chairman adjourned the meeting at 10:30 a.m.

Shirley G. Shay, Secretary
Environmental Quality Commission

Segment - September 20, 1974 EQC Meeting

Crothers: CRO
Hallock: HAL
Mosser: MOS
Myles: MYL
Phinney: PHI
Underwood: UND
Somers: SOM
Weathersbee: WEA
Shay: SHA
Schnitzer: SCHN

SCHN: ..., but if this becomes a fiscal impossibility, then we have a problem.
SOM: (inaudible) ... have you been delayed in the construction of your plant because your permit's bogged down in the Department?
SCHN: No, I didn't say that.
SOM: I know. I understand you want to know what the policy is, but you've not received any delays.
SCHN: No I'm just pointing out the importance for a decision from your committee - from your commission so that we can know whether we can proceed and start ordering our equipment to get started, because the longer we wait ... and also the equipment is backing up into the system so our deliveries are becoming much slower.
SOM: Well how far away is the permit from being completed now?
WEA: Uh, we just have their application. We haven't processed a great part; in fact we haven't had it very long.
WEA: Two weeks.
SOM: Two weeks?
WEA SOM: That's the way with many of these. While it's represented we've known about these for a long time it is not a fact. Many of these have developed within the last six months.
MOS: Well we have been in contact with the commission for approximately, what, four months? or six months? Since February, so...
SOM: But they can't take any official action on the permit (inaudible).

SOM: That's right. Any other, ... any questions:

SCHN: No, thank you, thank you very much.

SOM: John did you want to appear again?

MOS: No, thank you.

CRO: That concludes the list of people I have on that item. Now what do you wish to do about it. My... I can tell you right off what my own feeling is ... that we must write in to this business the tradeoffs which (inaudible)... And, uh, if it can be shown somehow... I don't know how you're going to write it, but I think John stated it... It can be shown that an industry is going to produce a net improvement, in either,... in any of the emissions, particulate or sulphur dioxide, then, they can have some of that net improvement. Then they can have some of that improvement for their own use. Which would get around the,... some of these (berry grapes?) I'm really bothered about the idea that, you know, we have, we have fif... what does it say 15,000 tons and we're haggling over 400.

CRO: We're not haggling. It's an important item.

WEA: To put that in a little better perspective, the 15,000 tons is for the total Portland metropolitan area.

CRO: Yeah, I know.

WEA: It becomes much... the 400 tons becomes much more critical when you're talking about Rivergate NW Portland. And that would compare against a reduced value of what?

SOM: 2,000 tons in that area.

WEA: 2,000 tons when we get control. So it is a substantial portion of that.

PHI: Also, I would assume you could figure out a multiplying factor. You get more employees moving into the area, whether in the automobiles and additional residences and what not.

WEA: Well, and the other aspect of this, pointed out in the report that wasn't gone into in great deatil. That's the most critical location with respect to the stations in downtown Portland which are presently in violation of particulate standards and are projected to first, uh, resume this violation condition for particulate standards.

SOM: Run that one by me more slowly now.

WEA: The Rivergate NW Portland, and it is in the report in pretty good detail, but we didn't cover it because we just went to the conclusions, is that the Rivergate NW Portland area is the most critical location with

respect to emission sources affecting the critical particulate stations which are downtown Portland. The ones that are in violation now and first become in violation again after the 19... at 1977.

SOM: Well, I would move that we postpone the adoption of the director's recommendation until we take it up at the next meeting. It's a policy that we can't keep the Department waiting because they've got to take action on these permits right away. But, we're telling them to go ahead and orderly process them. I don't know that we've asked you to hold up on anyone's have we?

WEA: No you haven't.

CRO: Well is the... are the members of the commission satisfied with the general idea that... that we've got a limited amount to give out, and that it's got to be given out very carefully... That we will take into account the tradeoffs that are available which will give a little more flexibility to what can be allowed?

SOM: Well I think there is no question about it...that one of the things we have to consider...what we've been doing..., I've had this in my ... for what, two weeks now? Is it two weeks Shirley?

SHA: One week.

SOM: One week.

CRO: (inaudible) Well, I was just trying to give direction to the staff, so that...

SOM: Sure, as a policy we have to develop an orderly development for the airshed. There's no question about it, but I'm not sure that with one week's reading... and I did read it over and I've heard the comments that people have made and there is a division of opinion.

CRO: I'd like to have some more information about the tradeoffs. What's really available there?

SOM: Well, the thing is we've got enough permits applied for there to use it up. Haven't we?

WEA: Yes, we do and this is a problem to the staff because they're filed at a given time and it doesn't take a uniform time to process these applications. It becomes a problem... What order do we process them? We bring... shall we go ahead and issue permits in the order that the information is supplied and the staff drafts the permits?

SOM: Well, ...

WEA: Or just where are we there with respect to all of the applications? That's our problem, as the matter really comes down to a matter of allocation.

SOM: I understand that and you've got to have some direction along those lines. But with one week's study, we could by a stroke of the pen today cut off future development of Portland, and Lord sakes, with the declining economy and,... Maybe some of these other businesses will go out of business and solve the problem. But in the meantime there's a... in the meantime we've got to actively work with industry. That's what the legislature had told us, and seek a solution to the problems and a development of the industries; and I ...

WEA: There's one industry... the permit is out on notice and ready to go and could be issued very shortly and that's Cook Industries.

CRO: How many tons is that?

WEA: 30

CRO: Okay, we've got no problems about that one.

WEA: We'll go ahead and proceed to the issue.

CRO: Yes, now the major problem is about the oil refinery. And there you've got to calculate the tradeoffs.

WEA: And we have to have some additional data submitted.

CRO: Calculate the tradeoffs and you've got no problem there. And possibly no problem with Owens Corning. And the steel mill is with...well within... How much there?

WEA: 86

CRO: That's pushing the 25%, getting close to it. But you may wind up with more tons than you thought you had because of the tradeoffs.

PHI: Mr. Westerdahl was asking us to consider priorities, which of these industries would be more valuable to the community as a whole, and I think it would be extremely difficult, if not impossible, for us to do that.

CRO: I agree with you.

PHI: I wonder if perhaps... if our staff were to get prior notification, that is before they were even close to the permits, if they would have a better idea of the industries that were planning on coming in and could give the information to the... perhaps Mr. Westerdahl's group. Then he would be in a better position to determine those priorities and use environmental data simply as part of his determination.

SOM: Let me ask a question...

CRO: That's Mr. Whelan's group primarily.

SOM: Yeah, but there's other ...

HAL: Also, the mayor of the city of Portland has a little group that you might give it to.

SOM: But the problem is that there's a big industrial complex out there and Rivergate's just a drop in the bucket compared to all the rest of them. Let me ask this of Mr... or counsel here, Ray. Do we have the authority to decide priorities? Do you think... under the statute?

UND: I don't think you have the authority to decide priorities on any basis other than environmental. When you begin to get into matters of employment and the social effects and all the rest, I think that is outside of your jurisdiction.

PHI: Well we could take other factors into consideration in evaluating any given plant though, I suppose.

UND: Well, I think no doubt, as a practical matter, as an individual in voting or assessing, you would; but they're really officially and legally extraneous to your consideration.

CRO: Well is... would it be agreeable to the members of the commission that we tell the staff that we are in general agreement with this policy, but we want the tradeoffs put in the thing, they can go ahead and allocate some of these... some of the available air, on the basis of this policy; but nobody's going to get a big hunk of it. And I think there isn't anybody that's applying for more than 25%... once you take into account the tradeoffs.

HAL: Yeah, but we don't really have the data on (inaudible). Whatever we could ...

SOM: Well... I don't want to... I wouldn't go that far. I don't want to close the door on Columbia Independent Refineries.

CRO: What do you want to do today, now?

SOM: Have some more time on it.

PHI: (Inaudible) should give us enough time to collect (inaudible)... tradeoffs, before making a decision.

CRO: You mean the staff is doing nothing at all about these permit applications this next month?

PHI: We agreed that Cook's I think is...

CRO: That's what I'm asking you. That's what I thought I said. Tell them to go ahead on the general basis of this policy. They've got 450 tons or something to allocate and nobody can have more than 25% of it, except, those that can show a tradeoff that will entitle them to morethan 200... than 125 tons or whatever the 25% is.

SOM: By doing that Dr. I feel we are adopting a policy which I personally don't understand the full ramifications of.

PHI: He's essentially saying adopt the policy as listed but to include or add to it some indication of tradeoff.

CRO: Well, I don't seem to put it right. You put it then. What you want done today, now.

UND: May I... I have a suggestion with regard to the way you do it. And I think... and I think that this policy should be incorporated in the form of a rule. And if you do take action today I think it should be in a rule making form as a temporary rule which would be in effect for 120 days, to be followed up, if you want to make it a permanent rule, by the regular notice and hearing procedure. Because, in view of the Court of Appeals decision in the Sun Ray Dairy case v. the OLCC there was indication that in a somewhat analogous situation the distribution of liquor licenses it was necessary for the liquor commission to have written in rule form the criteria for the allocation of such licenses. And I think there's an analogous situation here and I think that what we do should be done in rule form.

SOM: I agree. But I don't agree that we should do it today.

UND: Oh I'm not... it sounded to me as if you were getting close to doing something and I wanted to get...

CRO: Well, where does that leave the staff then for the rest of this month with respect to these permits?

SOM: (inaudible)... the way they were... We have said nothing. Strictly as they can.

CRO: They probably are going to anyway, but...

MYL: Sir as I understand what Mr. Somers was saying is that we continue to work toward the processing of permits and what have you as if we had no other policies than those that are in effect prior to the recommendation of this one. But I assume, keeping a weather eye tuned to the larger sources pending a possible decision from this body at the next commission meeting.

SOM: I'd say for... you know just... excuse me Jackie, but I'd say for just what my personal opinion is... generally, yes with giving priority to the table four with crosses, which includes Columbia Independent Refinery, Owens Corning Fiberglass, Pacific Carbides, Portland Steel Mill, Cook Industries, and Oregon Steel Mills. They've got applications pending. They're on file, and possibly we could have a temporary rule that we could look at in some detail proposed before the next meeting, and then establish hearings as to the form of a permanent rule. But,...

PHI: You are essentially agreeing with the additional statement that you've got to consider a temporary rule at the next meeting?

SOM: Yes, you know, I'm in favor of the general principle as an individual. I think we have to take some concrete steps along this line. And you know, we're accepting with blind faith and have heard no other comments. And people have told us they didn't have time to prepare comments. I'm stating the total...

CRO: I think then we've given the staff sufficient direction.

(inaudible)

CRO: Mr. Somors MOVES that the director's recommendation... that action on the director's recommendation be deferred until the next meeting

SOM: That's what I want.

PHI: Second.

CRO: There being no objections, we'll go to the question ahead of us. But the staff will keep on working.

ITEM E

END

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

MEMORANDUM

To : Environmental Quality Commission

From : Director

Subject: Agenda Item No. B, September 20, 1974 EQC Meeting

August 1974 Program Activity Report

During the month of August, staff action was taken relative to the list of project plans and specifications and/or reports which follows:

Water Quality

1. Ninety-four (94) domestic sewage project plans and specifications and/or reports were reviewed:

a. NORTHWEST REGION - 46 (see attachment #1)

Approval was given to two (2) municipal sanitary sewer system infiltration/inflow studies for Oak Lodge Sanitary District and Sandy, Oregon.

Provisional approval was given to 43 plans for sewer projects.

Additional information was requested regarding one (1) sanitary sewer plan located in Tualatin (sanitary sewer force main for Troxel).

b. WATER QUALITY DIVISION - 48 (see attachment #2)

Approval was given to five (5) Change Orders and Addenda.

Provisional approval was given to 41 sanitary sewer plans and two (2) sewage treatment plant projects.

2. Nine (9) industrial waste treatment plans were approved by the Northwest Region (see attachment #3).

Air Quality

Sixty-seven (67) project plans and specifications and/or reports were reviewed:

1. NORTHWEST REGION - 45 (see attachment #4)

   Approval was given to four (4) air pollution control plans.

   Additional information was requested regarding 25 air pollution control plans.

   Sixteen (16) air pollution control plans are in process.

2. AIR QUALITY DIVISION - 22

   Approval was given to seven (7) air pollution control plans:

   Georgia Pacific Corporation, Toledo, Lincoln County
   No. 2 electrostatic precipitator rebuild

   Georgia Pacific Corporation, Toledo, Lincoln County
   package boiler installation

   Sunrise Enterprises, Douglas County
   wood workshop

   Western Kraft Corporation, Albany, Linn County
   installation of a hog fuel boiler

   Medford Corporation, Jackson County
   modification to 2 boilers

   Jeld Wen, Klamath County
   hog fuel boiler installation

   Jeld Wen, Klamath County
   baghouse filter and cyclones installation

   Provisional approval was given to one (1) project plan and eleven (11) parking space facility proposals:

   Weyerhaeuser Company, Klamath County
   oil-fired boiler installation

   Safegard Mini-Storage, Washington County
   107-space parking facility

   Rustler Steak House, Multnomah County
   restaurant using existing parking

   Dwyer Memorial Hospital, Milwaukie, Clackamas County
   56-space parking facility expansion

The Dutch Trader, Gladstone, Clackamas County
59-space parking facility

Precision Castparts, Multnomah County
160-space replacement parking

Portland Steel Mills, Multnomah County
165-space parking facility

Jantzen Beach, Inc., Multnomah County
727-space parking expansion

Equitable Savings, Washington County
87-space parking facility

Port of Portland, Multnomah County
1,445-space interim parking facility
Portland International Airport

Five Oaks Intermediate School, Washington County
182-space parking facility

Pacific Northwest Bell Company, Multnomah County
Cherry Coin and Service Center
44-space parking facility

Additional information was requested regarding three (3) parking space facility proposals:

Clackamas Town Center, Clackamas County
6,000 to 6,500-space parking facility

Mt. Hood Mall, Multnomah County
6,328-space parking facility

Owens Corning Fiberglas, Multnomah County
200-space parking facility

Solid Waste Management

Ten (1) project plans and specifications were reviewed:

1. NORTHWEST REGION - 2

One (1) project plan was denied:

Conestoga Manufacturing, Marion County
new industrial site (letter authorization)

Provisional approval was given to one (1) project plan:

Beaverton Seventh-Day Adventist Church, Washington County
unauthorized domestic site closure plan

2. SOLID WASTE MANAGEMENT DIVISION - 8

Approval was given to four (4) project plans:

Keno Landfill, Klamath County
existing domestic site closure plan

Keno Transfer Station, Klamath County
new domestic site, construction and operational plans

Swisshome Landfill, Lane County
existing domestic site closure plan

Swisshome Transfer Station, Lane County
new domestic site, construction and operational plans

Provisional approval was given to four (4) project plans:

Joe Ney Disposal Site, Coos County
existing domestic site, operational plan

Culver Landfill, Jefferson County
new domestic site, construction and operational plans

Six Bit Prairie Sludge Lagoon, Klamath County
new domestic site, construction and operational plans

Oakridge Landfill, Lane County
existing domestic site, construction and operational plans

Director's Recommendation

It is the Director's recommendation that the Commission give its confirming approval to staff action on project plans and proposals for the month of August 1974.

KESSLER R. CANNON
Director

ss

attachments - 4

9/11/74

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHWEST REGION OFFICE - Technical Services

Water Quality Division - Project/Plan Review

During the month of August 1974, the following sanitary sewer 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.

See attached sheets for disposition of each project.

Summary of Projects

29 sanitary sewer plans received
43 sanitary sewer plans approved
2 Municipal sanitary sewer system infiltration/inflow studies approved.
1 sanitary sewer plan (#229 * request additional info)

	INFORMATION RECEIVED					DEQ Staff Dispositon		
No.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
91	7-12-74	Troutdale	Fraley Heights sanitary sewers	Sleavin-Kors	2 plans	7-30-74	Prov. Approval	AHJ
92		Salem (Willow)	Dorchester Heights sanitary sewers	William I. Peterson	2 plans	7-30-74	Prov. Approval	LJK
93	7-18-74	Salem (Willow)	Kanuku Street sanitary sewers	Clark & Groff	2 plans	7-30-74	Prov. Approval	LJK
94	7-16-74	Multnomah Co. (Inverness)	Central County Sanitary Service District - N.E. 158 north of Sandy Boulevard	George D. Ward & Associates	1 plan	8-13-74	Prov. Approval	LJK
95	7-23-74	Salem	Safeway Store at N.W. Commercial Street S.E. & Ratcliff Drive sanitary sewer	Jeppsen-Miller & Tobias AIA	1 plan	8-16-74	Prov. Approval	AHJ
96	7-24-74	West Linn	Hidden Springs Trunk Sewer	John W. Cunningham & Associates	2 plans	8-2-74	Prov. Approval	LJK
97	7-24-74	St. Helens	Gray Cliffs Park sanitary sewers	William I. Peterson	2 plans	8-5-74	Prov. Approval	LJK
98	7-24-74	USA (Tigard)	S.W. Murdock Street L.I.D. sanitary sewers	Harris-McMonagle Associates	3 plans	8-6-74	Prov. Approval	AHJ
99	7-29-74	Lake Oswego	Country Club Park Area sanitary sewer improvement L.I.D. 160	City of Lake Oswego	2 plans	8-8-74	Prov. Approval	AHJ
00	7-29-74	Jefferson	Hazel Street sanitary sewer	Clark & Groff	2 plans	8-2-74	Prov. Approval	LJK
01	7-29-74	Hillsboro (Westside)	Buena Vista # 2 sanitary sewer	City of Hillsboro	2 plans	8-5-74	Prov. Approval	LJK

INFORMATION RECEIVED						DEQ Staff Dispositon	
No.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
202	7-26-74	Portland	S.W. 45th Drive & private property sanitary sewers	Portland	1 plan	8-7-74	Prov. Approval	AHJ
203	7-29-74	USA (Sunset)	Torreyview sewers N.W. Oak Street sewer revision	John W. Cunningham & Associates	2 plans	8-8-74	Prov. Approval	AHJ
204	7-26-74	Salem	Khyber Court S.E. sanitary sewer	City of Salem	2 plans	8-8-74	Prov. Approval	AHJ
205	7-10-74	USA (Fanno)	Habitat Interceptor sanitary sewer Area A	Moffat Nichol & Bonney	2 plans	8-1-74	Prov. Approval	AHJ
206	6-25-74	Salem	Salem Industrial Park Trunk Sewer and Addendum No. 1	City of Salem	2 plans	8-6-74	Prov. Approval	AHJ
207	7-31-74	Newberg	Adec Technical Park Sanitary Sewer Extension	Klein & Stuckey	1 plan	8-2-74	Prov. Approval	LJK
208	7-17-74	CCSD #1	Oak Acres Mobile Home Park sanitary sewer	Compass Corp.	2 plans	8-2-74	Prov. Approval	LJK
209	7-12-74	USA (Fanno)	Brookridge Interceptor Relief Sanitary Sewer, Phase C, Plan I	Moffat Nichol & Bonney	2 plans	8-6-74	Prov. Approval	LJK
210	7-29-74	Milwaukie	Milwaukie sanitary sewer laterals, schedule II	Stevens, Thompson & Runyan	2 plans	8-6-74	Prov. Approval	LJK
211	7-29-74	Lake Oswego	Firewood Road sanitary sewer extension, W.O. 4892	City of Lake Oswego	1 plan	8-8-74	Prov. Approval	AHJ

	INFORMATION RECEIVED					DEQ Staff Dispositon	
No.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
212	7-31-74	Portland S. W. (Tryon)	Sanitary sewers in S.W. Tara Court West of S. W. 56th Avenue	City of Portland	1 plan	8-8-74	Prov. Approval	AHJ
213	8-5-74	Gresham	Hood Northwest L.I.D. sanitary sewers	Wilsey & Ham	2 plans	8-13-74	Prov. Approval	LJK
214	8-1-74	Tualatin	Sanitary Sewers West of 65th Avenue from station 0 + 00 to station 8 + 19	City of Tualatin	2 plans	8-13-74	Prov. Approval	LJK
215	8-2-74	E. Salem Sewage and Drainage District #1, (Willow)	Wagon Road Village Subdivision Sanitary Sewers	Westech Engineering	2 plans	8-20-74	Prov. Approval	LJK
216	8-5-74	West Linn (Bolton)	Sanitary Sewer extension near Hood Street & Burns Street	Compass Corp.	2 plans	8-13-74	Prov. Approval	AHJ
217	8-8-74	Salem (Willow)	Salem Industrial Park Trunk Sewer & Addendum No. 2 & No. 3	City of Salem	2 plans	8-14-74	Prov. Approval	AHJ
218	8-9-74	Portland S.W. (Tryon)	Sanitary Sewer system serving S. W. 55th Drive, S. W. 57th Avenue and Private Property, "Greentrees".	City of Portland	1 plan	8-7-74	Prov. Approval	LJK
195	8-12-74	Salem (Willow)	Safeway Store at N. W. Commercial Street S. E. & Ratcliff Drive sanitary sewer	Jeppsen-Miller & Tobias AIA	2 plans	8-16-74	Prov. Approval	LJK

	INFORMATION RECEIVED					DEQ Staff Disposition		
No.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
219	8-9-74	Gresham	Brigadoon Subdivision Sanitary Sewers	Howard Smith	2 plans	8-16-74	Prov. Approval	LJK
220	8-9-74	Lake Oswego	Holly Acres Addition sanitary sewers	Gary Buford	1 plan	8-16-74	Prov. Approval	LJK
221	8-1-74	Gladstone	Preliminary Interceptor Sewer to eliminate a pump station on Doncaster Drive	City of Gladstone	2 plans	8-16-74	Prov. Approval	AHJ
222	8-6-74	Salem (Willow)	Kashmir Heights Subdivision sanitary sewers	Clark & Groff	2 plans	8-16-74	Prov. Approval	AHJ
223	8-12-74	Portland (Tryon)	S.W. 55th Drive, S.W.57th Avenue & private property sanitary sewers	City of Portland	1 plans	8-20-74	Prov. Approval	AHJ
224	8-15-74	Independence	Hill Park No. 4 sanitary sewer	William I. Peterson	1 plan	8-19-74	Prov. Approval	AHJ
225	8-16-74	CCSD#1	Milwaukie Industry Center sanitary sewers	Storch Corp.	2 plans	8-20-74	Prov. Approval	AHJ
226	8-13-74	Tualatin	L.I.D. No. 2 sanitary sewer	R.A.Wright Engineering	2 plans	8-22-74	Prov. Approval	AHJ
227	8-16-74	E. Salem Sewage & Drainage District	Edith Bible sanitary sewer extension	Westech	2 plans	8-26-74	Prov. Approval	AHJ
228	8-15-74	Tualatin	Revised sanitary sewer near 65th Avenue	CH^2M/Hill	1 plan	8-26-74	Prov. Approval	AHJ

	INFORMATION RECEIVED					DEQ Staff Disposition	
.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
229	8-15-74	Tualatin	Sanitary sewer force main for Troxel	Sleavin-Kors	2 plans		Resubmit (pump data, GPM, TDH required 8-23-74)	AHJ
330	8-26-74	Lake Oswego (Tryon)	Mountain Park Phase 5-B sanitary sewers	Murray-McCormick Environmental Group	2 plans	8-28-74	Prov. Approval	AHJ
331	8-20-74	Gresham	Honeywood Subdivision sanitary sewers	Jim Weddle & Associates	1 plan	8-28-74	Prov. Approval	AHJ
332	8-19-74	West Linn (Bolton)	Glen Glenn sanitary sewers	William Carson	2 plans	8-29-74	Prov. Approval	AHJ
333	8-19-74	Tualatin	Indian Woods sanitary sewers	Gene T. Ginther	2 plans	8-29-74	Prov. Approval	AHJ
334	8-19-74	Tualatin	Arapaho Ridge sanitary sewers	Gene T. Ginther	2 plans	8-28-74	Prov. Approval	AHJ
335	8-19-74	Tualatin	105th Street sanitary sewers	Gene T. Ginther	2 plans	8-29-74	Prov. Approval	AHJ
336	8-22-74	Troutdale	Stoll's Folly sanitary sewers	Sleavin-Kors	4 plans	8-30-74	Prov. Approval	AHJ
337	8-28-74	E Salem Sewage & Drainage District #1 (Willow)	Jan Ree Estates 3 and 4 sanitary sewers	William I. Peterson Engineering	3 plans		Pending	
338	8-29-74	Lake Oswego	Lake Grove Apartments sanitary sewers, w.o. 4850	City of Lake Oswego	1 plan		Pending	
339	8-29-74	USA	Uplands L.I.D. 16	Hilton Engineering	2 plans		Pending	
340	8-29-74	Oregon City	Gaffney Lane-Hillendale sanitary sewer	Compass Corp.	2 plans		Pending	

	INFORMATION RECEIVED					DEQ Staff Disposition	
o.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
341	8- -74	Oak Lodge Sanitary District	Oak Lodge Sanitary District Inflow/Infiltration Study	----	1 plan	8-6-74	Approved	
342	8- -74	Sandy	Sandy Inflow/Infiltration Study	Boatwright Eng.	1 plan	8-6-74	Approved	

PROJECT PLANS

Water Quality Division

During the Month of August, 1974, the following project plans and specifications and/or reports were reviewed by the staff. The disposition of each project is shown, pending ratification by the Environmental Quality Commission.

Date	Location	Project	Action
	Municipal Projects - 48		
8-1-74	Klamath Co.	Round Lake Estates - effluent Cl_2 revision	Prov. Approval
8-5-74	Warrenton	Addendum No. 2 - East Warrenton Int.	Approved
8-5-74	Albany	Sanitary sewer projects - SS-74-5, 74-9A, 74-11, East Gate Subdivision	Prov. Approval
8-5-74	Lebanon	12th St. sewer	Prov. Approval
8-5-74	Fairview	Halsey St. sewer	Prov. Approval
8-5-74	Canyonville	Byron St. & Olson Subdivision sewers	Prov. Approval
8-5-74	Clackamas Co. S.D. #1	C.O. No. 4 - STP contract	Approved
8-5-74	No. Roseburg S.D.	Hewitt Hts. Subd. & Brentwood Manor First Addition sewers	Prov. Approval
8-6-74	Seneca	C.O. #1 - Schedule L, STP project	Approved
8-6-74	USA (Forest Grove)	C.O. #1, STP expansion	Approved
8-6-74	Lebanon	Grant St., Maple St., & Vine St. sewers	Prov. Approval
8-7-74	Ashland	Madison Subdivision sewers	Prov. Approval
8-7-74	Springfield	First Addition to Industrial Park sewers	Prov. Approval
8-9-74	Eugene	Five projects	Prov. Approval
8-12-74	BCVSA	South Medford interceptor	Prov. Approval
8-13-74	Roseburg	Crestview Ave. sewer	Prov. Approval

PROJECT PLANS

Water Quality Division

Date	Location	Project	Action
8-13-74	BCVSA	Harry & David camp. sewer	Prov. Approval
8-13-74	Medford	Sun Park Terrace Subdivision sewers	Prov. Approval
8-13-74	North Roseburg S.D.	Kline Street sewer	Prov. Approval
8-19-74	Springfield	N. sanitary sewer - S.P. Ind. Park	Prov. Approval
8-19-74	BCVSA	West Dale St. sewer	Prov. Approval
8-19-74	Sunriver	Sunriver Sky Park sewers & pump stations	Prov. Approval
8-20-74	Milwaukie	C.O. #2 - Milwaukie interceptor - schedule I	Approved
8-20-74	Port Orford	15th St. sanitary sewer extension	Prov. Approval
8-20-74	Bandon	Allegheny & Oregon Streets sewer extensions	Prov. Approval
8-20-74	BCVSA	West Main - McAndrews Road - Sweet Road sewers	Prov. Approval
8-20-74	N. Umpqua S.D.	Main A - sewer extension	Prov. Approval
8-21-74	Glendale	2nd St. sewer	Prov. Approval
8-21-74	Junction City	West Side collector sewer	Prov. Approval
8-29-74	Rufus	Sewage collection & treatment lagoons (revised plans)	Prov. Approval
8-30-74	Rogue River	Woodville Subdivision, Units 1, 2, 3 and 4 sewers	Prov. Approval
8-30-74	Eugene	1st Avenue sewer	Prov. Approval
8-30-74	Springfield	N. 54th St. & Ilex Plat, 2nd Addition sewers	Prov. Approval
8-30-74	Albany	Meadowview Addition & College Park P.U.D. sewer	Prov. Approval
8-30-74	BCVSA	15th St. & "G" Ave. - White City sewers	Prov. Approval

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHWEST REGION OFFICE - Technical Services

Water Quality Division - Project/Plan Review

During the month of August 1974, the following industrial 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.

See attached sheets for disposition of each project.

Summary of Projects

11	industrial plans received
9	industrial plans approved
5	industrial plans pending

	INFORMATION RECEIVED					DEQ Staff Disposition	
o.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
57-I	7-17-74	Salem	Boise Cascade Digester 8 and Counter Current Washer	Boise Cascade	1 plan	8-15-74	Approved	RJN
58-I	8-1-74	Tillamook Co.	Animal Waste Disposal System Holding Tank for Joe Donaldson	U.S.Department of Agriculture	1 plan	8-12-74	Approved	RHF
59-I	8-5-74	Tillamook Co.	Animal Waste Disposal System Holding Tank for Glen Metcalfe	U.S.Department of Agriculture	1 plan	8-12-74	Approved	RHF
60-I	8-5-74	Tillamook Co.	Animal Waste Disposal System Holding Tank for Harvey Wyss	U.S.Department of Agriculture	1 plan	8-12-74	Approved	RHF
61-I	8-5-74	Tillamook Co.	Animal Waste Disposal System Holding Tank for Ray Measur	U.S.Department of Agriculture	1 plan	8-12-74	Approved	RHF
62-I	8-5-74	Tillamook Co.	Animal Waste Disposal System Holding Tank for Ron Zuercher	U.S.Department of Agriculture	1 plan	8-12-74	Approved	RHF
63-I	8-5-74	Stayton	Stayton Canning Co. Tax Credit T-566, "Spray Irrigation System".	Clark and Groff	1 plan		pending	RJN
64-I	8-5-74	Stayton	Stayton Canning Co. Tax Credit T-567, "Wastewater Screening System".	Clark & Groff	1 plan		pending	RJN
65-I	7-12-74	Portland	Stauffer Chemical Co. Tax Credit T-552, "Lined Pond with Pump".	Stauffer Chemical Co. Engineering Department	1 plan		pending	REG

	INFORMATION RECEIVED					DEQ Staff Disposition	
No.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
6-I	8 74	Yamhill Co.	Millers Wholesale Meat Lagoon System	Environmental Associates	1 plan	8-15-74	Approved	RHF
7-I	7-16-74	Polk Co.	Willamette Industries Log Pond Modifications	Willamette Industries	1 plan	8-15-74	Approved	RHF SCC
70-I	8- -74	St. Helens	Kaiser Gypsum Preliminary study of sanitary sewer pressure line	Whiteley/Jacobsen & Associates	1 plan	8-12-74	Approved	LDP
71-I	8- -74	Portland	Zidell Oil Water Separator	Bryan Johnson	1 plan		Pending	LDP
72-I	8-8-74	Portland	Birden & Son Study for Recirculating Cooling Water	UMA			Pending	LDP

Attachment #4

MEMORANDUM

TO: Shirley Shay

Date: September 9, 1974

FROM: JFKowalczyk

SUBJECT: Supplement to August 1974 Activity Report to EQC

Northwest Region Permit Work Output-Backlog
- August 1974

	Sources Req'd Permits	Appl. Rec'd (mo.)	Permits Drafted (mo.)	Permits Issued (mo.)	Appl. Pending: Permits To be Drafted	Appl. Pending: Permits Drafted	Sources Under Regular Permit
Air Permits							
Process	292	2	5	2	138	44	82
Fuel Burning	800	20	0	5	300	320	7
Water Permits*							
Industrial	175	0	9	7	56	48	37
Domestic	127	0	2	16	2	59	50
Solid Waste Permits							
General Refuse	27	0	0	1	10	0	17
Demolition	10	0	0	0	3	0	7
Industrial	13	1	0	1	3	0	10

*NPDES

DEPARTMENT OF ENVIRONMENTAL QUALITY
Northwest Region

Technical Services
Air Quality Division - Project/Plan Review

During the month of August 1974, the following air pollution 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.

See attached sheets for disposition of each project.

Summary of Projects

7 Air Pollution Control Plans received
4 Air Pollution Control Plans approved
14 Air Pollution Control Plans pending
18 Air Pollution Control plans requesting additional information

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHWEST REGION - AQ-Plan Disposition

INFORMATION RECEIVED							DEQ Staff Disposition	
No.	Date Received	Location	Project	Review Engineer	Information Req'd	Information Rec'd	Approval Date	Action	By
144	11-9-73	Clatsop	AMAX Aluminum-New Aluminum Reduction Plans	JFK	12-26-73			Awaiting EIA	
NC 548	7-31	Clackamas	Barton Sand & Gravel Rock Crusher	JAP				Processing	
NC 534	7-17	Marion	Boise Cascade-Salem New Digester	DDO				Processing	
NC 535	7-17	Marion	Boise Cascade-Salem New Washers	DDO				Processing	
NC 531	7-11	Multnomah	Cargill-Grain Handling Dust Control	DDO	8-5	8-12		Processing	
294	5-31	Columbia	Cascade Energy-Oil Refinery	JAP	7-16			Awaiting Emission Information & EIA	
NC 540	7-24	Multnomah	City of Portland-Paint Spray Booth	JAP			8-28		
275-7	4-2	Multnomah	Columbia Independent Refinery-Oil Refinery	JAP	4-30			Awaiting Emission data	
259	1-30	Multnomah	Columbia Steel Casting New Furnace and Controls	JAP	2-6	6-13		Processing	
320	7-31	Multnomah	Cook Industries Grain Terminal	JAP				Issued Proposed Permit	
176	5-28	Columbia	Crown Zellerbach (Col. City) Hog Fuel Boiler with Scrubber	DDO	7-10	8-9		Processing	

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHWEST REGION - AQ-Plan Disposition

INFORMATION RECEIVED							DEQ Staff Disposition	
No.	Date Received	Location	Project	Review Engineer	Information Req'd	Information Rec'd	Approval Date	Action	By
NC 536	7-18	Clatsop	Crown Zellerbach (Wauna) Scrubber for Lime Kiln	DDO				Processing	
NC 541	7-24	Multnomah	Firestone Retread-Smoke Control for Tire Buffing	JAP			8-12		
NC 532	7-10	Multnomah	Flintkote Co.-Filter For Sand Handling	DDO				Processing	
316	7-16	Clackamas	Globe-Union Lead Remelt Furnace	JAP	4-15	7-14		Processing	
NC 547	8-22	Multnomah	Golden Triangle Specialist Paint Spray Booth	DDO			8-29		
267	2-28	Multnomah	Layton Funeral Home Cremation Incinerator	JAP	5-14			Awaiting Source Test	
NC 409	4-2	Multnomah	Miller Paint Co., Inc Filter for Dispenser Mill	JAP			8-13		
NC 513	3-26	Clackamas	Milwaukie Plywood-Veneer Dryer Control	JAP				Awaiting Revised Proposal	
NC 527	6-20	Columbia	Multnomah Plywood-Veneer Dryer Control	JAP	7-24			Processing	
NC 543	7-24	Multnomah	Oregon Steel Mills (Front Baghouse with Canopy	DDO				Processing	
NC 544	8-1	Multnomah	Oregon Steel (Front Ave.) Ladle Fume Exhaust	DDO				Processing	
296	6-7	Columbia	Niedermeyer Martin Wood Processing	JAP	6-28			Awaiting Info On Emission	

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHWEST REGION - AQ-Plan Disposition

INFORMATION RECEIVED							DEQ Staff Disposition	
No.	Date Received	Location	Project	Review Engineer	Information Req'd	Information Rec'd	Approval Date	Action	By
305	6-28	Multnomah	Owens Corning Fiberglas Plant	JFK	7-31			Awaiting Info On More Efficient Controls	
NC 542	6-12	Multnomah	Port of Portland-Bulk Loading Facility	JAP	7-22			Awaiting Info on Controls	
NC 520	5-7	Multnomah	Resource Recovery Paper Classifier	JAP	5-29			Awaiting Info on Controls	
317	7-18	Multnomah	Oregon Steel Mills (Rivergate) Pellet Metallizing	DDO				Processing	
NC 546	8-19	Multnomah	Portland State Univ. New Boiler	DDO				Processing	
NC 533	7-12	Washington	Pacific Building Materials Concrete Readymix Plant	DDO				Processing	
306	6-28	Multnomah	Portland Steel Mills New Steel Mill	JAP	7-17			Awaiting Info on Emissions	
NC 537	7-12	Yamhill	Publishers Paper-Newberg New Digester	DDO				Processing	
NC 538	7-18	Yamhill	Publishers Paper-Newberg New Hog Fuel Boiler	DDO				Processing	
282	4-15	Multnomah	Pacific Carbide New Furnace	JAP	5-17			Processing	
NC 526	6-20	Multnomah	Rich Manufacturing Baghouse	JAP	7-21			Awaiting Info. on Air Flows	

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHWEST REGION - AQ-Plan Disposition

INFORMATION RECEIVED								DEQ Staff Disposition	
No.	Date Received	Location	Project	Review Engineer	Information Req'd	Information Rec'd	Approval Date	Action	By
146	11-23-73	Multnomah	Schnitzer Steel Products Wire Incinerator	JAP	6-28			Processing	
NC 539	7-9	Multnomah	Triangle Milling Dust Control	DDO				Processing	
475	8-5	Multnomah	C.H. Stinson, Inc. Portable Asphalt Paving Plant	DDO				Processing	
321	8-19	Multnomah	J. Arlie Bryant, Inc. Portable Rock Crusher	DDO				Processing	
145	11-21-73	Multnomah	Union Carbide-#1 Furnace Product Change	JAP	7-15			Processing	
NC 504	2-5	Multnomah	Western Farmers-Dust Control of Truck Receiving	JAP	3-21			Awaiting Info on Air Flows	
549	8-15	Washington	Western Foundry-Scrubber to Control Cupola Emissions	JAP				Processing	
550	6-17	Washington	Western Foundry-Control of Furnace, Sand Handling, Cleaning Room	JAP	7-25			Awaiting Info on Control Equipment	
NC 529	7-1	Multnomah	Fry Roofing-Volney Felt Control Wood Flour	JAP	7-29			Awaiting Detailed Plans	
NC 530	7-1	Multnomah	Fry Roofing-Fume Control of Storage Tanks	JAP	7029			Awaiting Detailed Plans	
NC 545	8-8	Multnomah	Teeples & Thatcher, Inc. Sawdust Cyclones	DDO	8-27			Awaiting Detailed Plans	

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

To: Environmental Quality Commission

From: Director

Subject: Agenda Item C, September 20, 1974, EQC Meeting

Tax Credit Applications

Attached are review reports on 7 Tax Credit Applications. These applications and the recommendations of the Director are summarized on the attached table.

KESSLER R. CANNON

ahe

September 13, 1974

Attachments

Tax Credit Summary
Tax Credit Review Reports (7)

TAX CREDIT APPLICATIONS

Applicant	Appl. No.	Facility	Claimed Cost	% Allocable to Pollution Control	Director's Recommendation
American Can Company Halsey Mill	T-541	Non-condensible gas incineration system revision, two-stage mud washing system, electrostatic precipitator modifications, EPA particulate sampling train, spare recausticizing sump pump, and recausticizing sump flow-meter	$ 73,501	80% or more	Issue
Weyerhaeuser Company Wood Products	T-569	Aeration lagoon, quiescent lagoon, plywood & particleboard industrial waste collection sump, and chain-link fencing	273,755	80% or more	Issue
Southern Oregon Plywood, Inc.	T-570	Sanderdust collection system	61,299.87	80% or more	Issue
Gemco Wood Products, Inc.	T-574	Modification of wigwam waste burner consisting of feed conveyor, chipper, Apache hammer hog, electric motor for chipper, ground-chip conveyor, & necessary foundations, structural supports, housing, etc.	18,225.93	80% or more	Issue
Weyerhaeuser Company Paperboard Manufacturing	T-575	Particulate and Total Reduced Sulfur emissions monitors	15,344	80% or more	Issue
Weyerhaeuser Company Paperboard Manufacturing	T-576	Orifice-type scrubber on smelt dissolving tank vent	36,071	80% or more	Issue
Weyerhaeuser Company Paperboard Manufacturing	T-580	No. 4 recovery furnace system consisting of "low-odor" recovery furnace, air cascade evaporator, concentrator, electrostatic precipitator, and associated auxiliary equipment	8,511,981	80% or more	Issue

Appl T-541

Date August 26, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

American Can Company
Halsey Mill
P. O. Box 215
Halsey, OR 97348

The applicant owns and operates a bleached Kraft pulp and paper mill located near Halsey, Oregon.

2. Description of Facilities

The facilities described in this application are the following:

A. Non-condensible gas incineration system revision.

The non-condensible gas incineration system collects non-condensible odorous gases from the digesters, evaporators and black liquor storage tank vents and ducts the gases to the lime kiln or recovery furnace for incineration. The modification increased the fan size and provided for a spare fan.

B. Two-stage mud washing system.

This system provides a means of reducing lime kiln TRS emissions by removing soluble sulfide compounds from the lime mud before it enters the lime kiln.

C. Electrostatic precipitator modifications.

The electrostatic precipitator is used to control particulate emissions from the recovery furnace. The modifications consisted of the installation of larger salt cake removal hoppers and conveying screws.

D. EPA particulate sampling train.

This item is used to sample the lime kiln, smelt dissolving tank vent, and the recovery furnace for particulate emissions.

E. Spare recausticizing sump pump.

This pump is used to divert effluent from the recausticizing area to either an emergency collection pond or back to the process.

F. Recausticizing sump flowmeter.

This item allows plant operating personnel to continuously monitor effluent discharge volume from the sump.

Facility cost:

A.	Non-condensible gas incineration system revision	$ 8,922
B.	Two-stage mud washing system	52,821
C.	Electrostatic precipitator modifications	3,685
D.	EPA particulate sampling train	3,736
E.	Spare recausticizing sump pump	3,569
F.	Recausticizing sump flowmeter	768
	Total (Accountant's certificate was provided)	$73,501

The facilities were all placed in operation by January 1, 1974. Certification is claimed under the 1969 Act. Percentage claimed is 100%.

3. Evaluation of Application

A. Non-condensible gas incineration system revision.

Tax credit for the original non-condensible gas incineration system was approved on Tax Credit Application Number T-149. The modifications that were made increased the capacity of the system and provided a spare fan.

The facility is currently operating satisfactorily. There is no economic return from this installation.

B. Two-stage mud washing system.

This system was installed as part of American Can Company's program to meet the lime kiln TRS emission limitations of the 1973 Kraft Pulp Mill Regulation.

The facility is currently operating satisfactorily. However, the lime kiln TRS emissions were not reduced to the levels required by the regulation, so additional equipment will have to be installed. There is no economic return from this installation.

C. Electrostatic precipitator modifications.

Tax credit for the electrostatic precipitator was approved on Tax Credit Application Number T-213. The original design of the precipitator did not provide sufficient collection efficiency to meet the particulate emission requirements of the 1973 Kraft Pulp Mill Regulation. The Company went through the precipitator and made changes to improve the efficiency. One of the things that they did was to install the larger hoppers and conveying screws to prevent plugging. When the plugging would occur, part of the precipitator would short out and the particulate collection efficiency would fall off. The electrostatic precipitator is currently operating satisfactorily. The hoppers and conveyors were enlarged solely to improve air quality.

D. EPA particulate sampling train.

This equipment is used in monitoring particulate emissions from the various sources as required by the 1973 Kraft Mill Regulation.

The equipment operates satisfactorily and is used solely for air emissions monitoring.

E. Spare recausticizing sump pump.

This pump provides additional effluent volume for diverting effluent from the recausticizing area to either the collection pond or to the process. The pump originally installed was undersized.

This pump is operating satisfactorily and was installed solely for pollution control.

F. Recausticizing sump flowmeter.

This is a replacement item. The original flow meter was not capable of continual operation due to corrosion. Tax credit was not applied for on the original flowmeter.

This flowmeter is operating satisfactorily and was installed solely for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $73,501 be issued for the facilities claimed in Tax Application No. T-541 with more than 80% allocated to pollution control.

Appl T-569

Date 9/11/74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

Weyerhaeuser Company
Wood Products
P.O. Box 9
Klamath Falls, Oregon 97601

The applicant owns and operates a wood products complex at Klamath Falls, Oregon, consisting of a hardboard plant, hardboard finishing plant, particleboard, and plywood operations.

2. Description of the Claimed Facility

The claimed facility consists of:

a. 3.5 million gallon lined, aeration lagoon with 30 h.p. Ashbrook aerator and controls.
b. 3.5 million gallon lined quiescent lagoon and related outlet facilities.
c. A plywood and particleboard industrial waste collection sump and 1,600 feet of 6-inch steel pipe line to treatment lagoons.
d. 1,100 feet of 8-foot chain-link fencing.

The claimed facility was placed in operation July, 1971. Certification is claimed under the 1974 act with 100% of the cost allocated to pollution control.

Facility Cost: $273,755. (Accountants certification was attached to application).

3. Evaluation of Application

Installation of claimed facilities was required to increase waste treatment due to the addition of a particleboard and plywood plant to the wood products complex. The application claims that all of the settleable solids are removed, and 82 to 93% of the BOD is removed. Monitoring reports to this office from Weyerhaeuser Company have shown this to be true.

4. Director's Recommendation

It is recommended that a pollution control facility certificate be issued for the facilities claimed in application T-569, such certificate to bear the actual cost of $273,755 with 80% or more allocable to pollution control.

WDL:bm
9/11/74

Appl T-570

Date 7/31/74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

Southern Oregon Plywood Inc.
PO Box 269
Grants Pass, OR 97526

2. Description of Facility

The claimed facility is a sanderdust collection system including the following items:

a. Baghouse

b. Storage bin

c. Ductwork

d. Blowers, motors & controls

e. Fire protection equipment

f. Foundations, supports, etc.

This facility was completed and placed into service in May, 1973.

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

3. Evaluation

This facility collects the particulate matter generated by the sanders.

Prior to the installation of this facility the sanderdust was being emitted at the rate of 55#/hr. The present rate of emission is less than 1#/hr. This facility operates satisfactorily to reduce sanderdust emissions and is for the primary purpose of air pollution control.

It is concluded that this installation operates satisfactorily to reduce particulate emissions to within Department regulations and is for the primary purpose of air pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $61,299.87 with 80% or more of the costs allocated to pollution control be issued for the facility claimed in Tax Application #T-570.

Appl T-574

Date August 29, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

Gemco Wood Products, Inc.
261 White Oak Drive
Medford, OR 97501

The applicant operates a sawmill at Central Point, Jackson County, Oregon. At the mill, pine mill trim ends are resawn and sold for manufacturing as toys, mouse traps and kitchen components.

2. Facility Description

The subject facility is a wood waste processing system which was installed in order to eliminate the use of the company's wigwam waste burner (WWB). The subject facility consists of the following pieces of equipment:

1. One feed conveyor
2. One chipper, an Apache hammer hog
3. One electric motor for chipper
4. One ground-chip conveyor
5. Necessary foundations, structural supports, housings, etc.

The subject facility was completed and put into operation in July, 1973.

Certification for tax relief is claimed under the 1969 Act and with 100% of the facility's cost claimed for pollution control.

The facility costs $18,225.93 (certified by the Accountant).

3. Application Evaluation

The chipper system was installed in lieu of modifying the wigwam waste burner, which did not meet Departmental Air Quality Regulations. The chipper system was reported to be cheaper than the WWB modification, and it eliminated a source of air pollution as well. Although the chips are sold, no net profit is gained from the chipper operation.

The chipper facility operates satisfactorily, and it reduced total particulate emissions by an estimated 7.44 TPY and CO by an estimated 24.97 TPY.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $18,225.93 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-574.

AFB:mh

Appl T-575

Date August 27, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

Weyerhaeuser Company
Paperboard Manufacturing
P. O. Box 275
Springfield, OR 97477

The applicant owns and operates an unbleached Kraft pulp and paper mill located in Springfield.

2. Description of Facilities

The facilities are described as particulate and Total Reduced Sulfur emissions monitors. These monitors are used to continually monitor particulate emissions from the No. 3 recovery furnace and Total Reduced Sulfur emissions from the No. 3 recovery furnace and No. 1, No. 2 and No. 3 lime kilns.

Facility cost: $15,344 (Accountant's certification was provided.)

The facilities were placed in operation in March, 1972. Certification is claimed under the 1969 Act with 100% allocable to pollution control.

3. Evaluation of Application

These facilities were installed in response to the 1969 Kraft Pulp Mill Emission Regulation which required monitoring of various emission sources. The monitoring devices are not necessary for routine process control, since other instrumentation provides necessary information for that purpose. Therefore, it is concluded that no economic function is served by these facilities and they were installed and are operated solely for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $15,344.00 with 80% or more allocated to pollution control be issued for the facilities claimed in Tax Credit Application Number T-575.

CRC:mh

Appl T-576

Date 8-28-74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

Weyerhaeuser Company
Paperboard Manufacturing
P. O. Box 275
Springfield, OR 97477

The applicant owns and operates an unbleached Kraft pulp and paper mill in Springfield.

2. Description of Facility

The facility claimed in this application is described as an orifice type scrubber installed on the smelt dissolving tank vent for Number 4 recovery furnace.

Facility cost: $36,071 (Accountant's certificate was provided).

The facility was completed and placed in operation in January, 1973. Certification is claimed under the 1969 Act. Percentage claimed is 100%.

3. Evaluation of Application

This facility was installed in response to the 1973 Department of Environmental Quality Kraft Pulp Mill Emission Regulation which required that smelt dissolving tank vent emissions not exceed 0.5 pounds particulate per air dried ton of pulp produced. The plans and specifications for the facility were approved by the Department. Prior to the installation of the scrubber, the smelt tank particulate emissions were controlled by a demister pad; which did not reduce emissions below the regulation limit. Tax credit for the demister pads has not been applied for. The installation of a scrubber has reduced the smelt dissolving tank vent particulate emissions below the regulation limit.

Some sodium carbonate is recovered by the facility, but the value of it does not pay the scrubber operating expenses. Therefore, it is concluded that the system was installed and is operated solely for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $36,071 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Application Number T-576.

CRC:mh

Appl T-580

Date September 9, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

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

The applicant owns and operates an unbleached Kraft pulp and paper mill in Springfield.

2. Description of Facility

The facility claimed in this application is described to be the No. 4 recovery furnace system and includes a "low-odor" recovery furnace, an air cascade evaporator, a concentrator, an electrostatic precipitator and associated auxiliary equipment (pipes, pump and electrical equipment).

Facility cost: $8,511,981.00 (Accountant's certification was provided).

The facility was placed in operation in February, 1971. Certification is claimed under the 1969 Act with 100% allocable to pollution control.

3. Evaluation of Application

This facility was installed in response to the 1969 Kraft Pulp Mill Emission Regulation which required that recovery furnace Total Reduced Sulfur emissions should not exceed 0.5 pound of sulfur per ton of air dried pulp produced after July 1, 1975. The claimed facility replaced two recovery furnaces which could not be economically modified to meet the regulation. These two furnaces have been removed from service.

The installation of the new recovery furnace increased the total plant recovery furnace capacity from 1220 air dried tons per day to 1265 air dried tons per day. This is a 3.7 percent increase over previous capacity. Therefore, the percent allocable to pollution control should be 96.3%.

The electrostatic precipitator installed on the new furnace has a design particulate removal efficiency of 99.6 percent, whereas the precipitators on the old furnaces were designed for a particulate removal efficiency of 91 percent.

The additional chemicals recovered by the new recovery system does not pay for the installation. Therefore, it is concluded that the No. 4 recovery furnace system was installed solely for pollution control.

The facility represents highest and best practicable treatment and it is currently complying with the 1978 limits of the Kraft pulp mill Emission Regulation.

4. Director's Recommendation

It is recommended that a Pollution Control Facility certificate bearing the cost of $8,511,981.00 be issued for the facility claimed in Tax Credit Application No. T-580 with more than 80% allocated to pollution control.

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

MEMORANDUM

To : Environmental Quality Commission

From : Director

Subject: Agenda Item No. D (1), September 20, 1974 EQC Meeting

Oregon CUP Award Nomination: Dr. David Charlton

Background

Dr. Charlton has been suggested for an individual Oregon CUP Award by the Portland and Salem Chambers of Commerce and others knowledgeable in the environmental movement, from the time the Oregon CUP Awards program was first established. The Screening Committee discussed the nomination at one time early in the program, but since Dr. Charlton himself was a member of the Committee (not present during this discussion), it was felt it would be inappropriate to recommend a Screening Committee member for an award. Dr. Charlton's term on the Screening Committee expired June 30, 1974. The next meeting of the Screening Committee was July 30. The question of a CUP Award for Dr. Charlton was brought up at that time, and the Committee unanimously agreed to refer the nomination to the Environmental Quality Commission with a favorable recommendation.

Dr. Charlton has been actively involved in environmental advocacy for nearly fifty years. He was a laboratory technician performing tests on the first survey of pollution in the Willamette River from the Sellwood Bridge to the Columbia River during 1926 and 1927. This was a City of Portland project with the Bureau of Health and Department of Public Works cooperating. At that time, David Charlton, as a recent graduate of the University of British Columbia, was already speaking out publicly on pollution problems, as evidenced by a 1926 article from The Oregonian on the subject.

His concern about water pollution was highlighted by activity in 1937 to obtain passage of the initiative measure which after approval by the voters led to the creation of the Oregon State Sanitary Authority.

Dr. Charlton served as member and secretary of the State Planning Board Committee on Water Pollution during 1935 through 1937. He was active in civic groups that supported the establishment of a sewer user charge to finance the Portland city sewage disposal project in 1938, and in another to increase the sewer user charge as early as 1934. In 1939, he was technical advisor to the Sewer User Charge Equalization Board which has the responsibility of setting up sewer user charges for the City of Portland following a vote of the people. In 1948, he reported to Stream Purification Committee of the Izaak Walton League that the Willamette River was "more grossly polluted than ever." At a time when ecology was a word that appeared only in text books and pollution had not even begun to be thought of as a national issue, Dr. Charlton was calling attention to the impact on the Willamette River of pulp and paper mills and canneries which at that time were discharging their wastes into the river without treatment. Having been a pollution watcher for over twenty years even then, Dr. Charlton was in an excellent position to express concern about lack of action.

As a concerned environmental activist with a technical background which enabled him to understand both the problems and its possible solutions, Dr. Charlton continued to speak out and to demand action to deal with pollution problems.

There is no way of measuring the contribution of one man to the snowballing of environmental awareness among Oregonians. However, the record of his involvement with organizations having widespread community influence, and of his role in providing those organizations with the technical data they needed as a basis for action is abundantly clear. He has been a member of the Izaak Walton League of America since 1934, and has been a past president of the Oregon Division as well as Chairman of the National Executive Board. He now serves on the League's Water Pollution Committee. He has been a member of Portland Chamber of Commerce's Recreational and Natural Resource Committee since 1944, and is currently a member of the Chamber's Environmental Standard Committee. Other memberships and activities include Bonneville Power Administration Advisory Board, Pacific Marine Fisheries Commission, Oregon Roadside Council (President 1960-61 and now serving on Board of Directors), Oregon Building Congress, Rotary Club (since 1949), Oregon Museum of Science and Industry (past president 1953, currently on Board of Directors), Portland City Club (since 1935), Governor Hatfield's Oregon Outdoor Recreation Council (1963-67), Governor McCall's Committee for a Livable Oregon (1968 to date), and City Forest Park Committee of Fifty (charter member, 1946).

With strong citizen support the Willamette River cleanup has been accomplished and is now world famous. Since that time, Dr. Charlton has turned his attention to scenic rivers, litter control, and most recently, noise. He has been frequently in contact with DEQ staff and with the Environmental Quality Commission expressing his concern and sharing information from other states and other nations on noise control activities.

Evaluation

In the opinion of the Oregon CUP Award Screening Committee, Dr. Charlton's lifelong activity in all phases of environmental concern fully qualifies him for inclusion in the elite group of Oregon CUP Award winners. He has brought to Oregon's environmental movement a unique combination of technical qualifications and enthusiasm which has enabled him to have major impact on his fellow citizens and on government organizations with authority to carry out citizen demands for action.

Recommendation

The Director recommends that the Oregon CUP be awarded to Dr. David B. Charlton.

KESSLER R. CANNON
Director

BJS:ss

September 12, 1974

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

MEMORANDUM

To : Environmental Quality Commission

From : Director

Subject: Agenda Item No. D (2), September 20, 1974 EQC Meeting
Oregon CUP Award Renewal Application, Publishers Paper Company

Background

Publishers Paper Company was Oregon's first CUP Award recipient. The initial award was made in 1972 for both the Oregon City and Newberg Mills. At the time it was noted that these were both old plants that had been taken over by the company at a time when there were virtually no pollution control measures in effect and the company had brought them into compliance with all DEQ requirements and had in many instances anticipated DEQ requirements or recommendations that were not currently in effect.

The Oregon CUP Award was renewed for the calendar year 1974. The Oregon CUP Award Screening Committee at the time of renewal expressed the view that awards should be renewed as long as the company maintained the same standard of environmental control that was in effect at the time they first received the award.

Evaluation

Staff reports note that the Newberg Mill was brought into compliance during the past year in accord with its compliance schedule. The Oregon City Mill is in compliance with standards except for the digester blow pits. The recovery furnace was brought into compliance during the past year with the addition of a fourth venturi scrubber. The blow pit has a compliance schedule; however, the company has informed the Department that due to material delivery delays, the blow pit controls will not be finished on schedule. These delays are not the fault of Publishers Paper Company but are due to problems encountered by vendors.

Staff notes that Publishers Paper during the past year has achieved the goals set forth in last year's schedule and appears to be more deserving of the award this year than last year since their present performance is as good or better than it was when a decision was made to grant them the award.

Recommendation

It is recommended that renewal of Publishers Paper Company's Oregon CUP Award be granted for the calendar year 1975.

KESSLER R. CANNON
Director

BJS:kok

attachment - 1

September 10, 1974

PUBLISHERS PAPER TIMES MIRROR

D. F. WILLIAMSON
PRESIDENT

May 14, 1974

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

Attention: Oregon CUP Awards Screening Committee

Gentlemen:

The CUP Award presented to Publishers Paper Co. last year expires at the end of 1974. We would at this time request that we be considered for renewal of the award.

As indicated in our request of a year ago, our Newberg plant has been brought into compliance with SO_2 standards. We are presently working on equipment modifications to further improve the system's performance and reliability. Construction of a similar system is nearing completion at Oregon City, the first phase of which was completed last summer. The second phase, which was to have been completed about this time, is experiencing delays in equipment deliveries but should be in operation by this fall.

In addition to the continuation of the paper mill environmental improvement programs, Publishers Paper Co. has been active in several areas of its wood products mills. At our Portland Division, we have participated in construction and testing of a system for control of plywood veneer dryer emissions. The pilot operation has been expanded to a system for control of one dryer unit. Since the one dryer project has proven successful, a system for control of all dryers is presently under construction. This project, from pilot operation on, has been the object of broad interest by industry and regulatory groups throughout the Northwest. Its successful operation and testing could prove to be a substantial breakthrough for control of steam-heated veneer dryer emission controls.

At our Tillamook Division lumber mill we have completed a hog fuel fired boiler installation which will not only eliminate the requirement for use of heating oil, but also do away with the need for a wigwam burner.

We would be pleased to continue display of the award and use of the insignia on our letterheads and paper products.

Yours very truly,

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

MEMORANDUM

To : Environmental Quality Commission

From : Director

Subject: Agenda Item No. D (2), September 20, 1974 EQC Meeting
Oregon CUP Award Renewal Application, American Can Company

Background

American Can Company was one of the first two recipients of the Oregon CUP Award. The initial award was made in 1972. At the time the award was made, it was noted that American Can had built its Halsey Plant over initial opposition, with the promise that this would fully meet every existing pollution control requirement, and it has done exactly that.

There was some concern over lime kiln emissions at the time of the initial application, but it was decided American Can was doing everything available under present technology.

The Oregon CUP Award was renewed for the calendar year 1974. The Oregon CUP Award Screening Committee at the time of renewal expressed the view that awards should be renewed as long as the company maintains the same standard of environmental control that was in effect at the time they first received the award.

Evaluation

American Can Company has done an excellent job during the past year in reducing the particulate emissions from their pulp mill. As they stated in their request for renewal of the Oregon CUP Award, they have brought the recovery furnace and lime kiln into compliance with the 1975 particulate emission limits. The particulate emissions from the recovery furnace have been reduced from a 1973 average of 4.84 pounds per aid dried ton of pulp produced (lb/adt) to an average of 2.04 lb/adt since February 1974, as reported on the company's monthly monitoring reports. The lime kiln has been in compliance with the 1975 particulate limits since March 1973, and particulate emissions this year have averaged 0.58 lb/adt (compared to regulation limit of 1.0 lb/adt).

American Can has worked hard on trying to reduce the Total Reduced Sulfur (TRS) emission from the lime kiln. They have tried 2-state lime mud washing and lime mud oxidation, but the lime kiln TRS emissions were not reduced below the 1975 limits. An oxygen analyzer and a secondary air fan have been purchased to bring about a further reduction in the TRS emissions. The reason that American Can has not achieved the 1975 TRS emission limits is not due to lack of effort, but an industry-wide lack of technical information on the formation of TRS in the lime kiln.

The District Engineer for the Midwest Region notes that there have been no public complaints during the past year on any aspect of American Can's operation. All field visits have indicated no problem with regard to either air or water.

American Can has recently been disposing of primary clarifier sludge at the Albany solid waste disposal site. Previously, this sludge was totally used for mulching material by a company in Eugene. Disposal at the Albany site is entirely acceptable and may have a beneficial impact on operating that site since they lack good cover material.

American Can has recently been issued an NPDES permit for their waste water discharge. To date, monitoring results have been received for only the first few months of operation under this permit and no permit violations have been reported. In fact, American Can is well within most NPDES permit limitations.

In summary, American Can continues to operate in an exemplary manner with regard to its environmental responsibilities.

Recommendation

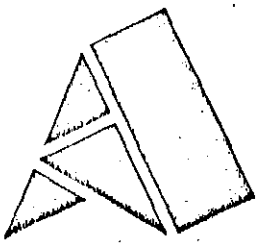
It is recommended that renewal of American Can Company's Oregon CUP Award be granted for the calendar year 1975.

KESSLER R. CANNON
Director

BJS:kok

attachment - 1

September 10, 1974



American Can Company

George J. Wagner, Manager

Box 215, Halsey, Oregon 97348

May 23, 1974

Department of Environmental Quality
Oregon CUP Awards Screening Committee
1234 S. W. Morrison Street
Portland, Oregon 97205

Attention B. J. Seymour

Gentlemen:

The Halsey pulp and paper mill of American Can Company appreciates your previous decision to originally award it the Oregon CUP Award in 1972 and the renewal in 1973 and 1974. We are proud of this award and display it on the labels of our Consumer tissue products that we manufacture at the Mill. We have received some favorable comments on the award. It also serves to remind us that we have to maintain high standards in order to live up to the spirit of the award. The current and future use of the insignia will comply with all the rules regarding its display.

We are requesting that we again be considered for the 1975 award. We continue to work on improvements of our operations as outlined in the following comments.

During the past year our ongoing pollution control improvement program concentrated in the area of reducing air emissions. During this past summer an intensive study of recovery furnace particulate losses determined the need for control device modifications. These modifications were engineered and installed by February 1974 and have resulted in reducing recovery furnace particulate losses to a point well below 1975 standards. We are now in the process of engineering further precipitator modifications

to avoid control device maintenance shutdowns which are now more frequent than we deem satisfactory. We have installed and are in the process of evaluating a continuous particulate monitor for use in determining precipitator malfunctioning and noncompliance. We have also revised operating procedures at our lime kiln to reduce particulate discharge from this source. We succeeded in this area to the point where our discharges are substantially below 1975 emission limits.

In the area of odorous gas emission control we have revised and enlarged our noncondensable gas handling system to provide assured continual thermal destructions of these materials. Lime kiln TRS emissions have been reduced, but not to our satisfaction, by studying 2-stage lime mud washing and lime mud oxidation. A continuous oxygen monitor has been purchased and installed to measure this parameter in the kiln flue gas to further aid in controlling TRS emissions from this source. Finally, we participated in a NCASI study to determine the degree of interference that is associated with TRS measurements from kraft mill point sources.

Work in the area of waste water control led to the installation of improved sewer samplers in various parts of the mill, development of an approved method of suspended solids measurement, and development of a technique for measuring sludge depth in our aerated lagoons, a technique we have used on numerous occasions. The Halsey Mill was selected by WAPORA as an exemplary operation for Phase II EPA guidelines to determine acceptable waste water discharge levels and we have cooperated fully in their survey. We have modified our bleach plant to provide even more efficient water and chemical reuse which we anticipate will improve effluent quality. This project will continue into the summer of this year.

In order to accomplish some of this work, we added one additional permanent technician to our technical staff.

We have a program of staying up-to-date through literature reviews, attending technical workshops, etc., on new developments in environmental control which may be alternates for the Mill for 1977 and beyond.

We would appreciate your serious consideration to grant our Mill the Oregon CUP Award for 1975.

Thank you again for past awards.

Sincerely,

George J. Wagner

/ms

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. E, September 20, 1974, EQC Meeting

Glenmorrie (Lake Oswego, Clackamas County) Health Hazard Annexation -- Certification of Plans for Sewerage System

Background

Glenmorrie, an unincorporated residential community located south of the City of Lake Oswego, in Clackamas County, is being considered by the Oregon State Health Division for designation as an emergency health hazard area. Glenmorrie is primarily a low density, large lot size residential community. One hundred and thirty-one residences presently exist within the area of approximately 220 acres. The sloping terrain and closeness to the Willamette River and the Metropolitan Area combine to make Glenmorrie a very desirable single-family residential neighborhood.

The State Health Division was requested by a petition signed by 12 residents of the Glenmorrie area to initiate mandatory annexation procedures under Oregon Revised Statutes (ORS) 222.850 through 222.915. The State Health Division requested the City of Lake Oswego by letter dated October 19, 1973, to develop preliminary plans, specifications, and a time schedule for removing or alleviating the alleged health hazard. These items have been prepared and submitted to the Department of Environmental Quality for review and certification as to their adequacy.

The proposed annexation area was surveyed by the State Health Division staff in May 1974 and a 45 percent subsurface sewage disposal system failure rate was documented. In line with their statutory responsibility, no specific effort was made by the State Health Division to determine feasibility of repair of each individual subsurface system found to be failing.

After the mandatory health hazard annexation proceeding started, the Department received approximately 20 written inquiries and many more telephone inquiries as to the procedures to be followed under the mandatory annexation statutes. Representatives of the Department and the State Health Division met with several families in the Glenmorrie area who expressed concern about the high cost of sewers; the impact that sewers might have on the character of their community, especially with regard to increased population densities and pressures to rezone to allow multi-family units if annexed into the City of Lake Oswego.

The people who attended the meetings and many of those who wrote or called the Department expressed a strong preference for repair of individual failing subsurface systems over installation of a system of community sewers. As a result of these meetings, the Department agreed that, with the assistance of Clackamas County, each of the failing subsurface sewage disposal systems would be looked at to determine if repairs to individual subsurface sewage disposal systems might constitute a practicable method of resolving the area sewage disposal problem.

A general evaluation of soil types and drainage conditions in the area was made and 40 homes which were noted to have failing subsurface sewage systems during the State Health Division's earlier survey were inspected during July 1974. Each lot was evaluated for feasibility or nonfeasibility of repair to the existing drainfield system. Of the 40 homes noted to have failing sewage disposal systems, only 9 were determined to have a reasonable chance of successful repair. A report detailing the Department's evaluation (attached) was prepared. It was concluded after the field investigation and evaluation that a high percentage of malfunctioning subsurface sewage systems exist within the area and that most of these are not feasible to repair such that they could reasonably be expected to function satisfactorily.

Several of the residents within Glenmorrie have suggested that their area be deleted from the annexation proposal. The Department's staff concluded in its evaluation of the overall problem that annexation of portions of the Glenmorrie area does not appear to be a viable alternative solution to the Glenmorrie area sewage disposal problem because of the widespread occurrence of poor soil types, adverse drainage, and excessive slopes and the sporadic geographic pattern of failing and nonrepairable subsurface systems.

In addition to the information required by statute, the Department requested the City of Lake Oswego to develop up-dated preliminary cost estimates for the installation of the sewerage system proposed for the Glenmorrie area. The City has indicated that the average parcel in Glenmorrie is approximately 0.82 acres. Assuming no divisions of property, Lake Oswego estimated that based on the present number of lots, average parcel cost for sewers would be approximately $3,390 and that a 20,000 square foot lot cost would be approximately $1,890. Some lots in the Glenmorrie area are substantially larger than 20,000 square feet and their cost would be correspondingly greater depending upon the assessment method adopted. It should be noted that these cost estimates are for the lateral sewers only. The City's cost estimates as presented in its letter to the Department dated August 1, 1974 (attached) appear to not be out of line with sewer installation cost throughout the State of Oregon.

Conclusions

1. Repair of malfunctioning subsurface sewage disposal systems is not considered a practicable alternative for solving the proposed annexation area sewerage disposal problem.

2. Preliminary plans and specifications together with the time schedule for design and construction of sanitary sewers for the Glenmorrie mandatory annexation area were submitted to the Department by the City of Lake Oswego. The documents submitted appear to be in sufficient detail to satisfy the statutory requirements of ORS 222.860.

3. The failing subsurface sewage disposal systems and resultant septic tank effluent on the surface of the ground and in area drainageways which are deemed to constitute a potential hazard to public health within the territory to be annexed can be removed or alleviated by the construction of sanitary sewers as proposed.

4. The costs estimated by the City of Lake Oswego for the installation of sewers in the Glenmorrie area are not considered exorbitant when compared to other projects within the Portland Metropolitan area on an average lot basis. Some lots in the Glenmorrie area would undoubtedly be faced with high sewer costs because of the large lot sizes.

Recommendation

It is the Director's recommendation that the Commission approve the proposed preliminary plans and specifications and the time schedule for installing sewers in the proposed Glenmorrie annexation area submitted by the City of Lake Oswego under date of April 3, 1974, and certify said approval to the Oregon State Health Division.

KESSLER R. CANNON
Director

REG/kz
9/10/74
Attachments
Department's Memorandum dated July 26, 1974
City of Lake Oswego's Letter dated August 1, 1974

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHWEST REGION

1010 N.E. COUCH STREET • PORTLAND, OREGON • 97232 • (503) 238-8471

TOM McCALL
GOVERNOR

KESSLER R. CANNON
Director

E. J. WEATHERSBEE
Region Administrator

July 26, 1974

MEMORANDUM

To: EJWeathersbee

From: CHGray

Subject: Field Evaluation of Failing Subsurface Sewage Disposal Systems in the Glenmorrie Area near Lake Oswego - Clackamas County

The Glenmorrie area is boundaried by the City of Lake Oswego on the west and north portions and Marylhurst College on the south. The City of Lake Oswego is served by the City of Portland Tryon Creek sewage treatment plant. Marylhurst College has a small package sewage treatment plant for the campus residents only.

The Health Division conducted a health hazard survey in the Glenmorrie area after receiving a petition requesting annexation under the authority of ORS 222.860 (2). The Health Division's survey was conducted May 13 through 24, 1974 and showed that approximately 45 percent of subsurface systems in the area were failing. Some of the residents of the Glenmorrie area were very concerned about the costs of bringing sewers into the area and the changes sewers might precipitate in increased population densities and influx of multi-family structures and urged that first consideration be given to repair of malfunctioning subsurface sewage disposal systems as a preferred means of solving the area sewage disposal problem.

On June 26, 1974, members of this Department, along with Norm Silver, Administrator of the Health Division, met with 22 area families who were concerned about the high cost of sewers and the annexation into the City of Lake Oswego. At this meeting, the Department announced that it had decided with the assistance of Clackamas County to look at each of the failing sewage disposal systems to determine if repairs to these systems was a practicable method of resolving the area sewage disposal problem.

Forty homes which were noted to have failing subsurface sewage disposal systems during the Health Division's survey in May 1974 were visited. This investigation was conducted on July 2, 3, 9, and 10, 1974.

Each lot was evaluated for feasibility or nonfeasibility of repairs of the drainfield systems. Where possible, each lot was reviewed based on such factors as soils, slope, available area, proximity to streams, drainage ditches, and past experiences with attempted repairs.

The evaluation basis used on each lot was primarily judgment and experience of the investigator with regard to the feasibility of effective repairs. Requirements of current regulations regarding top-soil depths, depth to winter perched water tables, and restrictive layers were not applied in the evaluation. If the current regulations were directly applied, which is not the routine procedure used in evaluating repairs, none of the sewage systems would have been deemed repairable.

Some of the residents were not home during our investigations and this limited the scope of our investigation, particularly the soils portion; however, it is not believed to be a significant factor in the overall conclusions of this subject evaluation.

Of the 40 homes noted to have failing sewage disposal systems, only 9 were determined to have a reasonable chance of successful repair. A detailed tabulation of the survey results is given in attached Table I.

Many of the homes are on rather large lots and one would expect that there should be sufficient available area for repair of the drainfields. This, however, was not always true since many of these large lots have steep slopes, large concrete patios, swimming pools, ornamental landscaping, creeks cutting through the lot, and the like. This situation coupled with adverse soil conditions resulted in the high percentage (77.5 percent) of non-repairable drainfields.

The sewage disposal systems which were designated repairable (22.5 percent) in most cases had adverse soil conditions. However, other favorable conditions were found such as large, relatively flat areas and no past attempts to repair the drainfield systems.

Dr. William H. Doak of Clackamas County Department of Public Works and Mr. Patrick Hanrahan of our Department conducted an intensive soils survey of the area concurrently with our survey. Their findings are attached.

The systems considered non-repairable were analysed based upon their proximity to the City of Lake Oswego. The location of these systems did not fit into any such pattern; the systems considered non-repairable tended to fall into a rather uniform geographical pattern throughout the survey areas (see attached Figure 1).

The drainfield systems deemed to be repairable were located primarily in the area east of the Pacific Highway (between the Highway and the Willamette River). Seven of the nine repairable systems were found there. Four of these homes are located on Glenmorrie Drive. However, these homes are boundaried above and below with homes which were found to have non-repairable systems.

The questions of possible annexation of certain sections of the Glenmorrie area which are contiguous to the City of Lake Oswego does not appear to be a viable alternative solution of the Glenmorrie sewage disposal problem. This conclusion is reached because of the sporadic geographical pattern of repairable and non-repairable systems.

The Health Division has found the Glenmorrie area to have a high incidence of failing subsurface sewage disposal systems (45 percent). After our field investigation of the area, it is concluded that a high percentage of malfunctioning subsurface sewage disposal systems exist within the area and that most of these are not susceptible to repair such that they can reasonably be expected to function satisfactorily.

CHG/kz

Attachments:
Table I
Figure 1
Glenmorrie Area Soil Survey (memorandum)

TABLE I

Field Evaluation of Failing Subsurface Sewage Disposal Systems in the Glenmorrie Area

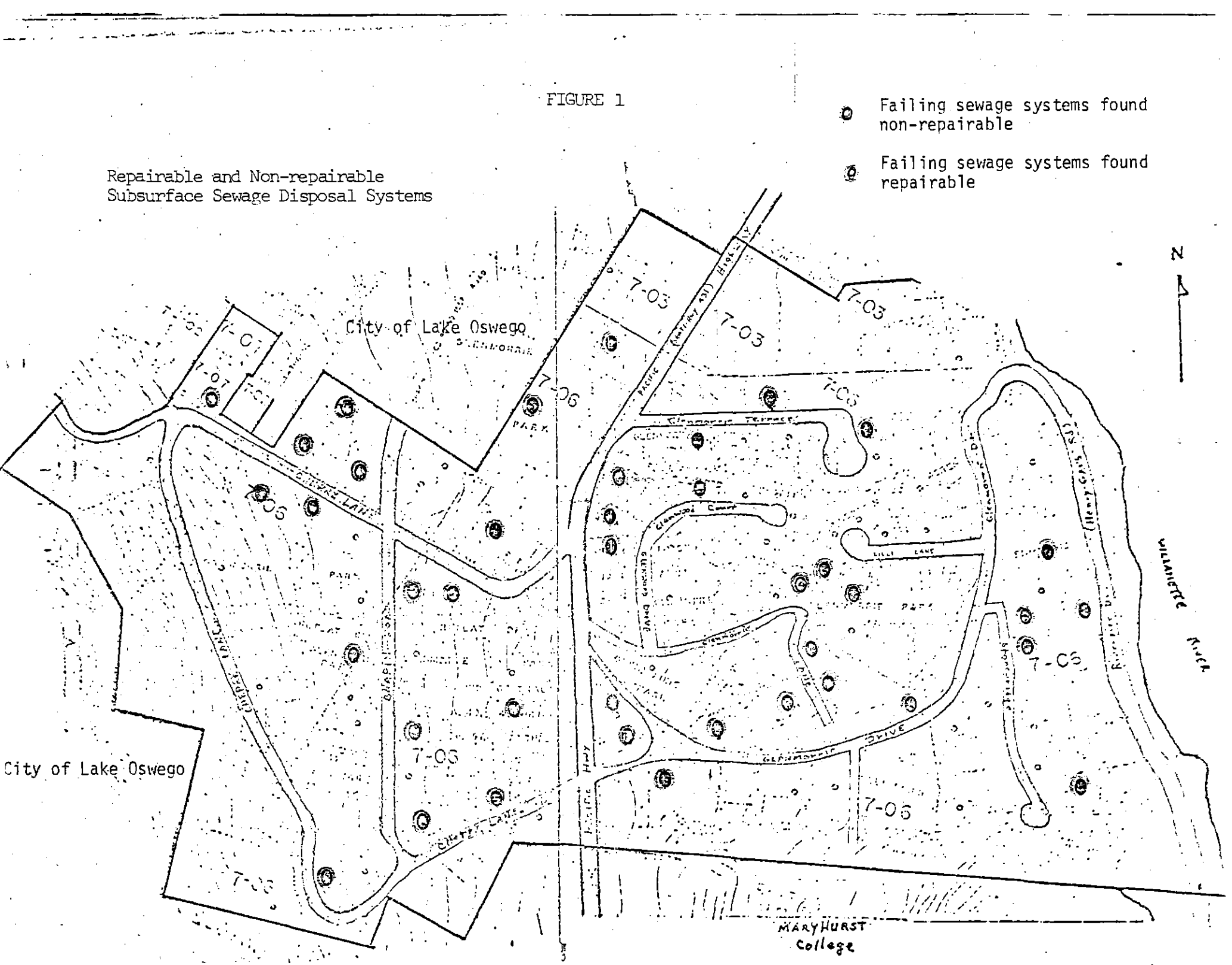
Address	Drainfield Repairable		Adverse Factors Affecting Drainfield Repairs			
	Yes	No	Poorly Drained Soils	Steep Slopes	Lack of Space	Past Attempts to Correct Drainfield
1129 Cherry Lane		X	X			
1218 Cherry Lane		X	X			X
1267 Cherry Lane	X		(marginal probability repairs could be successful)			
1292 Cherry Lane		X	X		X	
1345 Cherry Lane		X	X			
1789 Cherry Lane		X			X	
16825 Chapin Rd.		X	X			X
17010 Chapin Rd.		X	X	X	X	X
17015 Chapin Rd.		X	X		X	
17085 Chapin Rd.		X	X	X		X
17312 Chapin Rd.		X	X	X	X	
2221 Glenmorrie Rd.		X	X		X	
281 S. View Crest		X	X	X		
1515 S. Glenmorrie Rd.	X		(Large lot, but due to poorly drained soils, repairs are doubtful)			
1534 S. Glenmorrie Rd.		X	X			X
16540 S. Pacific Hwy.		X	X		X	
16625 S. Pacific Hwy.		X	X	X		
16755 S. Pacific Hwy.	X		(Poorly drained soils may preclude successful repairs)			

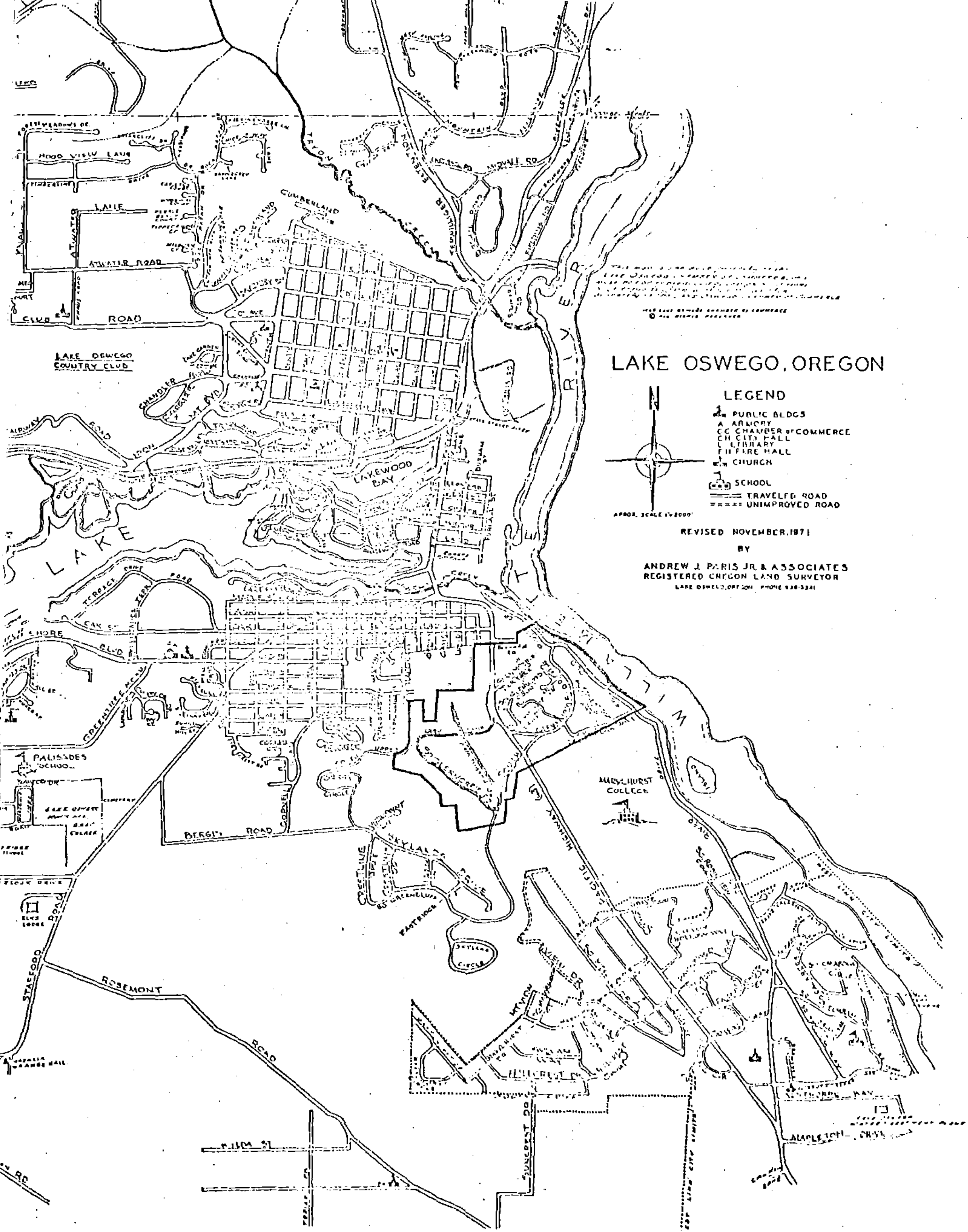
Address	Drainfield Repairable		Adverse Factors Affecting Drainfield Repairs			
	Yes	No	Poorly Drained Soils	Steep Slopes	Lack of Space	Past Attempts to Correct Drainfield
2367 Glenmorrie Dr.		X	X		X	
2475 Glenmorrie Dr.		X	X			X
2512 Glenmorrie Dr.	X					
2535 Glenmorrie Dr.		X	X	X	X	
2805 Glenmorrie Dr.		X		X	X	
2932 Glenmorrie Dr.	X		(Would require pumping to front yard; soils are very marginal)			
2980 Glenmorrie Dr.	X		(Would require pumping to front yard; soils are very marginal)			
3060 Glenmorrie Dr.	X		(Would require pumping to front yard; soils are very marginal)			
16805 River Road Dr.		X			X	
17075 River Road Dr.		X		X	X	
2119 Glenmorrie Lane		X		X	X	
2127 Glenmorrie Lane	X		(Relatively flat area available for repair)			
2145 Glenmorrie Lane	X		(Relatively flat area available for repair)			
2195 Glenmorrie Lane		X		X	X	
2212 Glenmorrie Lane		X		X	X	X
2247 Glenmorrie Lane		X		X	X	
16577 Glenmorrie Court		X	X	X	X	
16667 Glenmorrie Court		X	X	X	X	

Address	Drainfield Repairable		Adverse Factors Affecting Drainfield Repairs			
	Yes	No	Poorly Drained Soils	Steep Slopes	Lack of Space	Past Attempts to Correct Drainfield
16685 Glenmorrie Court		X	X		X	
16695 Glenmorrie Court		X	X		X	
1710 Glenmorrie Terrace		X		X	X	
1890 Glenmorrie Terrace	_	X	X	_	X	_
TOTALS	9	31	22	15	22	7

FIGURE 1

Repairable and Non-repairable
Subsurface Sewage Disposal Systems




LAKE OSWEGO, OREGON
LEGEND
PUBLIC BLDGS
A ARMORY
CC CHAMBER of COMMERCE
CH CITY HALL
L LIBRARY
FH FIRE HALL
CHURCH
SCHOOL
TRAVELED ROAD
UNIMPROVED ROAD
REVISED NOVEMBER, 1971
BY
ANDREW J. PARIS JR. & ASSOCIATES
REGISTERED OREGON LAND SURVEYOR
LAKE OSWEGO COUNTRY CLUB
CUMBERLAND
LAKEWOOD BAY
LAKE
WILLAMETTE RIVER
MARYLHURST COLLEGE
PALISADES SCHOOL
HOOD VIEW LANE
ATWATER ROAD
CLUB ROAD
BERGIS ROAD
ROSEMONT ROAD
STAFFORD ROAD
SKYLANDS CIRCLE
HILLCREST DR
PACIFIC HIGHWAY
TERRACE DRIVE
CORNELL
FAIRWAY ROAD

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHWEST REGION

1010 N.E. COUCH STREET • PORTLAND, OREGON • 97232 • (503) 238-8471

TOM McCALL
GOVERNOR

KESSLER R. CANNON
Director

E. J. WEATHERSBEE
Region Administrator

July 5, 1974

MEMORANDUM

To: REGilbert

From: PLHanrahan

Subject: Glenmorrie Area Soil Survey

On July 2 and 3, 1974, Mr. W. H. Doak and I made a soil survey of the Glenmorrie area of Clackamas County. Seven soil mapping units were characterized with reference to their feasibility for subsurface sewage disposal and are shown as Mapping Units A through G on the accompanying map.

Map Unit A consists of a shallow cobbley sandy loam soil developed from recent alluvium over Columbia River Basalt. It ranges in elevation from 10 to 40 feet of mean sea level. The depth to solid basalt is approximately 24 inches of the ground surface. This unit is a narrow area between Henry Gans Road and the bank dropoff to the Willamette River and is now unoccupied. Map Unit A does not appear feasible for homesites requiring subsurface sewage disposal because of shallow soil conditions and insufficient lot sizes.

Map Unit B consists of a somewhat poorly drained soil developed in recent fine sandy alluvium. It ranges in elevation from 40 and 100 feet of mean sea level. It is underlain by a massive, firm iron oxide layer which is well developed in portions of this mapping unit. The apparent textural class is loam over mottled silt loam over prominently mottled clay loam over compacted fine sandy loam containing the iron oxide layer. The depth to the winter perched ground water level ranges between 18 and 30 inches of the natural ground surface. Several springs and a pond were also noted within Map Unit B. Most of this unit does not appear feasible for subsurface sewage disposal because of perched ground water levels above 24 inches of the ground surface. However, there are some small inclusions of soil with mottling in the range of 24 to 30 inches, but most of these inclusions have been disturbed by filling operations and also do not appear feasible for subsurface sewage disposal.

Map Unit C represents one of the better soils of the survey area. It consists of a moderately well drained soil developed from the Willamette silts. It ranges in elevation from 100 to 130 feet of mean sea level. The depth to the winter perched ground water level ranges between 24 and 50 inches of the natural ground surface. The apparent textural class silt loam over siltly clay loam over a mottled silt loam restrictive layer which ranges in depth between 30 and 50 inches of the ground surface. Map Unit C appears feasible for subsurface sewage disposal systems installed on slopes less than 12 percent.

Map Unit D consists of a somewhat poorly drained silt loam soil formed in old alluvium. This unit ranges in elevation from 130 to 210 feet of mean sea level. The depth to the winter perched ground water level as indicated by prominent mottling ranges between 12 and 22 inches of the ground surface. The apparent textural class is silt loam over prominently mottled silt loam over compacted very fine sandy loam. This soil becomes restrictive above 30 inches of the ground surface, however, the boundary to the restrictive layer is gradual and is poorly defined. Map Unit D does not appear feasible for subsurface sewage disposal systems on all slopes.

Map Unit E consists of a somewhat poorly to moderately well drained soil formed in old cobbley alluvium. This unit ranges in elevation from 210 to 240 feet of mean sea level. No mottling was observed above 30 inches of the ground surface. The apparent textural class is silt loam over cobbley silty clay loam. The drainage class of this soil depends upon its position. Higher convex areas of Map Unit E are moderately well drained and appear feasible for subsurface sewage disposal systems installed on slopes less than 12 percent. Lower areas and steeper areas of Map Unit E do not appear feasible for subsurface sewage disposal.

Map Unit F consists of a somewhat poorly drained soil developed from mixed alluvium and loess. It ranges in elevation from 240 to 400 feet of mean sea level. The apparent textural class is silt loam over prominently mottled silt loam over a firm silty clay loam restrictive layer. The depth to the winter perched ground water level ranges between 11 and 23 inches of the natural ground surface. This is supported by a restrictive layer which generally ranges between 24 and 33 inches of the ground surface. Slopes greater than 12 percent also occur on portions of this unit. Map Unit F does not appear feasible for subsurface sewage disposal.

Map Unit G consists of a well drained soil developed from loess. It occurs at elevations greater than 400 feet of mean sea level. The apparent textural class is silt loam over silty clay loam which becomes restrictive at a depth of 44 inches and below. The major limitation for subsurface sewage disposal within Map Unit G is slope. Map Unit G only appears feasible for subsurface sewage disposal systems installed on slopes less than 18 percent.

The results of this study indicate that the majority of soils within this study area do not appear to be feasible for subsurface sewage disposal. Map Units, A, B, D, and F appear nonfeasible on all slopes. Map Units C and G which are of limited area appear feasible only on slopes less than 12 and 18 percent respectively. Map Unit E appears feasible only on the higher convex slopes which are less than 12 percent in slope.

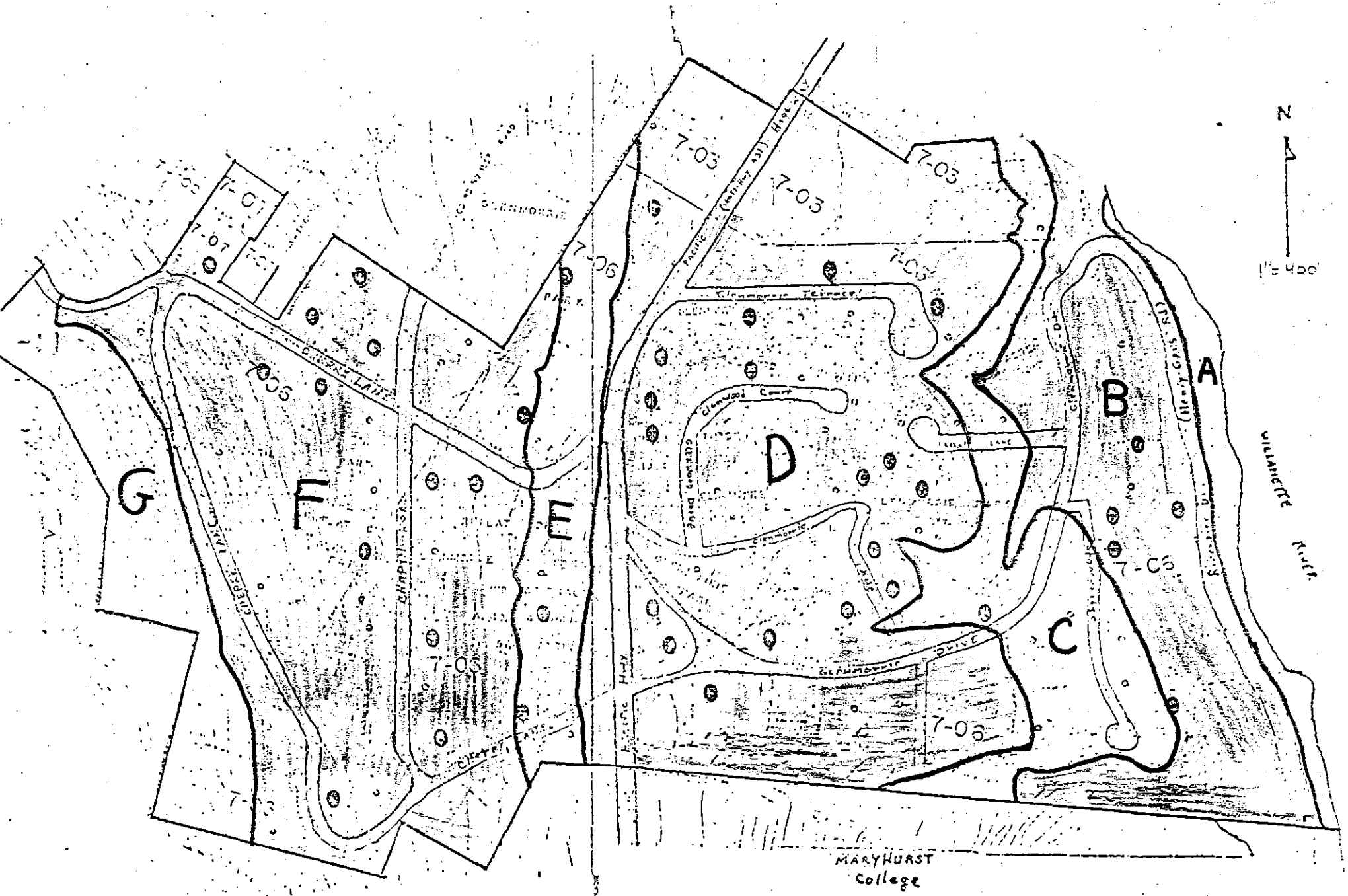
PLH/kz

Patrick L. Hamrick

cc Mr. William H. Doak
Mr. Charles H. Gray
Mr. E. J. Weathersbee

7-17-74
P&H

Soils Mapping Survey of the Glenmorrie Area



Requested By: Glenmorrie Area Soil Survey

Location Map unit A Elev. 10'-40'

Soil Assoc. McBee, Chehalis, Cloquato, 1 Date 7-2-74 Stop No. 1

Series Steiwer

N. veg. (or crop) Oak, Madronna, Poison Oak Climate

Parent material Recent Gravelly Alluvium

Physiography 1st terrace from Willamette Erosion

Relief Straight Sloping Slope

Drainage excessive above 24" Gr. water Permeability less than 0.02"/hr below 24"

Stoniness Basalt at 24" Root distrib.

Moisture

Remarks

hole ① Columbia River basalt at 24"
elev. 30', tax lot 100

File No.

Horizon	Depth	Thickness	Boundary	Color D(ry) M(oist)	Mottles	Texture	Structure	Consistence	Specific Features
AC	0-24"	24"	ab		no	Cobbley medium sandy loam	single grain		50% cobbles
IIR	24-50+"	> 3'	—		—	solid ledge basalt	massive	extremely hard	

Requested By: Glenmorrie Soil Survey

Location Map unit B Elev. 40-100'

Soil Assoc. Woodburn-Willamette 5 Date 7-2-74 Stop No.

Series Cloquato like, iron Pan subsoil

N. veg. (or crop) maple, cedar, grass Climate

Parent material fine sandy alluvium

Physiography terrace face Erosion

Relief straight sloping Slope

Drainage Somewhat Poorly dr. Gr. water Permeability

Stoniness Root distrib.

Moisture

Remarks hole ② elev. 55', iron pan at 42", dist. mottles 20". 20-30% slope
Perennial springs both above & below this site, spring fed pond with
cattails & mosquito larvae just above this site. Cut bank just above
hole ② is moist at ± 20". tax lot 1600

hole ⑥ elev. 90' sil 0-18" no mottles
slope 3-5% CL 18-42" distinct Gray & brown mottles
tax lot 700 fsl 42-50" dense brittle Pan with weakly
developed iron pan (red & Black Stained)

hole ㉖ elev 78' faint mottled CL at 16"; 30-32" prom. mottles with faint iron bands; 50" moist fsl tax lot 1000

hole ㉓ 0-18" fill, 18" faint mottles; 48" Prom mottles with moist fsl
tax lot 1201

File No.

Horizon	Depth	Thickness	Boundary	Color D(ry) M(oist)	Mottles	Texture	Structure	Consistence	Specific Features
A	0-20"	20"		YB	no	Loam	~~friable~~	friable	
B1	20-31"	11"		YB	Common Distinct	sil	—	friable	
B21	31-33"	2"		YB	Prominent Red & Black	clay loam	massive	—	
B22	33-42	9"		Red-Brown & Gray	Prom.	fsl	massive	dense	
B2ir	42-48	6"		Red	—	Fe_2O_3	massive	v. hard v. firm	iron pan
C	48-50+"	>2"		—	—	moist fsl	massive		soil is moist

Requested By: Glenmorrie Area Soil Survey

Location Map Unit C Elev. 100 - 130'

Soil Assoc. Woodburn-Willamette 5 Date 7-2-74 Stop No. C

Series Woodburn

N. veg. (or crop) grass, fir, scotchbroom, blackberries Climate

Parent material Willamette silts

Physiography Smooth gently sloping terrace Erosion

Relief Convex Slope 0 - 20+%

Drainage mod well dr. Gr. water Permeability slow below 32"

Stoniness Root distrib.

Moisture

Remarks hole (4) next to ravine at end of Canyon drive, tax lot 2900 dist. mottles 24" elev. 110', 0-5% slope

(5) Cutbank at end of ivy ct., elev 120' slope 20+% silt loam over distinctly mottled vfsl brittle pan at 40"

(27) silt loam over silty clay loam over Prom. mottled loam. — Prom mottles at 50",

File No.

Horizon	Depth	Thickness	Boundary	Color D(ry) M(oist)	Mottles	Texture	Structure	Consistence	Specific Features
A	0-17	17"	~~dB~~	dB	no	sil	m SAB	WSS WPS	
B2t	17-32	15"	—	dB	no	sicl	m SAB	WS WP	
B3	32-40+	>8"	—	dB	dist. mottles in Root Channels	sil	massive	firm	brittle

Requested By: Glenmorrie Area Soil Survey

Location Map unit D Elev. 130-210'

Soil Assoc. Aloha, 6 Date 7-2-74 Stop No. D

Series Aloha to Amity

N. veg. (or crop) Climate

Parent material old alluvium

Physiography Erosion

Relief Slope

Drainage Gr. water Permeability

Stoniness Root distrib.

~~Moisture~~ hole 7 bouldery fill elev 170'

Remarks hole 8 elev 160' dGB surface. Prom. mottles 12-15" dense vfsl 28"--moist. soil resembles amity, tax lot 5200

hole 9 elev 190', old test hole, Prom mottles 22" tax lot 700

10 elev 170', old test hole, Prom mottles 22" tax lot 700

18 elev 195', tax lot 1100, amity like, Prom mottles 11" Cobbles with vfsl matrix at 40"

19 elev 176', tax lot 500, amity like, Prom mottles 13", loam+ subsoil at 42"

24 elev 146', tax lot 400, aloha like, 8" to dist mottles 20" to Prom mottles 40" to fsl

(Burnett 2475 Glenmorrie dr.) 25 elev 190', tax lot 300, aloha like 18" to Prom mottles, compact + dense below 26" 40" fsl Compacted,

File No.

Horizon	Depth	Thickness	Boundary	Color D(ry) M(oist)	Mottles	Texture	Structure	Consistence	Specific Features
A	0-11	11"	ab-	vdGB	no	sil	Strong SAB	friable	
B21	11-22	11"	grad	dGB	Prom.	sil	weak SAB	friable	
B22	22+48"	26+"	—	B	Dist.	sil-	massive	firm	dense

Requested By: Glenmorrie Area Soil Survey

Location: Map unit E — Elev. 210-240'

Soil Assoc. Aloha, 6 — Date 7-2-74 — Stop No. E

Series unknown Silt loam over weathered Cobbles

N. veg. (or crop) Oak, Poison oak, grass — Climate

Parent material old cobbley Alluvium

Physiography terrace face — Erosion

Relief — Slope 10 - 30%

Drainage Somewhat poor to Mod well Gr. water — Permeability

Stoniness very stoney — Root distrib.

Moisture

Remarks hole (20) elev 236' tax lot 7000
deeply weathered Cobbles at 6"
(21) elev 232' tax lot 1600
deeply weathered cobbles at 8"

Cobbles can be seen in Road ditches.
Drainage class depends on position. higher areas are moderately well drained, lower areas are poorly drained.

File No.

Horizon	Depth	Thickness	Boundary	Color D(ry) M(oist)	Mottles	Texture	Structure	Consistence	Specific Features
A	0-6"	6"	cl		no	sil			
B2	6-30+"	>24"	—		no	Cobbley sicl	w SAB	firm	Cobbles are deeply weathered

Requested By: Glenmorrie Area Soil Survey

Location Map unit F Elev. 240-400'

Soil Assoc. Cazadero, Saum 11 Date 7-2-74 Stop No. F

Series Delena

N. veg. (or crop) Climate

Parent material mixed alluvium + loess

Physiography low upland Erosion

Relief Slope 5-30%

Drainage Somewhat poor Gr. water Permeability 0.06-0.20" below 30"

Stoniness None Root distrib.

Moisture

Remarks hole 11, tax lot 2501, elevation 400', from mottles 12", brittle pan 30"
12, tax lot 3800, elev. 300', from mottles 13", brittle pan 29"
13, tax lot 2800, elev 390', from mottles 23", no brittle pan
14, tax lot 3600, elev 330', 24" to brittle pan
15, tax lot 4200, elev. 285', 14" to mottles, 28" to pan
16, tax lot 2800, elev 260', 11" to mottles
17) tax lot 4800, elev 290', 33" to pan

File No.

Horizon	Depth	Thickness	Boundary	Color D(ry) M(oist)	Mottles	Texture	Structure	Consistence	Specific Features
A	0-12	12	ab	vdB	no	sil	strong SAB	friable	—
B1	12-30	18	cl	B	many from.	sil	weak SAB.	—	—
B2	30-40+	10	—	B	common from.	sicl	massive	V. hard firm	brittle pan contains some mica

Requested By: Glenmorrie Soil Survey

Location Map unit G Elev. >400'

Soil Assoc. Cazadero-Saum, II Date 7-2-74 Stop No. G

Series Laurelwood

N. veg. (or crop) fir, maple Climate

Parent material loess

Physiography upland Erosion

Relief Slope 20-50%

Drainage mod well to well dr. Gr. water Permeability 0.6-2.0"/hr

Stoniness none Root distrib.

Moisture

Remarks hole 22 44" to mottles

above this site, the soil improves and mottles are below 60".

File No.

Horizon	Depth	Thickness	Boundary	Color D(ry) M(oist)	Mottles	Texture	Structure	Consistence	Specific Features
A	0-12		cl	dB	none	Sil	Strong SAB		
B21	12-44		cl	7.5YR 4/3	none	SiCl	Weak SAB		
B22	>44"		—	—	dist	SiCl	Weak SAB to Massive	firm	

City of Lake Oswego

August 1, 1974

Mr. Jack Weathersby
Oregon State Department of
Environmental Quality
1010 N.E. Couch
Portland, Oregon 97232

Re: Preliminary Estimate Collection System, Glenmorrie Area Sanitary Sewers

Dear Mr. Weathersby:

In accordance with the health annexation procedures, we have provided preliminary plans and a time schedule for serving the subject Glenmorrie Area with sanitary sewer facilities.

Although not required by the procedures, you have asked that this office prepare a preliminary estimate of costs for the collection system. Without the benefit of final design and using the resources available, our preliminary estimate of the total project costs for the collection system only, including construction, legal, administrative and engineering costs, is $570,000.

This estimate is based on 1974 construction costs related to the preliminary plans furnished heretofore, envisions serving lots or tax lots as they now exist, assumes the project would not be unduly tied up in litigation procedures, assumes that reasonable methods and procedures will be used to reduce or eliminate the environmental effects and that the normal local improvement district procedures will hold.

The project contains approximately 6,088,000 square feet, including 168 separate properties of various sizes. The average parcel is approximately 35,750 square feet equaling approximately 0.82 acres. Assuming no divisions in property, the average parcel costs for sewers would be approximately $3,390. Using a straight porportion (although the assessment method adopted may not necessarily follow this line) a 20,000 square foot lot would cost approximately $1,890.

You will recall that this area is in the County and presently zoned R-20 (septic tank zoning). We can make no prediction whether or not there will be any future changes in the zoning. Any reduction in the zoning to, say, R-15 or R-10 would have significant impact in reducing the average assessment for sanitary sewer facilities.

Yours truly,

MARLIN J. DE HAAS, P.E.
Director of Public Works

md
cc: Glenmorrie File
Health Division - Dept. of Human Resources

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

To: Environmental Quality Commission

From: Director

Subject: Agenda Item F, September 20, 1974, EQC Meeting

Proposed Interim Policy for Approving New or Expanded Air Contaminant Emission Sources in the Portland Metropolitan Area

Background

Recent proposals to the Department to locate a number of "medium" to "high" air contaminant emitting industrial sources primarily in the Port of Portland's Rivergate Industrial Park in Northwest Portland has created great concern as to the possible adverse effect all or some of these facilities might have on objectives of the Oregon State Clean Air Implementation Plan (IP) adopted by the EQC on January 24, 1972. Primary objective of this plan was to "roll back" existing air contaminant emissions by 1975 sufficiently, by execution of a control strategy, to allow attainment of State and Federal air quality standards which are presently being exceeded primarily in the Western portion of Multnomah County. Excessive carbon monoxide and photochemical oxidant levels are being reduced by a transportation control strategy contained in the I.P. while excessive particulate levels are being reduced by a control strategy oriented primarily toward industrial process emissions. Sulfur dioxide (SO_2) air quality has been at acceptable levels and the IP contained a new sulfur content of fuels regulation to maintain acceptable levels. The concern raised by the recently proposed new industrial emissions is primarily directed at possible adverse effects on the particulate and sulfur dioxide control strategies contained in the I.P.

Reassessment of Implementation Plan and Development of 10-Year Air Quality Maintenance Plan

A margin of safety was built in the I.P. to allow for some added growth. This margin for Multnomah County amounted to roughly a 20% increase in particulate emissions and a 20% increase in sulfur oxide emissions.

A reassessment of the effectiveness of the I.P. completed in March 1974 indicated the I.P. particulate control strategy would not be as successful as originally anticipated within the Portland Metro Air Quality Maintenance Area (Figure 1). The annual particulate standard was projected to be barely achieved by 1975 but the maximum daily standard was projected not to be met. Conditions would steadily worsen after 1975 due to increased emissions from average growth projections and the annual particulate standard would be exceeded by 1977. Figure 2 represents the area of Western Multnomah County where the annual particulate air quality standard is presently being exceeded. Figure 3 represents the reassessment of the effectiveness of particulate and SO_2 control strategies in meeting air quality standards.

In regard to sulfur dioxide air quality, it is evident that annual and daily standards are now being met but based on the assumption of average growth these standards would be exceeded prior to 1985. Actual future increases in SO_2 emissions may greatly exceed projected average growth considering recent and projected shortages of energy formerly supplied by gas.

Tables 2 and 3 present a detailed breakdown of projected particulate and SO_2 emissions in the Portland Interstate AQMA. Noteworthy is the fact that less than 60% of particulate emission growth and less than 70% of sulfur dioxide emission growth is considered directly controllable by the Department (i.e. Commercial and Industrial fuel combustion, process loss, incineration, wigwam waste burners and power plants).

The March 1974 AQMA report was developed utilizing methodology and guidelines provided by the EPA and current input data gathered by the Department. Projections are considered the best available to date and nothing short of completing the comprehensive 10year air quality maintenance area (AQMA) plan can be considered more appropriate for area air quality management purposes.

The Department is currently on schedule with the complex job of developing a 10-year AQMA plan for the Portland Metro AQMA.

A sophisticated air shed model is being developed through consultant contract. This model will be extended to include the heavily industrialized areas down the Columbia River to Longview, Washington, which can have significant impact on the Portland AQMA. Also complex chemical and physical analyses of particulates in the Portland air shed are being undertaken through consultant contract to identify their sources of origin. This will provide means of cross checking the validity of the air shed model and for making adjustments for sources of particulates which heretofore have not been accounted for such as street and soil dust, sea salt, and conversion of gaseous emissions to particulate (e.g. acid rain from SO_2 emissions).

Proposals for Increases in Air Contaminant Emissions and Potential Impact

During recent months an abnormal number of proposals for medium to large new air contaminant sources have been discussed with the Department. Specifically 11 new facilities have been discussed, 6 have submitted permit applications. All are located in Northwest Portland with 6 of the facilities located in the Port of Portland's Rivergate Industrial Park. Table 4 presents a list of these facilities and their projected emissions. Also listed are two facilities proposed to be located just to the northwest of the Portland AQMA which could have some impact on the Portland AQMA air quality.

Location of proposed emission sources in Northwest Portland presents a highly adverse condition from an air quality impact standpoint in downtown Portland. Historical data indicates that poor particulate air quality most frequently occurs in downtown Portland when winds blow from the northwest. Figure 4 depicts this condition where over 50% of the 210 days per year which had particulate air quality greater than 60 ug/m^3 (which is annual standard) occurred when winds were from the northwesterly direction. The remaining days with poor air quality occurred under a wide range of wind directions.

Compounding the adverse effect of new emission sources being located in the northwest Portland area is the fact that typical hot gas emission sources with average 100 foot stack heights would have their greatest impact from 4 to 10 miles down wind. This would place the greatest ground level impact from these facilities within the poorest air quality areas of downtown and Guilds Lake.

The combined particulate emissions from all presently proposed facilities could conceivably exceed the projected annual average controllable growth rate of 1 1/2% per year in the Portland AQMA by a factor of 10 or in other words combined particulate emissions from all proposed facilities could represent 10 years average growth. Combined sulfur dioxide emissions from presently proposed facilities could represent a similar percentage increase.

When looking at the potential increase in emissions that could occur in the smaller but more critical Willamette River corridor area from downtown Portland to Northwest Portland, the percentage increase is even more dramatic. Table 5 presents a listing of particulate and SO_2 emissions in this critical area (Figure 5) before and after completion of I.P. control strategies. It is evident that the expected 2000 ton/year reduction in particulate from the present 4000 ton/year emission rate could be totally negated by potential increases in emissions from presently proposed new facilities. Present sulfur dioxide emission rate in this area of approximately 4000 tons/year could be almost doubled by addition of all proposed new facilities.

The potential adverse effect of all proposed facilities on attainment of air quality standards and the possibility of thwarting any hope of developing a successful 10-year air quality maintenance plan is clearly obvious if approval of all facilities as proposed occurred.

Interim Policy - Need and Development

The Department is legally committed to promptly act on permit applications once all information requested is received. It is obvious that action on many of the proposed facilities will be necessary prior to completion of the 10-year AQMA plan. An interim policy for approval of these facilities is urgently needed to prevent over-allocation of the air resource during the interim period to provide present and future permit applicants with air quality criteria against which economic feasibility of projects can be properly assessed and to provide the residents in the most populous portion of the State with protection against excessive air quality degradation.

An interim policy based on data in the March 1974 AQMA report, which would appear to best meet the above needs is one which:

a) Would not allow ambient standards to be exceeded where implementation of control strategies are projected to achieve compliance with standards.

b) Would restrict increases in emissions to a maximum two years' projected average growth.

c) Would allocate no more than one-quarter of the total allowable emission increases to any one facility.

Criteria a) is considered a legal responsibility of the Department under its commitment in the Oregon Clean Air Act Implementation Plan.

Criteria b) is justified by the projection that greater than two years average growth in particulate emission would cause violation of the annual particulate air quality standard (see Figure 3). With the great uncertainties in fuel supplies and sulfur content of fuels, committing more than two-year average growth in SO_2 emissions could also present a danger of exceeding SO_2 standards.

Criteria c) would tend to prevent concentration of emissions and avoid limiting emissions to a single source-type and offers an approach to equitable allocation of limited growth portntial.

Interim Policy and its Effects

In terms of allowing increases in emissions from controllable sources to a point where air quality standards would not be violated, the interim policy would translate in apparently the most critical conditions, as follows:

Pollutant	Allowable Ambient Increase		Location
Particulate	1. ug/m^3	(1)	Downtown Potland
SO_2	8. ug/m^3	(2)	Guilds Lake
SO_2	35. ug/m^3	(3)	Guilds Lake

(1) Annual geometric mean
(2) Annual arithmetic mean
(3) Second highest 24-hour average

In terms of allowing 2 years of projected average growth to occur the interim policy would translate as follows:

Pollutant	Average Annual Controllable* Growth Rate (tons/year)	Total Allowable Under Proposed Interim Program (tons/year)
Particulate	215	430
SO_2	715	1430

*Controllable growth rate from Table 3.3 March 1974 AQMA report for commercial and industrial fuel combustion process loss, incineration, wigwam waste burners and power plants.

Depending on exact source location, exhaust gas volume, temperature and stack height it is impossible to assess which criteria is most restrictive. In the case of particulates if all 430 tons/year were emitted in the Rivergate-Northwest Portland area from a typical hot gas plume with a 100 foot stack, it appears the ambient particulate increase criteria of 1 ug/m^3 downtown would be equivalent to the allowable 430 tons/year emission increase.

It is conceivable that very large emissions near but not in the Portland AQMA could have some detrimental effect on the interim policy, therefore, such sources must be evaluated individually as to their impact on critical air quality areas of the Portland AQMA. Emission increases in the State of Washington portion of the Portland AQMA would also have to conform to the interim policy to assure its effectiveness.

The proposed interim policy could be easily argued as too stringent or too lenient. Of most significance is the fact that every increase in particulate or SO_2 emission allowed now will have to be more than offset by future yet unplanned reductions if air quality standards are to be maintained in the region and growth accommodated in the ensuing 10 years and thereafter. Since I.P. control strategies require all significant existing sources to control emissions to a high degree, further reductions in emissions from these sources will be difficult and expensive to attain, therefore, any increase in emissions no matter how small must be looked at as an additional hurdle to be surmounted in developing the air quality management plan for the area.

Conclusions

1. The Department's report on designation of air quality maintenance areas, submitted to the EQC on March 18, 1974, concludes that the Oregon State Clean Air Act Implementation Plan (I.P.)adopted by the EQC on January 24, 1974, which contained control strategies designed to meet national ambient air standards by 1975, will not be fully successful in meeting and maintaining State and Federal air quality standards.

2. The most critical problem identified in the Air Quality Maintenance Area Report is that suspended particulate air quality in an area along the Willamette River stretching from Northwest Portland through the Downtown core area, will barely achieve the annual standard and will continue to exceed the maximum day standard in 1975 when I.P. control strategies are scheduled to be completed. Based on average industrial growth, particulate air quality is projected to steadily worsen with the annual standard again being exceeded by 1977. Annual and maximum daily sulfur dioxide ambient air standards are now being met but projections indicate that these standards will be exceeded prior to 1985, also based on the assumption that average growth will occur.

3. A revised control strategy to obtain and maintain national ambient air standards within the Air Quality Standards Maintenance Area for the ensuing ten-year period is scheduled to be developed and submitted to the Environmental Protection Agency by July, 1975. The Department is currently undertaking in-depth air quality studies which are designed to provide the information needed to guide the Department in making the necessary revisions to the Oregon Clean Air Implementation Plan.

4. The Department's Northwest Region is presently faced with evaluating proposals for a substantially greater than average number of medium to large new air contaminant sources which are proposed to be located immediately northwest of the Portland core area. This location is the most adverse from an air quality impact standpoint on the critical Willamette River corridor area. The collective air emissions from presently proposed facilities would represent more than a 30% increase in industrial process particulate emissions in Multnomah County and would exceed the projected annual industrial growth rate (of about 1 1/2% per year) for the area by a factor of ten.

5. Approval of all presently proposed facilities could hinder or even prevent attainment and maintenance of National Air Quality Standards. This is in spite of the fact that each individual facility would be required to apply highest and best practicable treatment and control and, individually, each facility might have small impact on area air quality.

6. The Department is legally committed to act on proposed permit applications for air contaminant sources once all information requested is submitted. It is apparent that the Department will have to take action on many of the proposed new air contaminant sources prior to completion of the in-depth air quality study and prior to development and adoption of a ten-year air quality maintenance plan.

7. An interim policy for processing new air contaminant source applications in the Portland Metropolitan Area is urgently needed to:

   A. Provide the Department with means of assuring that development of an effective air quality maintenance plan is not thwarted.

   B. Provide guidelines for processing presently pending permit applications in a timely manner.

   C. Provide present and future permit applicants with air quality criteria so that economic feasibility of projects can be properly assessed.

   D. Provide the most populous portion of the State of Oregon with protection against excessive and possibly irreversible air quality degradation.

8. The development of a long range policy for approval of new air contaminant sources in the Portland Metropolitan Area which will assure attainment and maintenance of air quality standards on a technically sound basis can only be accomplished with completion of the in-depth work the Department is now undertaking for development of a ten-year air quality maintenance plan. The plan will take a minimum of 9 months to complete. The best available information upon which to base an interim policy at this time appears to be data developed in the Department's Report on Designation of Air Quality Maintenance Areas, since this analysis utilized latest available air quality and emission data and followed procedures prescribed by EPA.

9. Recognizing that the report on air quality maintenance areas projects that at least the maximum day particulate standard will not be met in 1975; that other standards will be exceeded in future years unless successful counter strategies can be developed and implemented; that it is impracticable for the Department to precisely regulate about 40% of the projected increases in emissions, such as those occurring from increased population densities and population related emissions from transportation sources, heating systems and commercial support activities; that standards to protect health are not in danger of being exceeded , it is concluded that the most reasonable interim policy that can be considered for the Portland Metro Area in light of commitments in the Oregon State Clean Air Act Implementation Plan would include the following:

   A. Allow utilization of calculated air shed capacity but not allow ambient air standards to be exceeded where present projections indicate they will be met after completion of presently proposed implementation plan control strategies.

   B. In cases where maximum day standards are projected to be exceeded even after completion of present implementation plan control strategies and in consideration of minimizing degradation of air quality, emission increases should be allowed only in the amount projected in the air quality maintenance area report as average growth over the next two years. The two year period is considered reasonable since many, if not all of the facilities that will be considered under the interim policy could be operational within the ensuing two-year period or shortly thereafter.

   C. As a guideline, not allow any one facility to use more than one quarter of the total allowable emission increase for the Portland Metropolitan area.

9. Continued

(Such policy would translate by use of diffusion model analysis to an allowable increase over the next two-year period of approximately 400 tons per year of particulate emissions if all of the allowable development were to occur in the Rivergate/Northwest Portland area and consist of hot gaseous type emissions having a stack height of approximately 100 feet. Maximum allowable increases in particulate and SO_2 emission rates in the Portland Metropolitan AQMA, based on a two-year average growth rate, would amount to 430 tons per year and 1430 tons per year respectively.)

10. Additional industrial growth and development in the Portland Metro area beyond the interim period would be dependent upon results of the studies presently being undertaken, further reductions in existing point-source emissions by continued application of new technologies, and new control strategies that might be developed and implemented (such as an areawide, mandatory clean fuels use policy).

11. Development of the 10-year Air Quality Maintenance Plan will have to place considerable emphasis on exploring alternative control strategies to achieve and maintain the maximum daily particulate standard as well as providing adequate allowance for future area growth.

Director's Recommendation

In light of the urgent need for an interim policy to provide guidelines for site location, design, review and approval of new and expanded air contaminant sources in the Portland Metropolitan area in a manner which will protect against irreversible environmental damage, insure that air quality standards can be achieved and maintained, and prevent total disruption to the orderly growth and development of the area, it is the Director's recommendation that the Environmental Quality Commission adopt an interim policy, to remain in effect until July 1, 1975, at which time the ten-year air quality maintenance plan is scheduled to be adopted and become effective, as follows:

1. Increases in particulate and SO_2 air contaminant emissions from controllable new or expanded point sources within the Portland Air Quality Maintenance Area shall be allowed only to the extent(as indicated in the Department's March 1974 report on Designation of Air Quality Maintenance Areas) that air quality standards will not be exceeded after completion of Implementation Plan strategies.

2. Increases in particulate and sulfur dioxide air contaminant emissions from new or expanded controllable sources in the Portland Metropolitan Area Air Quality Maintenance Area shall be allowed up to the amount of two years projected "average" controllable growth as defined in the designation of air quality maintenance area report.

3. Define controllable growth as commercial and industrial fuel combustion, process loss sources, solid waste incineration, wigwam waste burners and power plants.

4. As a guideline, not allocate any one new or expanded source more than 25% of the overall increase in air contaminant emissions allowable under the interim policy.

5. Specific allocations shall be made by the Commission in acting upon individual permit applications.

6. Small air contaminant sources emitting less than ten tons per year of any one contaminant shall be exempted from this policy.

Since increases in air contaminant emissions in the State of Washington portion of the Portland Air Quality Maintenance Area can have significant effects on achieving the objectives of this interim policy and, further, considering the numerous applicants for new air contaminant source discharge permits already on file with the Department, some of which have indicated having alternative sites in the State of Washington, it is the Director's further recommendation that the Environmental Quality Commission authorize the Director to actively seek the cooperation and assistance of the Southwest Washington Air Pollution Control Authority and State of Washington Department of Ecology in equitably administering this policy.

KESSLER R. CANNON
Director

Attachments
EJW:lb
9/13/74

Table 1

DEPARTMENT OF ENVIRONMENTAL QUALITY

PROPOSED TIMETABLE FOR JOINT OREGON-WASHINGTON
STUDY OF ATMOSPHERIC DIFFUSION MODELS

Due Date	Elapsed Time (Days)	PROPOSED ACCOMPLISHMENT
7-1-74	0	Publish Request for Proposals and send copies to specific consultants agreed upon for direct solicitation.
8-1-74	30	Closing date for receipt of applications for consultants. Begin weekly meetings of Project Steering Committee to discuss applications, make final selection of a consultant, and formulate the final Scope of Work and schedule of payments.
9-1-74	60	Each state signs its contract with the consultant and study begins. Biweekly Project Steering Committee meetings as needed to review findings, adjust plans, etc.
12-15-74	105	Consultant's final written report due to Steering Committee.
12/74-4/75	135-255	Consultant's report utilized by states in conjunction with other air quality planning information to formulate new implementation strategy for SO_2 and particulate in the two problem areas for the next ten years.
4-15-75	255	DEQ's proposed strategy for maintaining ambient air quality standards in final written report form.
4-20-75	260	Public hearings on new air quality strategy announced. DEQ's written report available to public.
5-20-75	290	Public hearing on new air quality strategy.
6-1-75	300	Public hearing record closed. DEQ considers comments in formulating final ten year strategy.
6-15-75	315	New ten year air quality implementation strategy due for EPA.

SOURCE: Department of Environmental Quality, Request for Proposals, June 28, 1974

TABLE 2

PROJECTED 1975 and 1985 PARTICULATE EMISSIONS

FOR THE PORTLAND STANDARD METROPOLITAN STATISTICAL AREA

SOURCE CLASS	1970 Emissions, Tons/yr.	1975 Emissions, Tons/yr.	1985 Emissions, Tons/yr.
I. Fuel Combustion			
A. Residential	690	904	1373
B. Commercial	413	504	766
C. Industrial	1996	1570	2307
Subtotal Fuel Combustion	3099	2978	4446
II. Process Loss Sources	14176	6111	7259
III. Transportation			
A. Light duty vehicles	1562	1703	2008
B. Heavy duty vehicles	130	142	168
Subtotal Transportation	1692	1845	2176
IV. Solid Waste			
A. Incineration	90	27	31
B. Open Burning	513	397	427
C. Wigwam Waste Burners	200	2	2
Subtotal Solid Waste	803	426	460
V. Miscellaneous Sources			
A. Field Burning	399	203	203
B. Forest Fires	194	194	194
C. Slash Burning	878	781	781
D. Other	960	1258	1912
Subtotal Misc. Sources	2431	2436	3090
VI. Power Plants	53	134	134
Total Area Sources	6219	6761	8817
Total Point Sources	16035	7169	8748
Total All Sources	22254	13930	17565

TABLE 3

PROJECTED 1975 and 1985 SULFUR DIOXIDE EMISSIONS

FOR THE PORTLAND STANDARD METROPOLITAN STATISTICAL AREA

SOURCE CLASS	1970 Emissions, Tons/yr.	1975 Emissions, Tons/yr.	1985 Emissions, Tons/yr
I. Fuel Combustion			
A. Residential	2203	2886	4386
B. Commercial	3757	4921	7479
C. Industrial	7910	8072	11865
Subtotal Fuel Combustion	13870	15879	23730
II. Process Loss Sources	17153	4226	5022
III. Transportation			
A. Light duty vehicles	947	1032	1219
B. Heavy duty vehicles	234	255	302
Subtotal Transportation	1181	1287	1521
IV. Solid Waste			
A. Incineration	8	7	9
B. Open Burning	25	0	0
C. Wigwam Waste Burners	2	0	0
Subtotal Solid Waste	35	7	9
V. Miscellaneous Sources			
A. Field Burning	0	0	0
B. Forest Fires	0	0	0
C. Slash B urning	0	0	0
D. Other	1085	1421	2161
Subtotal Misc. Sources	1085	1421	2161
VI. Power Plants	240	400	400
Total Area Sources	11569	12430	18285
Total Point Sources	21995	10791	14558
Total All Sources	33564	23221	32843

TABLE 4

PROPOSED NEW AIR CONTAMINANT EMISSION SOURCES

IN PORTLAND AQMA

	Facility	Location	Emissions (tons/year) Particulate	SO_2
+	Columbia Independent Refinery 100,000 bbl/day oil refinery	Rivergate	800*	3000
+	Owens Corning Fiberglass fiberglass insulation mfg.	Rivergate	170	70
+	Pacific Carbide doubling of carbide mfg.	North Portland	0 (net)	0
+	Portland Steel Mills scrap steel reclamation and rolling mill	North Portland	86	205
+	Cook Industries terminal grain elevator	Rivergate	30	0
+	Oregon Steel Mills iron pellet mfg. expansion	Rivergate	80	0
	Union Carbide silicon metal plant	Rivergate	170	0
	City of Portland sewage sludge incinerator	North Portland	40	0
	Pennwalt Corporation caustic-chlorine mfg. - 70% expansion	Northwest Portland	?	?
	Sawmill	Rivergate	?	?
	OTHER SIGNIFICANT SOURCES WHICH MAY LOCATE NEAR PORTLAND AQMA			
	PGE Harborton 6 month/year oil operation	?	500	1600
	Charter Oil Corporation 52,000 bbl/day oil refinery	St. Helens	292-420	320-460
	Cascade Energy Corporation 30,000 bbl/day oil refinery	Rainier	397	1587

\+ permit applications filed in order
* pending final design

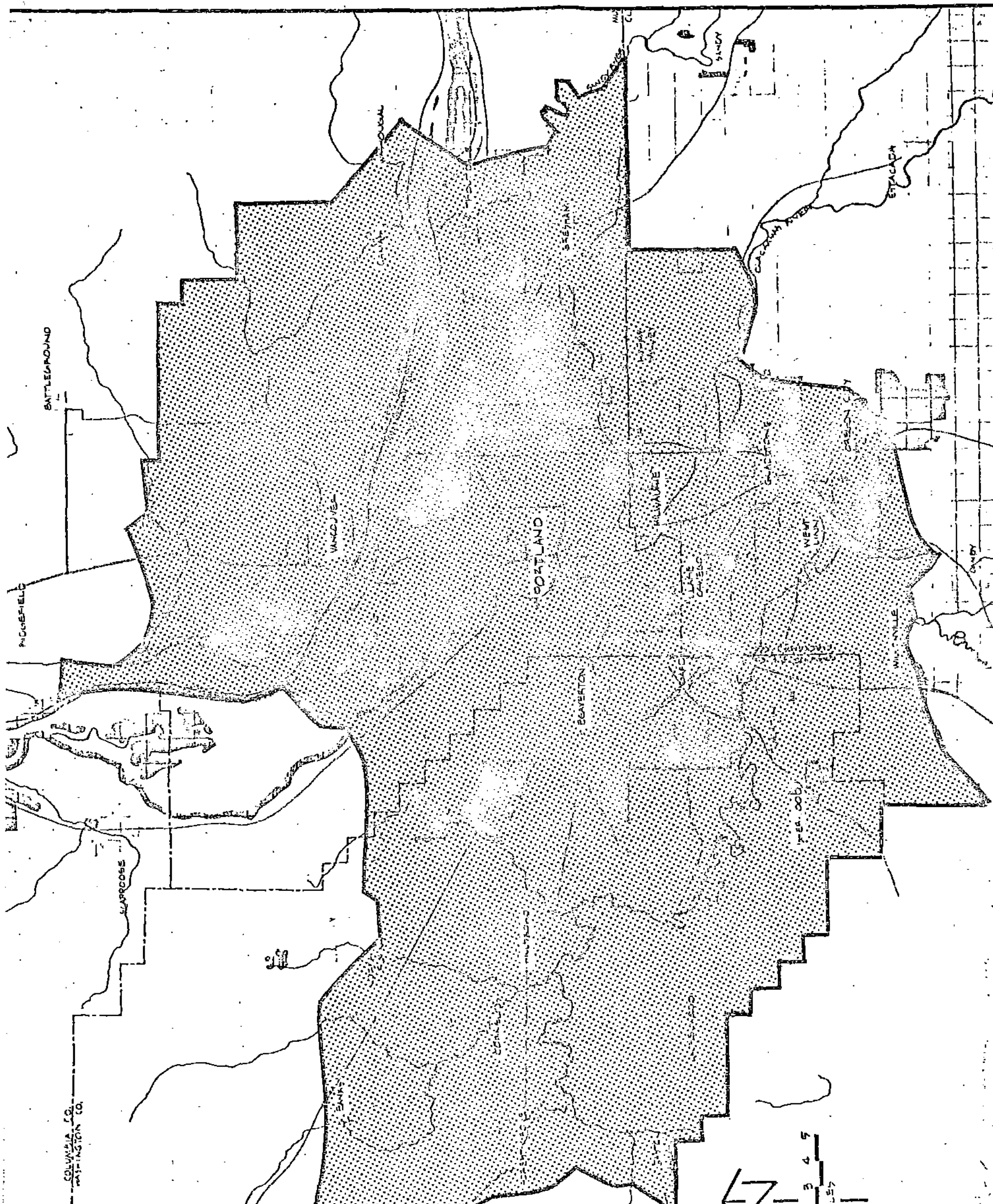
TABLE 5

PARTICULATE AND SO_2 EMISSIONS FROM EXISTING FACILITIES
IN CRITICAL RIVERGATE, GUILDS LAKE, DOWNTOWN AREA
(Tons/Year)

Point Source	Particulate 1975	Particulate 1973	SO_2 1975
Cargill	178	1045	0
Oregon Steel-Rivergate	174	174	0
Dreyfus Corporation	79	170	0
Cheveron Asphalt	68	68	66
Bird & Sons	56	56	215
Union Carbide	55	55	0
Pennwalt	52	52	443
Pacific Power and Light	44	44	317
Centennial Mills	40	50	5
Shell Oil	36	36	350
Oregon Steel-Midrex	35	409	276
Kerr Grain	33	120	0
Terminal Flour	26	364	0
Hercules	25	25	117
Linnton Plywood	22	22	21
Zidell Corporation	22	22	0
Oregon Steel-Front Street	22	95	27
Union Oil	18	18	186
Standard Oil	17	17	69
Albers Milling	17	173	3
K. F. Jacobson	15	38	0
Morris P. Kirk	12	12	369
Miscellaneous Point Sources <10 tons year (17 sources)	313	247	358
TOTAL POINT SOURCES	1337	3317	2822
Area Sources			
Motor Vehicles	272	272	150
Sea Going Vessels	204	204	140
Railroads	101	101	165
Residential Fuel Comb.	85	85	81
Commercial Fuel Comb.	85	85	147
TOTAL (area and point sources)	2054	4034	3505

Figure 1

PROPOSED PORTLAND METROPOLITAN AIR QUALITY MAINTENANCE AREA



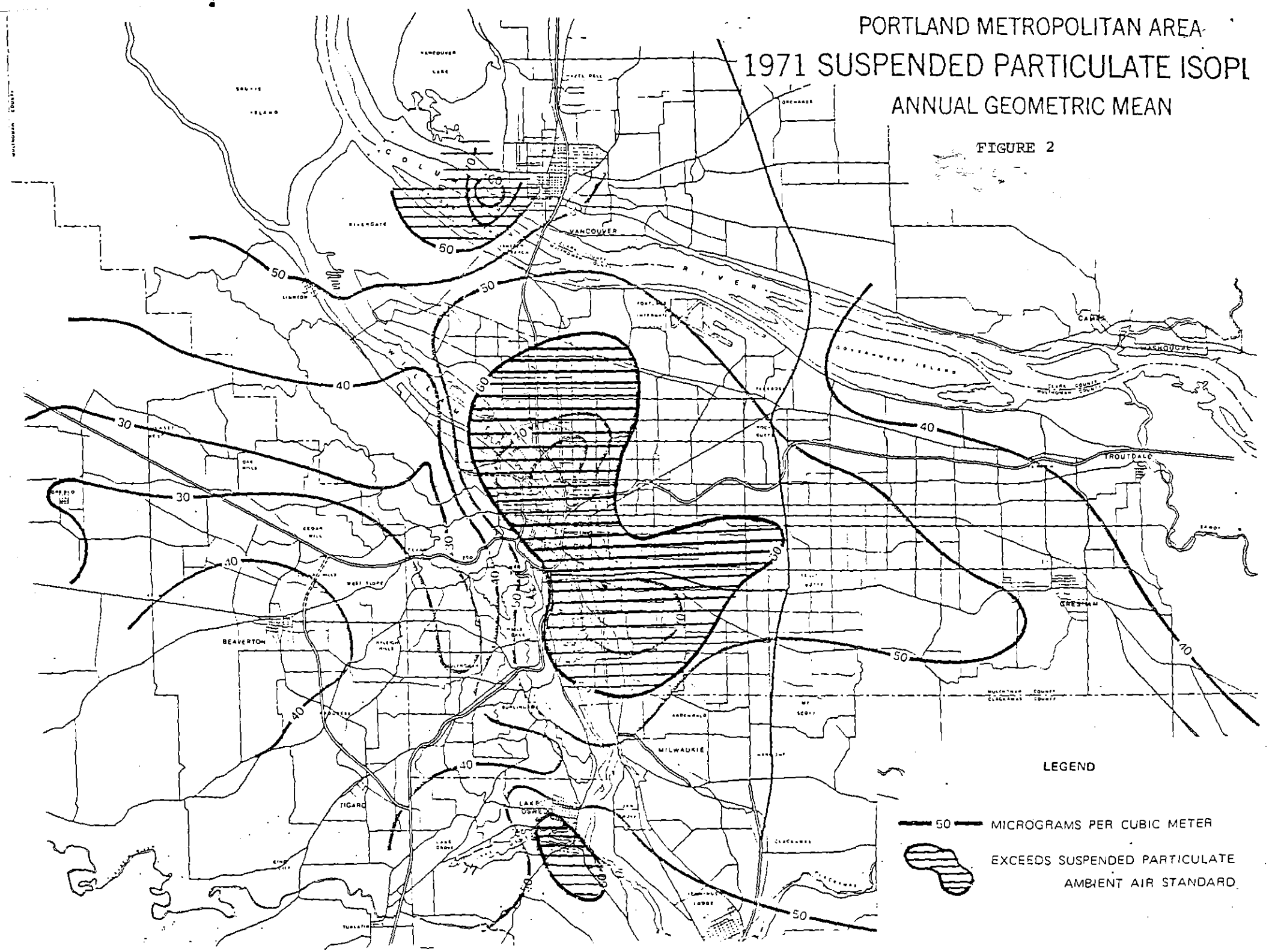
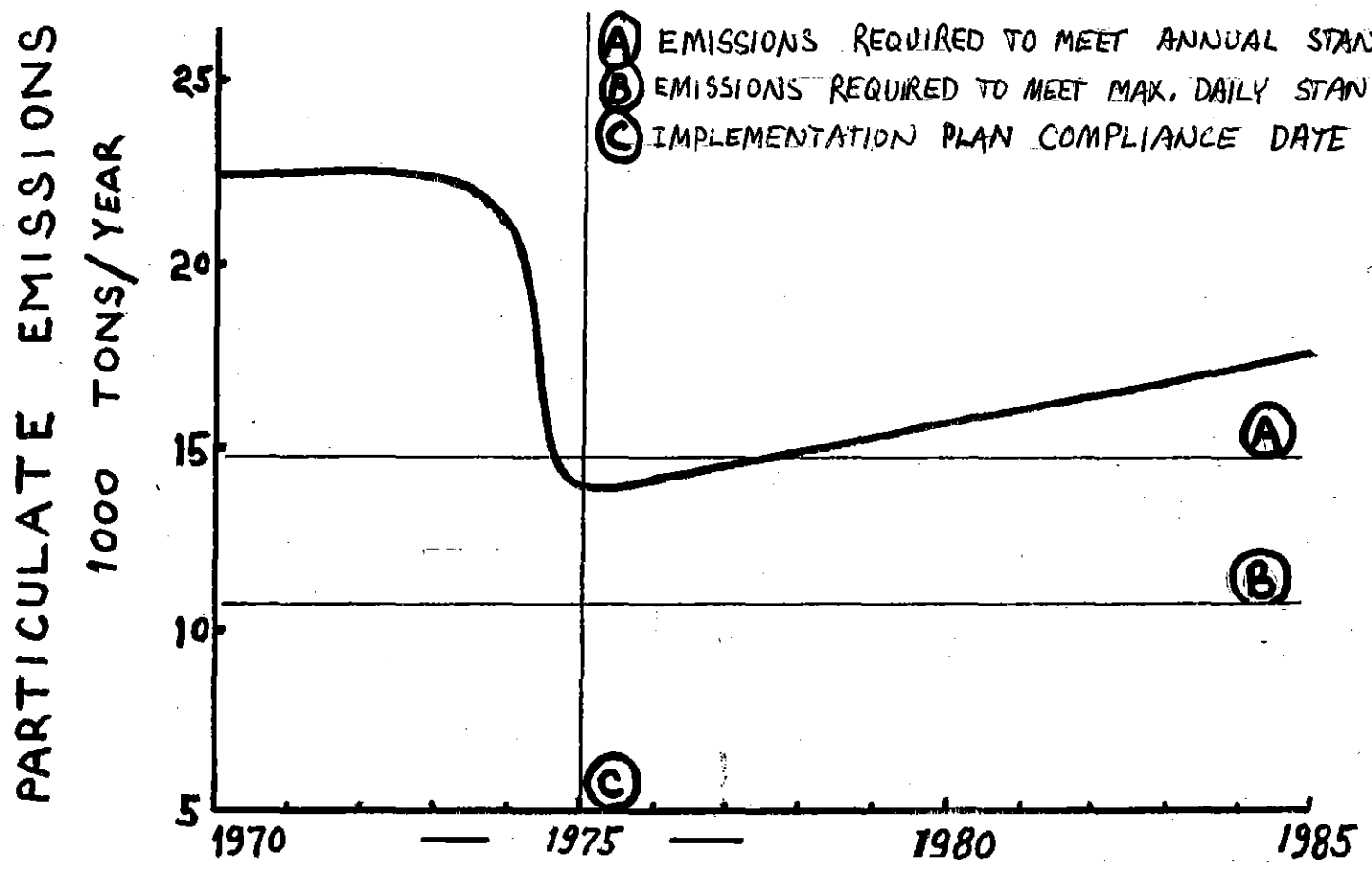
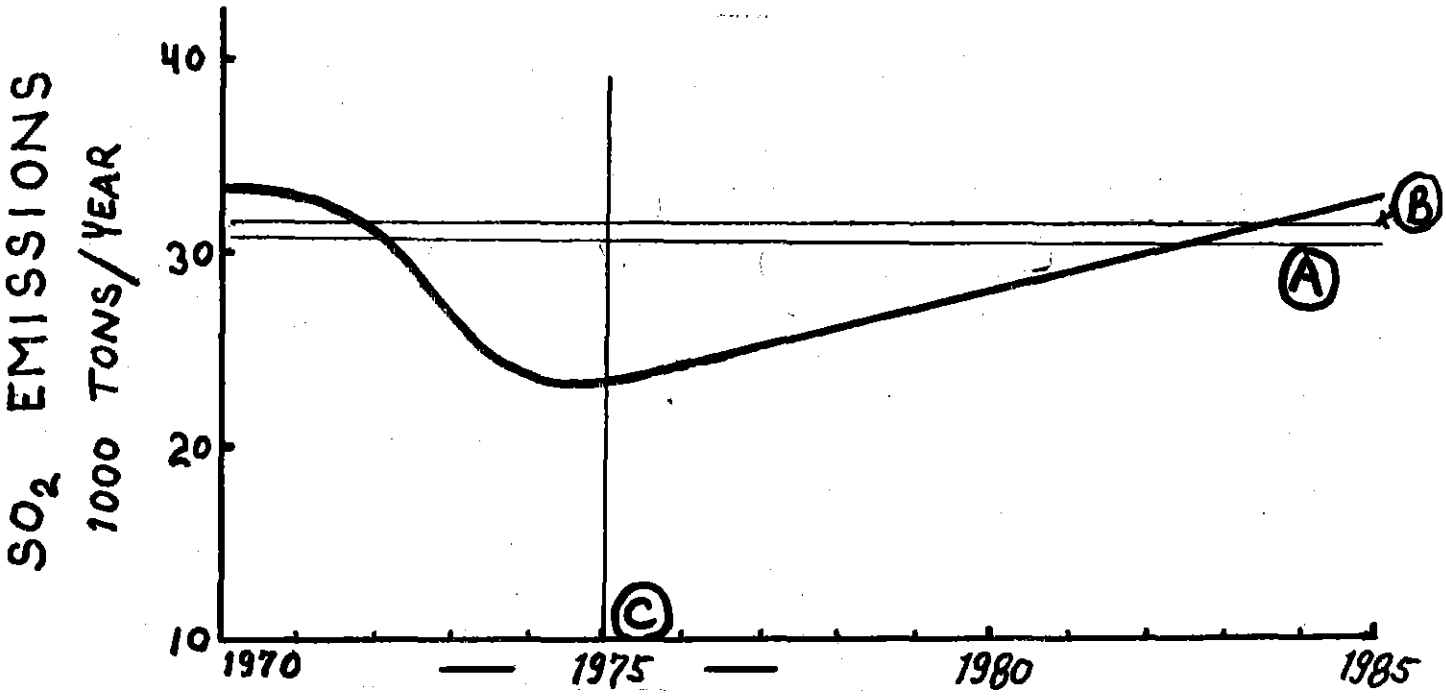

PORTLAND METROPOLITAN AREA
1971 SUSPENDED PARTICULATE ISOPL
ANNUAL GEOMETRIC MEAN
FIGURE 2
VANCOUVER
RIVER
BEAVERTON
TIGARD
MILWAUKIE
TROUTDALE
GRESHAM
LEGEND
50 MICROGRAMS PER CUBIC METER
EXCEEDS SUSPENDED PARTICULATE AMBIENT AIR STANDARD

FIGURE 3

PORTLAND AIR QUALITY MAINTENANCE AREA

PROJECTED EMISSIONS IN RELATION TO AIR QUALITY STANDARDS





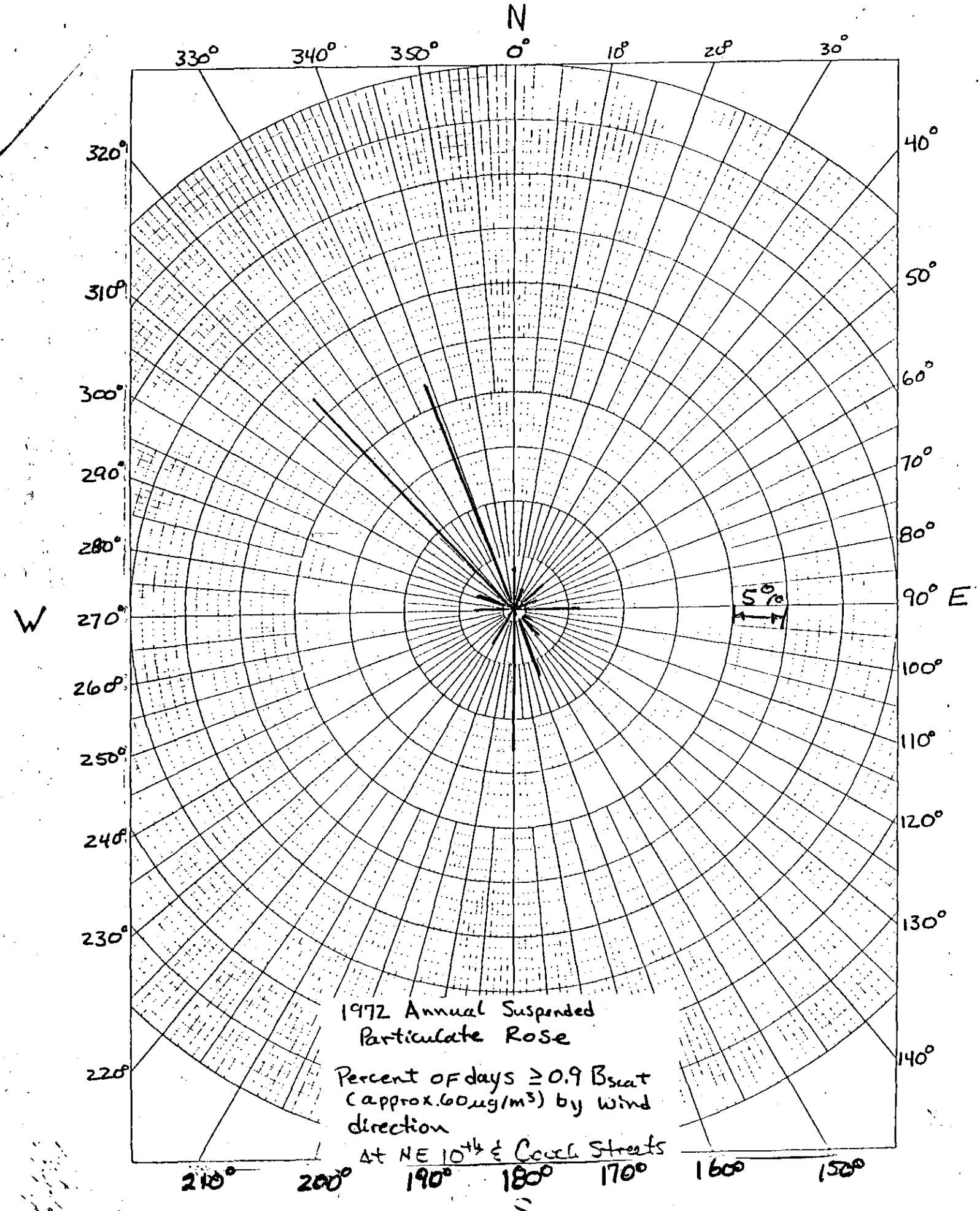

N
330°
340°
350°
0°
10°
20°
30°
320°
310°
300°
290°
280°
270°
260°
250°
240°
230°
220°
210°
200°
190°
180°
170°
160°
150°
40°
50°
60°
70°
80°
90° E
100°
110°
120°
130°
140°
W
5%
1972 Annual Suspended Particulate Rose
Percent of days ≥ 0.9 Bscat (approx. 60 µg/m³) by wind direction
At NE 10th & Couch Streets
TOTAL 210 days/yr > 60 µg/m³

Figure 4

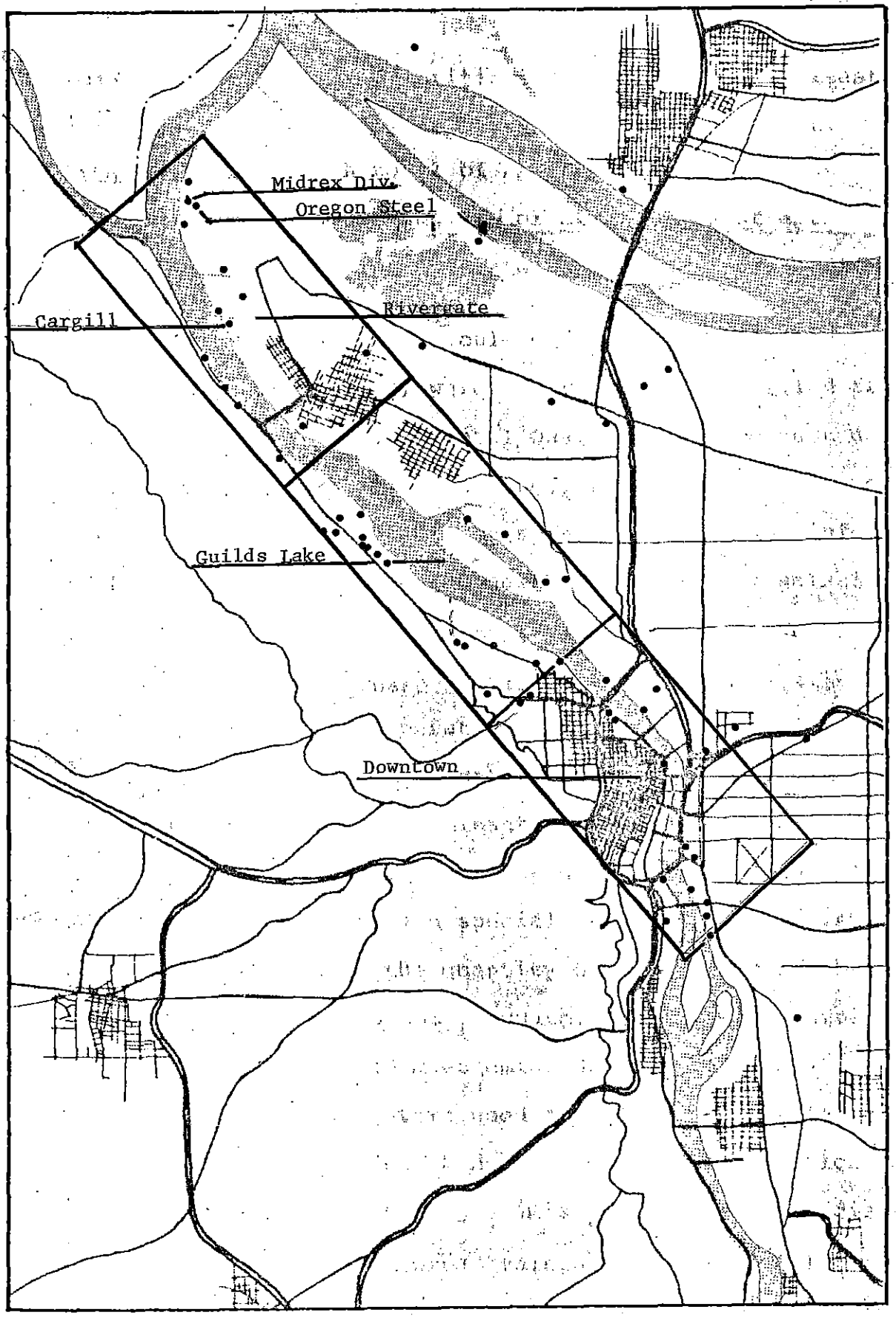


FIGURE 5
Critical Rivergate, Guilds Lake, Downtown Air Quality Area

• Major point sources

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

TOM McCALL
GOVERNOR

B. A. McPHILLIPS
Chairman, McMinnville

GRACE S. PHINNEY
Corvallis

JACKLYN L. HALLOCK
Portland

MORRIS K. CROTHERS
Salem

RONALD M. SOMERS
The Dalles

KESSLER R. CANNON
Director

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. G, September 20, 1974, EQC Meeting

Oregon Portland Cement - Report on Proposal
Air Contaminant Discharge Permit

Background

The Oregon Portland Cement Company has applied to the Department of Environmental Quality for an air contaminant discharge permit in accordance with Oregon Revised Statutes 468.310. The Department, after reviewing the application of the Oregon Portland Cement Company, has prepared the attached proposed air contaminant discharge permit.

For informational purposes, Oregon Portland Cement Company owns and operates a Portland cement manufacturing facility located at 145 North State Street in Lake Oswego, Oregon. The plant receives raw materials, including limestone, silica, alumina, and iron by truck, rail, and barge. These raw materials are prepared by grinding and proportioning before processing in the cement kilns. Three rotary kilns (designated #2, #3, and #4; #1 no longer operable), which process the raw materials by applying heat to form what is known as clinker, are the largest sources of air contaminant emissions at the plant. This clinker is then ground, gypsum is added, and distributed as the final product. Maximum production rate is approximately 58 tons per hour.

There are some 30 bag filter dust collectors located at various points within this plant. Two of the cement kilns (#2 and #3) use one common electrostatic precipitator installed in 1956. The third rotary kiln (#4) uses a bag filter air pollution control system installed in 1967. Particulate emissions from the cement kiln control equipment for all kilns are estimated to be 231 tons per year. The Nos. 2 and 3 kilns emit approximately two to four times as much particulate on a per ton of product basis as the No. 4 kiln. In addition, fugitive dust contributes to the particulate emissions from this plant.

A community air pollution problem has been associated with this plant off and on as far back as the Department's records go (1952). In 1967, the Company constructed its new #4 kiln and shut down kilns #1, #2, and #3 in order to reduce emissions. The plant operated essentially complaint free until #2 and #3 kilns were restarted in 1968. Recent need to increase production by longer operation of kilns 2 and 3 appears to have caused increased emissions and complaints. The plant emissions are relatively low compared to so-called average cement plants, but the location (downtown Lake Oswego) requires an exceptional degree of control. With respect to ambient air particulate concentration, the Department continues to record violations of ambient air standards for both fallout and suspended particulate around the plant site, including the Department's air monitoring site located at Lakewood School, and it is apparent that the plant operation is a major contributor to these standards violations. Fallout in the vicinity of this operation has been and continues to be a significant source of public complaints. In response to the public complaints, and in an effort to define points of excessive emissions, the staff has been conducting weekly plant inspections, which include observations of air pollution control equipment operation, production processes, and sources of fugitive dust emissions. As a result of numerous inspections, the staff has determined that the air pollution control systems operate essentially within Department emission standards, but due to continued ambient air standard violations and complaints, the staff believes it necessary to require upgrading of the present #2 and #3 kiln air pollution control system to a performance level equivalent to that of the new #4 kiln system; take further precautionary measures to reduce fugitive emissions; and institute an extensive monitoring program to conclusively determine the ambient air impact of the plant operation so that further control action, if necessary, can be oriented toward the appropriate dust sources.

Conclusion

It is the conclusion of the staff that the following conditions contained in the attached proposed permit are necessary to satisfactorily improve air quality by further reducing plant emissions, insuring highest and best practicable treatment is being applied to all processes, and provide conclusive data as to ambient air impact from various phases of the cement manufacturing process for use in developing other control strategies, if needed. The most significant permit conditions require:

1. Adherence to kiln emission limits that represent highest and best practicable treatment, Section A, Conditions 1, 2 and 3 of the permit.

2. Upgrading of kilns' #2 and #3 air pollution control system to attain a degree of collection efficiency demonstrated by the kiln #4 operation, Section A, Conditions 3b and 6c of the permit.

3. A program to insure continuous efforts to minimize fugitive dust emissions, Section A, Condition 12, and Section B, Condition 6 of the permit.

4. Monitoring of major source control equipment performance in order to quickly diagnose operational problems, Section A, Condition 18; and Section B, Condition 8 of the permit.

5. An extensive study of the nature of ambient air particulate in order to assist in determining further emission control measures to eliminate continuing ambient air standard violations, Section A, Condition 17 and Appendix I.

It should be pointed out that the Department staff and Oregon Portland Cement have not reached agreement on items 2 and 5, above, which would require considerable capital expenditure. However, the staff believes these conditions to be necessary if long standing air quality problems in the Lake Oswego community are to be eliminated or reduced to the greatest extent possible.

Director's Recommendation

This is intended as a status report on conditions of a proposed air contaminant discharge permit for the Oregon Portland Cement Company and to provide a means of soliciting public and Commission input and company comments on requirements contained in the draft permit. No formal action by the commission is required at this time.

Attachment
Proposed Permit

KESSLER R. CANNON

SEPT. 11, 1974

PRELIMINARY DRAFT

Permit Number:
Expiration Date: 6/30/78

AIR CONTAMINANT DISCHARGE PERMIT

Department of Environmental Quality
1234 S.W. Morrison Street
Portland, Oregon 97205
Telephone: (503) 229-5696
Issued in accordance wth the provisions of
ORS 468.310

ISSUED TO:

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

PLANT SITE:

145 N. State Street
Lake Oswego, Oregon

ISSUED BY DEPARTMENT OF ENVIRONMENTAL QUALITY

Kessler R. Cannon, Director — *Date*

REFERENCE INFORMATION

Application No. 47 and 256

Date Received 4/26/73

Other Air Contaminant Sources at this Site:

	Source	SIC	Permit No.
(1)			
(2)			

SOURCE(S) PERMITTED TO DISCHARGE AIR CONTAMINANTS:

Name of Air Contaminant Source	Standard Industry Code as Listed
Cement Manufacturing	3241
Minerals, Earth, Rock Ground and Otherwise Treated	3295

Permitted Activities

Until such time as this permit expires or is modified or revoked, Oregon Portland Cement Company is herewith permitted in conformance with the requirements, limitations and conditions of this permit to discharge treated exhaust gases containing air contaminants from its cement manufacturing and minerals, earth, rock ground and otherwise treated plant located at 145 N. State Street, Lake Oswego.

Compliance with the specific requirements, limitations and conditions contained herein shall not relieve the permittee from complying with all rules and standards of the Department and the laws administered by the Department.

Division of Permit Specifications	Page
Section A - Cement Manufacturing	2
Section B - Minerals, Earth, Rock Ground and Otherwise Treated	8
Section C - General Conditions	11

For Requirements, Limitations and Conditions of this Permit, see attached Sections

Section A - CEMENT MANUFACTURING

Performance Standards and Emission Limits

1. The permittee shall at all times maintain and operate all air contaminant generating processes and all contaminant control equipment at full efficiency and effectiveness such that the emissions of air contaminants are kept at the lowest practicable levels.

2. Emission rate of particulate matter from the #4 cement kiln baghouse shall not exceed 0.35 pound per ton of feed to the kiln or 23 pounds per hour.

3. Emission rate of particulate matter from the #2 and #3 cement kilns electrostatic precipitator shall not exceed any of the following:

   a. 1.2 pounds per ton of feed to the kilns or 38 pounds per hour.

   b. After July 1, 1976, 0.35 pounds per ton of feed to the kiln or 11 pounds per hour.

4. Emission rate of particulate matter from all other baghouse exhaust points in the cement manufacturing facility (excluding emission points limited by conditions 2 and 3) shall not exceed any of the following:

   a. A combined emission rate of 22 pounds per hour.

   b. A particulate concentration of 0.1 grain per standard cubic foot from any one baghouse exhaust point.

5. Compliance with the above conditions, shall be evaluated according to the following:

   a. The permittee shall use every available resource, including opacity measuring instruments to insure compliance with conditions 2 and 3 at all times.

   b. Compliance with conditions 2, 3, and 4 will be based on any one hour sample test. When any sample test exceeds these conditions corrective action shall be taken as defined by OAR Chapter 340, Section 21-075. In addition, follow-up sample test(s) shall be performed to demonstrate compliance.

   c. The permittee source testing frequency may be revised when compliance can be accurately related to opacity measurement results.

6. The observed or measured opacity shall not exceed any of the following:

   a. An opacity equal to or greater than twenty percent (20%) for a period or periods aggregating more than thirty (30) seconds in any one (1) hour from the #2 and #3 kilns electrostatic precipitator stack.

b. An opacity equal to or greater than ten percent (10%) for a period or periods aggregating more than thirty (30) seconds in any one (1) hour from any single emission point, excluding the #2 and #3 kilns electrostatic precipitator stack.

c. After July 1, 1976, an opacity equal to or greater than ten percent (10%) for a period or periods aggregating more than thirty (30) seconds in any one (1) hour from the #2 and #3 kilns electrostatic precipitator stack.

7. The permittee shall not cause or permit the emission of any particulate matter which is larger than 250 microns in size provided such particulate matter does or will deposit upon the real property of another person.

Special Conditions

8. The permittee shall not operate the plant at a production rate which is greater than the maximum rate of 58 tons/hour as specified in the current permit application.

9. (NOTICE CONDITION) The permittee is prohibited from discharging any treated or untreated scrubber water to any public waterway unless such discharge is the subject of a valid Waste Discharge Permit issued by the Department of Environmental Quality.

10. The permittee shall maintain a sufficient number of spare water nozzles at the plant for installation into the dust control system as necessary to provide continuous, efficient operation of the control system.

11. The permittee shall maintain a sufficient number of spare bags at the plant site for installation into the baghouse as necessary to maintain continuous, efficient operation of the baghouse.

12. The permittee shall, within 30 days of issuance of this permit, establish and maintain a plant inspection and fugitive emission control program which has been submitted to and approved in writing by the Department. Such plan may be revised and up-dated from time-to-time as may be necessary to maintain highest and best practicable control of area particulates.

13. Stack Dust Pile:

a. To prevent wind entrainment, any stack dust dumped in the open shall be sprinkled promptly upon dumping.

b. Dust from the pile shall not be loaded into trucks without being fully wetted.

c. The permittee shall notify the Department prior to adding stack dust to the stack pile or whenever movement of any of the pile is anticipated that would create dust emissions.

d. Open storage of other fine dry dust is prohibited.

14. Loading of open trucks from bulk storage bins is prohibited.

Emission Reduction Plan

15. The permittee shall implement the following emission reduction plan as previously agreed to during air pollution episodes when notified by the Department.

AIR POLLUTION ALERT

Source	Contaminants	Manner and Amount of Reduction
Rock Handling	Particulates	Prepare to shutdown barge unloading and crushing operations, including two diesel powered mobile units.
Kiln(s)	Particulates and SO_2	Reduce feed and heat load in kiln(s) as rapidly as possible without creating an upset condition. Ultimately operate at 75% load with 25% reduction in contaminant emissions. If burning oil, request permission from Northwest Natural Gas Co. (to change to gas if an Air Pollution Warning is declared).

AIR POLLUTION WARNING

Source	Contaminants	Manner and Amount of Reduction
Rock Handling	Particulates Hydrocarbons	Shut down barge unloading and crusher department. This also shuts down two diesel powered mobile units; eliminates all contaminant emissions.
Raw Grind	Particulates Hydrocarbons	Shut down Raw Grind department. This also shuts down one diesel powered mobile unit. Eliminates all contaminant emissions.
Kiln(s)	Particulates	Continue as under "Alert". If burning oil, change to natural gas if gas is available. (Eliminates SO_2 in products of combustion).
Ag-Limestone	Particulates	Shut down all drying and grinding. Eliminates all contaminant emissions.

Oregon Portland Cement Company

AIR POLLUTION EMERGENCY

Source	Contaminants	Manner and Amount of Reduction
Rock Handling	Particulates Hydrocarbons	Continue as under "Alert".
Raw Grind	Particulates Hydrocarbons	Continue as under "Alert".
Kiln(s)	Particulates and SO_2	Shut down kiln(s). Burn only enough fuel to protect kiln lining (estimate ten minutes each hour). Reduce contaminant emission to essentially zero.
Ag-Limestone	Particulates	Continue as under "Alert".
Finish Grind	Particulates	Shut down Finish Grind department. Eliminates all emissions.
Vehicles	Particulates Carbon Monoxide Hydrocarbons	Reduce vehicular traffic in plant and outside of plant by telephoning employees whose jobs have been discontinued by the foregoing to remain at home for duration of emergency. Reduces each contaminant emission 50% to 75%.

16. Compliance Schedule:

a. The permittee shall submit to the Department by no later than November 1, 1974 a time schedule and program to attain emission limits in accordance with conditions 3b and 6c. This program to reduce particulate emissions from #2 and #3 kilns to a level equivalent to highest and best practicable treatment and control shall include dates for: (1) submission of plans and specifications for any necessary construction and/or modification (2) obtaining Department approval of plans and specifications (3) issuing all purchase orders for components and control equipment (4) commencing on-site construction and/or modification and (5) completing all construction and/or modification.

b. By October 1, 1974 or before, all presently unpaved roadways on which vehicular traffic occurs shall be paved.

c. By November 1, 1974 or before, the permittee shall submit engineering plans and specifications including a time schedule for installation of equipment to control by not later than January 1, 1975 particulate emissions from the #1 Packing House bagging area.

d. By November 1, 1974 or before, the permittee shall submit engineering plans and specifications incldluing a time schedule for installation of equipment to control by not later than March 1, 1975 particulate emissions from all load-out facilities.

Ambient Air Monitoring and Reporting

17. The permittee shall conduct an ambient air monitoring and reporting program in accordance with Appendix I.

Monitoring and Reporting

18. The permittee shall effectively monitor the operation and maintenance of the plant and associated air contaminant control facilities. A record of all such data shall be maintained for a period of two years and be available at the plant site at all times for inspection by the authorized representatives of the Department. At least the following parameters shall be monitored and recorded at the indicated interval.

Parameter	Minimum Monitoring Frequency
a. The starting time and period of plant operation	Daily
b. The amount of each product produced	Daily
c. #2 and #3 kiln emission opacity	Continuous
d. #4 kiln emission opacity	Continuous
e. Particulate Source Test #2 and #3 kilns (EPA method 5 or an equivalent method approved by the Department)	Twice/month
f. Particulate Source Test #4 kiln (EPA method 5 or an equivalent method approved by the Department)	Twice/month
g. Particle size sample kilns 2 and 3 (sticky paper method)	Twice/week during rapping (for six weeks unless further testing required by the Department)
h. Frequency of #2 and #3 kilns ESP rapping	Continuous
i. #2, #3 and #4 kiln opacity meter calibration (zero, 5% and 10% opacity check)	Once/week
j. #2, #3 and #4 kiln production and operating hours	Daily
k. Particulate Source Test - all other baghouses (Hi Volume sampling method on file with the Department or an equivalent method approved by the Department)	Twice/year

19. Data from continuous opacity monitors on the exhaust stacks of kilns 2, 3 and 4 shall be recorded continuously. Emissions in excess of 10% opacity or failure of any components in the monitoring system shall be reported as defined by OAR Chapter 340, Section 21-075.

20. The permittee shall submit the following information to the Department on a weekly basis:

    a. Maximum hour, minimum hour and daily average of opacity meter readings on 2, 3 and 4 kilns.

    b. Number of times the opacity standard (Condition 5) was exceeded from each kiln or other emission point.

    c. Kiln production rates corresponding to items in 21a above.

21. The Department shall be notified one day prior to all particulate emission tests.

22. An annual report shall be submitted to the Department by March 1 of each year this permit is in effect, which shall include:

    a. Annual Plant Production

    b. Annual Quantities and Types of Fuels

    c. Annual Operating Season - percent (%) of total annual production during January-April, May-August, September-October and November-December.

SECTION B - LIMESTONE AND DOLOMITIC LIMESTONE

Performance Standards and Emission Limits

1. The permittee shall at all times maintain and operate all air contaminant generating processes and all contaminant control equipment at full efficiency and effectiveness such that the emissions of air contaminants are kept at the lowest practicable levels.

2. Emissions of air contaminants from the ag-lime and dolomite plant and all associated dust control equipment shall not exceed any of the following:

   a. An emission rate of particulate matter as determined from Table 1 of this permit, but in no case shall exceed 2.3 pounds per hour.

   b. A particulate concentration in the exhaust gas of 0.1 grains per standard cubic foot.

   c. An opacity equal to or greater than ten percent (10%) opacity for a period or periods aggregating more than thirty (30) seconds in any one (1) hour from any single emission point.

3. The permittee shall not cause or permit the emission of any particulate matter which is larger than 250 microns in size provided such particulate matter does or will deposit upon the real property of another person.

Special Conditions

4. The permittee shall maintain a sufficient number of spare water nozzles at the plant for installation into the dust control system as necessary to maintain continuous, efficient operation of the control system.

5. The permittee shall maintain a sufficient number of spare bags at the plant site for installation into the baghouse as necessary to maintain continuous, efficient control of the baghouse.

6. The permittee shall conduct, within 30 days of issuance of this permit, a plant inspection and fugitive emission control program in a manner approved in writing by the Department of Environmental Quality.

Emission Reduction Plan

7. The permittee shall implement the emission reduction plan as outlined in Section A, Condition 16 of this permit.

Monitoring and Reporting

8. The permittee shall effectively monitor the operation and maintenance of the plant and associated air contaminant control facilities. A record of all such data shall be maintained for a period of one year and be available at the plant site at all times for inspection by the authorized representatives of the Department. At least the following parameters shall be monitored and recorded at the indicated interval.

Parameter	Minimum Monitoring Frequency
a. The starting time and period of plant operation	Daily
b. The amount of ag-lime produced	Monthly
c. The date of inspecting all water nozzles in the dust control system	As performed
d. The amount, location and method of disposal of baghouse collected reject material	As performed
e. The pressure drop across the baghouse	Daily (for six months, unless further monitoring required by the Department).
f. The date of inspecting all bags in the baghouse	As performed
g. The date and number of bags replaced	As performed

9. An annual report shall be submitted to the Department at the end of the production season or by not later than March 1 of each year this permit is in effect, which shall include:

   a. Annual Plant Production

   b. Annual Quantities and Types of Fuels

   c. Annual Operating Season - percent (%) of total annual production during January-April, May-August, September-October and November-December.

Table I

Particulate Matter Emissions Standards for Process Equipment

Process Lbs/Hr	Emission Lbs/Hr	Process Lbs/Hr	Emission Lbs/Hr	Process Lbs/Hr	Emission Lbs/Hr
50	0.21	2300	4.44	7500	8.39
100	0.46	2400	4.55	8000	8.71
150	0.66	2500	4.64	8500	9.03
200	0.85	2600	4.74	9000	9.36
250	1.03	2700	4.84	9500	9.67
300	1.20	2800	4.92	10000	10.00
350	1.35	2900	5.02	11000	10.63
400	1.50	3000	5.10	12000	11.28
450	1.63	3100	5.18	13000	11.89
500	1.77	3200	5.27	14000	12.50
550	1.89	3300	5.36	15000	13.13
600	2.01	3400	5.44	16000	13.71
650	2.12	3500	5.52	17000	14.36
700	2.24	3600	5.61	18000	14.97
750	2.34	3700	5.69	19000	15.58
800	2.43	3800	5.77	20000	16.19
850	2.53	3900	5.85	30000	22.22
900	2.62	4000	5.93	40000	28.30
950	2.72	4100	6.01	50000	34.30
1000	2.80	4200	6.08	60000	40.00
1100	2.97	4300	6.15	70000	41.30
1200	3.12	4400	6.22	80000	42.50
1300	3.26	4500	6.30	90000	43.60
1400	3.40	4600	6.37	100000	44.60
1500	3.54	4700	6.45	120000	46.30
1600	3.66	4800	6.52	140000	47.80
1700	3.79	4900	6.60	160000	49.00
1800	3.91	5000	6.67	200000	51.20
1900	4.03	5500	7.03	1000000	69.00
2000	4.14	6000	7.37	2000000	77.60
2100	4.24	6500	7.71	6000000	92.70
2200	4.34	7000	8.05		

Interpolation and extrapolation of the data for process unit weight rates in excess of 60,000 lb/hr shall be accomplished by the use of the equation:

$E = 55.0P^{0.11} - 40$, where E = rate of process unit emission in lb/hr and P = process weight in tons/hr.

General Conditions

G1. A copy of this permit or at least a copy of the title page and an accurate and complete extraction of the operating and monitoring requirements and discharge limitations shall be posted at the facility and the contents thereof made known to operating personnel.

G2. This issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

G3. The permittee is prohibited from conducting any open burning at the plant site or facility.

G4. The permittee is prohibited from causing or allowing discharges of air contaminants from source(s) not covered by this permit so as to cause the plant site emissions to exceed the standards fixed by this permit or rules of the Department of Environmental Quality.

G5. The permittee shall at all times conduct dust suppression measures to meet the requirements set forth in "Fugitive Emissions" and "Nuisance Conditions" in OAR, Chapter 340, Section 21-050.

G6. (NOTICE CONDITION) The permittee shall dispose of all solid wastes or residues in manners and at locations approved by the Department of Environmental Quality.

G7. The permittee shall allow Department of Environmental Quality representatives access to the plant site and record storage areas at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emission discharge records and otherwise conducting all necessary functions related to this permit.

G8. The permittee, without prior notice to and written approval from the Department of Environmental Quality, is prohibited from altering, modifying or expanding the subject production facilities so as to affect emissions to the atmosphere.

G9. The permittee shall be required to make application for a new permit if a substantial modification, alteration, addition or enlargement is proposed which would have a significant impact on air contaminant emission increases or reductions at the plant site.

G10. This permit is subject to revocation for cause, as provided by law, including:

a. Misrepresentation of any material fact or lack of full disclosure in the application including any exhibits thereto, or in any other additional information requested or supplied in conjunction therewith;

b. Violation of any of the requirements, limitations or conditions contained herein; or

c. Any material change in quantity or character of air contaminants emitted to the atmosphere.

G11. The permittee shall notify the Department by telephone or in person within one (1) hour of any scheduled maintenance, malfunction of pollution control equipment, upset or any other conditions that cause or may tend to cause a significant increase in emissions or violation of any conditions of this permit. Such notice shall include:

a. The nature and quantity of increased emissions that have occurred or are likely to occur,

b. The expected length of time that any pollution control equipment will be out of service or reduced in effectiveness,

c. The corrective action that is proposed to be taken, and

d. The precautions that are proposed to be taken to prevent a future recurrence of a similar condition.

G12. Application for a modified or renewal of this permit must be submitted not less than 60 days prior to permit expiration date. A filing fee and Application Investigation and Permit Issuing or Denying Fee must be submitted with the application.

G13. The permittee shall submit the Annual Compliance Determination Fee to the Department of Environmental Quality according to the following schedule:

Amount Due			Date Due
Section A	Section B	Total	
$150	$37.50	$187.50	6/1/74
$150	$75.00	$225	6/1/75
$150	$75.00	$225	6/1/76
$150	$75.00	$225	6/1/77
(See G12.)			5/1/78

Appendix I

Ambient Air Monitoring and Reporting

OREGON PORTLAND CEMENT

1. Continuous Particulate Monitoring

   a. By no later than November 1, 1974, the permittee shall acquire, install, operate and maintain in their kiln control room, a continuous recorder connected by appropriate means to the Department's continuous particulate monitor located at Lakewood Grade School. The recorder shall be equipped with an audible alarm to indicate particulate air quality levels in excess of 2.0 Bscat, one hour average. Within one hour of the occurrence of particulateconcentrations in excess of 2.0 Bscat, the permittee will report the event to a designated Department staff member. Upon such occurrences, the permittee shall take all steps necessary to inspect sources of particulate within and around the plant site and take necessary corrective action, and submit a written report of findings to the Department within five days of each occurrence.

   b. By no later than March 1, 1974, the permittee and the Department shall meet to evaluate the effectiveness of the continuous particulate monitoring program. The Department will then determine if the permittee will be required to purchase the equipment necessary to fully conduct the monitoring program.

2. Meteorological Sensors

   By November 1, 1974, the permittee shall acquire, install, operate and maintain a wind speed, wind direction monitoring site on the plant site in an approved location. Hourly records of wind speed and direction will be maintained for a two year period and be made available to the Department upon request.

3. Particulate Characterization Program

   The permittee shall have conducted, by a qualified consultant, a comprehensive ambient particulate characterization program which shall accomplish the following:

   a. Determine the percent by weight of the suspended particulate and particulate fallout matter measured at Lakewood Grade School that originates directly or indirectly from Oregon Portland Cement's operation.

   b. Identify in general terms the extent to which other major point and area sources contribute to suspended particulate and particle fallout concentrations at Lakewood Grade School (considered necessary to support results of 3a, above).

   c. Identify qualitatively and quantatively which specific sources within the permittee's property (i.e., No. 2 and No. 3 kilns, No. 4 kiln, raw materials handling, etc.) contribute to the particulate collected at Lakewood School.

4. Minimum Program Requirements

The following are minimum requirements for the particulate characterization program. All details of the program including sample site location and analytical methods shall be approved by the Department.

Study period: 12 months ending January 1, 1976.

Sampling Sites (minimum)

a. Suspended particulate at an upwind site (North-Northeast of the OPC plant) and at Lakewood School (downwind site).

b. Particulate fallout at an upwind site, Lakewood School and at five other sites located at maximum concentration receptors.

Sampling Methodology

a. Suspended particulate: Time resolved - size segregate impactor samples and high volume sampling. Both samplers at each site.

b. Particulate fallout: 30 day samples using the Oregon-Washington PFO container. Department of Environmental Quality will provide the sampling containers.

Sampling Frequency

a. Suspended particulate impactor sampling on a continuous basis high volume sampling on a sixth day basis Department of Environmental Quality's schedule.

b. Particle fallout sampling on a continuous basis.

Ambient Sample Analysis

a. General: Ambient sample analysis should be directed toward the determination of elements and/or compounds identified by in-plant analysis as specific tracers related to OPC emissions and those required to determine the suspected sources of other particulate.

b. Suspended particulate analysis to include tracers identified (a, above) particle size distribution, a comprehensive elemental analysis and/or particulate morphology as required.

c. Number of samples to be analyzed should be consistent with statistical design requirements. Emphasis should be placed on analysis of samples exceeding air quality standards with a few samples obtained under low to moderate particulate loading and at least two time series to determine temporal variations.

Some samples should be analyzed when winds blow from the plant towards the Lakewood School and when winds blow towards the north site. Only a select few of the particle fallout samples would be analyzed in depth, all would be analyzed for total weight and calcium oxide. The following minimum number of analysis is required:

Particle Fallout:	Total weight, CaO all samples (42) Comprehensive elemental analysis for tracers (10)
Suspended Particulate:	High volume (30 samples/site) total weight, CaO on all samples. Comprehensive elemental analysis: five analyses of coinciding upwind and downwind samples. Impactor samples comprehensive elemental analysis: ten analyses of coinciding upwind and downwind samples.

5. In-Plant Program

Prior to initiation of the ambient particulate analysis program, an in-plant program to determine specific and distinct elemental and/or compound tracers and comprehensive elemental analysis from potential particulate sources within the plant must be conducted (i.e., limestone crushing, clinker handling, kiln stack emissions, cement handling, roadways, etc.). Identification of these tracers will direct the ambient particulate analysis program. The identity of the tracers specific to each source within the plant will be included in the project final report.

6. Data Evaluation

a. General: The data developed by the Study must be evaluated to meet the objectives of the program. This may include (but is not limited to) the evaluation of weekly and/or diurnal variations in particulate characteristics which can be directly related to plant operations and the development of pollution roses for specific sources identified through particulate characterization.

b. Analysis: The acquired data must be analyzed by appropriate statistical methods to indicate the probable accuracy and validity of the Study's findings.

7. Study Report

A final report summarizing significant findings and discussing in detail Study findings with respect to the program objectives listed above shall be prepared. The report shall identify significant sources contributing to particle fallout and suspended particulate ambient air concentrations measured in Lake Oswego.

Where applicable to emissions from OPC's operations, control recommendations may be made.

Copies of the final report must be submitted to the Department by Oregon Portland Cement no later than February 1, 1976.

62-1

SEPT. 11, 1974

PRELIMINARY DRAFT

Permit Number:
Expiration Date: 6/30/78
Page 1 of 12

AIR CONTAMINANT DISCHARGE PERMIT

Department of Environmental Quality
1234 S.W. Morrison Street
Portland, Oregon 97205
Telephone: (503) 229-5696
Issued in accordance wth the provisions of
ORS 468.310

ISSUED TO:

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

PLANT SITE:

145 N. State Street
Lake Oswego, Oregon

ISSUED BY DEPARTMENT OF ENVIRONMENTAL QUALITY

Kessler R. Cannon
Director

Date

REFERENCE INFORMATION

Application No. 47 and 256

Date Received 4/26/73

Other Air Contaminant Sources at this Site:

	Source	SIC	Permit No.
(1)			
(2)			

SOURCE(S) PERMITTED TO DISCHARGE AIR CONTAMINANTS:

Name of Air Contaminant Source	Standard Industry Code as Listed
Cement Manufacturing	3241
Minerals, Earth, Rock Ground and Otherwise Treated	3295

Permitted Activities

Until such time as this permit expires or is modified or revoked, Oregon Portland Cement Company is herewith permitted in conformance with the requirements, limitations and conditions of this permit to discharge treated exhaust gases containing air contaminants from its cement manufacturing and minerals, earth, rock ground and otherwise treated plant located at 145 N. State Street, Lake Oswego.

Compliance with the specific requirements, limitations and conditions contained herein shall not relieve the permittee from complying with all rules and standards of the Department and the laws administered by the Department.

For Requirements, Limitations and Conditions of this Permit, see attached Sections

Section A - CEMENT MANUFACTURING

Performance Standards and Emission Limits

1. The permittee shall at all times maintain and operate all air contaminant generating processes and all contaminant control equipment at full efficiency and effectiveness such that the emissions of air contaminants are kept at the lowest practicable levels.

2. Emission rate of particulate matter from the #4 cement kiln baghouse shall not exceed 0.35 pound per ton of feed to the kiln or 23 pounds per hour.

3. Emission rate of particulate matter from the #2 and #3 cement kilns electrostatic precipitator shall not exceed any of the following:

   a. 1.2 pounds per ton of feed to the kilns or 38 pounds per hour.

   b. After July 1, ~~1976~~ 1975, 0.35 pounds per ton of feed to the kiln or 11 pounds per hour.

4. Emission rate of particulate matter from all other baghouse exhaust points in the cement manufacturing facility (excluding emission points limited by conditions 2 and 3) shall not exceed any of the following:

   a. A combined emission rate of 22 pounds per hour.

   b. A particulate concentration of 0.1 grain per standard cubic foot from any one baghouse exhaust point.

5. Compliance with the above conditions, shall be evaluated according to the following:

   a. The permittee shall use every available resource, including opacity measuring instruments to insure compliance with conditions 2 and 3 at all times.

   b. Compliance with conditions 2, 3, and 4 will be based on any one hour sample test. When any sample test exceeds these conditions corrective action shall be taken as defined by OAR Chapter 340, Section 21-075. In addition, follow-up sample test(s) shall be performed to demonstrate compliance.

   c. The permittee source testing frequency may be revised when compliance can be accurately related to opacity measurement results.

6. The observed or measured opacity shall not exceed any of the following:

   a. An opacity equal to or greater than twenty percent (20%) for a period or periods aggregating more than thirty (30) seconds in any one (1) hour from the #2 and #3 kilns electrostatic precipitator stack.

b. An opacity equal to or greater than ten percent (10%) for a period or periods aggregating more than thirty (30) seconds in any one (1) hour from any single emission point, excluding the #2 and #3 kilns electrostatic precipitator stack.

c. After July 1, 1976, an opacity equal to or greater than ten percent (10%) for a period or periods aggregating more than thirty (30) seconds in any one (1) hour from the #2 and #3 kilns electrostatic precipitator stack.

7. The permittee shall not cause or permit the emission of any particulate matter which is larger than 250 microns in size provided such particulate matter does or will deposit upon the real property of another person.

Special Conditions

8. The permittee shall not operate the plant at a production rate which is greater than the maximum rate of 58 tons/hour as specified in the current permit application.

9. (NOTICE CONDITION) The permittee is prohibited from discharging any treated or untreated scrubber water to any public waterway unless such discharge is the subject of a valid Waste Discharge Permit issued by the Department of Environmental Quality.

10. The permittee shall maintain a sufficient number of spare water nozzles at the plant for installation into the dust control system as necessary to provide continuous, efficient operation of the control system.

11. The permittee shall maintain a sufficient number of spare bags at the plant site for installation into the baghouse as necessary to maintain continuous, efficient operation of the baghouse.

12. The permittee shall, within 30 days of issuance of this permit, establish and maintain a plant inspection and fugitive emission control program which has been submitted to and approved in writing by the Department. Such plan may be revised and up-dated from time-to-time as may be necessary to maintain highest and best practicable control of area particulates.

13. Stack Dust Pile:

a. To prevent wind entrainment, any stack dust dumped in the open shall be sprinkled promptly upon dumping.

b. Dust from the pile shall not be loaded into trucks without being fully wetted.

c. The permittee shall notify the Department prior to adding stack dust to the stack pile or whenever movement of any of the pile is anticipated that would create dust emissions.

d. Open storage of other fine dry dust is prohibited.

14. Loading of open trucks from bulk storage bins is prohibited.

Emission Reduction Plan

15. The permittee shall implement the following emission reduction plan as previously agreed to during air pollution episodes when notified by the Department.

AIR POLLUTION ALERT

Source	Contaminants	Manner and Amount of Reduction
Rock Handling	Particulates	Prepare to shutdown barge unloading and crushing operations, including two diesel powered mobile units.
Kiln(s)	Particulates and SO_2	Reduce feed and heat load in kiln(s) as rapidly as possible without creating an upset condition. Ultimately operate at 75% load with 25% reduction in contaminant emissions.
		If burning oil, request permission from Northwest Natural Gas Co. (to change to gas if an Air Polluti Warning is declared).

AIR POLLUTION WARNING

Source	Contaminants	Manner and Amount of Reduction
Rock Handling	Particulates Hydrocarbons	Shut down barge unloading and crusher department. This also shuts down two diesel powered mobile units; eliminates all contaminant emissions.
Raw Grind	Particulates Hydrocarbons	Shut down Raw Grind department. This also shuts down one diesel powered mobile unit. Eliminates all contaminant emissions.
Kiln(s)	Particulates	Continue as under "Alert". If burning oil, change to natural gas if gas is available. (Eliminates SO_2 in products of combustion).
Ag-Limestone	Particulates	Shut down all drying and grinding. Eliminates all contaminant emissions.

AIR POLLUTION EMERGENCY

Source	Contaminants	Manner and Amount of Reduction
Rock Handling	Particulates Hydrocarbons	Continue as under "Alert".
Raw Grind	Particulates Hydrocarbons	Continue as under "Alert".
Kiln(s)	Particulates and SO_2	Shut down kiln(s). Burn only enough fuel to protect kiln lining (estimate ten minutes each hour). Reduce contaminant emission to essentially zero.
Ag-Limestone	Particulates	Continue as under "Alert".
Finish Grind	Particulates	Shut down Finish Grind department. Eliminates all emissions.
Vehicles	Particulates Carbon Monoxide Hydrocarbons	Reduce vehicular traffic in plant and outside of plant by telephoning employees whose jobs have been discontinued by the foregoing to remain at home for duration of emergency. Reduces each contaminant emission 50% to 75%.

16. Compliance Schedule:

a. The permittee shall submit to the Department by no later than November 1, 1974 a time schedule and program to attain emission limits in accordance with conditions 3b and 6c. This program to reduce particulate emissions from #2 and #3 kilns to a level equivalent to highest and best practicable treatment and control shall include dates for: (1) submission of plans and specifications for any necessary construction and/or modification (2) obtaining Department approval of plans and specifications (3) issuing all purchase orders for components and control equipment (4) commencing on-site construction and/or modification and (5) completing all construction and/or modification.

b. By October 1, 1974 or before, all presently unpaved roadways on which vehicular traffic occurs shall be paved.

c. By November 1, 1974 or before, the permittee shall submit engineering plans and specifications including a time schedule for installation of equipment to control by not later than January 1, 1975 particulate emissions from the #1 Packing House bagging area.

d. By November 1, 1974 or before, the permittee shall submit engineering plans and specifications incldluing a time schedule for installation of equipment to control by not later than March 1, 1975 particulate emissions from all load-out facilities.

Ambient Air Monitoring and Reporting

17. The permittee shall conduct an ambient air monitoring and reporting program in accordance with Appendix I.

Monitoring and Reporting

18. The permittee shall effectively monitor the operation and maintenance of the plant and associated air contaminant control facilities. A record of all such data shall be maintained for a period of two years and be available at the plant site at all times for inspection by the authorized representatives of the Department. At least the following parameters shall be monitored and recorded at the indicated interval.

Parameter	Minimum Monitoring Frequency
a. The starting time and period of plant operation	Daily
b. The amount of each product produced	Daily
c. #2 and #3 kiln emission opacity	Continuous
d. #4 kiln emission opacity	Continuous
e. Particulate Source Test #2 and #3 kilns (EPA method 5 or an equivalent method approved by the Department)	Twice/month
f. Particulate Source Test #4 kiln (EPA method 5 or an equivalent method approved by the Department)	Twice/month
g. Particle size sample kilns 2 and 3 (sticky paper method)	Twice/week during rapping (for six weeks unless further testing required by the Department)
h. Frequency of #2 and #3 kilns ESP rapping	Continuous
i. #2, #3 and #4 kiln opacity meter calibration (zero, 5% and 10% opacity check)	Once/week
j. #2, #3 and #4 kiln production and operating hours	Daily
k. Particulate Source Test - all other baghouses (Hi Volume sampling method on file with the Department or an equivalent method approved by the Department)	Twice/year

19. Data from continuous opacity monitors on the exhaust stacks of kilns 2, 3 and 4 shall be recorded continuously. Emissions in excess of 10% opacity or failure of any components in the monitoring system shall be reported as defined by OAR Chapter 340, Section 21-075.

20. The permittee shall submit the following information to the Department on a weekly basis:

    a. Maximum hour, minimum hour and daily average of opacity meter readings on 2, 3 and 4 kilns.

    b. Number of times the opacity standard (Condition 5) was exceeded from each kiln or other emission point.

    c. Kiln production rates corresponding to items in 21a above.

21. The Department shall be notified one day prior to all particulate emission tests.

22. An annual report shall be submitted to the Department by March 1 of each year this permit is in effect, which shall include:

    a. Annual Plant Production

    b. Annual Quantities and Types of Fuels

    c. Annual Operating Season - percent (%) of total annual production during January-April, May-August, September-October and November-December.

SECTION B - LIMESTONE AND DOLOMITIC LIMESTONE

Performance Standards and Emission Limits

1. The permittee shall at all times maintain and operate all air contaminant generating processes and all contaminant control equipment at full efficiency and effectiveness such that the emissions of air contaminants are kept at the lowest practicable levels.

2. Emissions of air contaminants from the ag-lime and dolomite plant and all associated dust control equipment shall not exceed any of the following:

   a. An emission rate of particulate matter as determined from Table 1 of this permit, but in no case shall exceed 2.3 pounds per hour.

   b. A particulate concentration in the exhaust gas of 0.1 grains per standard cubic foot.

   c. An opacity equal to or greater than ten percent (10%) opacity for a period or periods aggregating more than thirty (30) seconds in any one (1) hour from any single emission point.

3. The permittee shall not cause or permit the emission of any particulate matter which is larger than 250 microns in size provided such particulate matter does or will deposit upon the real property of another person.

Special Conditions

4. The permittee shall maintain a sufficient number of spare water nozzles at the plant for installation into the dust control system as necessary to maintain continuous, efficient operation of the control system.

5. The permittee shall maintain a sufficient number of spare bags at the plant site for installation into the baghouse as necessary to maintain continuous, efficient control of the baghouse.

6. The permittee shall conduct, within 30 days of issuance of this permit, a plant inspection and fugitive emission control program in a manner approved in writing by the Department of Environmental Quality.

Emission Reduction Plan

7. The permittee shall implement the emission reduction plan as outlined in Section A, Condition 16 of this permit.

Monitoring and Reporting

8. The permittee shall effectively monitor the operation and maintenance of the plant and associated air contaminant control facilities. A record of all such data shall be maintained for a period of one year and be available at the plant site at all times for inspection by the authorized representatives of the Department. At least the following parameters shall be monitored and recorded at the indicated interval.

Parameter	Minimum Monitoring Frequency
a. The starting time and period of plant operation	Daily
b. The amount of ag-lime produced	Monthly
c. The date of inspecting all water nozzles in the dust control system	As performed
d. The amount, location and method of disposal of baghouse collected reject material	As performed
e. The pressure drop across the baghouse	Daily (for six months, unless further monitoring required by the Department).
f. The date of inspecting all bags in the baghouse	As performed
g. The date and number of bags replaced	As performed

9. An annual report shall be submitted to the Department at the end of the production season or by not later than March 1 of each year this permit is in effect, which shall include:

   a. Annual Plant Production

   b. Annual Quantities and Types of Fuels

   c. Annual Operating Season - percent (%) of total annual production during January-April, May-August, September-October and November-December.

Issued by the
Department of Environmental Quality for

Appl. No.: 47 and 256
File No.: 03-1840

Oregon Portland Cement

Table I

Particulate Matter Emissions Standards for Process Equipment

Process Lbs/Hr	Emission Lbs/Hr	Process Lbs/Hr	Emission Lbs/Hr	Process Lbs/Hr	Emission Lbs/Hr
50	0.21	2300	4.44	7500	8.39
100	0.46	2100	4.55	8000	8.71
150	0.66	2500	4.64	8500	9.03
200	0.85	2600	4.74	9000	9.36
250	1.03	2700	4.84	9500	9.67
300	1.20	2800	4.92	10000	10.00
350	1.35	2900	5.02	11000	10.63
400	1.50	3000	5.10	12000	11.28
450	1.63	3100	5.18	13000	11.89
500	1.77	3200	5.27	14000	12.50
550	1.89	3300	5.36	15000	13.13
600	2.01	3400	5.44	16000	13.71
650	2.12	3500	5.52	17000	14.36
700	2.21	3600	5.61	18000	14.97
750	2.34	3700	5.69	19000	15.58
800	2.43	3800	5.77	20000	16.19
850	2.53	3900	5.85	30000	22.22
900	2.62	4000	5.93	40000	28.30
950	2.72	4100	6.01	50000	34.30
1000	2.80	4200	6.08	60000	40.00
1100	2.97	4300	6.15	70000	41.30
1200	3.12	4400	6.22	80000	42.50
1300	3.26	4500	6.30	90000	43.60
1400	3.40	4600	6.37	100000	44.60
1500	3.54	4700	6.45	120000	46.30
1600	3.66	4800	6.52	140000	47.80
1700	3.79	4900	6.60	160000	49.00
1800	3.91	5000	6.67	200000	51.20
1900	4.03	5500	7.03	1000000	69.00
2000	4.11	6000	7.37	2000000	77.60
2100	4.24	6500	7.71	6000000	92.70
2200	4.34	7000	8.05		

Interpolation and extrapolation of the data for process unit weight rates in excess of 60,000 lb/hr shall be accomplished by the use of the equation:

$E = 55.0P^{0.11} - 40$, where E = rate of process unit emission in lb/hr and P = process weight in tons/hr.

General Conditions

G1. A copy of this permit or at least a copy of the title page and an accurate and complete extraction of the operating and monitoring requirements and discharge limitations shall be posted at the facility and the contents thereof made known to operating personnel.

G2. This issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

G3. The permittee is prohibited from conducting any open burning at the plant site or facility.

G4. The permittee is prohibited from causing or allowing discharges of air contaminants from source(s) not covered by this permit so as to cause the plant site emissions to exceed the standards fixed by this permit or rules of the Department of Environmental Quality.

G5. The permittee shall at all times conduct dust suppression measures to meet the requirements set forth in "Fugitive Emissions" and "Nuisance Conditions" in OAR, Chapter 340, Section 21-050.

G6. (NOTICE CONDITION) The permittee shall dispose of all solid wastes or residues in manners and at locations approved by the Department of Environmental Quality.

G7. The permittee shall allow Department of Environmental Quality representatives access to the plant site and record storage areas at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emission discharge records and otherwise conducting all necessary functions related to this permit.

G8. The permittee, without prior notice to and written approval from the Department of Environmental Quality, is prohibited from altering, modifying or expanding the subject production facilities so as to affect emissions to the atmosphere.

G9. The permittee shall be required to make application for a new permit if a substantial modification, alteration, addition or enlargement is proposed which would have a significant impact on air contaminant emission increases or reductions at the plant site.

G10. This permit is subject to revocation for cause, as provided by law, including:

a. Misrepresentation of any material fact or lack of full disclosure in the application including any exhibits thereto, or in any other additional information requested or supplied in conjunction therewith;

b. Violation of any of the requirements, limitations or conditions contained herein; or

c. Any material change in quantity or character of air contaminants emitted to the atmosphere.

G11. The permittee shall notify the Department by telephone or in person within one (1) hour of any scheduled maintenance, malfunction of pollution control equipment, upset or any other conditions that cause or may tend to cause a significant increase in emissions or violation of any conditions of this permit. Such notice shall include:

a. The nature and quantity of increased emissions that have occurred or are likely to occur,

b. The expected length of time that any pollution control equipment will be out of service or reduced in effectiveness,

c. The corrective action that is proposed to be taken, and

d. The precautions that are proposed to be taken to prevent a future recurrence of a similar condition.

G12. Application for a modified or renewal of this permit must be submitted not less than 60 days prior to permit expiration date. A filing fee and Application Investigation and Permit Issuing or Denying Fee must be submitted with the application.

G13. The permittee shall submit the Annual Compliance Determination Fee to the Department of Environmental Quality according to the following schedule:

Amount Due			Date Due
Section A	Section B	Total	
$150	$37.50	$187.50	6/1/74
$150	$75.00	$225	6/1/75
$150	$75.00	$225	6/1/76
$150	$75.00	$225	6/1/77
(See G12.)			5/1/78

Appendix I

Ambient Air Monitoring and Reporting

OREGON PORTLAND CEMENT

1. Continuous Particulate Monitoring

   a. By no later than November 1, 1974, the permittee shall acquire, install, operate and maintain in their kiln control room, a continuous recorder connected by appropriate means to the Department's continuous particulate monitor located at Lakewood Grade School. The recorder shall be equipped with an audible alarm to indicate particulate air quality levels in excess of 2.0 Bscat, one hour average. Within one hour of the occurrence of particulateconcentrations in excess of 2.0 Bscat, the permittee will report the event to a designated Department staff member. Upon such occurrences, the permittee shall take all steps necessary to inspect sources of particulate within and around the plant site and take necessary corrective action, and submit a written report of findings to the Department within five days of each occurrence.

   b. By no later than March 1, 1974, the permittee and the Department shall meet to evaluate the effectiveness of the continuous particulate monitoring program. The Department will then determine if the permittee will be required to purchase the equipment necessary to fully conduct the monitoring program.

2. Meteorological Sensors'

   By November 1, 1974, the permittee shall acquire, install, operate and maintain a wind speed, wind direction monitoring site on the plant site in an approved location. Hourly records of wind speed and direction will be maintained for a two year period and be made available to the Department upon request.

3. Particulate Characterization Program

   The permittee shall have conducted, by a qualified consultant, a comprehensive ambient particulate characterization program which shall accomplish the following:

   a. Determine the percent by weight of the suspended particulate and particulate fallout matter measured at Lakewood Grade School that originates directly or indirectly from Oregon Portland Cement's operation.

   b. Identify in general terms the extent to which other major point and area sources contribute to suspended particulate and particle fallout concentrations at Lakewood Grade School (considered necessary to support results of 3a, above).

   c. Identify qualitatively and quantatively which specific sources within the permittee's property (i.e., No. 2 and No. 3 kilns, No. 4 kiln, raw materials handling, etc.) contribute to the particulate collected at Lakewood School.

4. Minimum Program Requirements

The following are minimum requirements for the particulate characterization program. All details of the program including sample site location and analytical methods shall be approved by the Department.

Study period: 12 months ending January 1, 1976.

Sampling Sites (minimum)

a. Suspended particulate at an upwind site (North-Northeast of the OPC plant) and at Lakewood School (downwind site).

b. Particulate fallout at an upwind site, Lakewood School and at five other sites located at maximum concentration receptors.

Sampling Methodology

a. Suspended particulate: Time resolved - size segregate impactor samples and high volume sampling. Both samplers at each site.

b. Particulate fallout: 30 day samples using the Oregon-Washington PFO container. Department of Environmental Quality will provide the sampling containers.

Sampling Frequency

a. Suspended particulate impactor sampling on a continuous basis high volume sampling on a sixth day basis Department of Environmental Quality's schedule.

b. Particle fallout sampling on a continuous basis.

Ambient Sample Analysis

a. General: Ambient sample analysis should be directed toward the determination of elements and/or compounds identified by in-plant analysis as specific tracers related to OPC emissions and those required to determine the suspected sources of other particulate.

b. Suspended particulate analysis to include tracers identified (a, above) particle size distribution, a comprehensive elemental analysis and/or particulate morphology as required.

c. Number of samples to be analyzed should be consistent with statistical design requirements. Emphasis should be placed on analysis of samples exceeding air quality standards with a few samples obtained under low to moderate particulate loading and at least two time series to determine temporal variations.

Some samples should be analyzed when winds blow from the plant towards the Lakewood School and when winds blow towards the north site. Only a select few of the particle fallout samples would be analyzed in depth, all would be analyzed for total weight and calcium oxide. The following minimum number of analysis is required:

Particle Fallout:	Total weight, CaO all samples (42) Comprehensive elemental analysis for tracers (10)
Suspended Particulate:	High volume (30 samples/site) total weight, CaO on all samples. Comprehensive elemental analysis: five analyses of coinciding upwind and downwind samples. Impactor samples comprehensive elemental analysis: ten analyses of coinciding upwind and downwind samples.

5. In-Plant Program

Prior to initiation of the ambient particulate analysis program, an in-plant program to determine specific and distinct elemental and/or compound tracers and comprehensive elemental analysis from potential particulate sources within the plant must be conducted (i.e., limestone crushing, clinker handling, kiln stack emissions, cement handling, roadways, etc.). Identification of these tracers will direct the ambient particulate analysis program. The identity of the tracers specific to each source within the plant will be included in the project final report.

6. Data Evaluation

a. General: The data developed by the Study must be evaluated to meet the objectives of the program. This may include (but is not limited to) the evaluation of weekly and/or diurnal variations in particulate characteristics which can be directly related to plant operations and the development of pollution roses for specific sources identified through particulate characterization.

b. Analysis: The acquired data must be analyzed by appropriate statistical methods to indicate the probable accuracy and validity of the Study's findings.

7. Study Report

A final report summarizing significant findings and discussing in detail Study findings with respect to the program objectives listed above shall be prepared. The report shall identify significant sources contributing to particle fallout and suspended particulate ambient air concentrations measured in Lake Oswego.

Where applicable to emissions from OPC's operations, control recommendations may be made.

Copies of the final report must be submitted to the Department by Oregon Portland Cement no later than February 1, 1976.

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

MEMORANDUM

To: ENVIRONMENTAL QUALITY COMMISSION

From: Director

Subject: Agenda Item No. H, September 20, 1974, DQC Meeting

Ambient Air Standard for Lead, Status Report

The Commission will recall that the Hearings Officer's Report for a public hearing to consider a proposed ambient air standard for lead was presented at the July 19, 1974, meeting, along with a request by the Director that action on the proposed standard be delayed until further notice.

The volume of testimony received at and subsequent to the public hearing has necessitated the use of additional staff time for evaluation of data and revision of the proposed standard. Inasmuch as the current staff load has been extremely heavy due to delays in arrival of two new employes, the staff has been unable to progress on this study as rapidly as was anticipated. The staff is currently nearing completion of the evaluation and is presently planning to present a report at the October 25, 1974, Commission meeting.

KESSLER R. CANNON
Director

RMJ:mh

9/12/74

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

MEMORANDUM

To : Environmental Quality Commission

From : Director

Subject: Agenda Item No. I, September 20, 1974 EQC Meeting
Variance Request: Union Oil of California

Background

On June 21, 1974, the Environmental Quality Commission considered the attached staff report entitled "Consideration of Variance Request, Sulfur Content of Residual Fuel Oil." Based on the information available in June, the Department recommended and the Commission granted a short-term variance to the Union Oil Company of California until October 1974, with the conditions contained in the attached staff report.

The primary basis for the staff recommendation to limit the variance period for approximately 90 days was to allow sufficient time for the staff to meet with each of the oil companies and obtain additional information to evaluate their short and long range programs as related to the Department rule.

As planned, the Department had discussions with representatives of Shell Oil Company, Standard Oil of California, Mobil Oil, Texaco, Inc., Atlantic Richfield Company, and Union Oil of California.

Discussion

Based on the discussions held and the information obtained, the following general observations and conclusions are made:

1. As presently projected, the sulfur content of residual oil in Oregon for the next three to four years will be primarily dependent upon the sulfur content of the crude oil processed. In general, compliance with the Department's existing rule is achievable when processing domestic crudes and some foreign crudes. However, compliance will be difficult if not impossible in some cases where it is necessary to process higher sulfur foreign crude oils, primarily Arabian crude.

The most significant potential effect on the availability of crude oil as related to sulfur content in the near future (1979) will be the entry of North Slope crude oil. It is anticipated the North Slope crude will replace most of the foreign crude now used in the West Coast refineries. If no further refining changes are made, the sulfur content of processing North Slope crude should result in a residual product with a sulfur content consistently less than two percent or near that, presently obtained when processing present domestic crudes.

Other potential changes in crude supply such as shale oil are not expected to have any major effect until after 1980.

2. Another potential method of obtaining lower residual fuel oil would be to add residual desulfurization at existing refineries. Most of the companies are investigating this possibility; however, actual planning is only being conducted by one or two companies. It appears most of the companies are weighing the economics of desulfurization as compared to utilizing the higher sulfur oil in other processes such as coking.

If desulfurization units were added to existing plants, such units would not be operational for three to four years.

3. Market demand and refinery location can also affect the quality of oil received in Oregon.

Except for very small quantities, all the residual oil used in Oregon is received by ships from refineries located in California. In most cases the same vessel that delivers oil to Oregon also delivers oil to Washington. Consequently, frequently the same quality of oil is received by both states and often from the same vessel.

From the oil companies' viewpoint, it would be desirable to have identical regulations for fuel oil in both states.

4. According to the best information available to the staff, it appears that most of the suppliers and users of residual oil in the state have stored residual oil near their storage capacity. Also, with the increased availability of foreign crude, approximately the same quantity of oil as in the past appears to be available for use this coming winter.

Based upon all of the information thus far obtained, the staff is not recommending any changes in the Department rule concerning this matter at this time. However, it is the Department's intention to evaluate the need for any rule revision that may be necessary as part of the Maintenance of Air Quality Areas project work that is to be completed by July 1, 1975.

It is our opinion the Commission should continue the same policy as in the past in this matter, and that is to consider each variance request submitted on a case-by-case basis.

Variance Request, Union Oil of California

Attached is a request submitted by Union Oil to extend their existing variance from October 1, 1974 to July 1, 1975, including the basis for such request.

Also attached is a complete list of all Union Oil Residual Fuel Oil Customers in Oregon, as requested by the staff. As outlined in our June staff report, the primary users of Union's residual oil in Oregon are Crown Zellerbach and Hanna Nickel.

The Department has evaluated the information submitted and concurs with the request as submitted.

Recommendation

It is the Director's recommendation that the Commission grant a variance from the Department rule, Oregon Administrative Rules, Chapter 340, section 22-010(2) pertaining to the sulfur content of residual fuel oil to the Union Oil Company of California, and to its distributors and users of residual oil, until July 1, 1975, with the following conditions based upon a finding by the Commission that strict compliance with the Department rule is inappropriate because:

a) no other alternative facility or method of handling is yet available; or

b) conditions exist, as described in the letter request for extension of variance and in the staff report, that are beyond the control of the persons granted such variance.

Conditions

1. The maximum sulfur content of residual fuel oil to be sold, distributed or used shall not be more than 2.5 percent sulfur by weight.

2. Union Oil shall submit to the Department a report containing the sulfur analysis and quantity of each shipment sold or distributed in the state on a quarterly basis beginning October 1, 1974.

3. On or before May 15, 1974, Union Oil shall submit to the Department a written report describing plans or programs adopted to achieve compliance with the Department rules including expected dates of implementation.

4. This variance shall terminate July 1, 1975.

KESSLER R. CANNON
Director

EWH:ss
September 19, 1974
attachments - 3

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. I, June 21, 1974 EQC Meeting

Consideration of Variance Request, Sulfur Content of Residual Fuel Oil

Background

On the 24th of January 1972, the Environmental Quality Commission adopted rules pertaining to the sulfur content of fuel oils, specifically the following rule pertaining to residual fuel oil. The rule as adopted was submitted to the Environmental Protection Agency and incorporated as part of Oregon's Clean Air Act Implementation Plan.

> "Residual Fuel Oil" means any oil meeting the specifications of ASTM Grade 4, Grade 5 or Grade 6 fuel oils."
>
> "Section 22-010 Residual Fuel Oils (1) After July 1, 1972, no person shall sell, distribute, use or make available for use, any residual fuel oil containing more than 2.5 percent sulfur by weight.
>
> (2) After July 1, 1974, no person shall sell, distribute, use, or make available for use, any residual fuel oil containing more than 1.75 percent sulfur by weight."

Although concern was expressed this past winter that due to the anticipated oil shortage there may be difficulty in maintaining compliance with the Department rule, weather conditions and oil supply were such that the problem did not materialize.

Additional concerns have been expressed in the past few months primarily due to the Department's residual fuel oil rule to be implemented 1 July 1974, and the anticipated greater number of days natural gas may not be available this coming winter to its industrial and commercial customers.

Based on the information available, the Department sent a letter within the past month to over 60 major residual oil users, suppliers, and distributors (copy of letter attached). The letter in essence stated that unless a specific written application with supporting information justifying a variance was received and granted by the Commission, the Department would have no alternative but to strictly enforce the regulation as originally adopted in 1972. The letter further stated that applications for a variance received by the Department before June 10, 1974 would be considered by the Commission at their June 21, 1974 meeting in Coos Bay. Each applicant was requested to appear before the Commission and respond to questions and/or to supply additional information as may be necessary.

Discussion

The following is a brief summary of each variance request received by 14 June 1974 and other pertinent information received by the Department related to this matter. Copies of each variance request received and/or related information is attached.

Oil Suppliers

Shell Oil Company -- Shell's letter in essence states that they believe Shell Oil can for the short term comply with the Department rule. No firm commitment can be made to any specific maximum sulfur content for residual fuel beyond 60 days. Process variation and the varying pattern in the sulfur content of crude supply are not known with any certainty at this time.

In addition to other details Shell supplied data for the first months of 1974 on the sulfur content of residual fuel oil from their Martinez Refinery near San Francisco which is their primary supply for Oregon. Other data submitted relates to the sulfur content from their Portland Willbridge distribution facility and refinery located at Anacortes in Washington.

Shell is believed to be the largest supplier of residual oil in the State of Oregon (2 X any other supplier).

Representatives of Shell from Houston, Texas are expected to be present at the Commission meeting to supply additional information and respond to questions as needed.

Standard Oil of California -- A letter was received on the 6 June 1974 in response to the Department inquiry of 15 January 1974. In addition, a representative of Standard Oil did meet with the staff during the week of 10 June 1974 to supply additional information and a letter is expected prior to the Commission meeting on 21 June which will be attached to the staff report.

Based on the discussions held, it is believed Standard Oil will not apply for a variance at this time. As with Shell Oil, it may be necessary for Standard to apply for a variance in a few months according to demand and available supply. Standard Oil is prepared to supply additional information to the staff concerning their longer range plans as needed.

Mobile Oil Corporation -- Although a specific letter has not been received by the Department from Mobile Oil, from discussions with the Federal Energy Office and the Oil Heat Institute, it is believed Mobile Oil will be able to comply with the Department rule and does not intend to apply for a variance at this time. (Letter received and attached.)

Texaco, Inc. -- No correspondence or other communications have been received from Texaco. To the best of our knowledge, Texaco is not a supplier of residual fuel in Oregon.

Atlantic Richfield Company -- Mr. Fitzpatrick of Arco telephoned the Department and stated that ARCO would apply for variance for 90 days. The 90 days requested is believed needed to allow ARCO time to develop additional information. From the conversation it was learned ARCO storage facilities in Portland presently contain residual fuel oil containing 1.71 percent sulfur and shipments of unknown sulfur content are expected within the next 90 days.

The variance request when received will be submitted to the Commission. A representative of ARCO is expected to be present at the Commission meeting.

Union Oil Company of California -- On the 5 June 1974 a request for a variance was received from Union Oil. Union Oil has requested a variance to allow it to supply fuel oil averaging 2.5% sulfur to and through the Oregon market until 30 June 1975.

Union Oil is expected to be represented at the Commission meeting and supply additional information as needed by the Commission.

The above summary covers all known suppliers of residual oil in the State of Oregon.

Distributors

Oil Heat Institute of Oregon -- Requested a variance for all distributors (20-30) and end-users (3,000 or more) for a 90 day period starting 1 July 1974. The basis for the variance request as with all other requests received from distributors and users is that they have no control over the quantity or specifications of the product involved, both are dependent on what is provided by the prime supplier.

Representatives of the OHI are expected at the Commission meeting.

Empire Fuel Heat, Coos Bay -- Requested a variance and will be represented at the Commission meeting. No information was submitted on the prime supplier, quantity of oil, length of time variance is requested for, or other related information.

Valley Oil Company, Salem -- Requested a permanent variance for its firm and 110 customers. ARCO, the prime supplier, has advised Valley Oil its "....residual fuel oil will not meet the specifications imposed by Section 22-010, Subsection 2, and that they will no longer be able to provide residual oils after June 30, 1974."

Users

General Foods Corporation, Hillsboro and Woodburn -- In separate requests General Foods requested a variance for a minimum of one year for the residual fuel to be used in its boilers (interruptible natural gas) at its food processing plants in Hillsboro and Woodburn.

ARCO is General Foods prime supplier through Valley Oil. Representatives of the firm are expected at the Commission meeting.

Del Monte Corporation, Salem -- Requested a variance for its standby residual fired boiler based on information received from its prime supplier (ARCO). Representatives of Del Monte are not expected to attend the Coos Bay Commission meeting.

Stayton Canning Company, Stayton -- Requested a variance for its food processing plants located at Stayton, Dayton, Salem, Silverton and Brooks. Depending on location, Stayton's oil distributors are Capital City Transfer, Carson Oil, Home Fuel, Ross Oil and Valley Oil. Prime suppliers are Mobile Oil, ARCO, and Shell.

As with other food processing plants, Stayton uses residual fuel oil in its boiler when natural gas is curtailed.

Kelly, Farquhar and Co., Salem -- Requested a variance for one year to be assured of a supply of fuel during the food processing season. They have been informed by their distributor (Home Fuel) they may not be able to supply fuel with the required sulfur content.

Western Kraft Corporation, Albany -- Requested a variance for a period of one year from July 1, 1974 to June 30, 1975. Western Kraft has requested the variance on the basis its fuel distributor Cummings Transfer and Fuel has been advised by its prime supplier ARCO they will not be able to meet the Department rules and Western Kraft has been unable to secure an alternate source of supply.

During periods of natural gas curtailment Western Kraft uses approximately 1350 barrels of residual fuel per day. Representatives of Western Kraft are expected to be in attendance at the Commission meeting.

Publishers Paper, Oregon City and Newberg -- Publishers has requested the Commission to amend its rule related to the sulfur content of residual fuel based on existing air quality. In the event the Commission does not amend its rule, Publishers has requested a variance for all its mills in Oregon.

Texaco, Publishers prime supplier has informed Publishers they cannot guarantee a supply of oil for the entire curtailment period of less than 1.75 percent. ARCO is Publishers secondary supplier.

During periods of natural gas curtailment, Publishers uses approximately 1000 barrels of residual fuel daily. At its only plant outside Oregon using Bunker C fuel (Anacortes, Washington), the standard is 2% and ARCO has been able to supply fuel to meet that standard.

Georgia Pacific Corp., Toledo and Springfield -- Georgia Pacific suggests the "Commission delegate interim authority to issue variances to the Director of the DEQ to allow continued operation of plant should 1.75 percent oil become unavailable before the EQC could act on such a variance request."

Georgia Pacific is presently receiving 1.1 - 1.4 percent sulfur oil from its prime supplier Standard Oil.

Roseburg Lumber, Roseburg -- Requested a temporary variance until its prime supplier "...Texaco is able to supply oil with the proper sulfur content."

Crown Zellerbach, Wauna, West Linn, and Lebanon -- Crown Zellerbach submitted a variance request to allow its firm to use "...fuel oil having an average 2.5 percent maximum sulfur content through 30 June, 1975."

Crown Zellerbach's prime supplier is Union Oil of California which has submitted a similar request.

Hanna Nickel Smelting Company, Riddle -- Hanna Nickel has requested a variance to allow the burning of residual fuel in excess of 1.75 percent during periods of natural gas curtailment. Based on present estimate of available natural gas, Hanna would expect to use approximately 33,600 barrels of residual oil.

Hanna's prime supplier is Union Oil. In their variance request, reference is made to difficulties in obtaining a firm contract because of the Department rules and possible effect of the Federal Energy Office rules.

Evaluation

For purposes of evaluating this rather complex problem it has been divided into two distinct areas for consideration.

1. Short term

   Oil Suppliers - One firm (Union Oil) apparently cannot comply with the Department rule effective 1 July 1974 and has requested a variance for one year. ARCO has applied for a short term variance (90 days). Although other oil companies have expressed concern about their ability to comply with rules later this year, no variance request was submitted for consideration at this time.

   Distributors and Users - The distributors and users have clearly expressed their dependence on the quality of oil that may be made available. Excluding the customers of Union Oil (Crown Zellerbach and Hanna Nickel) and the response to ARCO's letter by its distributors and customers, the other variance requests submitted are primarily in anticipation of a potential problem. Such requests were submitted in an attempt to insure adequate supply if and when compliance could not be maintained.

2. Long term

Oil Suppliers - Although none of the oil companies thoroughly described their long range programs or plans as related to the sulfur content of fuel, each firm contacted expressed a willingness to meet with the Department staff on an individual basis and supply additional information that may be available. Such meetings could be arranged and accomplished within the next 60 - 90 days.

Distributors and Users - In most cases, it is not economically feasible nor desirable for individual distributors or users to build individual systems to reduce the sulfur in fuel or add air pollution control equipment for the reduction of SO_2. The most reasonable way to accomplish the needed reduction is by reducing the sulfur in the oil at a common facility and at this time it is apparent the distributors and users expect this to be accomplished by the oil suppliers.

Although the Department is concerned about the short term effects the burning of higher sulfur fuel may have, existing air quality is such in most areas of the State that primary concern is focused on the longer range effects.

It is of utmost importance to the Department to develop and adopt a long range workable program for sulfur dioxide. Such a program hopefully will insure an adequate fuel supply and allow for reasonable growth of population and industry that is consistent with the environmental needs of the State.

A number of firms have stated they are unable to obtain firm contracts because of the Department rules or have expressed that there is possible conflicts between the Department rules and the Federal Energy Office regulations.

From our discussions with representatives of oil companies, it is the opinion of the Department that the problem of firm contracts is not related to the Department rules. This problem appears to be primarily related to the allocation program and other factors.

A member of the Federal Energy office staff is expected to attend the Commission meeting and possibly can assist with any questions raised concerning their office. However, it is the opinion of Department that the rules of the Federal Energy Office do not preclude any person from complying with the Department rules.

Recommendations and Conclusions

Based on the information thus far submitted and that which is expected to be made available from various representatives at the meeting it is our opinion positive action can be taken at this time which will alleviate any short term problem that exists consistent with the long range objectives of the Department.

Since all of the oil companies contacted have indicated a willingness to meet with the Department staff to discuss their longer range programs, it is the Department recommendation that all suppliers of residual oil be requested to meet with the staff in the next 30 days and the staff be directed to report the results of these meetings to the Commission within 90 days. It would be the objective of the Department to meet with each as soon as possible so sufficient time can be given to obtaining additional information that may be needed. Based on the results of these meetings, the Department would outline to the Commission a long range program that is believed necessary to meet its objectives including any changes in procedures or rules determined necessary.

Concerning the short term problem, recognizing the dependence of the distributors and users on the oil suppliers, it is the Department recommendation the Commission consider each variance request submitted by the oil suppliers at this time. Based on the information submitted and received at this meeting such requests may be denied or granted with the resultant effect on the distributor or user recognized.

Concerning any variance requests submitted by distributors or users of oil companies that did not submit a variance request at this time the Commission may postpone or deny such variance requests until information has been submitted that compliance is not possible or feasible.

Following the outline of this report, it is the Director's recommendation the Commission consider the following variance requests and recommendations:

Union Oil Company of California - The letter requesting a variance is attached and has been summarized previously.

It is the Department's understanding that the sole customers of Union Oil residual oil in the State of Oregon are Crown Zellerbach and Hanna Nickel. If this is not the case, this should be clarified.

Based on the information submitted, the Department believes a short term variance for Union Oil, its distributors (if any) and customers may be justified and necessary. If the Commission finds such a variance is necessary, the Department would recommend consideration of the following conditions of such a variance.

1. Union Oil be required to submit to the Department the sulfur analysis and quantity on each shipment sold or distributed in the State of Oregon.

2. The maximum sulfur content of the residual oil to be sold, distributed or used should be limited to 2.5 percent by weight.

3. Appropriate representatives of Union Oil should be required to meet and/or prepare for the Department, details of their long range programs that outlines the sulfur content of residual oil that Union will make available in the State of Oregon by specific dates.

4. The time period of the variance should be limited to 90 days (1 October 1974).

5. The variance should be specifically for Union Oil, its distributors and customers, including Crown Zellerbach and Hanna Nickel for the sale, distribution and use of Union residual oil in the State of Oregon.

Atlantic Richfield Company - It is the Department's opinion ARCO did not submit sufficient information in its letter to the Department to justify the granting of such a variance. However, if representatives of ARCO supply sufficient additional information to the Commission at the meeting to justify the granting of a variance, the Department would recommend the conditions of the variance concerning maximum sulfur content, length of time, submission of reports and long range program are such that it is consistent with the program with other oil companies. As with Union Oil such a variance, if granted, should include all ARCO distributors and users of ARCO residual fuel oil.

The Department is not aware of any other variance requests from oil suppliers that should come before the Commission at this time.

KESSLER R. CANNON
Director

EWH:h 6/19/74

Union 76 Division: Western Region

Union Oil Company of California
2901 Western Avenue, Seattle, Washington 98111
Telephone (206) 682-7600

Union 76

C. R. Warnock
Division Sales Manager

September 6, 1974

Mr. Wayne Hanson, Assistant Director
Department of Environmental Quality
1234 S. W. Morrison
Portland, Oregon 97205

Dear Mr. Hanson:

Last June Union Oil wrote to the Department of Environmental Quality requesting a variance from the 1.75% sulfur restriction that would be effective July 1, 1974. At the Coos Bay meeting on June 21, you granted a variance permitting 2.5% sulfur fuel distribution by Union Oil Company until October 1, 1974. This current letter is written to request an extension of that variance, permitting 2.5% sulfur until July 1, 1975.

Subsequent to the June 21 meeting at Coos Bay, Union has met with the DEQ staff and has provided information regarding Union's longer range plans. This information included the following points:

Union expects to run 40-50% foreign crude at the Los Angeles Refinery during the second half of 1974 and during 1975, 45-55% foreign crude.

Foreign crudes available to Union are dependent upon spot availability since Union has no long-term foreign crude purchase contracts.

Union's plan is to, whenever available, acquire crudes with lower sulfur resids, but we recognize the most available crude is the Arabian crude with its high sulfur resids.

Average sulfur levels in Union's residual fuels will tend to increase until approximately 1978.

In 1978 Union anticipates receipt and processing of North Slope Alaskan crude with a corresponding displacement of the higher sulfur Arabian crude.

Preliminary work is now underway toward design and installation of residfining facilities at the Los Angeles Refinery with completion expected in 1979.

Additional low sulfur raw material is projected after 1980 when processing of shale oil is anticipated.

Subsequent to the July 23 meeting, we have monitored the sulfur in the Los Angeles Refinery fuel oil production. During July and August it has varied from a low of 2.15% to a high of 2.38%, with an average of approximately 2.25%. We remain unable to predict the specific source of our foreign crude supply for an extended period and anticipate that fuel oil sulfurs will be in the 2% to 2½% range throughout the coming burning season. For these reasons, we request the extension of Union's variance of 2.5% maximum until July 1, 1975. As before, we request this variance be applicable to the fuel oil customers served by Union Oil Company.

Union will have representation at your September 20 meeting for any further questions or discussion you desire.

Very truly yours,

C. R. Warnock

C. R. Warnock
Division Sales Manager

CRW:mh

Union 76 Division: Western Region

Union Oil Company of California
2901 Western Avenue, Seattle, Washington 98121
Telephone (206) 682-7600

PLEASE NOTE OUR NEW TELEPHONE
NUMBER IS (206) 223-7000

UNION 76

July 29, 1974

Mr. Wayne Hanson, Assistant Director
Department of Environmental Quality
1234 S.W. Morrison St.
Portland, Oregon 97205

Dear Mr. Hanson:

Attached is the list of Union Oil Company Bunker Fuel Oil customers of record as of July 1, 1974. You had requested that we provide the list during our July 23, 1974 meeting in Portland.

Yours very truly,

UNION 76 DIVISION: WESTERN REGION
UNION OIL COMPANY OF CALIFORNIA

D. E. D'Zurilla
Manager Operations

attch.
DED:ed

Crown Zellerbach Corp.
Wauna, Ore. - Oregon City, Ore.

Harbor Distributing Co.
Portland, Ore.

Rawlinson's Capitol City Cleaners
Salem, Ore.

Sunset Crushed Rock
Cornelius, Ore.

I. H. Baxter Co.
Eugene, Ore.

C & D Lumber Co.
Riddle, Ore.

Roseburg Lumber Co. (formerly Dillard Lbr. Co.)
Dillard, Ore.

Drain Plywood
Drain, Ore.

Nordic Plywood
Sutherlin, Ore.

W. D. Henry
Umpqua, Ore. (Sutherlin, Ore. branch)

Gene Fisher
Oakland, Ore (Sutherlin)

Roseburg, Ore.

Round Prairie Lumber Co.
Dillard, Ore.

Harry & David
Medford, Ore.

Empire Fuel Co.
Coos Bay, Ore.

Hanna Nickel Mining and/or
Hanna Nickel Smelting
Riddle, Ore.

Milo Academy
Riddle, Ore.

Mining Minerals Mfg.
Riddle, Ore.

Olsen-Lawyer Lbr. Co.
Medford, Ore.

Permaneer Corp.
Roseburg, Ore.

Cottage Grove Hospital
Cottage, Grove. Ore.

John T. Carson Oil Co. Inc.
Portland, Ore.

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

MEMORANDUM

To: ENVIRONMENTAL QUALITY COMMISSION

From: Director

Subject: Agenda Item J, September 20, 1974 EQC Meeting

Indirect Source(s) Proposed Rule
Authorization for Public Hearing

Background

On June 24, 1974, a public hearing was held before a hearings officer for the purpose of receiving testimony on a proposed rule entitled "Complex Sources". Significant oral and written testimony was received.

At the July 19, 1974 meeting the Environmental Quality Commission received the Hearing Officer's report pertaining to that public hearing. Since comment was extensive and testimony contained rather detailed textual amendments, the staff, after analysis, concluded that a complete rewriting of the rule was appropriate.

A new draft of the proposed rule was completed and contained numerous and significant changes in format and content. The main features become obvious - the rule name has been changed from "Complex Sources" to "Indirect Sources"; any reference to noise has been omitted; the regulation has been revised in terms of sequence; there is an attempt to spell out detailed information needed with an application for each type of indirect source; and greater emphasis has been placed on the regional Indirect Source Plan concept.

The Department mailed the new draft to all those testifying at the initial public hearing and interested persons. A copy of the draft rule was attached encouraging them to review the rule and/or contact the Department for an informal meeting. A time period from August 26, 1974 to September 16, 1974 was allowed for this process. In addition,

individual telephone calls have been made to assure receipt of the draft to inquire of individual comment.

Recommendation

It is the recommendation of the Director that the Commission authorize the Department to set a public hearing before the Hearings Office on October 21, 1974, in Portland, Oregon, for the purpose of taking public testimony concerning the proposed rule on Indirect Sources.

KESSLER R. CANNON
Director

HMP:h 9/11/74

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

TOM McCALL
GOVERNOR

B. A. McPHILLIPS
Chairman, McMinnville

GRACE S. PHINNEY
Corvallis

JACKLYN L. HALLOCK
Portland

MORRIS K. CROTHERS
Salem

RONALD M. SOMERS
The Dalles

KESSLER R. CANNON
Director

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. K, September 20, 1974 EQC Meeting

Proposed Adoption of Temporary Rule Pertaining to Standard Specification for Homogeneous Perforated Bituminized Fiber Pipe for Septic Tank Disposal Fields

Background

The permanent administrative rules pertaining to subsurface sewage disposal which were adopted by the Commission on March 22, 1974 and which became effective April 26, 1974 include as Appendix L the Standard Specification for Homogeneous Bituminized Fiber Drain and Sewer Pipe, Designation: D 1861-69, American Society for Testing and Materials (ASTM).

Appendix E, Section II D, of the same rules permits the use of perforated bituminized fiber pipe for the distribution lines in disposal trenches.

ASTM has adopted a specification for the perforated pipe which is separate and slightly different from the specification D 1861-69 for standard bituminized pipe. The difference is in the wall thickness and resulting crush strength of the pipe. The standard for the perforated pipe has strengths comparable to similar pipe manufactured from other types of material.

The absence in our rules of the ASTM specification for perforated bituminized fiber pipe has caused a hardship for that phase of the pipe industry.

The Technical Advisory Committee for Materials (TAC/M) appointed by the Director to advise the Department in connection with the subsurface sewage disposal program has reviewed this matter and has recommended that the ASTM Standard Specification for Homogeneous Perforated Bituminized Fiber Pipe for Septic Tank Disposal Fields (Designation: D 2312-73) be adopted as part of DEQ's subsurface sewage disposal rules.

Conclusions

In order to permit the use of perforated bituminized fiber pipe in distribution lines of disposal fields ASTM Specification D 2312-73 should be adopted to supplement the present rules.

Recommendation

It is recommended by the Director that the following proposed temporary rule be adopted by the Commission to become effective immediately upon filing with the Secretary of State, and that the Commission find that failure to adopt said rule at this time will cause hardship to property owners desiring to use perforated bituminized fiber pipe in disposal trenches, and further that failure to act promptly will result in prejudice to the public interest as well as to the interest of parties directly concerned:

Proposed Temporary Rule*

Amend the first two sentences of Section II.D. of Appendix E of the Standards for Subsurface Sewage and Nonwater-Carried Waste Disposal administrative rules contained in Subdivision 1, Division 7, OAR Chapter 340, to read as follows:

" D. Bituminized fiber of which both solid pipe and fittings must meet ASTM (American Society for Testing and Materials) Specification D 1861-69 which is designated Appendix [L] M and by this reference is made a part of these regulations. Perforated bituminized fiber pipe shall meet ASTM Specification D 2312-73 which is designated Appendix L and by this reference made a part of these regulations. Each length of pipe and each fitting shall

be marked with the nominal size, the manufacturer's name or trademark, or other symbol which clearly identifies the manufacturer and the appropriate ASTM standard number above."

KESSLER R. CANNON
Director

* Words in brackets are to be deleted and words underlined are to be added.

KHS:vt

DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 5696

TOM McCALL
GOVERNOR

KESSLER R. CANNON
Director

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. L, September 20, 1974, EQC Meeting

Fishhawk Lake Recreation Homesites:
Domestic Sewerage System Maintenance Performance Bond

Background:

The Fishhawk Lake domestic sewerage system in Clatsop/Columbia Counties was constructed in 1971 to serve approximately 320 recreation homesites. At that time, a maintenance performance bond with Aetna Casualty & Surety Company as corporate surety, was submitted to DEQ. The amount of the bond is $25,000. The bond principal is "Fishhawk Lake Estates, Inc." which is a corporate affiliate of the Brown Development Company, developers of Fishhawk Lake Estates.

According to information submitted to DEQ in 1971, the ownership of the sewerage system, along with other community properties, was transferred by bill of sale to the Fishhawk Lake Recreation Club, Inc., a nonprofit corporation comprised of lot purchasers in the Fishhawk Lake development. Since that time, management, operation and maintenance of the sewerage utility has been accomplished by the recreation club.

A Waste Discharge Permit was issued by the State in 1972 to the Fishhawk Lake Recreation Club, Inc., permitting operation of the subject utility with discharge to Fishhawk Creek at river mile 6.0. Limits of the permit include 20 mg/L BOD and suspended solids and flow of 0.1 MGD. Effluent disinfection is required prior to discharge.

The Fishhawk Lake Recreation Club, Inc. is requesting a reduction of the maintenance performance bond and substitution of a mortgage lien on the real property for the present corporate surety. More precisely, the club has prepared an agreement with the EQC to the effect that:

1. The recreation club is the entity acting on behalf of the property owners;

2. The club has shown that a $5,000 bond is sufficient to ensure compliance with permit requirements, and has proposed a substitute of a mortgage lien on real property valued at $5,000;

3. A document creating a mortgage lien on an unimproved lot within the plat will be delivered to the Commission;

4. The club agrees to deposit not less than $1,000 per year cash in a savings account until the account reaches $5,000, at which time the club will assign or pledge the account to the Commission as security in place of the mortgage lien on the lot. The $5,000 cash deposit will be permanent and recoverable by the Commission only. Interest will be payable to the club.

Evaluation:

1. Operation of the sewerage system and sewage treatment plant has been effective and adequate, although DEQ monitoring and operational reporting have not been adequate to show continuity in this regard.

2. There are currently 7 recreational homes connected to the sewer system, only 3 of which are occupied on a day-to-day basis.

3. The recreation club has exhibited a sincere desire and ability to accept full responsibility for all appropriate community functions.

4. The recoverable value of the security proposed in lieu of a cash bond or corporate surety will at least sustain its nominal value over the time involved. Subsequently, the savings account assignment can be increased in the future if appropriate.

Recommendation:

The request of the Fishhawk Lake Recreation Club, Inc. appears

to be well supported and a logical step in assigning full responsibilities for utilities operation to the entity with management capabilities and control. It is therefore recommended that the Commission reduce the amount of bond required to $5,000 and, further, to accept in lieu of other security a real property mortgage lien against Lot 32, Division II of the plat of Fishhawk Lake Estates in Columbia County. The appropriate document of agreement is available for signature of the Chairman.

KESSLER R. CANNON
Director

PDC:rgs

attachment

9-12-74

409 S.W. Ninth Avenue Portland, Oregon 97205
(503) 222-9931

A Service of
Transamerica Corporation

Transamerica Title Insurance Co

September 6, 1974

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

RE: Escrow #56253 BROWN DEVELOPMENT CO/DEPARTMENT OF ENVIRONMENTAL QUALITY COMMISSIONERS

Dear Mr. Curran:

In connection with the above transaction, please find enclosed the Security Agreement in Lieu of Bond, which was executed by Fishhawk Lakes Recreation Club, Inc. along with Mortgage executed by Fishhawk Lake Recreation Club, Inc. in favor of the Environmental Quality Commission of the State of Oregon for $5,000.00 given as security in lieu of bond under ORS 449.400.

In checking through our file to discover why we had not heard from you in relation to this matter, we realized that these documents were inadvertently omitted from thepackage originally sent to you on June 14, 1974 along with Mr. Scott Brown's letter of June 3, 1974. We sincerely apologize for any inconvenience our delay of sending these documents to you may have caused.

Please contact the undersigned upon approval and signature by the Environmental Quality Commission of the State of Oregon of these documents.

Very truly yours,

ESCROW DEPARTMENT

Vickie Agee A.N

(Mrs.) Vickie Agee
Escrow Officer

VA/mh
Enclosures

MORTGAGE

FISHHAWK LAKE RECREATION CLUB, INC., a non profit Oregon corporation, for a good and valuable consideration, receipt of which is hereby acknowledged, does hereby mortgage, bargain, sell, and convey unto THE ENVIRONMENTAL QUALITY COMMISSION OF THE STATE OF OREGON, the following described premises, situated in Clatsop County, Oregon, to-wit:

Lot 32, Division II, of the plat of Fishhawk Lake Estates

together with the tenements, heriditaments and appurtenances thereunto belonging or in any wise appurtaining.

This conveyance is intended as a mortgage to secure the payment and performance in the event the same become due of the sum of $5,000.00 to The Environmental Quality Commission. It is given as security in lieu of a bond under ORS 449.400. It shall be deemed in default and may be foreclosed in the event of the failure of Fishhawk Lake Recreation Club, Inc. to operate its sewage treatment plant as required under ORS 449.400, so that The Environmental Quality Commission would be entitled to declare a forfeiture on a bond.

The undersigned mortgagor covenants with The Environmental Quality Commission that it is the owner in fee simple of the premises aforesaid and that the premises are free and clear from encumbrances excepting restrictions of record, and that it will warrant and defend the same from claims of all persons. Mortgagor further covenants to commit no waste on the premises and to pay all taxes and assessments thereon and to keep the premises free from any liens which might become superior to this mortgage.

In any suit to foreclose this mortgage or any suit in

HIBBARD, CALDWELL, CANNING & SCHULTZ
ATTORNEYS AT LAW
P. O. BOX 470 — 710 CENTER STREET
OREGON CITY, OREGON

connection therewith, the Mortgagor agrees to pay such sum of money as reasonable attorneys fees, both on trial and upon appeal as the Court may determine proper, together with the reasonable costs of searching title records and other expenses incurred by Mortgagee in foreclosing this mortgage.

IN WITNESS WHEREOF, the Mortgagor has caused this instrument to be executed pursuant to resolution of its Directors this 31st day of May, 1974 ~~1972~~.

FISHHAWK LAKE RECREATION CLUB, INC.

By Theron D. Hiatt
President

By Vivian U. Ashton
Secretary

STATE OF OREGON)
) ss. May 31st, 1974 ~~1972~~.
County of Multnomah)

Personally appeared Theron D Hiatt, who, being duly sworn did say that he is the President of Fishhawk Lake Recreation Club, Inc. and that the seal affixed to the foregoing instrument is the corporate seal of said corporation and that said mortgage was signed and sealed in behalf of said corporation by authority of its board of Directors; and he acknowledged said instrument to be its voluntary act and deed. Before me:

Donna M Duddel
Notary Public for ORegon
My commission expires: 4/8/77

HIBBARD, CALDWELL, CANNING & SCHULTZ
ATTORNEYS AT LAW
P. O. BOX 470 — 710 CENTER STREET
OREGON CITY, OREGON

SECURITY AGREEMENT IN LIEU OF BOND

THIS AGREEMENT is made between THE ENVIRONMENTAL QUALITY COMMISSION OF THE STATE OF OREGON, herein called "Commission" and FISHHAWK LAKE RECREATION CLUB, INC., a non profit Oregon corporation, herein called "Club".

The parties agree:

1. The Club is the entity acting as the Association of property owners within the plats of Fishhawk Lake Estates, a recreational subdivision situated in Columbia and Clatsop Counties, Oregon. There is no municipal organization or district having jurisdiction over the subdivision for the purpose of operation of a sewage collection and treatment system and therefore the Club has installed a sewage collection and treatment system. Pursuant to ORS 449.400, the Commission required a bond at the commencement of construction in the sum of $25,000.00. The Club has now shown to the satisfaction of the Commission that a bond in the sum of $5,000.00 would be adequate and has requested the substitution of other security in lieu of a bond as authorized by ORS 449.400(2). The Commission has agreed to such substitution. The parties have made this agreement for the purpose of carrying out the agreement reached between them.

2. The Club will execute and deliver to the Commission at the time of execution of this agreement, a document creating a mortgage lien on an unimproved lot within the plat of Fishhawk Lake Estates hereby warranted by the Club to have a current fair market value of at least $5,000.00. The mortgage lien shall recite that it is to secure an obligation of $5,000.00 and may be foreclosed if the Club fails to comply with the requirements of ORS 449.400(3).

3. The Club agrees to deposit not less than $1,000.00 per

HIBBARD, CALDWELL, CANNING & SCHULTZ
ATTORNEYS AT LAW
P. O. BOX 470 — 710 CENTER STREET
OREGON CITY, OREGON

year cash in a savings account commencing with the calendar year 1973. The Club agrees to continue to make such deposits annually and not to make withdrawals therefrom until such time as the account reaches $5,000.00.

4. At the time there is $5,000.00 in such savings account, the Club shall assign or pledge the savings account to the Commission or its successor as security in place of the mortgage lien on the lot as aforesaid. The pledge shall be in such a manner that the Club cannot withdraw any funds which would reduce the account below $5,000.00 without consent of the Commission. The Club shall be entitled to receive the interest.

5. The Commission shall release the present bond held by it.

DATED this 31st day of ~~October, 1972~~ May, 1974.

FISHHAWK LAKE RECREATION CLUB, INC.

By Alison D. Hiatt
President

Attest Vivian H. Ashton
Secretary

THE ENVIRONMENTAL QUALITY COMMISSION

By _____

HIBBARD, CALDWELL, CANNING & SCHULTZ
ATTORNEYS AT LAW
P. O. BOX 470 — 710 CENTER STREET
OREGON CITY, OREGON

BROWN DEVELOPMENT CO. *Realtors and Developers* 1730 S.W. Skyline Blvd., Portland, Ore. 97221, 292-9088
500 South [redacted] Portland, Oregon [redacted] (503) 224-7820

June 3, 1974

Mr. Pat Curran
Dept. of Environmental Quality
1234 SW Morrison
Portland, Oregon 97205

Dear Mr. Curran:

About two years ago I had several phone conversations with you in regard to the sewer maintenance bond situation at Fishhawk Lake. We also exchanged correspondence, on two occasions, in regard to the same matter. In response to your letter of 2/15/74 to the Fishhawk Lake Recreation Club I wrote you a letter on 3/14/72. In that letter I outlined several options which the club could live with in regard to taking over the responsibility for maintaining the sewer system. Upon checking with the Department of Environmental Quality Commissioners, you in return advised me that a combination of two of the options would be acceptable. That combination is as follows:

a. The Recreation Club would execute a mortgage, for a lot owned by them, and with a value of at least $5,000.00, to the D.E.Q.

b. The Club will make annual deposits of $1,000.00,or more, to a savings account. When the account reaches a total of $5,000.00 the Club will assign it to the D.E.Q.. At that point the D.E.Q. would reassign their mortgage on the lot back to the Club.

At the time you advised me of the option which best suited the Commission, I volunteered to have our attorney draw up the legal documents. You indicated that would be preferable since your attorney was busy at the time. Therefore, the documents you will receive have been drafted by our attorney.

We have set up an escrow at Transamerica Title Insurance Co. in Portland for purposes of handling the details. The officer in charge of the escrow is Mike Zimmerman and can be contacted at 222-9931 in case you have any questions. This letter will be forwarded from the Title Co. and should be accompanied by the appropriate documents.

After speaking with you by phone a couple months ago, I am under the impression that this proposal will still be satisfactory to the D.E.Q. If there are any problems, or if you have any questions, please give me a call.

Sincerely,

FISHHAWK LAKE ESTATES, INC.

J. Scott Brown
Vice President

cc: Mr. Ted Hiatt, President
Fishhawk Lake Recreation Club Board of Trustees

JSB:sd

ENVIRONMENTAL QUALITY COMMISSION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5696

MEMORANDUM

To : Environmental Quality Commission

From : Director

Subject : Weyerhaeuser Company, Klamath Falls -- Request for Time Extension

Background

The Environmental Quality Commission, at its June 1972 meeting in Lakeview, adopted the following requirement for Weyerhaeuser Company, Klamath Falls:

> "Weyerhaeuser Company should be required to submit a program by October 1, 1972, for providing such facilities as are necessary to eliminate the use of the Klamath River as a wet feet channel for the mill and cleanup residual debris in the river by not later than October 1, 1974. The company should also be required to immediately improve its present debris control for the interim."

Weyerhaeuser Company did hire a consultant and did submit a report which listed eight schemes for eliminating the bark and debris problems. Because of the geography of the Weyerhaeuser complex in relation to the Klamath River the most desirable of the proposed schemes incorporated the use of a fill in the river adjacent to the mill.

In a letter from Weyerhaeuser dated March 6, 1974, they stated the following:

> "There is no way that we can meet a completion date of October 1, 1974. We are still determined to pursue the direction that we have been following to effect a dry land feed. Before beginning a project, however, it is necessary that we reach agreement and obtain approval from a variety of agencies, all of which are familiar to you. Any support and assistance that you can give us in gaining the necessary approvals will serve to speed up completion date of the total project.

After the necessary approvals are in hand, there will be a lead time of 6 to 9 months for the acquisition of construction materials and approximately 3 months for construction. Preliminary discussions with Game Commission indicate that the time of the year in which fill is made is of importance to them and may be an important factor in determining when construction can proceed."

Because of the controversial nature of a fill in the river and the requirement to obtain a permit from the Division of State Lands, the proposed project has not yet been implemented and progress toward its implementation has been very slow. No definite date for completion of the project can be set at this time. The present state of the economy particularly with respect to the wood products industry has added an additional cloud of doubt.

At the meeting of the Commission in Coos Bay in June 1974, a status report and proposed policy on log handling in Oregon's public waters was presented. The report included a summary of the Weyerhaeuser Klamath Falls problem and proposed that the Department support a limited fill to resolve the problem and that the staff be authorized to establish a new completion deadline contingent upon issuance of a fill permit by the Division of State Lands. The Commission voted to set the matter of a log handling policy over for a future hearing and thus did not act on the matter related to Weyerhaeuser.

The staff is presently revising the proposed log handling policy to clarify the intended meaning and plans to meet with industry representatives within the next 30 days. The hearing will be scheduled as soon as possible after the meeting with industry.

Director's Recommendations

It is recommended that the October 1, 1974 deadline for eliminating Weyerhaeuser logs from the Klamath River be rescinded and that the staff be authorized to renegotiate a time schedule for eliminating the problem which relates to the receipt of necessary approvals from other state agencies.

KESSLER R. CANNON
Director

HLS:ak

September 19, 1974

MINUTES OF THE SIXTY-FIRST MEETING

of the

OREGON ENVIRONMENTAL QUALITY COMMISSION

September 20, 1974

Public notice having been given to the news media, other interested persons and the Commission members as required by law, the sixty-first meeting of the Oregon Environmental Quality Commission was called to order by the Vice Chairman at 9 a.m. on Friday, September 20, 1974, in the Second Floor Auditorium of the Public Service Building, 920 S. W. Sixth Avenue, Portland, Oregon.

Commission members present were Dr. Morris K. Crothers, Vice Chairman, Dr. Grace S. Phinney, Mrs. Jacklyn L. Hallock, and Ronald M. Somers.

The Department was represented by Deputy Director Ronald L. Myles; Assistant Directors Frederick M. Bolton (Enforcement), Wayne Hanson (Air Quality), Harold L. Sawyer (Water Quality), and Kenneth H. Spies (Land Quality); Regional Administrators Verner J. Adkison (Midwest), Richard P. Reiter (Southwest), and E. Jack Weathersbee (Northwest); staff members C. Kent Ashbaker, Thomas R. Bispham, Thomas H. Blankenship, Patrick D. Curran, Robert E. Gilbert, Thomas G. P. Guilbert, Clarence P. Hilbrick, Jr., Raymond M. Johnson, John F. Kowalczyk, Judith A. Moore, David W. O'Guinn, T. Jack Osborne, Barbara J. Seymour, Shirley G. Shay, Fredric A. Skirvin, Richard L. Vogt, Jr., and Chief Counsel Raymond P. Underwood.

Representing EPA Region X, Oregon Operations Office, was Director John J. Vlastelicia.

MINUTES OF THE SEPTEMBER 4, 1974 COMMISSION MEETING

It was MOVED by Mr. Somers, seconded by Dr. Phinney and ordered by unanimous consent to approve the minutes of the sixtieth meeting of the Commission, held in Portland on September 4, 1974.

AUGUST 1974 PROGRAM ACTIVITY REPORT

It was MOVED by Mr. Somers, seconded by Dr. Phinney and ordered by unanimous consent to give confirming approval to staff actions, as reported by Mr. Myles,

regarding the 94 domestic sewage, 9 industrial waste, 67 air quality control, and 10 solid waste management projects:

Water Quality Control - Northwest Region (46)

Date	Location	Project	Action
6-25-74	Salem	Salem Industrial Park Trunk Sewer and Addendum No. 1	Prov. app.
7-10-74	USA (Fanno)	Habitat interceptor sanitary sewer Area A	Prov. app.
7-12-74	Troutdale	Fraley Heights sanitary sewers	Prov. app.
7-12-74	USA (Fanno)	Brookridge interceptor relief sanitary sewer, Phase C, Plan I	Prov. app.
	Salem (Willow)	Dorchester Heights sanitary sewers	Prov. app.
7-16-74	Multnomah County (Inverness)	Central County Sanitary Service District--N.E. 158th north of Sandy Boulevard	Prov. app.
7-17-74	CCSD #1	Oak Acres Mobile Home Park sanitary sewer	Prov. app.
7-18-74	Salem (Willow)	Kanuku Street sanitary sewers	Prov. app.
7-23-74	Salem	Safeway store at N.W. Commercial S.E. and Ratcliff Drive sanitary sewer	Prov. app.
7-24-74	West Linn	Hidden Springs trunk sewer	Prov. app.
7-24-74	St. Helens	Gray Cliffs Park sanitary sewers	Prov. app.
7-24-74	USA (Tigard)	S.W. Murdock Street L.I.D. sanitary sewers	Prov. app.
7-26-74	Portland	S.W. 45th Drive and private property sanitary sewers	Prov. app.
7-26-74	Salem	Khyber Court S.E. sanitary sewer	Prov. app.
7-29-74	Lake Oswego	Country Club Park area sanitary sewer improvement L.I.D. 160	Prov. app.
7-29-74	Jefferson	Hazel Street sanitary sewer	Prov. app.
7-29-74	Hillsboro (Westside)	Buena Vista #2 sanitary sewer	Prov. app.
7-29-74	USA (Sunset)	Torreyview sewers N.W. Oak St. sewer revision	Prov. app.
7-29-74	Milwaukie	Milwaukie sanitary sewer laterals, schedule II	Prov. app.
7-29-74	Lake Oswego	Firewood Road sanitary sewer extension, W.O. 4892	Prov. app.
7-31-74	Newberg	Adec Technical Park sanitary sewer extension	Prov. app.
7-31-74	Portland S.W. (Tryon)	sanitary sewers in S.W. Tara Court west of S.W. 56th Avenue	Prov. app.
8-1-74	Tualatin	sanitary sewers west of 65th Avenue from station 0 + 00 to station 8 + 19	Prov. app.
8-1-74	Gladstone	preliminary interceptor sewer to eliminate a pump station on Doncaster Drive	Prov. app.
8-2-74	E. Salem Sewage & Drainage District #1 (Willow)	Wagon Road Village subdivision sanitary sewers	Prov. app.

Water Quality Control - Northwest Region (cont)

Date	Location	Project	Action
8-5-74	Gresham	Hood Northwest L.I.D. sanitary sewers	Prov. app.
8-5-74	West Linn (Bolton)	sanitary sewer extension near Hood Street & Burns Street	Prov. app.
8-6-74	Salem (Willow)	Kashmir Heights subdivision sanitary sewers	Prov. app.
8-8-74	Salem (Willow)	Salem Industrial Park trunk sewer and Addenda No. 2 and 3	Prov. app.
8-9-74	Portland S.W. (Tryon)	sanitary sewer system serving S.W. 55th Drive, S.W. 57th Avenue and private property, "Greentrees"	Prov. app.
8-9-74	Gresham	Brigadoon subdivision sanitary sewers	Prov. app.
8-9-74	Lake Oswego	Holly Acres Addition sanitary sewers	Prov. app.
8-13-74	Tualatin	L.I.D. No. 2 sanitary sewer	Prov. app.
8-15-74	Independence	Hill Park No. 4 sanitary sewer	Prov. app.
8-15-74	Tualatin	revised sanitary sewer near 65th Avenue	Prov. app.
8-16-74	CCSD #1	Milwaukie Industry Center sanitary sewer	Prov. app.
8-16-74	E. Salem Sewage & Drainage Dist.	Edith Bible sanitary sewer extension	Prov. app.
8-19-74	West Linn	Glen Glenn sanitary sewers	Prov. app.
8-19-74	Tualatin	Indian Woods sanitary sewers	Prov. app.
8-19-74	Tualatin	Arapaho Ridge sanitary sewers	Prov. app.
8-19-74	Tualatin	105th Street sanitary sewers	Prov. app.
8-20-74	Gresham	Honeywood subdivision sanitary sewers	Prov. app.
8-22-74	Troutdale	Stoll's Folly sanitary sewers	Prov. app.
8-26-74	Lake Oswego (Tryon)	Mountain Park Phase 5-B sanitary sewers	Prov. app.
	Oak Lodge S.D.	Oak Lodge Sanitary District Inflow/Infiltration Study	Approved
	Sandy	Sandy Inflow/Infiltration Study	Approved

Water Quality Control - Water Quality Division (48)

Date	Location	Project	Action
8-1-74	Klamath County	Round Lake Estates - effluent Cl_2 revision	Prov. app.
8-5-74	Warrenton	Addendum No. 2 - East Warrenton interceptor	Approved
8-5-74	Albany	sanitary sewer projects--SS-74-5, 74-9A, 74-11, East Gate subdiv.	Prov. app.
8-5-74	Lebanon	12th Street sewer	Prov. app.
8-5-74	Fairview	Halsey Street sewer	Prov. app.
8-5-74	Canyonville	Byron Street and Olson subdivision sewers	Prov. app.
8-5-74	Clackamas Co. S.D. #1	C.O. No. 4 - STP contract	Approved

Water Quality Control - Water Quality Division (cont.)

Date	Location	Project	Action
8-5-74	N. Roseburg S.D.	Hewitt Hts. subdivision and Brentwood Manor First Addition sewers	Prov. app.
8-6-74	Seneca	C.O. #1 - Schedule L, STP project	Approved
8-6-74	USA (Forest Grove)	C.O. #1, STP expansion	Approved
8-6-74	Lebanon	Grant Street, Maple Street, Vine Street sewers	Prov. app.
8-7-74	Ashland	Madison subdivision sewers	Prov. app.
8-7-74	Springfield	First Addition to Industrial Park sewers	Prov. app.
8-9-74	Eugene	Five projects	Prov. app.
8-12-74	BCVSA	South Medford interceptor	Prov. app.
8-13-74	Roseburg	Crestview Avenue sewer	Prov. app.
8-13-74	BCVSA	Harry and David camp. sewer	Prov. app.
8-13-74	Medford	Sun Park Terrace subdivision sewers	Prov. app.
8-13-74	N. Roseburg S.D.	Kline Street sewer	Prov. app.
8-19-74	Springfield	N. sanitary sewer - S.P. Ind. Park	Prov. app.
8-19-74	BCVSA	West Dale Street sewer	Prov. app.
8-19-74	Sunriver	Sunriver Sky Park sewers and pump stations	Prov. app.
8-20-74	Milwaukie	C.O. #2 - Milwaukie interceptor - Schedule I	Approved
8-20-74	Port Orford	15th St. sanitary sewer extension	Prov. app.
8-20-74	Bandon	Allegheny and Oregon Streets sewer extensions	Prov. app.
8-20-74	BCVSA	West Main - McAndrews Road Sweet Road sewers	Prov. app.
8-20-74	N. Umpqua S.D.	Main A - sewer extension	Prov. app.
8-21-74	Glendale	2nd Street sewer	Prov. app.
8-21-74	Junction City	West Side collector sewer	Prov. app.
8-29-74	Rufus	sewage collection and treatment lagoons (revised plans)	Prov. app.
8-30-74	Rogue River	Woodville subdivision, Units 1, 2, 3 and 4 sewers	Prov. app.
8-30-74	Eugene	1st Avenue sewer	Prov. app.
8-30-74	Springfield	N. 54th Street and Ilex Plat, 2nd Addition sewers	Prov. app.
8-30-74	Albany	Meadowview Addition and College Park P.U.D. sewer	Prov. app.
8-30-74	BCVSA	15th Street and "G" Avenue - White City sewers	Prov. app.

Water Quality Control - Industrial Projects - Northwest Region (14)

Date	Location	Project	Action
7-12-74	Multnomah County	Stauffer Chemical Co. Tax Credit T-552, "Lined Pond with Pump"	Pending
7-16-74	Polk County	Willamette Industries log pond modifications	Approved

Water Quality Control - Industrial Projects (cont.)

Date	Location	Project	Action
7-17-74	Marion County	Boise Cascade - Salem digester 8 and counter current washers	Approved
8-1-74	Tillamook County	Joe Donaldson holding tank for animal waste disposal system	Approved
8-5-74	Tillamook County	Glen Metcalfe holding tank for animal waste disposal system	Approved
8-5-74	Tillamook County	Harvey Wyss holding tank for animal waste disposal system	Approved
8-5-74	Tillamook County	Ray Measur holding tank for animal waste disposal system	Approved
8-5-74	Tillamook County	Ron Zuercher holding tank for animal waste disposal system	Approved
8-5-74	Marion County	Stayton Canning Company Tax Credit T-566, "Spray Irrigation System"	Pending
8-5-74	Marion County	Stayton Canning Company Tax Credit T-567, "Wastewater Screening System"	Pending
8-8-74	Multnomah County	Birden & Son study for recirculating cooling water	Pending
8- -74	Columbia County	Kaiser Gypsum preliminary study of sanitary sewer pressure line	Approved
8- -74	Multnomah County	Zidell, Inc. oil-water separator	Pending
8- -74	Yamhill County	Millers Wholesale Meat Lagoon System	Approved

Air Quality Control - Northwest Region (45)

Date	Location	Project	Action
11-9-73	Clatsop County	AMAX Aluminum new aluminum reduction plant	Awaiting EIS
11-21-73	Multnomah County	Union Carbide #1 furnace product change	Processing
7-16-74	Clackamas County	Globe-Union lead remelt furnace	Processing
7-17-74	Marion County	Boise Cascade - Salem new digester	Processing
7-17-64	Marion County	Boise Cascade - Salem new washers	Processing
7-18-74	Clatsop County	Crown Zellerbach (Wauna) scrubber for lime kiln	Processing

Air Quality Control - Northwest Region (cont.)

Date	Location	Project	Action
8-18-74	Multnomah County	Oregon Steel Mills (Rivergate) pellet metallizing	Processing
7-18-74	Yamhill County	Publishers Paper - Newberg new hog fuel boiler	Processing
7-24-74	Multnomah County	Oregon Steel Mills front baghouse with canopy	Processing
7-24-74	Multnomah County	City of Portland paint spray booth	Approved
7-24-74	Multnomah County	Firestone Retread smoke control for tire buffing	Approved
7-31-74	Clackamas County	Barton Sand and Gravel rock crusher	Processing
7-31-74	Multnomah County	Cook Industries grain terminal	Issued Proposed Permit
8-1-74	Multnomah County	Oregon Steel (Front Avenue) ladle fume exhaust	Processing
8-5-74	Multnomah County	C. H. Stinson, Inc. portable asphalt paving plant	Processing
8-8-74	Multnomah County	Teeples & Thatcher, Inc. sawdust cyclones	Awaiting detailed plans
8-15-74	Washington County	Western Foundry scrubber to control cupola emissions	Processing
8-19-74	Multnomah County	J. Arlie Bryant, Inc. portable rock crusher	Processing
8-19-74	Multnomah County	Portland State University new boiler	Processing
8-22-74	Multnomah County	Golden Triangle Specialist paint spray booth	Approved

Air Quality Control - Air Quality Division (22)

Date	Location	Project	Action
8-5-74	Lincoln County	Georgia Pacific Corp., Toledo No. 2 electrostatic precipitator rebuilt	Approved
8-5-74	Lincoln County	Georgia Pacific Corp., Toledo package boiler installation	Approved
8-6-74	Douglas County	Sunrise Enterprises wood workshop	Approved
8-8-74	Linn County	Western Kraft Corp., Albany installation of a hog fuel boiler	Approved
8-8-74	Clackamas County	Clackamas Town Center 6,000 to 6,500-space parking facility	Add. info. req.
8-8-74	Multnomah County	Mt. Hood Mall 6,328-space parking facility	Add. info. req.
8-8-74	Washington County	Safegard Mini-Storage 107-space parking facility	Cond. app.

Air Quality Control - Air Quality Division (cont.)

Date	Location	Project	Action
8-8-74	Multnomah County	Rustler Steak House restaurant using existing parking	Cond. app.
8-8-74	Clackamas County	Dwyer Memorial Hospital, Milwaukie 56-space parking facility expansion	Cond. app.
8-8-74	Clackamas County	The Dutch Trader, Gladstone 59-space parking facility	Cond. app.
8-9-74	Jackson County	Medford Corporation modification to 2 boilers	Approved
8-9-74	Multnomah County	Precision Castparts 160-space replacement parking	Cond. app.
8-9-74	Multnomah County	Portland Steel Mills 165-space parking facility	Cond. app.
8-16-74	Klamath County	Jeld Wen hog fuel boiler installation	Approved
8-19-74	Klamath County	Jeld Wen baghouse filter and cyclones installation	Approved
8-19-74	Multnomah County	Owens Corning Fiberglas 200-space parking facility	Add. info. req.
8-20-74	Multnomah County	Jantzen Beach, Inc. 727-space parking expansion	Cond. app.
8-20-74	Washington County	Equitable Savings 87-space parking facility	Cond. app.
8-20-74	Multnomah County	Port of Portland 1,445-space interim parking facility, Portland International Airport	Cond. app.
8-21-74	Washington County	Five Oaks Intermediate School 182-space parking facility	Cond. app.
8-28-74	Klamath County	Weyerhaeuser Company oil-fired boiler installation	Cond. app.
8-29-74	Multnomah County	Pacific Northwest Bell Co. Cherry Coin and Service Center, 44-space parking facility	Cond. app.

Land Quality - Solid Waste Management Division (10)

Date	Location	Project	Action
8-2-74	Coos County	Joe Ney Disposal Site existing domestic site operational plan	Prov. app.
8-5-74	Klamath County	Keno Landfill existing domestic site closure plan	Approved
8-5-74	Klamath County	Keno Transfer Station new domestic site construction and operational plans	Approved
8-7-74	Marion County	Conestoga Manufacturing new industrial site (letter authorization)	Denied

Land Quality - Solid Waste Management Division (cont.)

Date	Location	Project	Action
8-8-74	Washington County	Beaverton Seventh-Day Adventist Church unauthorized domestic site closure plan	Prov. app.
8-9-74	Jefferson County	Culver Landfill new domestic site construction and operational plans	Prov. app.
8-12-74	Klamath County	Six Bit Prairie Sludge Lagoon new domestic site construction and operational plans	Prov. app.
8-20-74	Lane County	Swisshome Landfill existing domestic site closure plan	Approved
8-20-74	Lane County	Swisshome Landfill new domestic site construction and operational plans	Approved
8-29-74	Lane County	Oakridge Landfill existing domestic site construction and operational plans	Prov. app.

TAX CREDIT APPLICATIONS

Because the tax credit applications had not been received by the Commission in time to be studied adequately, Mr. Somers MOVED that action on the applications be deferred until the next regular meeting; motion seconded by Dr. Phinney and carried.

OREGON CUP NOMINATION--DR. DAVID CHARLTON

Mrs. Seymour summarized the Screening Committee's nomination of Dr. David Charlton for an individual CUP Award. It was MOVED by Mr. Somers, seconded by Mrs. Hallock, and "ordered by enthusiastic unanimous consent" to approve the nomination.

Dr. Charlton was present and acknowledged the nomination. He showed the Commissioners an original copy of the initiative petition creating the State Sanitary Authority in 1937. Mrs. Seymour noted that Dr. Charlton was active in securing passage of the petition. The Commissioners asked that the petition be copied and sent to them.

OREGON CUP RENEWALS

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to approve

the Director's recommendation that renewal of Publishers Paper Company's Oregon CUP Award be granted for the calendar year 1975. Mrs. Seymour commented that since the Screening Committee had met to consider Publishers renewal, the company announced construction of a deinking plant so it could make better use of recycling techniques.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to approve the Director's recommendation that renewal of American Can Company's Oregon CUP Award be granted for the calendar year 1975.

GLENMORRIE COMMUNITY SEWAGE DISPOSAL, CLACKAMAS COUNTY

Prior to presenting the staff memorandum report, Mr. Gilbert summarized the mandatory annexation procedure covered by ORS 222.850 through 222.915. He then read the staff report and the Director's recommendation that the Commission approve the proposed preliminary plans and specifications and the time schedule for installing sewers in the proposed Glenmorrie annexation area submitted by the City of Lake Oswego under date of April 3, 1974, and certify said approval to the Oregon State Health Division.

Public testimony followed and is summarized below:

Mr. James R. Moore, an attorney in Portland, stated that he represented a Mr. Waterbury who with his neighbors lives on Stonebridge Way in the Glenmorrie area. Mr. Moore said this is an area of approximately 10 lots with the best soil conditions and can adequately support septic tanks; it is also an area least proximate to the City of Lake Oswego. He asked that this area and perhaps others with similar soil conditions be deleted from the annexation proposal.

Mr. William A. Headlee, resident on Glenmorrie Terrace, said he was one of the original petitioners and was in agreement with the staff report recommendations. He stated that conditions of failure are more prevalent than reported in the spot checks conducted by the Department, and that the cost of sewers for oversize lots should not be a consideration in the solution of the health hazard problem. He said that unfortunately when sewer systems are put in, city boundaries that are not in continuity cannot be changed. The exclusion of parcels has caused one of the biggest problems in the continued development of both sewer systems and public services.

Mr. Warren Oliver, Chairman of the Glenmorrie Fire District, stated that he was one of the original petitioners supporting annexation, and that the petition outlined the area of the fire district which contains 130 homes.

Mrs. Jane Erickson of Glenmorrie Drive, said she would like to have sewers but commented that the problems with older homes are considerable, that many basements go 13 to 15 feet below the level the sewer laterals would have to be placed.

Senator Ralph Groener had telephoned a message concerning the cost of the proposed sewers which he asked to be relayed to the Commission by Mrs. Seymour. Senator Groener told Mrs. Seymour that 40 percent of the area are senior citizens on fixed incomes, and according to his information, costs would be exorbitant for them. He felt that the Legislature should provide financial assistance to areas where sewer costs are unusual and said he expected to introduce a bill to that effect.

Mr. John P. Dellett, 2247 South Glenmorrie Lane, discussed the environmental assessment made by the City of Lake Oswego, which showed much higher costs both for the project and for individual lot owners than those costs reported in the City's letter of August 1, 1974 attached to the staff report. His position was that sewers do not need to be built and that the septic tanks can be repaired. When asked by Dr. Crothers what evidence he had for making that statement, Mr. Dellett replied that he did not yet have the evidence since engineering studies to determine that have not been contracted for.

Mr. Richard P. Waterman, 1515 South Cherry Lane, Lake Oswego, stated that he believed a health hazard existed in the area and favored sewers. Although he would prefer having sewers to solve the health problem without annexation, he realized that was both impossible and impractical.

There were no further witnesses.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and unanimously carried to approve the Director's recommendation.

PUBLIC INFORMATION HEARING ON AMAX

The public information hearing on AMAX Aluminum Company, scheduled for October 18, 1974 in Astoria, though not an item appearing on the agenda for this meeting, was discussed by Mr. Somers in view of the conflict of interest

allegations made in the newspapers and on television. He felt it would be reasonable for the Commission to direct the Department to not have a public hearing until such time as the AMAX Company has disclosed satisfactorily to the Department all persons on their behalf or agencies who are in their service and who may be appearing or participating in the formation of their permit. He MOVED that the Commission adopt the following resolution:

> "WHEREAS the Environmental Quality Commission insist upon knowing the identity of every person representing AMAX in seeking the issuance of a Department of Environmental Quality permit for the construction and operation of an aluminum plant at Warrenton,
>
> "THEREFORE BE IT RESOLVED that the Commission direct the Director of the Department to not issue any permit for the construction or operation of a plant at Warrenton, until full disclosure satisfactory to the Commission is made by the AMAX Company, and each representative of AMAX seeking or causing to be sought the issuance of a permit be fully disclosed before a further hearing is held on this matter."

Dr. Phinney asked how the hearing scheduled for October 18th would be affected by adopting the resolution. Mr. Somers said if the disclosures were made in time the hearing could be held; otherwise it would not be.

Mrs. Hallock seconded the motion which carried unanimously.

PROPOSED INTERIM POLICY FOR APPROVING NEW OR EXPANDED AIR EMISSION SOURCES IN THE PORTLAND METRO AREA

Mr. Kowalczyk first displayed charts updating Figure 3 of the staff report:

Chart 1--Particulate Matter: Portland Air Quality Maintenance Area Emissions in Relation to Air Quality Standards: By 1975, the target date for the completion of the Clean Air Implementation Plan, the Department's assessment indicated that the annual standard would barely be met and the daily standard would not be met. After 1975, the Department's Air Quality Maintenance Study, which projected average growth to occur between 1975 and 1985, projected emissions which would steadily increase and which possibly would violate the annual standard by 1977.

Chart 2--Sulfur Dioxide: Portland Air Quality Maintenance Area Emissions in Relation to Air Quality Standards. The Air Quality Maintenance Study indicated that in 1970, 33,000 tons of sulfur dioxide were emitted per year. The State's Implementation Plan projected that by July 1975, these emissions would be reduced and the maximum daily and maximum annual standards would be in compliance. With projected average growth occurring to 1985, standards possibly would be exceeded by 1983.

Mr. Kowalczyk said that two factors have recently altered the projections on both charts. First is that natural gas to industrial users will be further curtailed in years ahead (projected from 120 days' curtailment per year in 1973 to approximately 200 by 1975), and the resulting energy deficiency would be made up by the use of residual fuel oil which would increase the sulfur dioxide emissions projected. He said that 32 million more gallons of oil per year would be needed to make up for the deficiency in natural gas, thus increasing SO_2 emissions to 36,000 tons per year. The SO_2 standards could be exceeded by as early as 1977. Both charts were based on existing Department regulations and included emission reductions anticipated by completion of Implementation Plan control strategies.

The conclusions and recommendations contained in the staff report followed:

Conclusions

1. The Department's report on designation of air quality maintenance areas, submitted to the EQC on March 18, 1974, concludes that the Oregon State Clean Air Act Implementation Plan (I.P.) adopted by the EQC on January 24, 1974, which contained control strategies designed to meet national ambient air standards by 1975, will not be fully successful in meeting and maintaining State and Federal air quality standards.

2. The most critical problem identified in the Air Quality Maintenance Area Report is that suspended particulate air quality in an area along the Willamette River stretching from Northwest Portland through the Downtown core area, will barely achieve the annual standard and will continue to exceed the maximum day standard in 1975 when I.P. control strategies are scheduled to be completed. Based on average industrial growth, particulate air quality is projected to steadily worsen with the annual standard again being exceeded by 1977. Annual and maximum daily sulfur dioxide ambient air standards are now being met but projections indicate that these standards will be exceeded prior to 1985, also based on the assumption that average growth will occur.

3. A revised control strategy to obtain and maintain national ambient air standards within the Air Quality Standards Maintenance Area for the ensuing ten-year period is scheduled to be developed and submitted to the Environmental Protection Agency by July, 1975. The Department is currently undertaking in-depth air quality studies which are designed to provide the information needed to guide the Department in making the necessary revisions to the Oregon Clean Air Implementation Plan.

4. The Department's Northwest Region is presently faced with evaluating proposals for a substantially greater than average number of medium to large new air contaminant sources which are proposed to be located immediately northwest of the Portland core area. This location is the most adverse from an air quality impact standpoint on the critical Willamette River corridor area. The collective air emissions from presently proposed facilities would represent more than a 30% increase in industrial process particulate emissions in Multnomah County and would exceed the projected annual industrial growth rate (of about 1 1/2% per year) for the area by a factor of ten.

5. Approval of all presently proposed facilities could hinder or even prevent attainment and maintenance of National Air Quality Standards. This is in spite of the fact that each individual facility would be required to apply highest and best practicable treatment and control and, individually, each facility might have small impact on area air quality.

6. The Department is legally committed to act on proposed permit applications for air contaminant sources once all information requested is submitted. It is apparent that the Department will have to take action on many of the proposed new air contaminant sources prior to completion of the in-depth air quality study and prior to development and adoption of a ten-year air quality maintenance plan.

7. An interim policy for processing new air contaminant source applications in the Portland Metropolitan Area is urgently needed to:

   A. Provide the Department with means of assuring that development of an effective air quality maintenance plan is not thwarted.

   B. Provide guidelines for processing presently pending permit applications in a timely manner.

   C. Provide present and future permit applicants with air quality criteria so that economic feasibility of projects can be properly assessed.

   D. Provide the most populous portion of the State of Oregon with protection against excessive and possibly irreversible air quality degradation.

8. The development of a long-range policy for approval of new air contaminant sources in the Portland Metropolitan Area which will assure attainment and maintenance of air quality standards on a technically sound basis can only be accomplished with completion of the in-depth work the Department is now undertaking for development of a ten-year air quality maintenance plan. The plan will take a minimum of 9 months to complete. The best available information upon which to base an interim policy at this time appears to be

data developed in the Department's Report on Designation of Air Quality Maintenance Areas, since this analysis utilized latest available air quality and emission data and followed procedures prescribed by EPA.

9. Recognizing that the report on air quality maintenance areas projects that at least the maximum day particulate standard will not be met in 1975; that other standards will be exceeded in future years unless successful counter strategies can be developed and implemented; that it is impracticable for the Department to precisely regulate about 40% of the projected increases in emissions, such as those occurring from increased population densities and population related emissions from transportation sources, heating systems and commercial support activities; that standards to protect health are not in danger of being exceeded; it is concluded that the most reasonable interim policy that can be considered for the Portland Metro Area in light of commitments in the Oregon State Clean Air Act Implementation Plan would include the following:

   A. Allow utilization of calculated air shed capacity but not allow ambient air standards to be exceeded where present projections indicate they will be met after completion of presently proposed implementation plan control strategies.

   B. In cases where maximum day standards are projected to be exceeded even after completion of present implementation plan control strategies and in consideration of minimizing degradation of air quality, emission increases should be allowed only in the amount projected in the air quality maintenance area report as average growth over the next two years. The two-year period is considered reasonable since many, if not all, of the facilities that will be considered under the interim policy could be operational within the ensuing two-year period or shortly thereafter.

   C. As a guideline, not allow any one facility to use more than one-quarter of the total allowable emission increase for the Portland Metropolitan Area.

   (Such policy would translate by use of diffusion model analysis to an allowable increase over the next two-year period of approximately 400 tons per year of particulate emissions if all of the allowable development were to occur in the Rivergate/Northwest Portland area and consist of hot gaseous type emissions having a stack height of approximately 100 feet. Maximum allowable increases in particulate and SO_2 emission rates in the Portland Metropolitan AQMA, based on a two-year average growth rate, would amount to 430 tons per year and 1430 tons per year respectively.)

10. Additional industrial growth and development in the Portland Metro Area beyond the interim period would be dependent upon results of the studies presently being undertaken, further reductions in existing point-source emissions by continued application of new technologies, and new control strategies that might be developed and implemented (such as an areawide, mandatory clean fuels use policy).

11. Development of the 10-year Air Quality Maintenance Plan will have to place considerable emphasis on exploring alternative control strategies to achieve and maintain the maximum daily particulate standard as well as providing adequate allowance for future area growth.

Director's Recommendation

In light of the urgent need for an interim policy to provide guidelines for site location, design, review and approval of new and expanded air contaminant sources in the Portland Metropolitan area in a manner which will protect against irreversible environmental damage, insure that air quality standards can be achieved and maintained, and prevent total disruption to the orderly growth and development of the area, it is the Director's recommendation that the Environmental Quality Commission adopt an interim policy, to remain in effect until July 1, 1975, at which time the ten-year air quality maintenance plan is scheduled to be adopted and become effective, as follows:

1. Increases in particulate and SO_2 air contaminant emissions from controllable new or expanded point sources within the Portland Air Quality Maintenance Area shall be allowed only to the extent (as indicated in the Department's March 1974 report on Designation of Air Quality Maintenance Areas) that air quality standards will not be exceeded after completion of Implementation Plan strategies.

2. Increases in particulate and sulfur dioxide air contaminant emissions from new or expanded controllable sources in the Portland Metropolitan Area Air Quality Maintenance Area shall be allowed up to the amount of two years' projected "average" controllable growth as defined in the designation of air quality maintenance area report.

3. Define controllable growth as commercial and industrial fuel combustion, process loss sources, solid waste incineration, wigwam waste burners and power plants.

4. As a guideline, not allocate any one new or expanded source more than 25% of the overall increase in air contaminant emissions allowable under the interim policy.

5. Specific allocations shall be made by the Commission in acting upon individual permit applications.

6. Small air contaminant sources emitting less than ten tons per year of any one contaminant shall be exempted from this policy.

Since increases in air contaminant emissions in the State of Washington portion of the Portland Air Quality Maintenance Area can have significant effects on achieving the objectives of this interim policy and, further, considering the numerous applicants for new air contaminant source discharge permits already on file with the Department, some of which have indicated having alternative sites in the State of Washington, it is the Director's further recommendation that the Environmental Quality Commission authorize the Director to actively seek the cooperation and assistance of the Southwest Washington Air Pollution Control Authority and State of Washington Department of Ecology in equitably administering this policy.

The Vice Chairman called for public testimony on the proposed policy. A summary is given below:

Mr. Edward G. Westerdahl II, Executive Director of the Port of Portland, stated that he would speak to the broader issues of the policy being considered by the Commission, and that the Port's Environmental Coordinator, Mr. Walter Hitchcock, would comment on the technical aspects.

Mr. Westerdahl said that it was his opinion that a state agency has in addition to its narrowly defined (statutory) responsibilities, a responsibility to interpret the public good. He said the Port has two primary concerns: (1) the way in which a government agency deals with customers, and (2) technical problems the Port sees in the proposals presented to the Commission. He then called on Mr. Hitchcock.

Mr. Hitchcock first commented on the data in the staff report. He questioned the data base upon which the staff reported 1376 tons per year of particulate matter were emitted from the 10 listed North Portland industries. He said it should be 595 tons and that there were mitigating factors that would make this less. He said the only SO_2 problem is in Willbridge, where 60 percent of the SO_2 sources are located. He said that there are feasible alternatives which should have been evaluated.

Another basic question raised by the proposal is, "Why did it take a federal requirement for the designation of air quality maintenance areas before the success of the Clean Air Implementation Plan was assessed?" He then commented on the 10-year maintenance plan study, stating that it has certain data limitations in the areas of sample analysis and meteorological factors. "It is imperative that this study be expanded in scope so we can proceed into the future on a solid data base and accurate projection techniques."

Mr. Westerdahl said that while the Port supported the concept and the guidelines on an interim basis, they still maintained that the data the Department is receiving for determining emission levels are inconsistent. He said a major problem has been changing requirements, that is, the DEQ has had three different directors and different Commissions, and the Port's principal concern is with after-the-fact changes made by the Department which are unreasonable. Discussions have always begun early between industry and the DEQ, but over a

period of time requirements were changed and "standards are imposed that haven't been met anywhere in the world and cannot be met."

Mr. Westerdahl also discussed the need for the economic growth of the Portland metropolitan area. He said new industries such as Cook, the pulp mill at Halsey, Columbia Independent Refinery, and Owens Corning Fiberglas will put pressure on existing industries to become more efficient.

Mr. Westerdahl suggested that the policy presented to the Commission "is injurious to Oregon," that many of the problems faced by the Commission in this regard are due to a lack of information: "Nobody has an adequate data base." He supported the undertaking of a study by the Department but suggested that the money available be used as a first-phase and much more sophisticated study, that a full study should cost in the neighborhood of $250,000 to $300,000, and that the Port would enlist help in persuading the Legislative Assembly to appropriate the needed money. He asked that the Commission adopt standards and stay with them, and take into account broad economic and community needs--the trade-offs--that must be considered in approving specific industries. He concluded by stating that an interim plan makes sense. "Expand the study and get the type of information so we all can have a good data base."

Dr. Cfothers asked how many industries were presently looking at Rivergate and how they could all be accommodated there within the Clean Air Act limitations. Mr. Westerdahl replied that Columbia Independent Refinery, Cook Industries, Owens Corning Fiberglas and another grain elevator comparable to that proposed by Cook had applied for Rivergate, and that he believed these industries could be accommodated at that location without injuring the conditions of the air shed. He added that Columbia Independent Refinery was the only one with heavy sulfur emissions.

Mr. Somers asked Mr. Westerdahl what he suggested as a resolution of the problem. Mr. Westerdahl replied that each industry listed in the Department's staff report could be brought into the area without injuring the air shed by working with existing industries and by considering trade-offs. He said, "The newest, the cleanest, and the best put pressure on older industries to improve." He offered the assistance of his staff to spend time with the DEQ staff to look at alternatives.

OREGON PORTLAND CEMENT--PUBLIC INFORMATIONAL HEARING

Because the time of the hearing on Oregon Portland Cement had been set for 10:30 a.m. and the Vice Chairman had previously announced he would allow only a 30-minute discussion of the previous agenda item until after that hearing, the Vice Chairman announced that the public informational hearing on Oregon Portland Cement would begin.

Mr. Somers asked that the reading of the staff report be waived except for the conclusion, which was read by Mr. Kowalczyk:

Conclusion

It is the conclusion of the staff that the following conditions contained in the attached proposed permit are necessary to satisfactorily improve air quality by further reducing plant emissions, insuring highest and best practicable treatment is being applied to all processes, and provide conclusive data as to ambient air impact from various phases of the cement manufacturing process for use in developing other control strategies, if needed. The most significant permit conditions require:

1. Adherence to kiln emission limits that represent highest and best practicable treatment, Section A, Conditions 1, 2 and 3 of the permit.

2. Upgrading of kilns #2 and #3 air pollution control system to attain a degree of collection efficiency demonstrated by the kiln #4 operation, Section A, Conditions 3b and 6c of the permit.

3. A program to insure continuous efforts to minimize fugitive dust emissions, Section A, Condition 12, and Section B, Condition 6 of the permit.

4. Monitoring of major source control equipment performance in order to quickly diagnose operational problems, Section A, Condition 18; and Section B, Condition 8 of the permit.

5. An extensive study of the nature of ambient air particulate in order to assist in determining further emission control measures to eliminate further emission control measures to eliminate continuing ambient air standard violations, Section A, Condition 17 and Appendix I.

It should be pointed out that the Department staff and Oregon Portland Cement have not reached agreement on items 2 and 5 above, which would require considerable capital expenditure. However, the staff believes these conditions to be necessary if long-standing air quality problems in the Lake Oswego community are to be eliminated or reduced to the greatest extent possible.

Mr. Kowalczyk said the staff had met with the company the week of this meeting and two issues in the permit had been resolved:

On page 2 of the proposed permit, Section A(3)(b): "After July 1, [1976] 1975, 0.35 pounds per ton of feed to the kiln or 11 pounds per hour."

On page 1 of Appendix I, Section 3, the following paragraph should be inserted at the beginning of the section:

"The particulate characterization program requirements outlined below are intended to provide minimum study guidelines which the Department feels are necessary to assure that program objectives are realized. In order that this program may be accomplished at minimum expense to Oregon Portland Cement, a quarterly progress report as prepared by OPC's consultant shall be submitted to the Department for review and discussion. If in the judgment of the Department it is apparent that the program objectives will be met during early phases of the study, changes in the program guidelines may be made to delete later portions of the study."

Public testimony followed and is summarized below:

Mr. Erik Voldbaek, First Vice President of Oregon Portland Cement, distributed copies of a prepared statement which he asked be made a part of the permanent record. His testimony focused on two of the permit conditions with which his company has not agreed--the upgrading of Kilns #2 and 3 control system by 1975 to the same efficiency as Kiln #4, and the proposed ambient air monitoring program as shown in Appendix I of the proposed permit.

Mr. Eugene Popma, 100 Leonard Street, Lake Oswego, representing 10 owners of a condominium complex located about three blocks from the cement plant, said he and the other owners backed the staff report and urged its implementation. He said, "We have unbearable air quality living standards," referring to the particulates, dust, noise and odor from the plant.

Mr. Larry Williams, Executive Director of the Oregon Environmental Council, Portland, had asked to testify but was not present when called.

Mr. Joseph Cahan, owner of Friendly Chevrolet and a homeowner in Lake Oswego, presented for inspection by the Commissioners two anodized aluminum strips from 1974 cars etched beyond repair by cement dust. (Mr. Somers indicated they would be called Exhibit A and made a part of the permanent record.)

Mrs. Heidi McLean, a Lake Oswego resident, said she could substantiate Mr. Cahan's testimony concerning dust and noise.

Mr. Steve J. Gimarelli of Dee Thomason Ford in Lake Oswego, said that some of the Oregon Portland Cement employees had tried without success to remove the pitting on the aluminum strips on their cars. He said his firm was obliged to clean their cars with vinegar.

Mr. Bob McGinnes, a Lake Oswego resident on the corner of Church and Durham Streets, had objections similar to those previously presented. He said that most of the dust goes into Old Town, somewhere on Durham Street. He suggested using a razor blade to remove the dust from car windshields.

There were no further witnesses and the Vice Chairman recessed the meeting for lunch.

At 1:15 the meeting was reconvened and the Vice Chairman stated that no action on the Oregon Portland Cement agenda item was required. He added that the Commission expected the Department staff to proceed to draft the conditions of a permit which would produce a great improvement in the area.

PROPOSED INTERIM POLICY (continued)

Mr. Carl N. Petterson, representing Northwest Natural Gas Company, spoke in favor of the proposed oil refinery at Rivergate, which possibly could increase Northwest's year-round supply of gas by 15 percent because enough petroleum naphtha could be produced by an oil refinery to assure Northwest a consistent supply of synthetic natural gas (SNG) plant feed stock. "The prospect of an additional 50 million cubic feet per day of natural gas offers to both energy consumers and the administering DEQ and EQC a significant trade-off in local air emissions as various grades of oil are supplanted by cleaner burning natural gas." He added that the SO_2 content of liquid gas is the same as for natural gas.

Mr. David N. Hobson, attorney for Portland General Electric Company (PGE), said the figures pertaining to PGE were apparently incorrect. He asked for adequate time for persons in opposition to submit information to the Commission before the Commission adopted the report. He referred specifically to the staff placement of PGE in Table 4 (proposed new industries and other significant sources which may locate near Portland), stating that Harborton should have been placed under Table 5 (industries presently in existence). He also said that the report missed "a most important philosophical point"...determining the priorities of what Portland needs.

Mr. Kowalczyk said that Harborton was placed in Table 4 because the Department's permit requires the facility to be relocated by September 1975.

Mr. Roger Ulveling, Planning Coordinator for Columbia Independent Refinery, a subsidiary of Pacific Resources of Honolulu, submitted copies of prepared testimony. He also questioned some data in the staff report; summarized the history of CIRI's application for an air contaminant discharge permit, beginning with former Director L. B. Day; and stated that adoption of the proposed interim policy containing the SO_2 limitation would preclude CIRI's continued development at Rivergate. As to the SO_2 limitation, Mr. Ulveling said that his company and the Department had never discussed SO_2 emissions in relation to the proposed permit.

In response to questions from the Commission regarding the staff projection of 800 tons of particulate per year and the SO_2 limitation in the proposed policy, Mr. Ulveling replied that the maximum level for particulates in the proposed permit would be 225-230 tons per year, "and we expect to meet that level." With respect to the SO_2 limitation, if the policy were adopted as presented, CIRI would effectively be eliminated as an applicant because even using 0.5% sulfur residual fuels, the refinery would still produce 300 tons of SO_2 per year. Mr. Ulveling said his position was based on the fact that there was no indication in the interim policy of trade-offs. If this concept is written into the policy statement, then he said he had no objection to its adoption.

Mr. Weathersbee stated that the refinery would produce low sulfur fuel which would provide other industries with a cleaner fuel source, thereby reducing SO_2 discharges in the entire area.

Commissioners discussed the problems posed by the emissions limitations, the recommendation that no one source could contribute more than 25 percent of the total, and the proposal by CIRI which would exceed both particulate and SO_2 restrictions. They asked what kind of trade-off could be applied to CIRI. Mr. Weathersbee replied that CIRI cannot effect a trade-off in particulates. Mr. Ulveling said that the company could blend fuels and use distillates some of the time in order to alleviate the emissions problems.

Other questions directed by the Commission to Mr. Ulveling dealt with the company's preference for Rivergate as a location for the refinery, the difference

between the SO_2 levels reported by the Port of Portland and CIRI, and the type of crude oil to be processed.

Mr. Ulveling replied that locating the refinery outside Portland--in the Beaver area, for example--would necessitate running a pipeline to Portland, "which would cost as much or more than shipping the product from Bellingham to Portland." The difference in the reported SO_2 levels was the result of CIRI's basing its predictions using the 0.5 percent residual under worst case conditions. The refinery would process low sulfur crude by hydro-desulfurization. The equipment for this process would add approximately $40 million to building the operation and would add about seven cents per gallon to home heating fuel costs.

Mr. Weathersbee stated that the Department has recognized the trade-off possibility with SO_2 but cannot effect a trade-off in particulates in the Rivergate area. He said that CIRI has submitted an application for a 100,000 barrel per day refinery, and staff analysis indicates that amount of crude cannot be processed burning the fuels proposed and produce less than 800 tons (of particulatesmatter) per year.

Mr. Ulveling replied that the Department staff based its projections on EPA guidelines developed 18 years ago, and that CIRI planned to substantiate their data in a report on tests that were recently completed in Japan on a similar refinery.

Mr. Weathersbee said that CIRI cannot be accommodated at the Rivergate location at its proposed emission levels without endangering exceeding the standards if any of the other applications were allowed. "Allocating a limited air resource has never been done before and today is the first time we've come to the Commission with this difficult problem."

Mr. Ulveling concluded his testimony by stating that CIRI believed there would be trade-offs in both particulates and SO_2, and that the proposed interim policy was not appropriate at this time.

Dr. George Tsongas, a professor in the Department of Applied Science and Engineering at Portland State University, spoke for the Oregon Environmental Council, the National Environmental Defense Council, and himself as a concerned citizen and professional. He strongly supported such a proposed policy, although

he said he had some problems with the specifics of this particular policy. He suggested that the Department was overly optimistic about the effects of their control strategy and questioned the need for new development. He recommended the following revisions to the policy proposed:

1. The Department should set a one-year moratorium on granting new air contaminant discharge permits until completion of the Air Quality Maintenance Study.

2. The Department should allow new permits only after necessary reductions in other emissions from existing plants have actually been attained.

Dr. Tsongas said he realized these revisions implied little or no growth as regards large industrial sources of pollution but said that may be necessary if the goals of the Clean Air Act were to be reached. Growth, he said, could be accommodated by smaller, cleaner industries.

When questioned about the trade-off concept previously discussed, Dr. Tsongas replied that he would have no objection to applying that concept and further, "Those are the kinds of trade offs we should be making." He concluded his remarks by stating that no one really knew, however, how much of CIRI's low-sulfur residual fuel would be available for use in the Portland area.

Mrs. Ruth Spielman, President of the Portland League of Women Voters, asked for a delay on the decision to adopt the policy because ample notice of the details in the staff report had not been given. She said that this proposed policy was "far more important than just you and the industries; it's between you and the people of the metropolitan area." She stated that the boundaries of the air shed should be further delineated and then a lid clamped on the entire air shed if it is endangered in any way. She also asked what was being done to clamp a lid on the Longview-Kelso area. "If you cannot get a bi-state agreement with the State of Washington, then hopefully you will bring this matter to the attention of the Federal Government."

She also asked that the Commission take into account the economic and social benefits industries bring to the community and requested the Commission to obtain economic information from industries in the Portland area and from the Port of Portland as well. She saw no justification for putting a 100-ton limit on basic industry and letting unlimited numbers of 10-ton permits as outlined in the proposal. "We shouldn't nickel ourselves to death with small emission sources.

If we aren't in imminent danger, then I think that there should be steps taken for public input to have a regional development proposed of the total air shed."

Mr. John Mosser, an attorney with offices at 1505 Standard Plaza, Portland, representing Portland Steel Mill (outside Rivergate but adjacent to it), said he wished to speak in defense of the DEQ staff with respect to certain criticisms voiced at this meeting. He pointed out that the staff, unlike the Port of Portland staff, was subject to the Commission for final decisions and also to federal and state requirements for public hearings; it is not a decision-making staff.

He said there was merit in the testimony given by a number of industries that "if any industry can come in and show that there will in fact be a net offsetting reduction to bring it within that limit, you consider one of even a thousand tons provided it can find 900 tons of offset somewhere."

Mr. Mosser supported Mr. Westerdahl's suggestion to have a larger-scope study to provide the needed information. He concluded by stating that the staff's policy was reasonable with the one addition that if offsetting reductions could be demonstrated, then the Commission consider industries exceeding the 25 percent limitation.

The Commission agreed not to take immediate action on the proposed policy. They informed the Department staff to proceed with the issuance of a permit to Cook Industries (with a 30-ton limit), to calculate the trade offs relative to CIRI, to process the permit applications for the industries listed under Table 4 which have applications pending, and to develop the trade off concept for inclusion in the policy statement.

Mr. Somers asked Mr. Underwood if the Commission had authority under the statutes to decide priorities, as suggested by several witnesses. Mr. Underwood replied that the Commission did not have the authority to decide on any basis other than environmental. He suggested that the proposed interim policy be presented to the Commission in the form of a rule for their consideration. Mr. Somers requested the staff to propose a temporary rule prior to the next meeting for consideration at that meeting.

It was MOVED by Mr. Somers, seconded by Dr. Phinney and ordered by unanimous consent to defer action on the Director's recommendation until the next meeting.

AMBIENT AIR STANDARD FOR LEAD--STATUS REPORT

Mr. Johnson read the staff memorandum report dated September 12, 1974, Because of the large volume of testimony received at and subsequent to the public hearing, the staff was still evaluating the information and planned to present a report to the Commission at the October 25, 1974 meeting.

VARIANCE REQUEST: UNION OIL OF CALIFORNIA

Mr. Hanson summarized the staff report containing the Director's recommendation as follows:

It is the Director's recommendation that the Commission grant a variance from the Department rule, Oregon Administrative Rules, Chapter 340, section 22-010(2) pertaining to the sulfur content of residual fuel oil to the Union Oil Company of California, and to its distributors and users of residual oil, until July 1, 1975, with the following conditions based upon a finding by the Commission that strict compliance with the Department rule is inappropriate because:

a) no other alternative facility or method of handling is yet available; or

b) conditions exist, as described in the letter request for extension of variance and in the staff report, that are beyond the control of the persons granted such variance.

Conditions

1. The maximum sulfur content of residual fuel oil to be sold, distributed or used shall not be more than 2.5 percent sulfur by weight.

2. Union Oil shall submit to the Department a report containing the sulfur analysis and quantity of each shipment sold or distributed in the state on a quarterly basis beginning October 1, 1974.

3. On or before May 15, 1975, Union Oil shall submit to the Department a written report describing plans or programs adopted to achieve compliance with the Department rules including expected dates of implementation.

4. This variance shall terminate July 1, 1975.

It was MOVED by Mr. Somers to approve the Director's recommendation. There being no objection it was so ordered by unanimous consent.

INDIRECT SOURCE(S) PROPOSED RULE--AUTHORIZATION FOR PUBLIC HEARING

Mr. Hanson summarized the staff memorandum report on the status of the Indirect Source(s) Proposed Rule. Because comment and testimony were substantive

and extensive, a new draft of the proposed rule was completed and mailed to all interested parties. Therefore, the Director recommended that the Commission authorize the Department to set a public hearing before the Hearings Officer on October 29, 1974 (changed from October 21, 1974), in Portland, Oregon, for the purpose of taking public testimony concerning the proposed rule on Indirect Source(s).

It was MOVED by Mr. Somers to approve the Director's recommendation. There being no objection it was ordered by unanimous consent.

TEMPORARY RULE PERTAINING TO STANDARD SPECIFICATION FOR HOMOGENEOUS PERFORATED BITUMINIZED FIBER PIPE FOR SEPTIC TANK DISPOSAL FIELDS

The staff memorandum report concluded that the following proposed temporary rule be adopted in order to permit the use of perforated bituminized fiber pipe for the distribution lines in septic tank disposal trenches, as recommended by the Technical Advisory Committee for Materials, appointed by the Director in connection with the Department's subsurface sewage disposal program:

Proposed Temporary Rule

Amend the first two sentences of Section II. D. of Appendix E of the Standards for Subsurface Sewage and Nonwater-Carried Waste Disposal administrative rules contained in Subdivision 1, Division 7, OAR, chapter 340, to read as follows:

"D. Bituminized fiber of which both solid pipe and fittings must meet ASTM (American Society for Testing and Materials) Specification D 1861-69 which is designated Appendix [L] M and by this reference is made a part of these regulations. Perforated bituminized fiber pipe shall meet ASTM Specification D 2312-73 which is designated Appendix L and by this reference made a part of these regulations. Each length of pipe and each fitting shall be marked with the nominal size, the manufacturer's name or trademark, or other symbol which clearly identifies the manufacturer and the appropriate ASTM standard number above." (Words in brackets are to be deleted and words underlined are to be added.)

It was the Director's recommendation that the temporary rule be adopted by the Commission to become effective immediately upon filing with the Secretary of State, and that the Commission find that failure to adopt said rule at this time will cause hardship to property owners desiring to use perforated bituminized fiber pipe in disposal trenches, and further that failure to act promptly will result in prejudice to the public interest as well as to the interest of parties directly concerned.

It was MOVED by Mr. Somers that the Director's recommendation be approved with the addition that the matter immediately be processed for adoption as a permanent rule. There being no objection, it was so ordered by unanimous consent.

FISHHAWK LAKE RECREATION HOMESITES: DOMESTIC SEWERAGE SYSTEM MAINTENANCE PERFORMANCE BOND

Mr. Curran presented the staff memorandum report and responded to questions by the Commission. The Fishhawk Lake Recreation Club, Inc. requested a reduction of the $25,000 maintenance performance bond and substitution of a mortgage lien on the real property for the present corporate surety and proposed the following agreement with the Environmental Quality Commission:

1. The recreation club is the entity action on behalf of the property owners;
2. The club has shown that a $5,000 bond is sufficient to ensure compliance with permit requirements, and has proposed a substitute of a mortgage lien on real property valued at $5,000;
3. A document creating a mortgage lien on an unimproved lot within the plat will be delivered to the Commission;
4. The club agrees to deposit not less than $1,000 per year cash in a savings account until the account reaches $5,000, at which time the club will assign or pledge the account to the Commission as security in place of the mortgage lien on the lot. The $5,000 cash deposit will be permanent and recoverable by the Commission only. Interest will be payable to the club.

It was the Director's recommendation that the Commission reduce the amount of bond required to $5,000 and, further, to accept in lieu of other security a real property mortgage lien against Lot 32, Division II of the plat of Fishhawk Lake Estates in Columbia County.

Mr. Somers objected to the recommendation principally on the basis that the developer must be held liable in perpetuity rather than being allowed to turn over the responsibility to the purchasers.

It was MOVED by Mr. Somers, seconded by Dr. Cfothers and unanimously carried to deny the Director's recommendation.

WEYERHAEUSER COMPANY, KLAMATH FALLS--REQUEST FOR TIME EXTENSION

Mr. Ashbaker summarized the staff memorandum report on the company's inability to comply with the schedule deadline of October 1, 1974, requiring Weyerhaeuser

to eliminate the use of the Klamath River as a wet feet channel for the mill and clean up residual debris in the river. Weyerhaeuser proposed to comply with the requirement through the use of a fill in the river adjacent to the mill. Because of the controversial nature of a fill in the river and the requirements to obtain a permit from the Division of State Lands, the proposed project has not yet been implemented and progress toward its implementation has been very slow.

It was the Director's recommendation that the October 1, 1974 deadline for eliminating Weyerhaeuser logs from the Klamath River be rescinded and that the staff be authorized to renegotiate a time schedule for eliminating the problem which relates to the receipt of necessary approvals from other state agencies.

It was MOVED by Mr. Somers to approve the Director's recommendation. There being no objection, it was so ordered by unanimous consent.

There was no further business, and the Vice Chairman adjourned the meeting at 3:15 p.m.

Shirley Shay, Secretary
Environmental Quality Commission

OREGON PORTLAND CEMENT COMPANY

INCORPORATED 1915

COMMENTS BY OREGON PORTLAND CEMENT COMPANY
AS TO PROPOSED AIR CONTAMINANT DISCHARGE PERMIT

Mr. Chairman and Members of the Commission. I am Erik Voldbaek, First Vice President of Oregon Portland Cement Company, and I have the following comments to make with respect to the proposed air contaminant discharge permit in its present form:

The Department of Environmental Quality (DEQ) staff has acknowledged in its Memorandum (page 2) that Oregon Portland Cement Company (OPC) "control systems operate essentially within Department standards." It is the purpose of OPC not only to meet all state standards but also to further reduce emissions wherever it is practicable to do so. We call attention to the fact that the average emission from Kiln #4, our largest kiln, is on an average of about 18 lbs. per hour, which is about 30 lbs. per hour below the state's process weight standard. Kilns #2 and 3 which operate intermittently have been averaging about 28 lbs. per hour, which is about 13 lbs. per hour below the state's process weight standard.

We have agreed in various meetings with the DEQ staff to many conditions of the proposed permit that we believe can help reduce emissions at the plant. We have also agreed to a few conditions that are not going to reduce emissions but with which we can comply. We have not agreed to two of the five most significant permit conditions referred to in the Director's Memorandum to the Commission (page 3).

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The first of these involves upgrading of Kilns #2 and 3 control system by 1975 to the same efficiency as Kiln #4. Kilns #2 and 3, by industry standards, are old kilns which inherently operate with poor fuel economy. These kilns are served by a 1956 electrostatic precipitator (ESP) which has been shown to achieve excellent results. The proposed emission rate of 1.2 pounds per ton of feed is a reasonable limit for this source which will rarely be exceeded and which provides a suitable margin for normal variations in both emissions and in testing procedures. We have rejected the idea that emission limits for this source can or need to be reduced by 1975 to 0.35 lbs. per ton of feed by replacing the existing ESP with a baghouse or equal collector. Our reasons are substantially as follows:

(1) It has not been shown that the proposed reduction in emission limits for Kilns #2 and 3 will have any noticeable effect on the ambient air quality in Lake Oswego.

(2) This is an impossible application for a baghouse due to high kiln back-end temperatures coupled with potential dew-point problems if using tempered air. We have so informed the members of the DEQ staff that have been working on the proposed permit and have also told them that we expect to document the foregoing statement by a letter from one of the manufacturers of such equipment.

(3) Because of space limitations, a replacement collector would almost have to occupy the space where the existing ESP is located. Thus, production from Kilns #2 and 3 would not be available for a period long enough to remove the existing collector and erect the new one. From the standpoint of production scheduling, we do not know how we could handle such a construction job.

In connection with upgrading the collection efficiency of Kilns #2 and 3 control systems, we have proposed to the DEQ staff that we would be willing to perform certain electrical and mechanical modifications on the collection system while those kilns are not operating during the 1974-75 winter and would, on starting the kilns in April or May, 1975, experiment with reduced production rates to see whether the emission limit of 11 lbs. per hour could be reached with a tolerable production efficiency and rate. However, this would only be an experiment. If the target emission level could not be maintained, or if ambient air quality had not been improved, then we would, by some date in mid-1975, agree with the DEQ staff on another permit level or submit dates for accomplishing a suitable level of emissions.

The second of the significant permit conditions to which we take exception is the proposed ambient air monitoring program as shown in Appendix I of the proposed permit. We have concurred with the DEQ staff in that such a program is necessary to fix the extent of OPC responsibility for particulate levels at certain

monitoring stations. One area of disagreement is that in our opinion the proposed ambient air sampling program should precede the imposition of certain of the proposed permit conditions. This is for the reason that the results of the program may demonstrate that certain proposed permit conditions may not be required. Particularly, the study program should precede any decision to impose more strict limits on Kilns #2 and 3 by mid-1975.

Another problem we find with the ambient air program is that the mass of data obtained from the required testing may not lead to any conclusive result. We have suggested that the program be conducted on a step-by-step basis with an evaluation by the DEQ staff and OPC at intervals where the program could be modified, enlarged or curtailed as might be found to be appropriate.

We appreciate that this informational hearing before the Environmental Quality Commission has been held in advance of consideration of the final draft of permit. We hope that the foregoing will be useful to the members in understanding our position on the proposed permit. You may be assured that we will continue to work with the DEQ staff to resolve problems that exist in the proposed permit prior to issuance of a final draft of the permit by the DEQ.

We respectfully request that the original of the foregoing statement be made part of the official record of this informational hearing.

OREGON PORTLAND CEMENT COMPANY

By _____
First Vice President

September 20, 1974

PRESENTATION TO BE MADE BY ROGER A. ULVELING ON SEPTEMBER 20, 1974 TO THE ENVIRONMENTAL QUALITY COMMISSION

AGENDA ITEM F--PROPOSED INTERIM POLICY FOR APPROVING NEW OR EXPANDED AIR CONTAMINANT EMISSION SOURCES IN THE PORTLAND METROPOLITAN AREA

I AM ROGER ULVELING, PLANNING COORDINATOR FOR COLUMBIA INDEPENDENT REFINERY, INC. (CIRI), A SUBSIDIARY OF PACIFIC RESOURCES, INC. OF HONOLULU. COLUMBIA INDEPENDENT REFINERY WILL BE LOCATED IN THE RIVERGATE INDUSTRIAL DISTRICT. OUR PERMIT APPLICATIONS WERE FILED WITH THE DEPARTMENT OF ENVIRONMENTAL QUALITY ON APRIL 1, 1974, AND ARE UNDER CONSIDERATION BY THEM.

1. BACKGROUND

IN MARCH 1972, WE APPROACHED THE PORT OF PORTLAND WITH A PRELIMINARY PROPOSAL FOR CONSTRUCTING A REFINERY IN THE RIVERGATE AREA. THE DEPARTMENT OF ENVIRONMENTAL QUALITY (DEQ) WAS SUBSEQUENTLY ASKED TO EVALUATE PRELIMINARILY WHETHER A REFINERY WOULD BE COMPATIBLE WITH OREGON CONTROLS. HAWAIIAN INDEPENDENT REFINERY, A SISTER COMPANY, WAS USED AS AN EXAMPLE FOR THE STUDY. L. B. DAY, THEN DIRECTOR OF DEQ, INDICATED THAT ALL OF THE ITEMS OF CONCERN TO THE DEPARTMENT WITH REGARD TO HAWAIIAN INDEPENDENT REFINERY COULD BE TREATED BY CURRENT TECHNOLOGY. IT BASICALLY WAS THE DECISION OF THE DEPARTMENT AT THAT TIME THAT A REFINERY WOULD FIT INTO THE ENVIRONMENTAL SCHEME OF THE RIVERGATE DISTRICT AND WAS POSSIBLE UNDER OREGON STANDARDS.

IN MAY OF 1973, A MEETING WAS SET UP BY THE PORT BETWEEN OUR REPRESENTATIVES AND MR. O'SCANNLAIN, THEN DIRECTOR OF DEQ, AND ONE OF HIS CHIEF ENGINEERS. THEY WANTED US

TO KNOW THAT THEY FELT THAT ON THE PARTICULAR SITE WE HAD BEEN DISCUSSING WITH THE AMBIENT CONDITIONS, THE REFINERY, IF ITS EMISSIONS MEET STATE AND FEDERAL STANDARDS, WOULD PRESENT NO SERIOUS PROBLEMS AND WOULD BE IN KEEPING WITH THE MASTER PLAN AND OVERALL LONG-TERM ENVIRONMENTAL INTERESTS OF OREGON.

WE INDICATED THAT THE TECHNOLOGY EXISTED TO MEET ALL NECESSARY RESTRICTIONS AND LIMITATIONS OF THE FEDERAL ENVIRONMENTAL PROTECTION AGENCY (EPA). THE PLANT WOULD ENCOMPASS THE MOST MODERN OF DEVELOPMENTS TO CONTROL AND MINIMIZE TO ECONOMIC LIMITS THE ELEMENTS OF SOUND, ODOR, WATER, AND AIR EMISSIONS.

2. WE HAVE PROPOSED A CLEAN REFINERY BURNING NATURAL GAS, REFINERY GAS, AND as available CLEAN 1/2 PERCENT SULFUR RESIDUAL FUEL OIL, WHICH IS 1-1/4 PERCENT SULFUR, BY WEIGHT, BELOW THE RECENT REDUCTION IN OREGON'S STANDARD TO 1.75 PERCENT S WHICH BECAME EFFECTIVE LAST JULY 1. THIS 1.75 PERCENT LEVEL, WHICH ACCORDING TO OTHER AGENDA ITEMS TO BE DISCUSSED TODAY, STILL CANNOT BE MET BY ONE OF THE MAJOR OIL COMPANIES SUPPLYING THIS AREA.

3. THE INTERIM POLICY PROPOSED TODAY BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY IS A SIGNIFICANT EXAMPLE OF THE CHANGES WE HAVE ENCOUNTERED. UP TO THIS PAST TUESDAY, THE DEPARTMENT HAS DISCUSSED THE CONCEPT OF AN INTERIM POLICY ONLY AS IT RELATED TO PARTICULATES. THERE HAS BEEN NO MENTION TO US OF SUCH A POLICY AS IT RELATES TO SSULFUR DIOXIDE (SO_2). DEQ HAS HAD INFORMATION ON THE RATE OF CIRI SO_2 EMISSIONS SINCE AUGUST 1973 AND OUR PERMIT APPLICATIONS SINCE APRIL 1, 1974. INSTEAD OF TELLING US THAT OUR REFINERY COULD NOT BE ACCOMMODATED IN THIS AIR SHED, WE HAVE BEEN ENCOURAGED AND HAVE SPENT APPROXIMATELY 1/2 MILLION DOLLARS RESPONDING TO DEQ QUESTIONS AND PROVING NEW TECHNOLOGY FOR THE ONE SIGNIFICANT EMISSION PROBLEM WHICH DEQ HAS TOLD US ABOUT, THAT IS, PARTICULATE. WE ARE NOW DISCONCERTED TO THEN BE HIT WITH A POLICY FOR A "PROBLEM" WHICH DEQ HAS NOT RESPONDED TO IN RELATION TO OUR PERMIT SUBMISSIONS AND WHICH IN THE STAFF REPORT IS NOT NOW A PROBLEM AND WILL NOT BE A PROBLEM UNTIL 1982 AND IF IT DOES BECOME A PROBLEM IN 1982, CIRI FUELS COULD

HELP TO ALLEVIATE SUCH PROBLEM. AND, FURTHER, IF SO_2 IS A PROBLEM, THEN DEQ KNEW, OR SHOULD HAVE KNOWN, THAT NO NEW REFINERY COULD BE BUILT IN THE PORTLAND AREA, AND WE FEEL THAT THEY HAD A MORAL OBLIGATION TO TELL US A LONG, LONG TIME AGO.

IT IS IMPORTANT TO POINT OUT THAT WITH THIS POLICY, THERE WILL BE NO REFINERY IN THIS AREA. SUCH A POLICY WOULD THUS ELIMINATE THE POSSIBLILITY OF A SOURCE OF FEEDSTOCK FOR THE LOCAL NATURAL GAS DISTRIBUTION COMPANY'S PROPOSED SYNTHETIC NATURAL GAS FACILITY IN THIS AREA AND COULD THUS CAUSE VERY SERIOUS PROBLEMS WITH INDUSTRY SHUTDOWNS, LOSS OF JOBS, LOSS OF TAX REVENUE AND ALL OF THEIR ASSOCIATED PROBLEMS.

CONCLUSION

CIRI has proposed to make a $100 million investment in the Rivergate Industrial area. The refinery will fill a vital need, processing up to 100,000 barrels of crude oil each day to produce the projected quantities of low sulfur residual fuel, diesel oil, home heating oil, and other products needed by consumers in Portland and Vancouver and throughout the Columbia Basin. The refinery will mean about 140 new jobs, and an annual payroll in excess of $2 million. About $5.5 million is expected to be paid annually in taxes to support local government, schools, hospitals, and other special tax districts. The fuels purification facility we propose would be one of the cleanest of its type in the world.

I have brought these facts to your attention because progress in this fuels purification facility is at a virtual standstill, and the project is in danger. We at CIRI recognize the need for particulate control and accept the conditions proposed in this interim policy relating to particulate. Throughout the project, we have tried to cooperate with DEQ in every conceivable way. But, in relation to sulfur dioxide, DEQ has never mentioned SO_2 as a major problem in relation to the emission levels in our permit application submitted last April. The DEQ staff report, as written, confirms that SO_2 is not now a problem, and will not be a problem for the duration of this proposed interim policy and that it is not anticipated to be a problem before 1982. As a matter of fact, indications by top DEQ staff just last month were that CIRI did not have any problems with sulfur dioxide. Prior to making a decision in this proposed interim policy, would you ask yourselves this question: Does the policy actually preclude those industries which are now causing the problem in ambient conditions from obtaining the cleaner fuels necessary to help alleviate the problem?

Therefore, based upon DEQ's own findings (AS STATED IN THE REPORT), we do not feel an interim policy pertaining to SO_2 should be adopted by the Environmental Quality Commission today. We feel that this interim policy as it related to SO_2 would be unnecessary and injurious to the Long Range Environmental and Economic goals of the State of Oregon.