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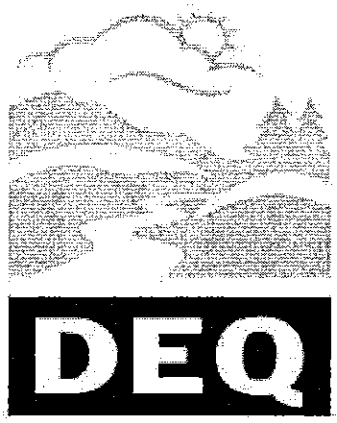
6/21/1974

OREGON
ENVIRONMENTAL QUALITY
COMMISSION MEETING
MATERIALS



State of Oregon
Department of Environmental Quality

A G E N D A

ENVIRONMENTAL QUALITY COMMISSION

meeting of

June 21, 1974

Coos Bay Cultural Center, Fifth and Anderson Streets, Coos Bay, Oregon 97420

9 a.m.

A. Minutes of the May 24, 1974 Commission Meeting

B. May 1974 Program Activity Report

C. Tax Credit Applications

D. Oregon CUP (Cleaning Up Pollution) Award Nomination

E. Development of Coal Deposits in Coos Bay Area and Environmental Impact

WATER QUALITY

F. Log Handling in Public Waters--Status Report and Proposed Program

G. Weyerhaeuser Company, Springfield--Status Report on NPDES Permit Application

H. Fiscal Year 1975 Annual Water Strategy including Fiscal Year 1975 Sewage Works Construction Grant Priority List

10:30 a.m.

PUBLIC FORUM

AIR QUALITY

I. Consideration of Variance Requests, Sulfur Content of Residual Fuel Oil

J. Authorization for Public Hearing to Consider Adoption of Statewide Rules Relating to Noise Pollution from Industrial and Commercial Sources

K. Public Hearing to Consider Adoption of Statewide Rules and Procedure Manuals Relating to Noise Pollution for New and In-Use Motor Vehicles including Off-Road Recreational Vehicles and Motorcycles

L. Alderwood Manufacturing Company (Philomath), Consideration of Variance to Open Burn Granted by Mid-Willamette Valley Air Pollution Authority

[over]

LAND QUALITY

* M. Public Hearing to Consider Adoption of Permanent Rules Pertaining to (a) Fees for Subsurface Sewage Disposal Permits and Licenses; (b) Fees and Procedures for Evaluations of Methods of Sewage Disposal or of Site Suitability for Installation of Subsurface Sewage Disposal Systems; and (c) Subsurface Sewage Disposal Permit Appeals Boards

N. Petition to Amend Subsurface Sewage and Nonwater-Carried Waste Disposal Rules

O. Criteria for Acceptable Prior Approvals for Installation of Subsurface Sewage Disposal Systems

P. Public Hearing to Consider Proposed Regulations for State Financial Assistance to Public Agencies for Pollution Control Facilities for the Disposal of Solid Waste

ENFORCEMENT

Q. Authorization for Public Hearing to Consider Adoption of Rules Pertaining to a Schedule for Civil Penalties and Amendments to Rules Pertaining to Practices and Procedures

NORTHWEST REGION

R. Open-burning of Domestic Refuse and Land-clearing Debris--Multnomah, Clackamas, Washington and Columbia Counties

* scheduled for 1:30 p.m. or later

The Commission will meet for breakfast on June 21st at 7:30 a.m. at the Timber Inn.

No-host luncheon at 12:15 at the Pony Village Motor Lodge on Virginia Street in North Bend.

State of Oregon

DEPARTMENT OF ENVIRONMENTAL QUALITY

H. Patterson

INTEROFFICE MEMO

To: Regional Administrators, Assistant Directors, Division Administrators

Date: June 24, 1974

From: Shirley Shay

Subject: June 21, 1974 EQC Meeting

For your information, actions taken by the EQC at the June meeting are noted below:

A. Minutes of the May 24, 1974 EQC Meeting -- approved

B. May 1974 Program Activity Report -- approved

→ C. Tax Credit Applications

1. approved the following:

T-393 Humphrey Dairy Farm - $11,047.82
T-480 International Paper Company, Gardner Paper Mill, Northern Division - $26,728.6
T-490R Kaiser Gypsum Company, Inc. - $278,124.
T-522 Willamette Industries, Inc., Duraflake Company - $18,356.15
T-532 Omark Properties, Inc., Omark Industrial Park, Waste Treatment Department - $260,640.00
T-535 Western Kraft, Division of Willamette Industries, Albany Mill - $98,777.00
T-536 Lakeview Lumber Products Company: to reduce wastes going into wigwam waste burner (this is a correction) - $356,737.00
T-543 Ore-Ida Foods, Inc., Ontario, Oregon Plant - $749,254.60
T-548 Portland Provision Company - $8,527.00
T-556 Martin Marietta Aluminum, Inc., Reduction Division - $215,143.54
T-539 Boise Cascade, Paper Group - $665,779.00
T-546 Cascade Construction Company - $179,893.42
T-553 Oregon Portland Cement Company - $11,826.74
T-554 Oregon Portland Cement Company - $11,269.61
T-555 Sunset Crusher Rock - $83,500.00
T-533 Boise Cascade Corporation, Paper Division - $1,213,771.00
T-557 Menasha Corporation, Paperboard Division - $249,284.17

→ 2. deferred until July, action on the application of Fred E. Moe (T-549, $11,186.16), pending review by Legal Counsel.

D. Oregon CUP Award Nomination - approved nomination of Willamina Lumber Company

E. Development of Coal Deposits in Coos Bay Area - report presented by Ralph Mason, Deputy Director, Oregon Department of Geology and Mineral Resources

F. Log Handling in Public Waters - Status Report and Proposed Program - voted to set the proposed program for public hearing

G. Weyerhaeuser Company, Springfield - Status Report on NPDES Permit Application - deferred until July 19th EQC meeting

H. Fiscal Year 1975 Annual Water Strategy including Fiscal Year 1975 Sewage Works Construction Grant Priority List - approved

I. Consideration of Variance Requests, Sulfur Content of Residual Fuel Oil

1. granted variance request for Union Oil Company for 90 days

2. postponed variance request for Atlantic Richfield because of lack of information

J. Authorization for Public Hearing to Consider Adoption of Statewide Rules Relating to Noise Pollution from Industrial and Commercial Sources - approved

K. Public Hearing to Consider Adoption of Statewide Rules and Procedure Manuals Relating to Noise Pollution for New and In-Use Motor Vehicles including Off-Road Recreational Vehicles and Motorcycles - voted unanimously that the hearing be closed but the record kept open for ten days, and that the matter be placed on the agenda for the July 19th EQC meeting

L. Alderwood Manufacturing Company (Philomath), Consideration of Variance to Open Burn Granted by MWVAPA - approved

M. Public Hearing to Consider Adoption of Permanent Rules Pertaining to (a) Fees for Subsurface Sewage Disposal Permits and Licenses; (b) Fees and Procedures for Evaluations of Methods of Sewage Disposal or of Site Suitability for Installation of Subsurface Sewage Disposal Systems; and (c) Subsurface Sewage Disposal Permit Appeals Boards - adopted rules as presented

N. Petition to Amend Subsurface Sewage and Nonwater-Carried Waste Disposal Rules - voted unanimously to deny the petition but submit it to the Task Force for review

O. Criteria for Acceptable Prior Approvals for Installation of Subsurface Sewage Disposal Systems - temporary rules adopted

P. Public Hearing to Consider Proposed Regulations for State Financial Assistance to Public Agencies for Pollution Control Facilities for the Disposal of Solid Waste -- approved

Q. Authorization for Public Hearing to Consider Adoption of Rules Pertaining to a Schedule for Civil Penalties and Amendments to Rules Pertaining to Practices and Procedures - approved

R. Open-burning of Domestic Refuse ~~and Land-clearing Debris~~--Multnomah, Clackamas, Washington and Columbia Counties - approved

The July 19th meeting of the Commission will be held in Room 20, State Capitol, beginning at 9 a.m.

MINUTES OF THE FIFTY-EIGHTH MEETING

of the

OREGON ENVIRONMENTAL QUALITY COMMISSION

June 21, 1974

Public notice having been given to the news media, other interested persons and the Commission members as required by law, the fifty-eighth meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 9 a.m. on Friday, June 21, 1974, in the Coos Bay Cultural Center, Coos Bay, 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 Wayne Hanson (Air Quality), Harold L. Sawyer (Water Quality), Kenneth H. Spies (Land Quality) and Frederick M. Bolton (Enforcement); Regional Administrators Verner J. Adkison (Midwest) and Richard P. Reiter (Southwest); staff members Ronald E. Baker, Glen Carter, Delbert P. Cline, Edward T. Davison, Thomas Guilbert, John Hector, Merlyn Hough, Donald K. Neff, T. Jack Osborne, Ernest A. Schmidt, Barbara J. Seymour, Shirley G. Shay, John L. Smits, Paul M. Stolpman, R. Terry Westfall, and Chief Counsel Raymond P. Underwood.

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

MINUTES OF THE MAY 24, 1974 COMMISSION MEETING

It was MOVED by Dr. Phinney, seconded by Mrs. Hallock and carried that the minutes of the fifty-seventh meeting of the Commission, held in Portland on May 24, 1974, be approved as prepared and distributed.

PROGRAM ACTIVITY REPORT FOR THE MONTH OF MAY 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

72 domestic sewerage, 2 industrial waste, 25 air quality control, and 10 solid waste management projects:

Water Quality Control - Northwest Region (29)

Date	Location	Project	Action
5/1/74	Woodburn	Brandywine San. Sewer Improvements	Prov. app.
5/1/74	USA (Oak Hills)	Oak Hills Sewage Treatment Plant	Prov. app.
5/3/74	CCSD #1	Sewage Pumping Stations, Lower Phillips and Upper Phillips	Prov. app.
5/3/74	Gresham	San. Sewer on SE 282nd Avenue, North from SE Powell Blvd.	Prov. app.
5/6/74	Sandy	San. Sewers for Miles Hts. Subdn.	Prov. app.
5/7/74	Salem (Willow Lake)	Pringle Cr. Estates San. Sewers	Prov. app.
5/8/74	Portland	SE Henderson St. and SE 87th Ave.	Prov. app.
5/8/74	Oak Lodge SD	San. Sewer between Rose Ave. and Portland Ave. in the "Doral" Subdn.	Prov. app.
5/8/74	Canby	Oak St. San. Sewer Extension	Prov. app.
5/9/74	Hillsboro	Rood Bridge Rd. San. Sewer Extension	Prov. app.
5/9/74	Salem	Lakewood Park Sewers	Prov. app.
5/13/74	CCSD #1	Highlands Subdn San. Sewer	Prov. app.
5/13/74	CCSD #1	Boyer Meadows Replat Subdn. San. Sewers	Prov. app.
5/13/74	Multnomah Co. (Inverness)	Revised Barkerbrook and Holcomb Hts. San. Sewer	Prov. app.
5/14/74	Hillsboro	Padgett Park No. 3 Subdn. San. Sewer	Prov. app.
5/14/74	USA (Somerset West)	Berger School Sanitary Sewer	Prov. app.
5/16/74	Hillsboro	Willow Oak Park Subdn 32nd Court San. Sewer	Prov. app.
5/16/74	Salem (Willow Lake)	Hoyt Street South from Rex St. to Mountain View Dr. San. Sewer	Prov. app.
5/17/74	Salem (E. Salem Sewage & Drainage Dist. 1)	Crestdale Subdn San. Sewers	Prov. app.
5/17/74	Tualatin	Indian Meadows San. Sewers	Prov. app.
5/17/74	Gresham	El Camino No. 6	Prov. app.
5/21/74	Salem	Laguna Village South Sewers (formerly Pringle Cr. Estates)	Prov. app.
5/28/74	Gladstone	Sherwood Too, No. 3 San. Sewers	Prov. app.
5/30/74	Woodburn	Industrial Park Addition for Woodburn Dev. Co. San. Sewers	Prov. app.
5/30/74	USA (Beaverton-Aloha System)	Little Tree No. 3 San. Sewers	Prov. app.
5/30/74	USA (Beaverton-Aloha System)	Ladd and Reed Addition San. Sewers	Prov. app.
5/30/74	Gresham	Sanitary Sewer on NE 190th Ave. between NE Pacific St. and NE Glisan St.	Prov. app.
5/30/74	Keizer SD #1	Stratford Plaza San. Sewers on Orchard Court	Prov. app.
5/30/74	USA (Beaverton) Fanno System	The Denny Village Condominium Dev. Sanitary Sewers	Prov. app.

Water Quality Control - Water Quality Division (42)

Date	Location	Project	Action
5/2/74	Port Orford	Deady St. Sewer	Prov. app.
5/2/74	Eugene	Prospect Park Sewers	Prov. app.
5/2/74	Springfield	Laura and Q Streets Sewer	Prov. app.
5/6/74	BCVSA	Prelim. Plans--South Medford Trunk Sewer	Prov. app.
5/9/74	Eugene	Seven sewer projects	Prov. app.
5/10/74	USA (Aloha)	Tanasbourne Town Center Sewers	Prov. app.
5/13/74	Prairie City	Cozart Ave. Sewer	Prov. app.
5/14/74	Hines	John Wood Subdivision Sewer	Prov. app.
5/14/74	BCVSA	Clover Lane, Meadow Lane and Sunset Court Sewers	Prov. app.
5/15/74	Prineville	Auxiliary Power - Main Lift Station	Prov. app.
5/15/74	Douglas County	Tri-City Sewers - Phase 4	Prov. app.
5/15/74	Coos Bay	Modifications to Pump Sta. 1, 5-10, 12 and 13	Prov. app.
5/15/74	USA (Aloha)	STP Equipment Specifications - Aloha Expansion (Pumps)	Prov. app.
5/15/74	Ashland	C.O. #1 - STP Contract	Approved
5/15/74	USA (Aloha)	STP Equipment Specifications - Aloha Expansion (Process Equipment)	Prov. app.
5/20/74	Albany	Four sewer projects	Prov. app.
5/20/74	Albany	Septic tank sludge dumping station	Not Approved
5/20/74	Springfield	5th Addn. to Laksonen Park Sewers	Prov. app.
5/23/74	Warrenton	East Warrenton Int.	Prov. app.
5/28/74	Yachats	C.O. #6 STP and Sewers	Approved
5/28/74	Milwaukie	C.O. #1 - Milwaukie Interceptor	Approved
5/28/74	Roseburg	Rainbow End Subdn Sewers	Prov. app.
5/28/74	BCVSA	Schultz Road Sewer	Prov. app.
5/28/74	Springfield	Laksones Park 5th Add. Sewers	Prov. app.
5/28/74	The Dalles	Eastside Int. Sewer	Prov. app.
5/28/74	Hermiston	N. W. 7th St. Sewer	Prov. app.
5/28/74	St. Helens	C. O. No. C-4 STP Contract	Approved
5/28/74	Echo	C. O. B-2, sewer project	Approved
5/28/74	Arch Cape SD	Sewer System and 0.1 MGD Secondary Sewage Treatment w/summer irrigation and effluent	Prov. app.
5/28/74	USA (Aloha)	Menlo West Sewers	Prov. app.
5/30/74	Sutherlin	Sutherlin Hts. Subdn	Prov. app.

Water Quality Control - Industrial Projects (2)

Date	Location	Project	Action
5/9/74	Columbia County	Chappell Quarry rock quarry drainage control	Prov. app.
5/23/74	Linn County	Joe Nickols Dairy animal waste facilities	Prov. app.

Air Quality Control - Northwest Region (5)

Date	Location	Project	Action
5/2/74	Multnomah County	MJB--modification to coffee cooler to incinerate blue haze	Approved
5/3/74	Multnomah County	Ross Island Sand and Gravel Rock Crushing Plant--control of dust from mineral aggregate facility with water spray	Approved
5/3/74	Clackamas County	Oregon Portland Cement Company enlargement of an existing baghouse to control dust generated by the limestone and dolomite grinding mills	Approved
5/14/74	Multnomah County	Mayflower Farms--control of particle emissions from the air lift system cyclone that serves two roller mills by utilizing a wet vortex scrubber	Approved
5/31/74	Wasco County	Forest Fiber Products - Stimson Lumber Company--installation of a B & W wood-fired boiler	Approved

Air Quality Control - Air Quality Division (20)

Date	Location	Project	Action
5/2/74	Washington County	Electro Scientific Industries 101-space parking facility expansion	Cond. app.
5/3/74	Multnomah County	Columbia Independent Refinery 80-space parking facility	Req. add. info.
5/8/74	Multnomah County	Pleasant Valley Community Baptist Church--50-space parking facility	Approved
5/13/74	Multnomah County	Freightliner Corporation 370-space parking facility	Cond. app.
5/13/74	Multnomah County	Reorganized Church of Jesus Christ 102-space parking facility	Dept. action pending land use approval
5/14/74	Klamath County	Weyerhaeuser Company review of oil-fired boiler compliance demonstration source test report	Approved
5/17/74	Clackamas County	Clackamas Industrial Park 77-space parking facility	Req. add. info.
5/17/74	Washington County	Lincoln International #2 204-space parking facility	Req. add. info.
5/17/74	Washington County	Oregon Office/Industrial Park Building 5 and 6 28-space parking facility	Req. add. info.
5/20/74	Multnomah County	Mountain Village Apartments 450-space parking facility	Req. add. info.

Air Quality Control - Air Quality Division (cont)

Date	Location	Project	Action
5/21/74	Jackson County	Timber Products Company review of compliance demonstration source test report for cyclones, boilers and sanderdust scrubbers	Req. add. info.
5/22/74	Marion County	Kaiser Aetna, shopping center 420-space parking facility	Cond. app.
5/22/74	Multnomah County	Mill Park Baptist Church 91-space parking facility	Cond. app.
5/22/74	Multnomah County	Cooper Development Company apartment--76-space parking facility	Cond. app.
5/22/74	Multnomah County	State Office Facility, Department of Human Resources 155-space parking facility	Req. add. info.
5/22/74	Malheur County	Malheur Solid Waste Advisory Committee--reivew of compliance demonstration source test report for municipal incinerator at Ogden, Utah	No action required
5/24/74	Washington County	Portland Community College, Rock Creek Center 449-space parking facility	EQC cond. app.
5/25/74	Washington County	Randall Construction Company mini-warehouse 62-space parking facility	Approved
5/24/74	Josephine County	Cabax Mills review of hog fuel boiler compliance demonstration source test report	Approved
5/29/74	Harney County	Edward Hines Lumber Company review of compliance demonstration source test report for plywood plant cyclones	Approved

Solid Waste Management - Northwest Region (1)

Date	Location	Project	Action
5/17/74	Multnomah County	Malarkey Roofing Company existing industrial site, operational plan	Approved

Solid Waste Management - Solid Waste Management Division (9)

Date	Location	Project	Action
5/1/74	Lane County	Bethel-Danebo Sanitary Landfill new domestic site, construction and operational plans	Prov. app.
5/2/74	Douglas County	Round Prairie Lumber Company new industrial site, letter authorization	Prov. app.

Solid Waste Management - Solid Waste Management Division (cont)

Date	Location	Project	Action
5/3/74	Curry County	Brookings Plywood Corporation new industrial site, construction and operational plans	Prov. app.
5/9/74	Lane County	Oakridge Landfill existing domestic site, operational plan	Req. add. info.
5/16/74	Lane County	Bohemia, Inc., Dorena Mill Landfill existing industrial site, operational plan	Approved
5/21/74	Lane County	Bohemia, Inc., Saginaw Disposal Site--existing industrial site, operational plan	Approved
5/28/74	Lane County	Cottage Grove Landfill existing domestic site, operational plan	Prov. app.
5/30/74	Multnomah and Morrow Counties	Columbia Processors Co-op, Barge Loading and Unloading Sites new domestic waste handling facilities; construction and operational plans	Approved
5/31/74	Morrow County	Desert Magic, Inc. sludge disposal site, new domestic site, operational plan	Approved

TAX CREDIT APPLICATIONS

Mr. Sawyer presented briefly the Department's evaluations and recommendations regarding the following 18 tax credit applications:

Applicant	Appl. No.	Cost	% Allocable to Pollution Control
Humphrey Dairy Farm, Independence	T-393	$ 11,047.82	80% or more
International Paper Company, Gardiner Paper Mill--Northern Division, Gardiner	T-480	26,728.69	80% or more
Kaiser Gypsum Company, Inc., St. Helens	T-490R	278,124.00	80% or more
Willamette Industries, Inc.--Duraflake Company, Portland	T-522	18,356.15	80% or more
Omark Properties, Inc., Omark Industrial Park, Waste Treatment Department, Portland	T-532	260,640.00	80% or more
Western Kraft, Division of Willamette Industries--Albany Mill, Albany	T-535	98,777.00	80% or more
Lakeview Lumber Products Co., Lakeview	T-536	356,737.00	80% or more
Ore-Ida Foods, Inc., Ontario, Oregon Plant, Boise	T-543	749,254.60	80% or more
Portland Provision Company, Portland	T-548	8,527.00	80% or more

Tax Credit Applications (cont)

Applicant	Appl. No.	Cost	% Allocable to Pollution Control
Martin-Marietta Aluminum, Inc. Reduction Division, The Dalles	T-556	$ 215,143.54	80% or more
Boise Cascade Corporation, Paper Division, Salem	T-539	665,779.00	80% or more
Cascade Construction Co., Inc., Portland	T-546	179,893.42	80% or more
Fred E. Moe, Hood River	T-549	11,186.16	80% or more
Oregon Portland Cement Company, Portland	T-553	11,826.74	80% or more
Oregon Portland Cement Company, Portland	T-554	11,269.61	80% or more
Sunset Crushed Rock, Astoria	T-555	83,500.00	80% or more
Boise Cascade Corporation, Paper Division, Salem	T-533	1,213,771.00	80% or more
Menasha Corporation, Paperboard Division, North Bend	T-557	249,284.17	80% or more

Regarding the tax credit application of Fred E. Moe, who owns and operates an apple and pear orchard, Mr. Somers questioned whether the Commission could consider an application from an unregulated source, particularly since the Department has no authority to monitor the operation of the system. Mr. Cannon said that he would request a legal opinion from Mr. Underwood.

Dr. Crothers asked for an explanation of the two Boise Cascade tax credit applications for air quality pollution control systems. Mr. Sawyer stated that a major emphasis of the Corporation's program was to control discharges into the Willamette River. These pollution control devices improved water quality in the river but significantly altered the air quality because of the chemical recovery system employed by the company. The two systems for which tax credit applications were submitted were for control of pollutants.

It was MOVED by Mr. Somers, seconded by Dr. Crothers and carried that as recommended by the Director, Pollution Control Facility Tax Credit Certificates be issued to the above-named applicants, with the exception of Fred E. Moe, for facilities claimed in the respective applications and with the costs and cost percentages listed being allocable to pollution control; and that the application of Fred E. Moe be placed on the agenda for the Commission meeting in July.

OREGON CUP AWARD NOMINATION

Mrs. Seymour presented the staff memorandum report dated June 10, 1974, regarding the unanimous vote of the Oregon CUP Awards Screening Committee to

recommend to the Commission that the Oregon CUP be awarded to Willamina Lumber Company. The recommendation was based on the company's extremely cooperative attitude and its willingness not only to meet requirements but to do the best job possible in abating pollution problems. The Director concurred in the recommendation of the Screening Committee.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to award the Oregon CUP to Willamina Lumber Company.

COOS BAY AREA COAL DEPOSITS

Mr. Cannon introduced Mr. Ralph Mason, Deputy Director of the Oregon Department of Geology and Mineral Resources, for a report on the history and potential development of the coal deposits in the Coos Bay Area. A summary of Mr. Mason's comments follows:

The coal deposits in Coos Bay, first mined in 1854, supplied the heating requirements of the City of San Francisco, residential heating for the local area, and the energy source for locomotives in the western division of the Southern Pacific Railroad. With the discovery of oil and natural gas in California shortly after the turn of the century, the need for coal declined and mining stopped. Approximately three million tons were produced from the field which has an estimated capacity of two billion tons. The coal is a low sulfur, high ash, high moisture resource, readily useful for its by-product content, gasification and allied petrochemicals. A cooperative study conducted by Coos County, the U. S. Bureau of Mines, the Department of Economic Development and the Department of Geology and Mineral Resources will determine whether or not it is economically feasible to make a full study of the coal resources in the area.

There is a possibility that the coal could be gasified in place rather than mined. It is also possible that the coal will be far more valuable for its by-product content than for direct energy production.

There is concern about the environmental impacts of any resumption of coal mining on the Bay and on the adjacent estuary and sanctuary proposed on South Slough. Any in-place mining from the surface would have no effect on the estuary and sanctuary since the coal there, as well as in the rest of the canoe-shaped field, is at a depth estimated in excess of 3,000 feet. Any subsidence would long be vitiated before it reached the surface. Approximately two acres of the field lie under the City of Coos Bay and would be left in place.

The Chairman thanked Mr. Mason for an informative and timely presentation.

LOG HANDLING IN PUBLIC WATERS

Mr. Carter presented the status report and proposed program on log handling in public waters, a copy of which has been made a part of the permanent file.

A slide presentation illustrating log handling practices preceded the reading of the recommendations and proposed program.

The following witnesses responded to the Chairman's invitation to comment on the staff report and proposed program:

Cliff Shaw, Coos Bay, Chairman of the Bay Area Council on Environment and Trade (BACET), affiliated with the Western Environmental Trade Association. (A copy of his prepared statement has been made a part of the permanent file.)

Ted W. Nelson, North Bend, Raw Materials Manager for the Southwest Oregon Region of Weyerhaeuser Company.

Miles Munson, General Manager of Al Peirce Lumber Company, Coos Bay.

All voiced objections to the grounding of logs, both because of the economic impact on the companies which rely almost exclusively on water for storage, sorting and transporting of logs to their mills, and because of the limited area available for land storage. Mr. Nelson and Mr. Munson urged the Commission not to adopt the proposed program at this meeting but allow time for the industry to study and evaluate the proposed program and comment at a later date in a public hearing.

It was MOVED by Dr. Crothers, seconded by Mr. Somers and carried that the proposed program be set for public hearing.

PUBLIC FORUM

Both State Senator Jack Ripper and State Representative Ed "Doc" Stevenson criticized the administration of the Department's subsurface sewage disposal program. The Director and Commissioners commented on the issues of permits, alternate systems, and geographical differences, and assured Senator Ripper and Representative Stevenson that the proper and equitable administration of the program is of the highest priority to the Department.

CONSIDERATION OF VARIANCE REQUESTS, SULFUR CONTENT OF RESIDUAL FUEL OIL

Mr. McPhillips relinquished the chair to Vice Chairman Crothers for this portion of the agenda. Since Mr. McPhillips is currently employed as an operating officer of a petroleum distributorship in Oregon whose supplier is Texaco, he felt he should abstain from comment or participation in these proceedings.

Mr. Hanson presented the staff report which has been made a part of the permanent file. The report contained a summary of each variance request received by the Department and other pertinent information related to this matter. The Department recommended the granting of a conditional variance to Union Oil Company of California, its distributors and customers as follows:

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 outline 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.

The Department concluded that the Atlantic Richfield Company did not submit sufficient information in its letter to justify the granting of a variance. If, however, ARCO representatives supplied sufficient additional information to the Commission at this meeting, the Department would recommend the conditions of the variance concerning maximum sulfur content, length of time, submission of reports and long range program consistent with the program of other oil companies.

Commissioner Somers and Mr. Hanson discussed the possibility of requiring suppliers to meet the 1.75 percent sulfur by weight regulation by averaging over a six-month to one-year period the sulfur content of residual fuel oil supplied in Oregon.

The meeting was interrupted by a request from the floor for information on Agenda Item No. G, Weyerhaeuser Company, Springfield, Status Report on NPDES Permit Application. It was MOVED by Mr. Somers, seconded by Mr. McPhillips and carried that the Weyerhaeuser report be postponed until the July 19th Commission meeting in Salem.

Dr. Crothers called for public testimony on the agenda item under discussion.

Mr. J. W. Hughes, consultant with Jack B. Robertson, Regional Administrator of the Federal Energy Office, Region X, Seattle, submitted a prepared statement,

a copy of which has been made a part of the permanent file. Mr. Hughes' statement clarified the role of the Federal Energy Office, which is to provide for the equitable allocation and pricing of petroleum products, and explained the FEO's regulation dealing with sulfur content of residual fuels.

Mr. Thomas Donaca, General Counsel for Associated Oregon Industries, discussed the impact on industrial users of projected increased natural gas curtailment beginning in September. He requested that the 90-day variance requested by Oregon Oil Heat Institute for all distributors and users be granted, and that the Commission provide assurance of variances for suppliers.

Mr. Pete Schnell, Publishers Paper Company, Oregon City, whose company is supplied primarily by Texaco, requested a variance from the 1.75 percent weight regulation on the basis that low sulfur residual fuel might not be available for use when natural gas, the company's prime fuel, is interrupted. He further stated that while he would not want Oregon's air quality standards lowered, maintaining the 2.5 percent weight regulation would not harm air quality.

Mr. Ted Metcalf, Shell Oil Company, **Houston**, Texas, stated that Shell could meet the 1.75 weight regulation for a short period of time. Commenting on questions regarding residual desulfurization, he said that very few plants in the United States have this capability although the technology for desulfurization has been developed. He distributed a summary sheet on refinery operations of residual fuel oil production, a copy of which has been made a part of the permanent file.

No representatives from Standard Oil, Mobil, Texaco or ARCO were present.

Mr. Jerry Tyhurst of Eugene, Area Manager for Southern Oregon, Union Oil Company of California, presented company representatives from Los Angeles for comment on Union's variance request:

Mr. E. R. Friess, Manager of Marketing Distribution, stated that Union could meet a yearly average if the standard was high enough. Much of the company's supply is Arabian crude which is high in sulfur and which cannot be mixed with low-sulfur Alaskan crude.

Mr. Ron Runge, Manager of Planning for West Coast Refining, concurred with Mr. Friess on the company's ability to meet a yearly average.

There were no other witnesses.

It was MOVED by Mrs. Hallock, seconded by Mr. Somers and carried that the recommended variance for Union Oil Company of California be granted.

Mr. Marv Shelby, General Foods, Woodburn, requested a variance for the company's plants at Woodburn and Hillsboro. General Foods is an ARCO end-user whose distributor is Valley Oil. The plants operate on natural gas during the summer.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to postpone action on the request of Atlantic Richfield Company for a variance because of insufficient information presented to the Department.

Mr. John Myers, Project Engineer, Permaneer Corporation, Dillard, had previously submitted a prepared statement for the record. As a representative of several customers of Union Oil, he asked for clarification for the record of those covered by the variance granted Union Oil. He was told everyone was covered--the supplier, the distributors and the end users.

ALDERWOOD MANUFACTURING COMPANY (PHILOMATH), VARIANCE REQUEST

Mr. Hanson summarized the staff memorandum report regarding the request of Alderwood Manufacturing Company (Philomath) for a variance to open burn a pile of slab logs existing on the mill site at the time it was purchased by Alderwood in 1969, to which was added other material resulting from the dismantling of the mill and construction of a new mill. All waste from the new mill is chipped and sold. The variance request was approved by the Mid-Willamette Valley Air Pollution Authority and the Director recommended Commission approval.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to approve the variance request.

OPEN BURNING, VARIANCE REQUEST

Mr. Hanson summarized the staff memorandum report regarding the request of Multnomah, Clackamas, Washington and Columbia Counties for an extension of the July 1, 1974 cut-off date for open burning of domestic rubbish, previously

permitted under the former Columbia-Willamette Air Pollution Authority rules for certain areas within the four counties.

It was MOVED by Dr. Crothers, seconded by Mrs. Hallock and carried to grant the variance request for 120 days, as recommended.

It was MOVED by Mr. Somers, seconded by Dr. Crothers and carried that the staff reports and attachments for Agenda Items No. L and No. R (the variance requests summarized above) be made a part of the permanent record.

PUBLIC HEARING ON NOISE RULES FOR MOTOR VEHICLES

Proper notice having been given as required by state law and administrative rules, the public hearing scheduled on this date of June 21, 1974, in the matter of statewide rules and procedure manuals relating to noise pollution for new and in-use motor vehicles including off-road recreational vehicles and motorcycles was opened by the Chairman with all members of the Commission in attendance.

Mr. Hector presented the staff memorandum report dated June 10, 1974, regarding the procedure manuals submitted to the Commission at the May 24, 1974 meeting, and two minor revisions to the proposed motor vehicle noise rules:

1. Add the words "devised by the manufacturer and" after the phrase "noise sampling techniques shall be" in Section (2)(a) of the New Vehicle standard. (This places the responsibility for noise testing on the manufacturer.)
2. In section (1)(d) of the In-Use Vehicle rules add the words "which is" after the phrase "entering or leaving property" in the first sentence after Table E.

It was the Director's recommendation that after public testimony, the Commission approve and adopt the noise procedure manuals NPCS-1, 2 and 21, and the submitted rules for new and in-use motor vehicles to be effective on July 26, 1974.

Mr. Ken Mutch, Service Consultant to the Oregon Automobile Dealers Association, Portland, and Mr. Rich Keister, Assistant Manager of the Association, submitted prepared testimony in opposition to proposed section 35-025(2)(a) and (b) and 35-025(3), which provides for dealer testing of new motor vehicles and reporting procedures. A copy has been made a part of the permanent file.

Dr. David Charlton of Portland expressed concern with the general problem of noise abatement, primarily traffic noise.

Mr. Dennis David, Technical Standards Engineer, Motorcycle Industry Council, Inc., Washington, D. C., submitted prepared testimony concerning four objections to the proposed standards, a copy of which has been made a part of the permanent file.

The Council's objections were divided into four categories:

1. "The standards and regulations applicable to the sale of new motor vehicles do not differentiate between road vehicles and off-road recreational vehicles."

   Mr. David said he believes it impossible to bring the pure off-road vehicles down to 86 decibels and recommended that the regulation be amended to establish separate regulations for pure off-road motorcycles at 86 decibles for January 1, 1975 and beyond.

2. "The noise standards applicable to the sale of new motorcycles for model years 1976 and beyond are unnecessarily restrictive and would seriously damage the entire motorcycle industry in the State of Oregon."

   Mr. David said that the limit of 80 decibels would eliminate about 35 percent of the motorcycle industry in Oregon in 1976, and proposed that "noise limits below the level of 83 dBA as specified for the year 1975, not be adopted until such time as both the desirability and technological feasibility of lower levels is determined."

3. "The exemption allowed for racing vehicles is ambiguous and could lead to unnecessary complications for the manufacturers and the state itself."

   Mr. David said the proposed regulation would require the manufacturer to make the impossible guarantee that racing vehicles would be used exclusively for that purpose. The Council suggested that "the exemption for racing vehicles be allowed for those machines which are specifically designated and adequately labeled by their manufacturer as being intended solely for racing purposes."

4. "The administrative procedure for monitoring and reporting new motor vehicle noise data is an unnecessary burden for the State as well as for each individual manufacturer."

Mr. David made the additional point that the industry would prefer basing the regulations on date of manufacturer rather than model year. He also said that the regulations do not really address the problem of vehicle modifications. He said the only way to attack this problem is through a firm on-road enforcement program or through a certification program for muffler installation.

Discussion followed concerning the proposed decible requirements, types of motorcycles and enforcement procedures.

Mr. Roger Hagie, representing Kawasaki Motors Corporation, Santa Monica, California, which manufacturers the Kawasaki motorcycles, submitted prepared testimony expressing objections similar to those presented by Mr. David. A copy has been made a part of the permanent file.

Mrs. Marguerite N. Watkins, Coos Bay, formally presented the written testimony of the Oregon Environmental Council which had previously been mailed to the Commission. A copy has been made a part of the permanent file. The OEC testimony offered the following changes in the proposed rules:

1. prohibit vehicle modifications, particularly of the exhaust systems and the sale of "noisy" exhaust systems.
2. strengthen the standard for trucks and buses manufactured before 1976 (EPA regulations for motor carriers will require all trucks and buses moving at speeds of 35 mph or less to meet a standard of dBA at 50 feet; DEQ has proposed a standard of 88 dBA).
3. suggested a weight cutoff at 10,000 pounds for trucks (rather than the proposed 6,000 pounds).
4. suggested Oregon require more stringent regulations for buses and gasoline-powered trucks.
5. recommended the proposed September 1973 level for automobiles in a moving test be reinserted in Table C.
6. recommended against exemption from the moving vehicle test of Table C of a motor vehicle equipped with snowtires (suggested a "bumping" upward instead).
7. recommended establishment of a separate standard for watercraft similar to the Seattle standard of 76 dBA.
8. suggested that nighttime hours begin at 8 p.m. rather than 10 p.m.

Mr. McPhillips said that a letter had been received from Freightliner Corp., Portland, a copy of which has been made a part of the permanent file. In summary, Freightliner fully favored an "aggressive vehicle noise control program and supported the proposed noise control regulations subject to their suggested modifications.

Mr. Ed Hughes, Oregon Motorcycle Dealers Association, Portland, supported Mr. David's comments and asked that the regulations be amended by substituting the word "distributor" for "dealer" in section 35-025, subsections (2) through (4).

There were no further witnesses.

The Chairman said the hearing record would remain open for 10 days for the submission of other testimony.

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried that the hearing be closed but the record kept open for 10 days, and that the matter be placed on the agenda for the July 19th meeting of the Commission, to be held in Salem.

FISCAL YEAR 1975 ANNUAL WATER STRATEGY

Mr. Sawyer summarized the key elements of the staff memorandum report, explaining that this was the second annual water strategy prepared by the Department. He said the two major points were:

1. The Water Quality Program is concentrating manpower in four priority areas:
    a. NPDES permits
    b. construction of waste treatment facilities, specifically the construction grant program
    c. completion and adoption of river basin water quality management plans
    d. compliance monitoring.
2. The Construction Grant Priority List for Fiscal Year 1975, contained in the second annual water strategy, is basically a modification of the List adopted by the Commission last fall, which was for FY 1974 and 1975.

Mr. Sawyer read the Director's recommendation that following receipt and consideration of public comments, the Commission approve the FY 1975 Annual State Water Strategy and adopt the revised FY 1975 priority list and project list for construction grants.

No one wished to comment on the staff report.

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried to approve the Director's recommendation.

PUBLIC HEARING ON ADOPTION OF PERMANENT RULES PERTAINING TO SUBSURFACE SEWAGE DISPOSAL--FEES FOR PERMITS AND LICENSES, FEES AND PROCEDURES FOR EVALUATIONS REPORTS, AND APPEALS BOARDS

Proper notice having been given as required by state law and administrative rules, the public hearing scheduled on this date of June 21, 1974, in the matter of the permanent adoption of the subject rules was opened by the Chairman with all members of the Commission in attendance.

Mr. Spies presented the staff memorandum report dated June 10, 1974, which recommended permanent adoption of the temporary rules pertaining to the above subjects adopted by the Commission on March 22, 1974. The proposed permanent rules contained one change from the temporary rules, that is, that the $5 portion of each evaluation report fee per lot for subdivision plots and real estate evaluations to be remitted by agreement counties to the Department be deleted. This change was recommended by the Citizens' Task Force which concluded that it would be more appropriate to cover this matter in the agreement with each county rather than to specify it in the rules.

It was the Director's recommendation that the proposed rules pertaining to Fees for Permits, Licenses and Evaluation Reports and to Subsurface Sewage Disposal Permit Appeals Boards be adopted as permanent rules, that they be added as Subdivisions 2 and 3, respectively, to Division 7 of Oregon Administrative Rules, Chapter 340, and that they be filed promptly with the Secretary of State, and become effective 10 days after publication by that office.

Mr. James F. Peterson, Director of Operations, Palmain Construction Company, Culver, Oregon, stated that he would like to have a mandatory requirement for the establishment of appeals boards in each county. Jefferson County did not have one and therefore citizens who were denied permits had no recourse for appeal.

Discussion followed on appeal procedures available to citizens. Mr. Cannon pointed out that Senate Bill 107 (1974 Special Session) which provided for appeals boards contained permissive rather than mandatory language. He added that an applicant for a permit denied by an agreement county which did not have an appeals board could ask for review by the Department's regional office.

Mr. Peterson expressed concern about subdivision plots given blanket approval by the county in which there are lots now deemed unsuited for septic

tank or drainage field installation. Even with the adoption of the proposed rule on prior approvals, owners of such lots will not be able to qualify for a subsurface sewage disposal system permit. Mr. Peterson agreed that septic tanks and drainage fields were not suitable for the area but argued in support of provisions for special systems which were allowed by the Health Division when that agency administered the subsurface sewage disposal program but which were deleted by the Department's rules.

Mr. Spies explained that the Health Division had observed so many failures by modified systems that that agency placed a moratorium on their use and through rule change subsequently eliminated their use. He said the Department has a statutory requirement to set regulations pertaining to alternate systems and that the staff was investigating several types.

Dr. Crothers requested a staff recommendation on package treatment plants as soon as possible.

Mr. Cannon informed the Commission that Mr. Peterson's case, which involves subdivision plots which cannot presently be developed, is under review by the Department's Central Region.

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried to adopt the rules as proposed. A copy is made a part of the permanent file.

Mr. George Hanson, an attorney from Oregon City, concurred with Mr. Peterson's comments. He said that evidence had been submitted to the Department from registered engineers supporting alternate systems, but none had yet received Department approval. He asked for a reinstatement of the alternate system rule. Mr. Somers informed Mr. Hanson of the Commission's administrative procedures concerning rule changes and invited him to submit a petition on the matter which would then require a public hearing.

Mr. Ray Huff, Chief Sanitarian for Malheur County, objected to the $50 permit fee. He said it was too high and would hinder the administration of the program in his county. He requested that agreement counties be allowed to set their own fees up to $50. Judge Roy T. Hirai of Malheur County concurred with Mr. Huff's comments.

Mr. Spies explained that the fee was set by rule for uniformity throughout the state. Mr. McPhillips said that the county could petition the Commission for a reduction of the fee, in which case a public hearing on the matter would be scheduled.

AUTHORIZATION FOR PUBLIC HEARING ON COMMERCIAL AND INDUSTRIAL NOISE STANDARDS

Mr. Hector presented the Director's recommendation that on July 19th in Salem the Environmental Quality Commission hold a public hearing for the adoption of the additions to the noise procedure manuals NPCS-1 and 2, and the noise rules for industry and commerce.

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

PETITION TO AMEND SUBSURFACE SEWAGE DISPOSAL RULES

Mr. Spies presented the staff memorandum report dated June 11, 1974, regarding the petition of Mr. Jim Christopherson of Jacksonville, Oregon, to amend the Commission rules pertaining to slope requirements for subsurface sewage disposal systems. It was the Director's recommendation that unless the petitioner would waive the 30-day requirement of ORS 183.390, the petition submitted by Mr. Christopherson be denied, but that the requested amendment be submitted to the Citizens' Task Force for consideration and recommendation before a decision on the merits of the request is made by the Commission.

Mr. Christopherson asserted that the Department had without justification changed the slope requirements used by the Health Division. He offered the example of a couple in Jackson County who had purchased a lot, prepared it for construction of a residence, received an offer substantially in excess of its initial cost, and who were denied a permit on the basis of the slope. He asked that the former requirements be substituted.

Mr. Osborne commented that the present slope requirements were based on expert testimony, particularly that received from soil scientists. He discussed the efforts of the Citizens' Task Force which includes a subcommittee to study the rules in general and controversial sections in particular. Slope requirements will be discussed by the subcommittee on June 28 in Tillamook, and expert testimony was invited.

Mr. Christopherson asked the Commission for an immediate decision on his petitioned request.

Dr. Crothers stated that the evidence submitted by Mr. Christopherson was insufficient to warrant a rule change and MOVED to deny the petition but to submit the subject to the Citizens' Task Force for review; seconded by Dr. Phinney and carried.

PROPOSED TEMPORARY RULES PERTAINING TO PRIOR PERMITS OR APPROVALS FOR CONSTRUCTION OF SUBSURFACE SEWAGE DISPOSAL SYSTEMS

Mr. Somers MOVED that the staff memorandum report dated June 17, 1974, be made a part of the permanent record, that the Director's recommendation be accepted, and the proposed rule adopted; seconded by Dr. Phinney. Discussion followed.

Mr. James Peterson, Culver, praised the rule proposal but still asked for blanket approval to cover unspecified lots.

Mr. Ed Shipsey, Klamath County, opposed the July 1, 1976 construction deadline, stating that once a permit was issued by a registered sanitarian it should be honored indefinitely.

Mr. Cecil Shaw of North Bend said that he bought 17 acres approved by the county but could not get a permit. Mr. Cannon said that the prior approval rule if adopted would **apply if Mr. Shaw had written approval.**

Mr. Al Bateman of Klamath Falls, representing Southern Oregon Defense, said that the Soil Conservation Service estimated that only 15-16 percent of Klamath County land was suitable for subsurface sewage systems. He submitted a copy of approvals granted by Klamath County in the last three years, contending that many lots were approved on the basis of submitted information only. He asked that prior approvals meet the rules that were applicable at the time approval was given. He circulated copies of pictures illustrating the unsuitability of the land for subsurface sewage disposal systems.

Mr. Ray Huff, Vale, stated that he would prefer a $25 charge since the evaluation reports had been prepared and need not be repeated.

Mr. George Hanson, Oregon City, again asked for prior approval of plots as well as specific lots.

Hon. Ray E. Doerner, Chairman of the Board of Commissioners for Douglas County, distributed copies of a prepared statement. He expressed the hope that the Department would seek legislative change to permit payment for services of appeals board members. He also objected to the July 1, 1976 deadline for completion of construction and said that "more work needs to be done with slope requirements."

Mr. Bob Dortsch of Klamath Falls also objected to the construction deadline and slope requirements. He submitted a copy of a study, "Demonstration Trenches on Slopes" by John Timothy Winneberger, Ph.D., Berkeley, California.

Mrs. Nancy Lecklider of Klamath Falls, wife of a developer, distributed copies of an article from the Klamath Falls Herald and News, dated April 21, 1974, which the Chairman said would be made a part of the permanent record. She also objected to the construction deadline.

Mr. John Schoonover, Klamath Falls, criticized the Southern Defense League and discussed the administration of the Department's subsurface sewage disposal program in Klamath County.

A realtor from Roseburg also objected to the construction deadline.

Mr. McPhillips closed the public hearing. The vote on the motion was unanimous (Mrs. Hallock was absent).

PUBLIC HEARING TO CONSIDER PROPOSED REGULATIONS FOR STATE FINANCIAL ASSISTANCE TO PUBLIC AGENCIES FOR POLLUTION CONTROL FACILITIES FOR THE DISPOSAL OF SOLID WASTE

Mr. Schmidt presented the Director's recommendation that public testimony pertaining to the proposed rules for State Financial Assistance to Public Agencies for Pollution Control Facilities for the Disposal of Solid Waste be received at this time; that the record remain open for 10 days following this hearing to receive any additional written comment; and that a final draft of the proposed rules be prepared after the 10-day period, with consideration of the testimony and comments received, for adoption by the Commission at its regular meeting scheduled for July 19, 1974.

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

AUTHORIZATION FOR PUBLIC HEARING TO CONSIDER ADOPTION OF RULES PERTAINING TO CIVIL PENALTIES AND ADMINISTRATIVE PROCEDURES.

It was the Director's recommendation that the Commission authorize public testimony to be heard to consider repealing existing rules on civil penalties, oil spill violations, and certain rules on the Commission's practices and procedures, and adopting new civil penalty rules and making amendments to its rules of practice and procedure, at their meeting in Salem on July 19, 1974, and that appropriate action be taken on these changes and proposed new rules after giving consideration to the testimony received and presented.

It was MOVED by Dr. Phinney, seconded by Mr. Somers and carried that the Director's recommenation be approved.

The meeting was adjourned at 7 p.m.

Shirley G. Shay, Secretary
Environmental Quality Commission

ENVIRONMENTAL QUALITY COMMISSION

Attendance Record

Meeting of June 21, 1974 in Coos Bay, Oregon

Name	Organization	Address
Jack Brown	Crown Zellerbach	1500 S.W. 1st Portland
Herman R. Amberg	Crown Zellerbach Corp	Camas, WA.
Sharlene P. Nelson	The Oregonian	Coos Bay
[illegible]	4 wheeling Coast Rangers	PO Box 314 North Bend Ore. 97459
Ed L. [illegible] (4WCR)	Pacific North West Four Wheel Drive Assoc.	PO Box 314 N. Bend Ore 97459
Norman Hanson	Westlog Inc.	P.O. Box 1091 Coos Bay
Charles [illegible]	OMARK INDUSTRIES.	OREGON SAW/CHAIN DIV. 9701 S.E. McLOUGHLIN BLVD PORTLAND, ORE. 97222
Gary L. Rust	Omark	same
Thomas D Hutton	Freightliner corp	Portland, Oreg
TOM R. BOWERMAN	INDIVIDUAL	Rt 2 Box 326B Eugene, Oregon 97401
James R [illegible]	individual	742 W. 10th Eugene, Ore
[illegible]	individual	Rt 2 Box 328 A Eugene Oregon
Steve [illegible]	HOT -	1149 Court St. NE Salem
Lloyd Buford	Bohemia Inc.	Eugene
MARY SHELBY	GENERAL FOODS CORP.	WOODBURN
Jim Coyle	Hanna Nickel Smelting	Riddle
Ralph D. Carter	Hanna Nickel Smelting Co.	Riddle
Michael J. Doyle	Hanna Nickel Smelting Co.	Cleveland, Ohio
Robert R Robertson	Hanna Nickel Smelting Co	Riddle
John Gunn	Int'l Paper Co	Eugene
Ted W. Nelson	Weyerhaeuser Co	North Bend
Miles Munson	Al Peirce Lbr Co.	Coos Bay
C. W. [illegible]	CCD Board member	Coos Bay

Clifford C. Shaw	Bay Area Council of Environment and Traffic	Coos Bay
Ed Stevenson	State Representative	Coquille
Gerald [illegible]	I-W.A. 3-116	Coos Bay
Harold Walton	I.W.A. 3-116	COOS BAY
John Neilson	Ore. Environmental Council	Portland
Marguerite N. Watkins	270 Johnson League of Women Voters	Coos Bay
Roy Morrison	Woolley Entp.	Drain Ore.
C. G. Lemanski	Cape Arago Lbr. Co.	Coos Bay
D.W. Miller	MOORE OREGON LBR CO	COOS BAY
Jack Rippen	[illegible]	North Bend
David R. [illegible]	CB CHAMBER OF COMM.	COOS BAY
J. M. Hutchins	Oregon Dunes N.R.A.	Reedsport
Stafford Owen	OREGON DUNES N.R.A	Reedsport
[illegible]	DEQ	ROSEBURG
ERNIE SCHMIDT	〃	PORTLAND
[illegible] Peterson	Private Citizen - Jefferson County	Culver Oregon
JAMES F. PETERSON	DIRECTOR OF OPERATIONS, PALMAN CONSTRUCTION CO. INC.	CULVER OREGON
R. S. MASON	STATE DEPT. GEOLOGY	PORTLAND.
Delbert P. Cline	DEQ	Coos Bay
John L. Smits	DEQ	Coos Bay
Edward T. Davison	DEQ	Roseburg
Richard Reiter	DEQ	Roseburg
K. E. Baker	DEQ	Roseburg
Merlyn Hough	DEQ	Roseburg
R.T. Westfall	DEQ	Roseburg
R.W. Adams	Gold Coast Motorcycle	1350 Ocean Blvd Coos Bay
Paul E. Harrison	Weyerhaeuser Co.	Springfield

Glen Carter		
Dennis David	Motorcycle Industry Council	1001 Connecticut Ave N.W. Washington D.C. 20036
ROGER HAGIE	KAWASAKI MOTORS CORP. USA	1062 MCGAW AVENUE SANTA ANA, CA. 92705
ED HUGHES	OREGON MOTORCYCLE DEALERS ASSN.	PORTLAND, OREGON
Ron Wannamaker	Yamaha of Roseburg	Roseburg Ore
Bob HARLESS	HARLESS HONDA	1350 OCEAN BLVD COOS BAY ORE 97420
Phil JOHNSON	HONDA OF ROSEBURG	310 NE STEPHENS ROSEBURG, OREGON
PAUL STOLPMAN	DEQ	
John Hector	DEQ	
BJ Seymour	DEQ	
Ralph Gazley		762 North Second Coos Bay
Alice Culbertson	Weyerhaeuser Co	Springfield
Jerry Harper	" "	"
Tom DONACA	ASSOC. OREG. IND.	PORTLAND
Fred Bolton	DEQ	PORTLAND
Ronald R. Ronge ✓	Union Oil of Calif	Los Angeles. Calif
DONALD C. GEARHART ✓	UNION OIL CO OF CALIF	LOS ANGELES, CALIF
E R Friess ✓	Union Oil Co of Calif	Los Angeles Calif
Jerry Tyhurst	" " " " "	Eugene Oregon
Ed Blum ✓	" " " " "	Los Angeles Calif
Ray Huff R.S.	Malheur Co.	courthouse Vale, Ore.

ORIGINAL

MINUTES OF THE FIFTY-SEVENTH MEETING

of the

OREGON ENVIRONMENTAL QUALITY COMMISSION

May 24, 1974

Public notice having been given to the news media, other interested persons and the Commission members as required by law, the fifty-seventh meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 9 a.m. on Friday, May 24, 1974, in the Second Floor Auditorium of the Public Service Building, 920 Southwest Sixth Avenue, 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 Wayne Hanson (Air Quality), Harold L. Sawyer (Water Quality) and Kenneth H. Spies (Land Quality); Regional Administrators E. Jack Weathersbee (Northwest), Verner J. Adkison (Midwest) and Richard P. Reiter (Southwest); staff members Thomas R. Bispham, Barbara A. Burton, Michael J. Downs, Russell H. Fetrow, Thomas R. Fisher, Thomas Guilbert, Patrick L. Hanrahan, John M. Hector, Merlyn L. Hough, Raymond M. Johnson, John F. Kowalczyk, John R. Lariviere, Gary W. Messer, Allen H. Mick, Douglas D. Ober, Harold M. Patterson, Ernest A. Schmidt, Barbara J. Seymour, Shirley G. Shay, Fredric A. Skirvin, Paul M. Stolpman, Dr. Warren C. Westgarth, and Chief Counsel Raymond P. Underwood.

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

MINUTES OF THE APRIL 19, 1974 COMMISSION MEETING

It was MOVED by Dr. Crothers, seconded by Mr. Somers and carried that the minutes of the fifty-sixth meeting of the Commission, held in La Grande on April 19, 1974, be approved as prepared and distributed.

PROGRAM ACTIVITY REPORT FOR THE MONTH OF APRIL 1974

Mr. Myles reported the actions taken by the Department during the month of April 1974, regarding the following 48 domestic sewerage, 2 industrial waste, 26 air quality control, and 5 solid waste management projects:

Water Quality Control - Northwest Region (17)

Date	Location	Project	Action
4-2-74	Gladstone	Ridgewood No. 2 Sewer	Prov. app.
4-2-74	Salem	Chadwick Glen Subdn. Sewers	Prov. app.
4-3-74	West Linn	Schlabach Tract Sewers	Prov. app.
4-8-74	Salem	Eola Dr. N.W. Barberry St. Sewer	Prov. app.
4-9-74	Portland	S.E. Barbara Welch Road Sewer	Prov. app.
4-9-74	Troutdale	Santana Addition Sewers	Prov. app.
4-9-74	Oak Lodge S.D.	Oakridge Subdn. Phase 2 Sewers	Prov. app.
4-10-74	Marion County	Illahe Hills Country Club Sewer	Prov. app.
4-15-74	Salem	Southtree Estates Sanitary Sewer Imp.	Prov. app.
4-16-74	Multnomah County	Errol Heights Park Sewers	Prov. app.
4-16-74	Portland	Waste Disposal Facility for Harbor Patrol Base	Prov. app.
4-17-74	Lake Oswego	Jan's Subdn. L.I.D. 139	Prov. app.
4-24-74	Hillsboro	Portland - Hillsboro Airport Sewer	Prov. app.
4-25-74	Gladstone	Charolais Heights Sewers	Prov. app.
4-25-74	Warrenton	First St., Birch Court to Block 133 Sewers	Prov. app.
4-26-74	Multnomah County	Barkerbrook & Holcomb Hts. Sewer	Prov. app.
4-26-74	Gresham	Bartels' Sewer Extension	Prov. app.

Water Quality Control - Water Quality Division (31)

Date	Location	Project	Action
4-1-74	Medford	Harry & David Factory Sanitary Sewers	Prov. app.
4-1-74	Central Point	First St. & Fourth St. Sewer	Prov. app.
4-1-74	USA (Tigard)	Panorama West Condominium Sewer	Prov. app.
4-1-74	Toledo	Shewey's Addn. Sewer	Prov. app.
4-1-74	USA (Aloha)	STP Expansion Equipment	Prov. app.
4-1-74	Pendleton	Mt. Hebron & Downtown Bypass Int.	Prov. app.
4-2-74	Cedar Hills	Lynnwood Relief Sewer (USA)	Prov. app.
4-2-74	Astoria	C.O. #11 to Sch. A - Int. Project	Approved
4-5-74	Oak Lodge S.D.	C.O. #7 - STP Contract	Approved
4-5-74	Florence	Florence St. Sewer	Prov. app.
4-5-74	Sunriver	West Cascade Trunk Sewer - Mt. Village East Trunk Sewer	Prov. app.
4-5-74	Astoria	C.O. #6 Sch. C - STP Contract	Approved
4-8-74	Springfield	Seeger Estates - 2nd Addn. Sewers	Prov. app.
4-8-74	USA (Aloha)	Equip. Specifications - STP Expansion	Prelim. app.
4-9-74	Bend	Greenwood Manor Apt. Sewer	Prov. app.
4-11-74	Sutherlin	Sherwood Dr. Sewer	Prov. app.

Date	Location	Project	Action
4-11-74	Crestellyn Acres	Plans for Completion of Sewage Pumping Station and 0.7 Acre Sewage Lagoon	Prov. app.
4-11-74	Woodburn	C.O. #1 - STP Contract	Approved
4-12-74	Boardman	Homestead Village No. 1 - Trailer Park Sewers	Prov. app.
4-17-74	Salem (Willow Lake)	STP Expansion - 70 MGD - Full Secondary	Prov. app.
4-22-74	North Bend	Spruce St. Sanitary Sewer	Prov. app.
4-22-74	Prineville	Hillcrest Subdn Sewers	Prov. app.
4-24-74	USA (Forest Grove)	T.V. Hwy Sewer Relocation	Prov. app.
4-26-74	USA (Gaston)	Evert Brown Sewer	Prov. app.
4-27-74	Florence	Spruce Subdn Sewers	Prov. app.
4-29-74	Pendleton	Addendum #1 - Mt. Hebron Sewer	Approved
4-30-74	BCVSA	Renault Ave. & Stearns Way Sewers	Prov. app.
4-30-74	Junction City	Lynch Subdn Sewers	Prov. app.
4-30-74	Echo	C.O. #A-1 - Sewer Contract	Approved

Water Quality Control - Industrial Projects (2)

Date	Location	Project	Action
4-3-74	Clackamas County	Eagle Creek National Fish Hatchery waste water control facilities	Prov. app.
4-12-74	Washington County	M. W. Sandhagen Dairy animal waste facilities	Prov. app.

Air Quality Control - Northwest Region (6)

Date	Location	Project	Action
4-11-74	Multnomah County	General Battery Corporation control of fumes from lead melting pots utilizing fabric filter	Approved
4-15-74	Multnomah County	Beall Pipe and Tank Corporation control of asphalt and coal for emissions from the coal tar pots and pipe coating and lining operation, by passing the contaminated air through four fiberglass filtration systems	Approved
4-16-74	Multnomah County	Ash Grove Cement Co. control of quick lime dust during kiln startup and shutdown by ducting the emissions to the existing baghouses	Approved
4-16-74	Multnomah County	Terminal Flour Mills Company control of grain and flour dust emissions from existing cyclones by replacing them with three reverse air jet bag filters	Approved

Air Quality Control - Northwest Region (cont)

Date	Location	Project	Action
4-17-74	Clackamas County	Alpine Veneer, Inc. control of veneer drier emissions by combustion of the hydrocarbons prior to discharge	Approved
4-17-74	Multnomah County	McCall Oil and Chemical Company construction of a 270,000 barrel capacity storage tank for No. 6 fuel oil	Approved

Air Quality Control - Air Quality Division (20)

Date	Location	Project	Action
4-1-74	Hood River County	Champion International, U.S. Plywood Division installation of a wood waste energy recovery system with hog fuel boiler	Cond. app.
4-2-74	Coos County	Roseburg Lumber Co. Plant #5 installation of Hammerquist baghouse filters	Approved
4-2-74	Douglas County	Roseburg Lumber Co. Plant #4 installation of Hammerquist baghouse filters	Approved
4-2-74	Douglas County	Roseburg Lumber Co. Plant #3 installation of Hammerquist baghouse filters	Approved
4-8-74	Multnomah County	Fred Meyer Shopping Center 484-space parking facility	Approved
4-11-74	Multnomah County	Lynch Terrace School 73-space parking facility	Cond. app.
4-12-74	Washington County	Tanasbourne Town Center 705-space parking facility	Req. add. info.
4-15-74	Multnomah County	Woodlawn Housing Project 100-space parking facility	Cond. app.
4-15-74	Lane County	Weyerhaeuser Co., Springfield installation of a system to control TRS emissions from "other sources"	Approved
4-15-74	Lane County	Weyerhaeuser Co., Springfield installation of an electrostatic precipitator for lime kiln particulate control	Approved
4-17-74	Douglas County	Hub Lumber Co. installation of wood waste recovery system with hog fuel boiler	Approved
4-18-74	Hood River County	Hanel Lumber Co. installation of wood waste recovery system with hog fuel boiler	Approved

Air Quality Control - Air Quality Division (cont)

Date	Location	Project	Action
4-22-74	Clackamas County	Holly Farm Shopping Center 501-space parking facility	Req. add. info.
4-22-74	Multnomah County	Mountain Village Apartments 450-space parking facility	Req. add. info.
4-23-74	Washington County	Sunset Volkswagon 171-space parking facility	Conceptual app.
4-24-74	Multnomah County	PGE Office Building 401-space parking facility	Approved
4-25-74	Marion County	Kaiser Aetna (shopping center) 420-space parking facility	Cond. app.
4-26-74	Lane County	Coburg Plaza (Phases II & III) 65-space parking facility	Cond. app.
4-26-74	Lane County	Wood Products Credit Union 93-space parking facility	Cond. app.
4-26-74	Multnomah County	Cooper Development Co. (apartments) 76-space parking facility	Conceptual app.

Solid Waste Management - Northwest Region (2)

Date	Location	Project	Action
4-18-74	Tillamook County	Crown Zellerbach Corporation Hallinan Road Disposal Site, new wood waste landfill; proposed permit	Approved
4-22-74	Yamhill County	U.S. Plywood Corp. Willamina Mill Landfill; existing wood waste landfill; letter authorization	Prov. app.

Solid Waste Management - Solid Waste Management Division (3)

Date	Location	Project	Action
4-2-74	Linn County	Lebanon Sanitary Landfill existing domestic site; Operational Plan	Prov. app.
4-5-74	Linn County	Tomco Inc. Landfill existing domestic site; Operational Plan	Prov. app.
4-10-74	Lane County	Marcola Disposal Site existing domestic site; Operational Plan	Prov. app.

Dr. Crothers asked to what extent, if any, was an enterprise in the state delayed because the Department did not have the necessary staff to process a permit application in a timely manner. The staff acknowledged delays in processing permit applications in all program areas, particularly NPDES permit

applications, primarily due to procedural requirements of federal legislation, but also due to the shortage of staff in certain areas.

Dr. Crothers asked about the status of the sewage disposal plans submitted by Wa-Chuck for the Portage Inn, The Dalles. Mr. Cannon replied that on May 23, the Department had received a letter from the City of The Dalles, stating that the City would accept the sewage from the facility and supervise its handling. Mr. Sawyer explained that Wa-Chuck proposed building a holding tank as an interim facility.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to give confirming approval to the staff actions reported.

PUBLIC HEARING ON ADOPTION OF PERMANENT RULES PERTAINING TO ADMINISTRATIVE PROCEDURES

Proper notice having been given as required by state law and administrative rules, the public hearing in the matter of the adoption of permanent rules pertaining to administrative procedures was called to order by the Chairman at 9:30 a.m. All Commissioners were in attendance.

Mr. Myles presented the staff memorandum report dated May 9, 1974, proposing that the present temporary rules pertaining to administrative procedures, which repealed Sections 11-005 through 11-170, Oregon Administrative Rules, Chapter 340, Division 1, Subdivision 1, and adopted in lieu Sections 11-005 through 11-135, adopted by the Commission on March 22, 1974, be adopted as permanent rules of the Commission.

Mr. McPhillips noted for the record that no correspondence on this matter had been received to date. He then opened the hearing for public testimony. However, no one wished to testify.

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried that the present temporary rules be approved and adopted as permanent rules of the Commission pertaining to administrative procedures. (A copy of these rules is made a part of the permanent file.)

PGE HARBORTON (PORTLAND), STATUS REPORT AND REQUEST FOR PUBLIC HEARING

Mr. Kowalczyk presented the staff memorandum report regarding the status of

the air contaminant discharge permit issued by the Department on September 21, 1973, for PGE's Harborton gas turbine electric generating facility, with respect to future operation and fuel use projections and a detailed and comprehensive compliance demonstration program and schedule.

The report contained the Director's recommendation that a public hearing be authorized before a hearings officer in Portland, at a time and place to be determined by the Director, to consider modifying PGE's Harborton permit in accordance with the following staff recommendations:

1. Incorporate PGE's projected fuel use-operating schedule for the 13-month period beginning July 1, 1974, into the Harborton permit as a maximum allowable use.
2. Require minimum use of the facility to the extent possible.
3. Continue to require use of natural gas to the maximum extent available when operation is necessary.
4. Require a detailed projected fuel use-operating schedule for each remaining month of operation to be submitted to the Department for approval by the 15th of each preceding month.
5. Require monthly reports on the progress toward relocation of the plant to be submitted to the Department each month beginning August 1, 1974.
6. Prohibit commercial power generation until compliance with permit conditions is demonstrated or an acceptable compliance schedule is submitted and approved for particulate and carbon monoxide emissions while gas firing, smoke spot when oil firing and sound pressure levels.
7. Require a comprehensive air monitoring program and schedule to be submitted to the Department for approval by August 1, 1974, for implementation beginning September 1974, which will define actual air quality impact of the facility including plume rise under various meteorological conditions including "worst" ventillation conditions.
8. Provide for restricting operating hours and/or power levels at Harborton if noise becomes a significant problem prior to attaining compliance with sound pressure levels contained in the Harborton air contaminant discharge permit.

Mrs. Hallock asked if the Department had received any information from the City of Portland regarding the status of the land use permit, which will expire in the fall of 1974, issued by the City for the Harborton facility. Mr. Cannon replied that the Department had been advised that a definitive answer from the City would be forthcoming in early June. He added that if the Commission approved the request for a public hearing, he would want it held within a month.

Dr. Phinney asked for clarification of the manner in which the decision is made as to the amount of natural gas available.

Mr. H. A. Porter, Senior Vice President of Portland General Electric Company, replied that PGE had requested an estimate from Northwest Natural Gas Company as to the availability of gas for this fall, and the best estimate is that no gas will be available during the winter months. Mr. Porter said that it is PGE's view that availability of fuel will be restrictive as far as the company's ability to operate is concerned.

Discussion followed on the staff evaluation of the performance of the turbines with respect to emissions control capability.

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried that the Director's recommendation for a public hearing be approved.

PGE BETHEL (MARION COUNTY)--STATUS REPORT, JOINT PUBLIC HEARING

Mr. Mick presented the staff memorandum report regarding complaints of noise and vibration from the operation of PGE's gas turbine power generating facility at the Bethel substation located east of Salem.

He reported that a public hearing has been scheduled before the Environmental Quality Commission and Mid-Willamette Valley Air Pollution Authority Board at 7:30 p.m. on June 17, 1974, in the City Council Chambers of the Salem Civic Center, in order that the EQC and MWVAPA Board can receive an updated evaluation of the environmental impact of the Bethel turbine generators and to consider the need for possible modification of PGE's air contaminant discharge permit and/or noise limits or operating conditions. A tour of the Bethel facility and nearby residences will precede the public hearing.

WEYERHAEUSER COMPANY, May 13, 1974 PUBLIC HEARING

The Chairman stated that the tentative agenda for this meeting anticipated a report on the subject hearing and an opportunity for public comment. Although the agenda item was subsequently removed, Mr. McPhillips wanted to provide an opportunity for anyone from the Springfield area who might have come to Portland to testify. However, no one responded to the Chairman's invitation.

BOISE CASCADE (SALEM)

Mr. Fetrow presented the staff memorandum report regarding a proposed modification to the air contaminant discharge permit for Boise Cascade's Salem Pulp and Paper Plant, and authorization for a public hearing to consider the company's proposed expansion of pulping capacity and improvements to its waste water control facility.

In order to meet the recovery system particulate requirements by June 1, 1975, as stated in the permit, Boise Cascade submitted to the Department a Notice of Construction and Application for Approval of the installation of a mist eliminator on the recovery furnace, action on which was requested of the Commission at this meeting; and the installation of counter current washers and an additional (eighth) digester, to be the subjects of the proposed public hearing.

The report contained the Director's recommendation that the Commission:

1. approve, subject to staff approval of detailed plans and specifications, installation of a mist eliminator to control plume opacity and particulates and authorization of modifications to Boise Cascade's Air Contaminant Discharge Permit as per Attachment A;
2. authorize a public hearing to be held at the Salem Civil Center at 7:30 p.m., June 27, 1974, to further consider proposed expansion of pulping capacity and proposed improvements to wastewater control facilities.

Mr. C. J. Fahlstrom, Resident Manager of the Boise Cascade Salem Pulp and Paper Mill, distributed to the Commission copies of a prepared statement which he read (a copy has been made a part of the permanent file).

In summary, Mr. Fahlstrom's statement agreed with the clarifying intent of the wording change in Condition 1, Section A of the proposed modification to the Salem mill air contaminant discharge permit, but requested a change in the recommended construction and demonstrated compliance dates for installation of a mist eliminator to control plume opacity (from June 1, 1975 to July 1, 1975) because of a delayed delivery time given by the manufacturer. The company also asked for a hearing earlier than the proposed June 27th date.

It was MOVED by Mr. Somers, seconded by Dr. Phinney and carried to approve the Director's recommendation with the substitution of the company's proposed revised schedule.

CARGILL, INC. (PORTLAND)

Mr. Bispham presented the staff memorandum report regarding a proposed modification of the company's air contaminant discharge permit to accommodate a revised compliance schedule submitted by the company together with a check for the full amount of the civil penalty levied ($100 per day for 20 days in violation).

In summary, the Cargill proposal incorporates a three-phase control program:

> Phase I proposes to relocate the existing barge unloading facility and utilize a modified conveyor system by January 1, 1975. The company believes this will result in an 80 percent reduction of particulate emission from this operation.
>
> Phase II relates to the control of emissions from the truck and grain transfer and receiving, transfer of grain to storage and grain cleaning facilities. Compliance of these facilities would be accomplished in the same time frame as the original schedule.
>
> Phase III encompasses the control of emissions from the barge unloading and ship loading operations. Cargill has requested a final completion date of May 1, 1976, which exceeds the original compliance date by six months for this portion of the overall control program.

Mr. Bispham presented the Director's recommendation that the Commission authorize acceptance of the proposed revised compliance schedule and incorporation of said schedule into a proposed modified permit to be issued pursuant to required notice and hearing procedures.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to approve the Director's recommendation.

Discussion followed concerning the effectiveness of the $100 per day penalty, the maximum amount that can be levied for a permit violation. It was generally agreed that the amount was large enough to deter pollution and to gain the attention and subsequent cooperation of companies in violation.

Mr. Cannon noted for the record that as far as the Department is concerned, "both Cargill and The Port of Portland were equally at fault in getting us to this position and delaying the improvements that were necessary to resolve the problem."

PUBLIC FORUM

The Chairman altered the order of the agenda to provide an opportunity for anyone in attendance to be heard on any subject pertinent to the Commission's jurisdiction. No one responded.

WESTERN FOUNDRY COMPANY, WASHINGTON COUNTY

Mr. Bispham presented the staff memorandum report regarding "recent excessive and highly visible" emissions from the operation of Western Foundry Company for which the Department issued a Notice of Violation on January 31, 1974. In subsequent meetings with Western Foundry representatives, the Department required the company to submit a short-range program for best practicable control of the entire foundry. This requirement will be met by June 3, 1974, when the original scrubber serving the cupola and electric arc furnace will be on line. Regarding the long-range program to provide separate control systems for the electric arc furnace, sand-handling processes and cleaning room, the Department and Western Foundry Company agreed to the following compliance schedule which will be incorporated into the company's forthcoming permit:

1. June 15, 1974, or before, submit a Notice of Construction with engineering plans and specifications for the control of air contaminants from the electric arc furnace, sand-handling equipment and cleaning room operations.

2. August 15, 1974, or before, receive Department approval of the engineering plans and specifications with any required amendments.

3. September 15, 1974, or before, the company shall have issued purchase orders for the air pollution control equipment approved in item #2 with copies thereof furnished to the Department.

4. February 1, 1975, or before, Western Foundry Company shall furnish proof to the Department of procurement of the air pollution control equipment approved in item #2.

5. March 1, 1975, or before, the company shall have initiated on-site construction for the installation of the air pollution control equipment.

6. May 1, 1975, or before, Western Foundry Company shall complete the installation and adjustment of the air pollution control equipment and have attained compliance with the Department standards. (At this time, the existing restored Venturi scrubber system would serve only the existing cupola.)

The Director's recommendation requested the Commission to authorize acceptance of the proposed program and compliance schedule for incorporation in the Western Foundry permit subsequent to the required public notice and hearing.

Commissioners and staff discussed the issue raised by Mr. Somers as to the propriety of the Commission's accepting this type of recommendation until the entire administrative process was completed; that is, by granting acceptance of the proposal at this time, the Commission would be giving de facto approval without benefit of other information which might be brought to the public hearing. Mr. Somers commended the staff for assisting the company in developing control procedures to attain compliance, but wanted to avoid placing the Commission in a posture of prejudging an applicant.

Mr. Weathersbee agreed and said that the purpose of the report was to bring the matter to the Commission for their information and direction. Mr. Underwood said that the staff memorandum should have been worded as a status report to the Commission without any recommendation for action by the Commission.

The Commission concurred and added that they appreciated being advised.

REYNOLDS ALUMINUM (TROUTDALE)

Mr. Kowalczyk presented the staff memorandum report on the status of activities related to issuance of a proposed air contaminant discharge permit to Reynolds Metals Company. A public hearing to consider adoption of the proposed permit has been set for June 10, 1974, in Portland before the Department's Hearings Officer.

No formal action by the Commission was required.

Discussion followed on Dr. Crothers' question to Mr. Somers as to the propriety of members of the Commission visiting aluminum plants. Mr. Somers stated that if there is known conflict in the proposed issuance of a permit and/or a substantial question over the issuance of a permit, the Commission or any member of the Commission must not take ex parte testimony from one side or the other without giving the other side an opportunity to be present. Where

there is no known conflict in the issuance of a permit, or when the Commission is considering administrative regulation that would affect an entire industry, the Commission should make every effort to learn as much as possible about the particular plant or industry.

Mr. Cannon pointed out that if three or more Commissioners visit a plant, requirements of the public meeting law must be met.

Mr. Underwood summarized by stating that under Fasano, the Commission must avoid ex parte contacts in a conflict situation. The Commission must also avoid visits in such numbers that the members are technically involved in a public meeting without prior notice. Other than those two exceptions, the Commission could conduct whatever visits or inspections it deemed necessary to and appropriate to the conduct of its business.

LABISH VILLAGE (MARION COUNTY), PROPOSED MORATORIUM ON SUBSURFACE SEWAGE SYSTEMS

Mr. Messer presented the staff memorandum report dated May 13, 1974, on Labish Village subdivision with respect to problems with the subsurface sewage systems because of soil formation and lot size. Sewage failures in the subdivision have been estimated as high as 50 percent by the Director of Marion County Health Services. The decision to sewer the subdivision was recently reached by Marion County, the City of Salem, the Marion-Polk Boundary Commission, and the Department of Environmental Quality. The residents of the area have also recognized the need for sewers and a Sanitary Service District is in the process of being formed.

Mr. Cannon provided more detail on the problem presented by Labish Village. The subdivision lies beyond the containment boundaries for the City of Salem established by the Marion-Polk Boundary Commission. The problem of the septic tank failure rate in the area could have been resolved either by sewering the area or by forcing the residents to move out. All parties concerned met and agreed upon the proposal presented to the Commission, that is, to build a pressure sewer line to serve Labish, connecting it to the City of Salem, and ask the Commission to place a moratorium on further development within the subdivision; ask the appropriate governmental units to prohibit further building outside the area; and request the Commission and the Department to control the development of the area by issuing a waste discharge permit on the sewer line.

Mr. Somers questioned the Commission's authority to use a waste discharge permit to facilitate the resolution of local zoning problems. Mr. Sawyer explained that the county service district which is being established in the area would propose a collection system of a certain size and capacity and apply to the DEQ for a permit to construct and operate the system; the Department's responsibility would be to review the permit application to insure that it meets DEQ requirements. He added that the key reason for limiting septic tank installation in the areas outside of but immediately adjacent to Labish Village is that continued installation of septic tanks with their high rate of failure would force annexation to the City of Salem to solve a health hazard problem and could result in expansion of the subdivision through the mandatory extension of the city sewer system.

Mr. Messer clarified the Director's recommendation by stating that the Department was requesting the Commission to authorize a public hearing to consider the moratorium proposal.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to set the matter for public hearing.

PUBLIC HEARING ON PROPOSED AMENDMENTS TO NPDES PERMIT PROCEDURES

Proper notice having been given as required by state law and administrative rules, the public hearing in the matter of the adoption of proposed amendments to the National Pollutant Discharge Elimination System (NPDES) permit procedures was called to order by the Chairman at 11:30 a.m. All Commissioners were in attendance.

Mr. Sawyer presented the staff memorandum report dated May 14, 1974, proposing amendments to the waste discharge permit rules adopted by the Commission on September 21, 1973, by adding language to section 45-035, subsections (6), (7) and (8), Oregon Administrative Rules, Chapter 340, Division 4, Subdivision 5, as follows (new material underscored):

Subsection (6): After the 14-day applicant review period has elapsed, the public notice and fact sheet shall be circulated in a manner prescribed by the Director. Any public notice under this section shall be prepared and circulated consistent with the requirements of regulations issued under the Federal Act. The fact sheet,

proposed NPDES permit provisions, application and other supporting documents will be available for public inspection and copying.

(7) The Director shall provide an opportunity for the applicant, any affected state, or any interested agency, person, or group of persons to request or petition for a public hearing with respect to NPDES applications. If the Director determines that useful information may be produced thereby, or that there is a significant public interest in holding a hearing, a public hearing will be held prior to the Director's final determination. There shall be public notice of such a hearing.

(8) At the conclusion of the public involvement period, the Director shall make a final determination as soon as practicable and promptly notify the applicant thereof in writing. Any NPDES permit issued hereunder shall contain such pertinent and particular conditions as may be required to comply with the Federal Act or regulations issued pursuant thereto. If the Director determines that the NPDES permit should be denied, notification shall be in accordance with section 45-050. If conditions of the NPDES permit issued are different from the proposed provisions forwarded to the applicant for review, the notification shall include the reasons for the changes made. A copy of the NPDES permit issued shall be attached to the notification.

These additions essentially formalize procedures which are presently in effect by virtue of a memorandum of agreement between EPA and the Department.

The only witness who wished to be heard on this matter was Mr. Christopher Kittell, representing the Northwest Environmental Defense Center (NEDC), who distributed to the Commission copies of a prepared statement which he then read (a copy is made a part of the permanent file). As a part of his statement, he proposed further changes to the proposed amendments to the NPDES rules which the NEDC believed would more clearly establish compliance with the Federal Act and regulations issued pursuant thereto.

Following the Commission's questioning of the witness, Mr. Underwood pointed out that the pertinent issue before the Commission was consideration of whether or not the proposed amendments presented by Mr. Sawyer be adopted. Mr. Kittell or any one else could petition the Commission for rule changes under the procedural rules adopted by the Commission earlier in the day.

It was MOVED by Dr. Crothers, seconded by Mr. Somers and carried that the proposed amendments to the NPDES rules be adopted.

The Chairman recessed the meeting for luncheon.

MARTIN MARIETTA ALUMINUM, INC. (THE DALLES)

Following the luncheon recess, the Chairman reconvened the meeting at 1:30 p.m.

Mr. Skirvin presented the staff memorandum report dated May 17, 1974, regarding the public hearing conducted by the Commission on May 3, 1974, at The Dalles, for the purpose of (1) considering an air contaminant discharge permit proposed for issuance to Martin Marietta Aluminum, Inc. and (2) considering a petition on behalf of the Wasco County Fruit and Produce League requesting that the Commission designate The Dalles as a Special Problem Area.

The matter before the Commission at this meeting was:

1. to determine whether or not The Dalles area should be designated as a Special Problem Area, and

2. to determine whether or not the proposed permit should be issued. (The proposed permit as written requires compliance with the existing aluminum plant emission limits upon issuance.)

Mr. Somers asked that the transcript made of the hearing be corrected to show that on page 140, Mr. Somers, not Mr. Haskins, was speaking.

It was MOVED by Dr. Crothers, seconded by Mr. Somers and carried that no action be taken on the request for designation of The Dalles as a Special Problem Area. Mrs. Hallock voted "no" and for the record the Chairman voted "aye."

It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried that the proposed air contaminant discharge permit be issued as proposed.

AMBIENT AIR STANDARD FOR LEAD, STATUS REPORT

Mr. Johnson presented the staff memorandum report dated May 17, 1974, regarding a proposed ambient air standard for lead which will be presented for public hearing on June 24, 1974 in Portland. The following standard will be recommended for adoption:

The lead concentration measured at any sampling station, using sampling and analytical methods on file with the Department, shall not exceed 2.0 ug/m^3 as an arithmetic average concentration of all samples collected during any three calendar month period.

Discussion followed on the problem of enforcing such a standard and on the health hazard aspect of high concentrations of lead in the ambient air.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried that the report be accepted as part of the record.

COMPLEX SOURCES RULE REVISION, STATUS REPORT

Mr. Downs presented the staff memorandum report dated May 20, 1974, regarding proposed revisions to the Complex Sources Rule adopted in January 1972, following adoption of Oregon's Clean Air Act Implementation Plan. The Environmental Protection Agency (EPA) has required its revision as a part of the Department's Maintenance of Air Quality Standards.

The main points made by EPA for consideration in revising the rule are: 1) regulations and procedures must apply statewide; 2) rule requirements must apply to other traffic generating sources as well as highways and parking facilities; 3) specific provisions must be made for complex sources proposals to be made available for public review and comment; and 4) owners and operators of proposed complex sources must comply with applicable portions of the transportation control strategy in the State Implementation Plan.

Mr. Downs summarized the proposed revision of the rules which will be presented at a public hearing on June 24, 1974, in Portland.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to adopt the status report as part of the record.

SULFUR CONTENT OF FUELS, INFORMATIONAL REPORT

Mr. Hanson presented the staff memorandum report dated May 20, 1974, regarding Commission rules pertaining to sulfur content in fuel oils, and specifically the rule pertaining to residuals, incorporated as part of Oregon's Clean Air Act Implementation Plan, which after July 1, 1974, requires that "no person shall sell, distribute, use, or make available for use, any residual oil containing more than 1.75 percent sulfur by weight."

Following is a summary of the oral report presented by Mr. Hanson:

Late last fall the Commission adopted the following position relative to the energy crisis in the United States: "The nation must find ways to produce energy without degrading the environment. In Oregon, industry and the public need to understand that the Environmental Quality Commission will not use the energy crisis to back off from environmental quality standards."

In January, the Department wrote to oil suppliers to obtain information as to what the shortage would be, what kind of sulfur content they would be able to supply the state, and how much more oil they would be able to supply if in fact the regulations were changed. Letters received in reply and other information received by the Department indicate a general concern among industry distributors and oil manufacturers as to their ability to meet the Department regulation of 1.75 percent sulfur by weight in residual oil. There evidently is no problem in meeting the Department's regulations on the lighter distillates such as home heating oil.

Northwest Natural Gas Company has notified industrial users that there could be a potentially greater shortage of natural gas this winter, which would mean a greater dependency on residual oil. Some of the oil companies have notified their customers and distributors that they are not going to be able to supply them oil because of the Department regulation.

Mr. Hanson then read a copy of the letter sent by the Department in early May to approximately 60 companies which included manufacturers, major industrial users and distributors. In summary, the letter informed the recipients that a partial response to the information requested from them by the Department in January, 1974, indicated there may be some difficulty in complying with the 1.75 percent sulfur limitation for residual fuel, effective July 1, 1974; that currently "the Department does not have sufficient information to justify a specific recommendation to the Commission nor to project a long-range plan. Therefore, unless specific written applications with supporting information justifying a variance are received and granted by the Commission, we [the Department] will have no alternative but to strictly enforce the regulation."

Following Mr. Hanson's presentation and questions from the Commission members, the Chairman called on witnesses who wished to be heard.

Mr. Thomas C. Donaca, General Counsel, Associated Oregon Industries (AOI), distributed copies of a prepared statement which he read (a copy is made a part of the permanent file). In summary, Mr. Donaca's testimony dealt with the

problems of lack of availability of residual fuels, regulations pertaining to sulfur content by weight recently promulgated by the Federal Energy Office, and difficulties posed by the variance procedure. In view of these and other matters reported by Mr. Donaca, AOI requested a one-year extension of the 2.5 percent sulfur limitation, from July 1, 1974 to July 1, 1975.

Mr. Jack R. Brown, representing Crown Zellerbach, distributed copies of a prepared statement which he read (a copy is made a part of the permanent file). In summary, Mr. Brown's testimony indicated the steps taken by Crown Zellerbach to acquire adequate supplies of fuel that would meet Oregon's environmental requirements. The company's supplier, Union Oil Company, has indicated it cannot meet the 1.75 percent sulfur limitation during the 1974-75 winter period. Further, Crown Zellerbach was informed by Northwest Natural Gas Company "to expect between 180 to 210 days of 100% gas curtailment between September 1, 1974 and May 31, 1975" (the previous winter Crown Zellerbach experienced 138 days' curtailment). Thus, the estimated fuel oil usage has had to be increased. The company also supported the one-year extension of the 2.5 percent sulfur limitation.

Mr. David C. Klick, Secretary of the Northwest Food Processors Association, and speaking on behalf of 28 Oregon members of the Association, distributed copies of a prepared statement which he read (a copy is made a part of the permanent file). In summary, Mr. Klick's testimony affirmed the dependency on residual fuel for the processing industry as well as other kinds of industry in Oregon, particularly if natural gas is curtailed. Further, "...any shortage of residual fuel oil caused by DEQ's enforcement of a 1.75% limit which suppliers cannot meet would have an adverse affect on food processors..." The Association recommended maintenance of the 2.5 percent sulfur limitation for another year.

Mr. Leonard Gassner, Executive Director, The Oil Heat Institute of Oregon, commented on his concern for the 20 or so members of the Institute who distribute residual oil, and for the more than 2,500 end-users of residual fuel oils in Oregon, including schools at all levels, state institutions, apartment houses, hotels, rest homes and various major industries. He agreed that distributors did not have control over the product they received, but added that the end users also did not have control. He said the variance procedure would present "an unusual administrative problem" due to the large number of variances

applications that would have to be filed. He urged a one-year extension of the 2.5 percent sulfur limitation.

Mr. Cannon pointed out that the Department had made a good faith effort to get the information needed to make an evaluation of the situation and recommendation to the Commission. He wanted the record to note the dismay and frustration "we have all experienced...with the apparently highhanded position of the oil companies."

Mr. Dennis L. Samuelson, Superintendent of the Portland Terminal, Union Oil Company of California, submitted a letter which indicated that Union Oil intended to file an application for a variance prior to June 10th. Representatives from the Company plan to attend the June 21st meeting of the Commission in Coos Bay. (A copy of the letter is made a part of the permanent file.)

There were no other witnesses.

Mr. Cannon noted for the record that the Commission and Department had received a letter from Hanna Nickel Smelting Company in Riddle, Oregon, requesting the Commission to delay for one year implementation of the 1.75 percent sulfur by weight limitation. (A copy of this letter is made a part of the permanent file.)

PROPOSED NOISE RULES, STATUS REPORT

Mr. Stolpman presented the staff memorandum report dated May 15, 1974, on the status of departmental implementation of the noise control enabling legislation, which requires the Department to establish specifications for equipment to be used in the monitoring of noise emissions and the procedures for the collection, reporting, interpretation and use of data obtained from noise monitoring activities prior to the adoption of noise control regulations. To meet this requirement, Department staff prepared the following procedures manuals, the contents of which were summarized in the staff report:

1. Sound Measurement Procedures Manual, NPCS-1
2. Requirements for Sound Measuring Instruments and Personnel, NPCS-2
3. Motor Vehicle Sound Measurement Procedures Manual, NPCS-21

The remainder of the staff report dealt with a proposed policy statement applicable to all noise rules, exceptions and variances, and a summary of the

proposed standards for new and in-use motor vehicles including off-road recreational vehicles and motorcycles.

Mr. Stolpman presented the Director's recommendation that on June 21, 1974 in Coos Bay, the Commission hold a public hearing for the purpose of adopting the noise manuals and the noise rules for motor vehicles.

Mrs. Janette Egger, Chairman of the Oregon Environmental Council Noise Pollution Subcommittee, read a brief statement regarding the roadways section of the proposed noise rules, requesting a hearing on this section within two months, to be held in a centrally located city.

It was MOVED by Mr. Somers, seconded by Dr. Crothers and carried to approve the Director's recommendation to hold the requested public hearing.

PORTLAND COMMUNITY COLLEGE, ROCK CREEK CAMPUS, PROPOSED PARKING FACILITY

Mr. Downs presented the staff memorandum report dated May 23, 1974, regarding an application from Portland Community College (PCC) to construct a 449-space parking facility ancillary to a proposed new PCC campus known as the Rock Creek Campus.

Land use and transportation problems were analyzed in the report, concluding with the Director's recommendation that the Commission issue an order prohibiting construction of the 449-space parking facility proposed by Portland Community College, without prejudice to the right of Portland Community College to file a revised application when an approved location has been obtained from the Columbia Region Association of Governments (CRAG).

Witnesses were called by the Chairman.

Mr. Hugh McGilvra of Forest Grove, member of the Board of PCC and District Zone #7 representative, discussed the concept of PCC with its emphasis on technical and vocational education as it related to the ancillary developments proposed in the PCC Master Plan for the Rock Creek Campus. He summarized the five-year development of the proposed campus and discussed the problems presented by changing requirements imposed by successive Washington County planning directors. Continued delays have extended the opening date of the campus from September 1974 until at least the fall of 1975.

Mr. John Mosser, attorney for PCC, stated that he was unaware of any problems with the parking facility application until the week of the May 24th Commission meeting. He said that the site work specifications were out for bid and that the architects were working on final plans for the building which PCC hoped to let out for bid in August or September. He developed the project's history to illustrate "how thoroughly the campus has worked with all the agencies which make up CRAG..."

Mr. Mosser pointed out that the final choice of the Rock Creek site was urged by a former Washington County planning director, and thus 250 acres were purchased in 1970 for $550,000 from local funds. Recent land use zoning changes established the Rock Creek site as a forest conservation and agricultural zone. PCC, however, applied to Washington County and secured conditional use approval for the campus to continue in the Rock Creek location. Final approval is contingent upon PCC's meeting site plan conditions specified by the Washington County Planning Commission at its meeting on May 14th, that is, PCC must have EQC approval of the parking space facility, Boundary Board approval for water and sewerage, and must submit a landscape plan.

PCC submitted its parking facility application on March 15, 1974, and on March 27th received a letter from the DEQ requesting additional details on the proposed transit service and computer carpool program. DEQ subsequently received a letter from the CRAG staff indicating CRAG disapproval of the Rock Creek site. This letter and the land use questions it raised was the basis for the Director's recommendation to prohibit construction of the facility until the land use question was resolved. Mr. Mosser stated that this letter was not authorized by the CRAG Board because the proposed campus has never been discussed by the Board, and that both staff and members of CRAG's Board agreed with PCC that approval must come from the Washington County Planning Commission, not from CRAG.

Mr. Mosser suggested that the Commission authorize the parking facility but with the provision that if the CRAG Board votes on May 31st that it does not want the campus at Rock Creek, the EQC disapprove it; or, authorize the Director either to approve the parking facility if there is no action by the CRAG Board on May 31st, or to reject the parking facility if the CRAG Board says on May 31st that it does not want PCC to locate at Rock Creek.

Discussion followed concerning acreage devoted to agriculture, requirements for a building permit, and the status of the Washington County Master Plan.

Roger Mellem, Administrative Assistant, presented the prepared statement of Multnomah County Commissioner Donald E. Clark, who could not attend the meeting because of a prior commitment (a copy is made a part of the permanent file). Commissioner Clark urged the Commission to prohibit construction of the parking facility "until such time as all of the questions are answered and concerns are resolved." He recommended that the site location matter be referred to CRAG for resolution.

In the discussion that followed, Dr. Crothers asked Mr. Mosser if CRAG now has any legal standing to disapprove the use of the land. Mr. Mosser replied that it does not have, that CRAG hopes to have a first draft of a master plan by July 1, 1975 for adoption in 1977, after which the agency would be in a legal position to review and act upon plans approved previously by other governmental units.

Mr. Roy Hemmingway, representing the Oregon Environmental Council, spoke against the PCC parking facility application. He felt that the Commission should consider the project in a comprehensive fashion and not just its air pollution impact.

Mr. Downs stated that the staff report as prepared only addressed the land use implication because it is the policy of the Commission not to take action until land use problems are resolved. Although the report did not specifically address the transportation aspects of the application, the staff found the proposed program inadequate. Action on the application had been withheld because of land use problems and the inadequacy of the application.

Dr. Crothers MOVED that approval be granted for construction of a 449-space parking facility unless the CRAG Board at its May 31st meeting disapproves the site; seconded by Mr. Somers.

Dr. Phinney questioned tying Commission approval to CRAG's consideration of the land use matter on May 31st, when the subject was not on CRAG's meeting agenda. Both Dr. Phinney and Mrs. Hallock expressed concern for the proposed PCC transportation program which the DEQ staff felt was not adequate.

Voting "aye" were Mr. Somers and Dr. Crothers; voting "no" were Dr. Phinney and Mrs. Hallock. The Chair voted "aye."

Mr. McPhillips suggested Mr. Cannon contact the CRAG Board prior to May 31.

STATEWIDE SOLID WASTE MANAGEMENT ACTION PLAN, STATUS REPORT

Mr. Schmidt presented the staff memorandum report dated May 14, 1974, on the status of the Statewide Solid Waste Management Action Plan. Funds in the amount of $1,129,630 have provided 22 local government planning projects and one service and assistance project to local governments and the Department by the Bureau of Governmental Research and Service, University of Oregon. A contingency balance of $21,652 remains. The Statewide Solid Waste Management Action Plan is scheduled for completion in late fall 1974.

A summary of the status of state planning projects as of May 14, 1974, was attached to the report.

POLLUTION CONTROL FACILITIES FOR DISPOSAL OF SOLID WASTE--REQUEST FOR PUBLIC HEARING TO CONSIDER PROPOSED REGULATIONS

Mr. Schmidt summarized the staff memorandum report dated May 15, 1974, requesting authorization to hold a public hearing before the Commission at the June 21, 1974 Commission meeting in Coos Bay, to receive public testimony pertaining to proposed rules for state financial assistance to public agencies for pollution control facilities for the disposal of solid waste.

It was MOVED by Dr. Crothers, seconded by Mr. Somers and carried to authorize the hearing.

Mr. Cannon stated for the record that the Commission noted the fact that Mrs. Hallock left the meeting following the Portland Community College agenda item, to enter the hospital for surgery. The Commission expressed concern and extended very best wishes to Mrs. Hallock.

The meeting was adjourned at 5:15 p.m.

Shirley G. Shay, Secretary
Environmental Quality Commission

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, June 21, 1974 EQC Meeting
May 1974 Program Activity Report

During the month of May, staff action was taken relative to the list of project plans which follows:

Water Quality

1. Seventy-two (72) domestic sewage projects were reviewed:
   a. Northwest Region - 29 (itemized list attached)

      Provisional approval was given to 28 plans for sewer projects and one (1) sewage treatment plant pump station.

   b. Water Quality Control Division - 43 (itemized list attached)

      Approval was given to five (5) Change Orders for sewage treatment plants.

      Provisional approval was given to 33 plans for sewer projects and four (4) sewage treatment plant projects.

      One (1) septic tank sludge dumping station was not approved.

2. Two (2) industrial waste treatment plans were reviewed and provisional approval given:

   Chappell Quarry, Columbia County
   rock quarry drainage control

   Joe Nickols Dairy, Linn County
   animal waste facilities

Air Quality

Twenty-five (25) project plans and proposals were reviewed:

1. Northwest Region - 5

Approval was given to the following five (5) projects:

Ross Island Sand and Gravel Rock Crushing Plant, Multnomah County
control of dust from mineral aggregate facility with water spray

MJB, Multnomah County
modification to coffee cooler to incinerate blue haze

Forest Fiber Products - Stimson Lumber Company, Washington County
installation of a B & W wood-fired boiler

Oregon Portland Cement Company, Clackamas County
enlargement of an existing baghouse to control dust generated by the limestone and dolomite grinding mills

MayFlower Farms, Multnomah County
control of particle emissions from the air life system cyclone that serves two roller mills by utilizing a wet vortex scrubber

2. Air Quality Control Division - 20

Approval was given to the following three (3) projects:

Weyerhaeuser Company, Klamath County
review of oil-fired boiler compliance demonstration source test report

Cabax Mills, Josephine County
review of hog fuel boiler compliance demonstration source test report

Edward Hines Lumber Company, Harney County
review of compliance demonstration source test report for plywood plant cyclones

Additional information was requested from the following project:

Timber Products Company, Jackson County
review of compliance demonstration source test report for cyclones, boilers and sanderdust scrubbers

No action was required for the following:

Malheur Solid Waste Advisory Committee, Malheur County
review of compliance demonstration source test report for municipal incinerator at Ogden, Utahl

Approval was given to the following two (2) parking facility proposals:

Pleasant Valley Community Baptist Church, Multnomah County
50-space parking facility

Randall Construction Company, Washington County
mini-warehouse, 62-space parking facility

Conditional approval was given to five (5) parking facility proposals:

Electro Scientific Industries, Washington County
101-space parking facility expansion

Freightliner Corporation, Multnomah County
370-space parking facility

Kaiser Aetna, Marion County
shopping center, 420-space parking facility

Mill Park Baptist Church, Multnomah County
91-space parking facility

Cooper Development Company, Multnomah County
apartment, 76-space parking facility

EQC conditional approval was given to the following parking facility proposal:

Portland Community College, Washington County
Rock Creek Center, 449-space parking facility

Additional information was requested regarding the following six (6) parking facility proposals:

Columbia Independent Refinery, Multnomah County
80-space parking facility

Clackamas Industrial Park, Clackamas County
77-space parking facility

Lincoln International #2, Washington County
204-space parking facility

Oregon Office/Industrial Park, Building 5 and 6, Washington County
28-space parking facility

Mountain Village Apartments, Multnomah County
450-space parking facility

State Office Facility, Department of Human Resources, Multnomah County
155-space parking facility

Department action pending land use approval for the following parking facility proposal:

Reorganized Church of Jesus Christ, Multnomah County
102-space parking facility

Land Quality

Ten (10) solid waste management project plans and specifications were reviewed:

a. Northwest Region - 1

Approval was given to:

Malarkey Roofing Co., Multnomah County
existing industrial site; Operational Plan

b. Solid Waste Management Division - 9

Approval was given to the following four (4) projects:

Bohemia, Inc., Lane County
Dorena Mill Landfill - existing industrial site; Operational Plan

Bohemia, Inc., Lane County
Saginaw Disposal Site - existing industrial site; Operational Plan

Columbia Processors Co-op, Multnomah and Morrow Counties
barge loading and unloading sites, new domestic waste-handling facilities; Construction and Operational Plans

Desert Magic, Inc., Morrow County
Sludge Disposal Site - new domestic site; Operational Plan

Provisional approval was given to the following four (4) projects:

Bethel-Danebo Sanitary Landfill, Lane County
new domestic site; Construction and Operational Plans

Round Prairie Lumber Co., Douglas County
new industrial site; Letter Authorization

Brookings Plywood Corp., Curry County
new industrial site; Construction and Operational Plans

Cottage Grove Landfill, Lane County
existing domestic site; Operational Plan

Additional information was requested from:

Oakridge Landfill, Lane County
existing domestic site; Operational Plan

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 May 1974.

KESSLER R. CANNON
Director

ss

6/17/74

attachments - 2

PROJECT PLANS

Northwest Region

During the Month of May, 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 - 29		
5/1/74	Woodburn	Brandywine San. Sewer Improvements	Prov. Approval
5/1/74	USA (Oak Hills)	Oak Hills Sewage Treatment Plant	Prov. Approval
5/3/74	CCSD #1	Sewage Pumping Stations, Lower Phillips & Upper Phillips	Prov. Approval
5/3/74	Gresham	San. Sewer on SE 282nd Ave., North from SE Powell Blvd.	Prov. Approval
5/6/74	Sandy	San. Sewers for Miles Hts. Subdn	Prov. Approval
5/7/74	Salem (Willow Lake)	Pringle Cr. Estates San. Sewers	Prov. Approval
5/8/74	Portland	SE Henderson St. & SE 87th Ave.	Prov. Approval
5/8/74	Oak Lodge SD	San. Sewer between Rose Ave. & Portland Ave. in the "Doral" Subdn	Prov. Approval
5/8/74	Canby	Oak St. San. Sewer Extension	Prov. Approval
5/9/74	Hillsboro	Rood Bridge Rd. San. Sewer Extension	Prov. Approval
5/9/74	Salem	Lakewood Park Sewers	Prov. Approval
5/13/74	CCSD #1	Highlands Subdn San. Sewer	Prov. Approval
5/13/74	CCSD #1	Boyer Meadows Replat Subdn San. Sewers	Prov. Approval
5/13/74	Multnomah Co. (Inverness)	Revised Barkerbrook & Holcomb Hts. San. Sewer	Prov. Approval
5/14/74	Hillsboro	Padgett Park No. 3 Subdn San. Sewer	Prov. Approval
5/14/74	USA (Somerset West)	Berger School Sanitary Sewer	Prov. Approval
5/16/74	Hillsboro	Willow Oak Park Subdn 32nd Court San. Sewer	Prov. Approval

PROJECT PLANS

Northwest Region

Date	Location	Project	Action
5/16/74	Salem (Willow Lake)	Hoyt Street South from Rex Street to Mountain View Dr. San. Sewer	Prov. Approval
5/17/74	Salem (E.Salem Sewage & Drainage Dist. 1)	Crestdale Subdn San. Sewers	Prov. Approval
5/17/74	Tualatin	Indian Meadows San. Sewers	Prov. Approval
5/17/74	Gresham	El Camino No. 6	Prov. Approval
5/21/74	Salem	Laguna Village South Sewers (Formerly Pringle Cr. Estates)	Prov. Approval
5/28/74	Gladstone	Sherwood Too, No. 3 San. Sewers	Prov. Approval
5/30/74	Woodburn	Industrial Park Addition for Woodburn Dev. Co. San. Sewers	Prov. Approval
5/30/74	USA (Beaverton Aloha System)	Little Tree No. 3 San. Sewers	Prov. Approval
5/30/74	USA (Beaverton Aloha System)	Ladd & Reed Addition San. Sewers	Prov. Approval
5/30/74	Gresham	Sanitary sewer on NE 190th Ave. between NE Pacific St. & NE Glisan St.	Prov. Approval
5/30/74	Kiezer SD #1	Stratford Plaza San. Sewers on Orchard Court	Prov. Approval
5/30/74	USA (Beaverton) Fanno System	The Denny Village Condominium Dev. Sanitary Sewers	Prov. Approval

28 sewer plans
1 STP pump station

29 Projects

PROJECT PLANS

Water Quality Division

During the Month of May, 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 - 42		
5/2/74	Port Orford	Deady St. Sewer	Prov. Approval
5/2/74	Eugene	Prospect Park Sewers	Prov. Approval
5/2/74	Springfield	Laura & Q Streets Sewer	Prov. Approval
5/6/74	BCVSA	Prelim. Plans-South Medford Trunk Sewer	Prov. Approval
5/9/74	Eugene	Seven sewer projects	Prov. Approval
5/10/74	USA (Aloha)	Tanasbourne Town Center Sewers	Prov. Approval
5/13/74	Prairie City	Cozart Ave. Sewer	Prov. Approval
5/14/74	Hines	John Wood Subdivision Sewer	Prov. Approval
5/14/74	BCVSA	Clover Lane, Meadow Lane & Sunset Court Sewers	Prov. Approval
5/15/74	Prineville	Auxiliary Power - Main Lift Station	Prov. Approval
5/15/74	Douglas Co.	Tri-City Sewers - Phase 4	Prov. Approval
5/15/74	Coos Bay	Modifications to Pump Sta. 1, 5-10, 12 & 13	Prov. Approval
5/15/74	USA (Aloha)	STP Equipment Specifications - Aloha Expansion (Pumps)	Prov. Approval
5/15/74	Ashland	C.O. #1 - STP Contract	Approved
5/15/74	USA (Aloha)	STP Equipment Specifications - Aloha Expansion (Process Equipment)	Prov. Approval
5/20/74	Albany	Four sewer projects	Prov. Approval
5/20/74	Albany	Septic tank sludge dumping station	Not Approved
5/20/74	Springfield	5th Addn. to Laksonen Park Sewers	Prov. Approval
5/23/74	Warrenton	East Warrenton Int.	Prov. Approval
5/28/74	Yachats	C.O. #6 STP & Sewers	Approved

PROJECT PLANS

Date	Location	Project	Action
5/28/74	Milwaukie	C.O. #1 - Milwaukie Interceptor	Approved
5/28/74	Roseburg	Rainbow End Subdn Sewers	Prov. Approval
5/28/74	BCVSA	Schultz Rd. Sewer	Prov. Approval
5/28/74	Springfield	Laksones Park 5th Add. Sewers	Prov. Approval
5/28/74	The Dalles	Eastside Int. Sewer	Prov. Approval
5/28/74	Hermiston	N. W. 7th St. Sewer	Prov. Approval
5/28/74	St. Helens	C. O. No. C-4 STP Contract	Approved
5/28/74	Echo	C. O. B-2, sewer project	Approved
5/28/74	Arch Cape SD	Sewer System & 0.1 MGD Secondary sewage treatment w/summer irrigation & effluent	Prov. Approval
5/28/74	USA (Aloha)	Menlo West Sewers	Prov. Approval
5/30/74	Sutherlin	Sutherlin Hts. Subdn	Prov. Approval

33 sewer plans
5 change orders
4 STP projects

42 Projects

(1 Septic Tank Sludge Dumping Station Not Approved)

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, June 21, 1974, EQC Meeting

Tax Credit Applications

Attached are review reports on 10 Tax Credit Applications. These applications and the recommendations of the Director are summarized on the attached table.

KESSLER R. CANNON

ahe

June 11, 1974

Attachments

Tax Credit Summary
Tax Credit Review Reports (10)

TAX CREDIT APPLICATIONS

Applicant	Appl. No.	Facility	Claimed Cost	% Allocable to Pollution Control	Director's Recommendation
Humphrey Dairy Farm	T-393	Cattle manure solids storage building	$11,047.82	80% or more	Issue
International Paper Company Gardiner Paper Mill - Northern Division	T-480	soda ash handling system	26,728.69	80% or more	Issue
Kaiser Gypsum Company, Inc.	T-490R	Primary clarifier with equipment	278,124.00	80% or more	Issue
Willamette Industries, Inc. Duraflake Company	T-522	Roof vent stack extensions	18,356.15	80% or more	Issue
Omark Properties, Inc. Omark Industrial Park Waste Treatment Department	T-532	Plating waste chemical recovery and reuse system	260,640.00	80% or more	Issue
Western Kraft Div. of Willamette Industries Albany Mill	T-535	Outfall line and diffuser	98,777.00	80% or more	Issue
Lakeview Lumber Products Co.	T-536	Modification of wigwam waste burner	356,737.00	80% or more	Issue
Ore-Ida Foods, Inc. Ontario, Oregon, Plant	T-543	Pump station	749,254.60	80% or more	Issue
Portland Provision Company	T-548	Thermal oxidizer	8,527.00	80% or more	Issue
Martin-Marietta Alumunium, Inc. Reduction Division	T-556	250-ton Burnt Lime Storage Silo, BIF Model 42-02 lime Slaker-Feeder, Clarifier with Marlow 203 E Diaphragm pump, and Honeywell pH, temperature and flow measuring equipment	215,143.54	80% or more	Issue

Appl. T-393

Date 6-11-74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

Humphrey Dairy Farm
Route 1, Box 211
Independence, Oregon 97351

The applicants own and operate a 150-head dairy farm operation located at Route 1, Box 211, Independence, Oregon in Polk County.

2. Description of Claimed Facility

A cattle manure solids storage building was constructed with a design storage capacity of 14 days. Concurrently, an 8' x 8' x 16' liquid waste catch tank was constructed to collect daily drainage prior to pumping it through 350 feet of buried 3" plastic pipe to an existing liquid waste storage tank. Approximately 1900 square feet of roof was constructed to cover existing areas of rainfall runoff contamination. A 100' x 100' x 3' temporary lagoon was constructed to contain contaminated runoff prior to completion.

The claimed facility was placed in operation in September, 1972.

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

Claimed cost: $13,483.24 (receipts were submitted).

3. Evaluation of Application

Prior to the installation of the claimed facilities runoff waters, contaminated from the manure generated at the dairy, would enter public waters. With the claimed facilities, contaminated runoff waters are reduced, and the manure is contained and spread on agricultural lands.

It should be noted that a 200' x 14' roof valued at $2,435.42 and claimed in the application had not been constructed at the time of the investigation of the claimed facilities.

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

Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $11,047.82 ($13,483.24 - $2,435.42 which is the cost of the unconstructed roof), with 80% or more of the cost allocated to pollution control be issued for the facilities claimed in Tax Application No. T-393.

Appl T-480

Date June 3, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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

The applicant owns and operates an unbleached Kraft pulp and paper mill at Gardiner, Oregon.

2. Description of Facility

The facility described in this application is a soda ash handling system which keeps the sulfur content (sulfidity) of the pulp cooking liquor at approximately 25 percent. Total reduced sulfur emissions are reduced by minimizing the sulfidity of the liquor.

Facility Cost: $26,728.69 (Accountant's certificate was provided.)

The facility was placed in operation in March, 1972. Certification is claimed under the 1969 act.

The percentage claimed is 100%.

3. Evaluation of Application

This facility was installed to supplement a system (Tax Credit Application No. T-258) which added caustic soda (NaOH) to the cooking liquor to lower the sulfidity. The facility became necessary in 1971 because caustic soda became unavailable in the quantities the company needed to purchase. The claimed facility uses soda ash (Na_2CO_3) instead of caustic soda to control the sulfidity of the cooking liquor.

The Department reviewed the proposal for this system.

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

It is concluded that the installation was installed solely for pollution control.

4. Director's Recommendation

It is recommended that a pollution Control Facility Certificate bearing the cost of $26,728.69 be issued for the facility claimed in Tax Credit Application T-480 with 80% or more allocated to pollution control.

Appl. T-490R

Date 6-10-74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

Kaiser Gypsum Company, Inc.
St. Helens, Oregon 97051

The applicant owns and operates a wood and mineral fiber insulation board manufacturing plant located on Scappoose Bay near St. Helens in Columbia County, Oregon.

2. Description of Claimed Facility

The claimed facility consists of a primary clarifier with equipment to return the fiber back to the wet end of the manufacturing process, an 8 million gallon aeration basin with 6 - 25 HP aerators and 3 - 10 HP aerators, and a secondary clarifier. In addition, equipment has been included to meter in sufficient nutrients to sustain the biological treatment process. Laboratory equipment and a boat for maintenance are also included in the claimed facility. The claimed facility was placed in operation August 1, 1969.

Certification is claimed under the 1967 Act with 100% allocated to pollution control.

Facility Cost: $278,124.00 (Accountant's certification was submitted).

3. Evaluation of Application

Prior to the construction of the facility, waste water generated in the manufacturing of the insulation board was discharged directly to Scappoose Bay without treatment, resulting in great quantities of waste fiber being deposited in Scappoose Bay. With the claimed facility, waste water receives secondary treatment prior to its discharge to Scappoose Bay. There have been some operating problems experienced as a result of accumulating biological solids, however, the company has undertaken corrective measures by pond dredging.

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

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $278,124.00, with 80% or more of the cost allocated to pollution control be issued for the facilities claimed in Tax Application No. T-490.

Appl T-522

Date June 3, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

Willamette Industires, Inc.
Duraflake Company
3825 1st National Bank Tower
1300 S. W. Fifth Avenue
Portland, Oregon 97204

The applicant operates a fiberboard plant in Albany, Linn County, Oregon.

2. Description of Facility

The claimed facility is described to be roof vent stack extensions installed for the purpose of allowing dispersion of formaldehyde fumes from the fiberboard press operation. It consists of the following equipment items:

1. Seven (7) exhaust stack extensions.
2. One (1) new 60" exhaust fan.
3. Necessary structural supports, installation, etc.

The facility was completed and placed into operation in March, 1973.

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

Facility costs: $18,356.15 (Accountant's cost certification was provided).

3. Evaluation of Application

This installation permits adequate dispersion of formaldehyde fumes exhausted through roof vents above the particleboard presses.

The facility was installed with plans and specifications approved by the Mid-Willamette Valley Air Pollution Authority. The Authority has inspected the completed facility and has confirmed that the installation does operate as planned.

It is concluded that this installation does reduce ground level air pollution by increasing stack height of the plant's roof vents, thereby increasing dispersion of formaldehyde fumes from the fiberboard press operation.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $18,356.15 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-522.

JEP:kok

Appl. T532

Date 5-24-74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

Omark Properties, Inc.
Omark Industrial Park
Waste Treatment Department
2100 S.W. Milport Road
Portland, Oregon 97222

2. Description of Claimed Facility

The claimed facility, a plating waste chemical recovery and reuse system, consists of Chrome Recovery, Chrome Waste Treatment, Zinc Recovery and Acid/Alkali Neutralization. The major equipment of each system is as follows:

A. Chrome Recovery
   1. Cation Exchanger
   2. Anion Exchanger

B. Chrome Waste Treatment
   1. Treatment Tank, 650 gallon
   2. Automatic Chemical Monitoring and Control
   3. Chemical Feed

C. Zinc Recovery
   1. Boiler
   2. Heat Exchanger
   3. Separator
   4. Condenser
   5. Condensate Cooling Tank
   6. Electronic/Pneumatic Control

D. Acid/Alkali Neutralization
   1. Treatment Tank
   2. Automatic Chemical Monitoring and Control
   3. Chemical Feed
   4. Precipitator, 2800 gallon
   5. Polyelectrolyte Feed
   6. Centrifuge

Piping, electrical wiring and controls, buildings and land required are included.

The claimed facility was placed in operation in November 1973. Certification is claimed under the 1969 Act with 100% of the cost allocated to pollution control.

Facility Cost: $260,640.00 (accountant's certification was attached to the application).

3. Evaluation of Application

Installation of the claimed facilities removes and recovers for reuse 99% of the chemicals in the Chrome waste water chemicals, 99% of the Zinc Chloride waste water chemicals, 99% of the acid alkali waste from the effluent previously discharged to Milwaukie Sanitary Sewer.

Although there is value in the reclaimed chemicals, Omark Properties claims, in the application, that total annual operating expenses exceed that value.

4. It is recommended that a Pollution Control Facility Certificate be issued for the facilities claimed in application T532 such certificate to bear the actual cost of $260,640.00 with 80% or more of the cost allocable to pollution control.

Appl. T-535

Date 6-11-74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

Western Kraft
Division of Willamette Industries, Inc.
Albany Mill
P. O. Box 339
Albany, Oregon 97321

The applicant owns and operates a Kraft pulp mill located North of Albany adjacent to I-5 Freeway in Linn County.

2. Description of Claimed Facility

The claimed facility consists of an outfall line and diffuser in the Willamette River for dispersing residual wastewaters after secondary treatment in the aerated stabilization basin. The outfall line consists of approximately 3,000 feet of 24-inch diameter underground concrete tiles. The diffuser consists of 26 - 6 inch outlets spaced 4 feet apart, stabilized on the river bottom.

The claimed facility was placed in operation July 1, 1973. Certification is claimed under the 1969 Act with 100% of the cost allocable to pollution control.

Facility Cost: $98,777.00 (Accountant's certification was attached to application)

3. Evaluation of Application

Prior to the installation of the outfall line and diffuser into the Willamette River, discharge of wastewater from secondary treatment was to Third Lake. Waste Discharge Permit 1439 required this installation before July 1, 1973.

There is no recovery of nutrients or profit to the permittee resulting from this installation.

The facility is performing as designed.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the facility claimed in T-535, such certificate to bear the actual cost of $98,777.00 with 80% or more of the cost allocable to pollution control.

Appl T - 536

Date June 10, 1974

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

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1. Applicant

Lakeview Lumber Products Co.
P. O. Box 224
Lakeview, OR 97630

The applicant operates a sawmill, planing mill, and moulding plant at Lakeview, Oregon.

2. Description of Claimed Facility

The facility claimed in this application is described as an installation to reduce the amount of mill waste burned in a modified wigwam waste burner and consists of the following:

1. Barker
2. Conveyors
3. Chipper
4. Shaker rolls
5. Metal Detector
6. Surge bin
7. Pneumatic Conveying system
8. Car loader
9. Car puller
10. Railroad track spur
11. Necessary foundations, enclosures, etc.

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

Facility cost: $356,737.00 (Accountants' certification was provided).

3. Evaluation of Application

This facility was installed to reduce the amount of wood wastes being burned in the Company's modified wigwam waste burner which was certified by the Department in October, 1972.

Chips produced by this facility are collected and sold to the Crown Zellerbach Corporation for use in the manufacture of paper, thus utilizing about thirty (30) tons per day of wood wastes which were previously burned in the modified wigwam waste burner. The net annual profit before taxes represents a 3.7% return on the original investment, well below the 15% return normally required by the Company.

The Company has developed a market for sawdust wastes and is currently installing a sawdust collection system so as to achieve the goal of total utilization of all wood residues. This utilization effort will result in almost total phase-out of the modified wigwam waste burner. The only expected use of the modified wigwam waste burner will be a few times a year for disposal of log debris.

It is concluded that this facility does perform satisfactorily and has reduced the amount of wood wastes burned in the modified wigwam waste burner. Emissions of particulates have been reduced by approximately 21 tons per year, and the amount of CO emissions have been reduced by approximately 150 tons per year.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $356,737 with 80% or more of the costs allocated to pollution control be issued for the facility claimed in Tax Application T - 536.

JEP:mh

Appl. T-543

Date 6-10-74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

Ore-Ida Foods, Inc.
P.O. Box 10
Boise, Idaho 83707

Plant Site: Ontario

The applicant owns and operates a frozen food processing plant in Ontario, Oregon in Malheur County. The plant processes about 1500 tons per day of potatoes producing mostly frozen french fries. Also processed are onions and corn.

2. Description of Claimed Facility

The claimed facility consists of a pump station with 3 Johnston Filter Pumps, a Del-Pak redwood activated biological filter, an aeration pond aerated by 3 75 hp. Asbrook floating aerators, an 85 ft. diameter concrete final clarifier, and related piping, equipment and controls.

Facility Cost: $749,254.60 (Accountant's certification was submitted)

The claimed facility was placed in operation in August, 1973. Certification is claimed under the 1969 Act with 97% allocated to pollution control. This percentage was arrived at by deducting startup costs.

3. Evaluation of Application

Prior to installation of claimed facility, waste waters generated in the processing plant received primary treatment with a portion receiving secondary treatment. With this facility, all of the waste receives secondary treatment. The wastewater BOD is reduced, on the average, 90% through secondary treatment.

Investigation has found the plant well operated and well maintained.

The startup costs noted in the application are considered to be part of the cost of completing an operable facility and are therefore eligible for certification.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the facilities claimed in Tax Credit Application T-543, with such certificate to bear the actual cost of $749,254.60 with 80% or more of the cost allocable to pollution control.

ak

Appl T-548

Date June 10, 1974

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

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1. Applicant

Portland Provision Company
N. Columbia Boulevard and Burrage
Portland, OR 97217

The Company operates a pork processing plant in Portland, Multnomah County, Oregon.

2. Description of Facility

The claimed facility is described to be a thermal oxidizer used to control emissions from pork smoking ovens, and consists of the following equipment items:

1. One (1) 48 inch I.D. (54 inch O.D.) x 10 ft. thermal oxidizer.
2. Combustion air fan.
3. Exhaust fan with motor.
4. Castable refractory.
5. Three (3) inch insulation.
6. Natural gas supply.
7. Sheet metal and duct work.
8. Miscellaneous materials, electrical parts, thermocouples, safety alarms, automatic controls, pilot lights, necessary support structures, etc.

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

Facility cost: $8,527.00 (A copy of the Purchase Order was provided).

3. Evaluation of Application

This facility enables the Company to control pork processing fumes as required by OAR, Chapter 340, Section 25-055.

The facility was installed with plans and specifications approved by the Northwest Regional Office of DEQ. The Region has inspected the completed facility and has confirmed that the installation does operate as planned.

It is concluded that this installation does operate satisfactorily, and did reduce air pollution by oxidizing pork processing fumes to carbon dioxide and water.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $8,527.00 with 80% or more of the costs allocated to pollution control be issued for the facility claimed in Tax Application T-548.

JEP:mh

Appl. T-556

Date 6-10-74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

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

The applicant owns and operates a primary aluminum production plant at 3313 W. Second Street in The Dalles, Wasco County.

2. Description of Claimed Facility

The claimed facilities consist of:

a) 1 - 250 ton Burnt Lime Storage Silo.
b) 1 - BIF Model 42-02, 10 ton per day lime Slaker-Feeder.
c) 1 - 60 ft. diameter x 12 ft. deep clarifier with Marlow 203 E Diaphragm pump.
d) Honeywell pH, temperature and flow measuring equipment.

The claimed facilities were completed and placed in operation in September 1972.

Claimed Cost: $215,143.54 (Documentation provided) with 100% claimed for pollution control.

3. Evaluation

The claimed facility operates to treat 2500 gpm of scrubber water to reduce fluoride and suspended solids by pH adjustment and precipitation.

Clarifier sludge is disposed of to a slurry lagoon on plant property.

Prior to the facility, plant effluent pH was in the range of 3.0. Discharge now falls within the required range of 6.5 to 8.5. Fluoride and suspended solids levels now fall below 50 mg/l as required by DEQ.

The facility was required by DEQ permit condition and plans were approved prior to construction.

4. Recommendation

It is recommended that a pollution control facility certificate bearing a total cost of $215,143.54 with 80% or more of the cost alloecated to pollution control be issued to Martin Marietta Aluminum, Inc. for the facility claimed in Application T-556.

ak

ENVIRONMENTAL QUALITY COMMISSION

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

To: Environmental Quality Commission

From: Director

Subject: Addendum - Agenda Item C, June 1974, EQC Meeting

Tax Credit Applications

Attached are review reports on 6 Tax Credit Applications. These applications and the recommendations of the Director are summarized on the attached table.

KESSLER R. CANNON

ahe

June 12, 1974

Attachments

Tax Credit Summary
Tax Credit Review Reports (6)

TAX CREDIT APPLICATIONS
ADDENDUM

Applicant	Appl. No.	Facility	Claimed Cost	% Allocable to Pollution Control	Director's Recommendation
Boise Cascade Paper Group	T-539	Digester Pump Out System	$665,779.00	80% or more	Issue
Cascade Construction Company, Inc.	T-546	Baghouse, pneumatic dust conveying system, dust silo, and fugitive dust control sprinkler support towers	179,893.42	80% or more	Issue
Fred E. Moe	T-549	Pressurized diesel fueled orchard heating system	11,186.16	80% or more	Issue
Oregon Portland Cement Company	T-553	Baghouse, fan, and 25 hp motor for removing cement dust from discharge end of clinker conveyor No. 4 and feed ends of conveyors No. 5 and No. 6	11,826.74	80% or more	Issue
Oregon Portland Cement Company	T-554	Baghouse, fan, and 25 hp motor for removing cement dust from exhausts of Silos No. 18 & No. 19	11,269.61	80% or more	Issue
Sunset Crusher Rock	T-555	Baghouse, twin cyclones, and associated duct work & controls	83,500.00	80% or more	Issue

Appl T-539

Date June 12, 1974

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

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1. Applicant

Boise Cascade Corporation
Paper Division
PO Box 2089
Salem, OR 97308

The applicant owns and operates a bleached sulfite pulp and paper mill located in Salem, Oregon.

2. Description of Facility

The facility described in this application is a digester pumpout system. This system ducts all of the SO_2 emissions from the digesters to the absorption towers.

The facility was placed in operation in December, 1973. Certification is claimed under the 1969 Act with 100% allocable to pollution control.

Facility Cost: $665,779.00 (Accountant's certification was provided).

3. Evaluation of Application

This facility was installed in response to the 1971 Department of Environmental Quality Sulfite Pulp Mill Emission Regulation which required that blow pit emissions not exceed 0.2 pounds of sulfur dioxide per minute per ton of unbleached pulp on a 15-minute average and 800 ppm as an hourly average, and in accordance with plans and specifications received and approved by the Department. Prior to the installation of this system, the pressure of the digesters was relieved to 30 psig, and the cooked chips were blown into the blow pits by this pressure and sulfur dioxide and steam were released to the atmosphere. After the claimed facility was installed, the pressure of the digester was relieved to atmospheric pressure and the chips are pumped out of the digester. With this system all of the digester gases are passed through absorption medium. Sulfur dioxide emissions have been reduced by approximately 9 tons/day.

There is some sulfur recovered by this system, but the value of it is insufficient to repay the costs of the system. 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 $665,779.00 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Application T-539.

Appl T-546

Date June 12, 1974

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

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1. Applicant

Cascade Construction Company, Inc.
Post Office Box 4267
Portland, OR 97208

The applicant operates a stationary hot-mix asphalt plant located at the foot of SW Abernethy, Portland.

2. Description of Claimed Facility

The facility claimed in this application is described to include a Model 25 S 1400 stationary WAG baghouse, associated ductwork and controls, pneumatic dust conveying system, dust silo, and two stockpile fugitive dust control sprinkler support towers.

The facility was completed and placed in operation on August 10, 1973.

Certification is claimed under the 1969 Act with 100% being claimed for pollution control.

Facility cost: $179,893.42 (Accountant's certification was provided).

3. Evaluation of Application

The claimed facility was installed in accordance with detailed plans and specifications reviewed and approved by the Columbia-Willamette Air Pollution Authority. A source test of the facility indicates that the operation complies with applicable emission regulations.

The material collected is added to the hot asphalt-aggregate mixture and is of no significant economic value.

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

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the actual cost of $179,893.42 with 80% or more of the cost allocable to pollution control, be issued for the facility claimed in Tax Application T-546.

Appl T-549

Date June 12, 1974

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

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1. Applicant

Fred E. Moe
Route 2, Box 1590
Hood River, OR 97031

The applicant owns and operates an apple and pear orchard near Hood River, Oregon.

2. Description of Claimed Facility

The facility claimed in this application is described to be a pressurized diesel fueled orchard heating system consisting of a 10,000 gallon diesel storage tank; fuel pump, motor, regulator, gauge and filter; 800 heaters and associated PVC pipe and valves.

The facility was completed and placed in operation in March, 1973.

Certification is requested under the 1969 Act with 100% of the cost being claimed as allocable to pollution control.

Facility cost: $11,187.16 (Accountant's certification was provided).

3. Evaluation of Application

The claimed facility was installed as a replacement for about 800 class II pot type heaters in 30 acres of orchard. The new system emits very little smoke compared to the smudge pots. The claimed facility is not used for any other purpose than orchard heating.

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

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $11,186.16 with 80% or more allocable to pollution control, be issued for the facility claimed in Tax Application T-549.

Appl T-553

Date June 12, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

Oregon Portland Cement Company
111 SE Madison Street
Portland, OR 97214

The applicant owns and operates a cement and agricultural limestone facility at 145 N. State Street, Lake Oswego, Oregon.

2. Description of Claimed Facility

The facility claimed in this application is described to include a size 48, Model 108 Ultra Jet Wheelabrator baghouse, fan, and 25 horsepower motor for removing cement dust from the discharge end of clinker conveyor No. 4 and the feed ends of conveyors No's. 5 and 6.

The facility was completed and placed in operation on November 15, 1973.

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

Facility cost: $11,826.74 (Accountant's certification was provided).

3. Evaluation of Application

The claimed facility was installed in compliance with Columbia-Willamette Air Pollution Control Authority Compliance Stipulation No. 72-6. An inspection of the facility indicates that the unit is capable of compliance with applicable emission regulations.

The material collected which is returned to the process has an estimated annual value of $120.00. Annual operating expenses are estimated to be $1,752.00. Thus the unit operates at a $1,600.00+ annual loss.

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

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the actual cost of $11,826.74 with 80% or more of the cost allocable to pollution control, be issued for the facility claimed in Tax Application T-553.

Appl T-554

Date June 12, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

Oregon Portland Cement Company
111 SE Madison Street
Portland, OR 97214

The applicant owns and operates a cement and agricultural limestone facility at 145 N. State Street, Lake Oswego, Oregon.

2. Description of Claimed Facility

The facility claimed in this application is described to include a size 48, Model 108 Ultra Jet Wheelabrator baghouse, fan, and 25 horsepower motor for removing cement dust from the exhausts of Silos No's. 18 and 19.

The facility was completed and placed in operation on April 11, 1973.

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

Facility cost: $11,269.61 (Accountant's certification was provided).

3. Evaluation of Application

The claimed facility was installed in accordance with detailed plans and specifications reviewed and approved by the Columbia-Willamette Air Pollution Authority. An inspection of the facility indicates that the unit is capable of compliance with applicable emission regulations.

The material collected which is returned to the process has an estimated annual value of $60.00. Annual operating expenses are estimated to be $1,752.00. Thus the unit operates at a $1,790.00 annual loss.

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

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the actual cost of $11,269.61 with 80% or more of the cost allocable to pollution control, be issued for the facility claimed in Tax Application T-554.

Appl T-555

Date June 12, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

Sunset Crushed Rock
PO Box 948
Astoria, OR 97103

The applicant owns and operates a stationary asphalt plant located off NE King Street, Warrenton, Oregon.

2. Description of Claimed Facility

The facility claimed in this application is described to include a Model 203-48 stationary WAG baghouse, twin cyclones, associated duct work and controls.

The facility was completed and placed in operation on May 18, 1973.

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

Facility Cost: $83,500.00 (Accountant's certification was provided).

3. Evaluation of Application

The claimed facility was installed in accordance with plans and specifications reviewed and approved by the Department. An inspection of the facility indicates that the unit is capable of compliance with applicable emission regulations.

The material collected is added to the asphalt-aggregate mixture.

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

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $83,500.00 with 80% or more of the cost allocable to pollution control, be issued for the facility claimed in Tax Application T-555.

TAX CREDIT APPLICATIONS
ADDENDUM 2

Applicant	Appl. No.	Facility	Claimed Cost	% Allocable to Pollution Control	Director's Recommendation
Boise Cascade Corporation Paper Division	T-533	Additional costs expended on chemical recovery and secondary treatment system (Certificate No. 364).	$1,213,771.00	80% or more	Issue
Menasha Corporation Paperboard Division	T-557	Additional costs expended on deep ocean outfall (Certificate No. 354).	249,284.17	80% or more	Issue

Appl. T-533

Date 6-13-74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

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

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

2. Description of Claimed Facility

The applicant is seeking certification of additional costs expended on the chemical recovery and secondary treatment system certified in Certificate No. 364, (Application No. T-416) on March 2, 1973, based on certified costs through calendar year 1972.

Claimed additional cost: $1,213,771 (Accountant's certification was provided)

The claimed additional costs were incurred during calendar year 1973. The basic facilities were placed in operation in June 1972 and were substantially complete as of December 1973.

3. Evaluation

At the time Certificate No. 364 was issued, the accountant certified auditable expenditures through calendar year 1972. Thus it was known that the final costs would be higher, but exact costs could not be certified. This application therefore requests a certificate for the final increment of costs.

4. Recommendation

It is recommended that a Pollution Control Certificate be issued to Boise Cascade Corporation for the additional costs of the chemical recovery and secondary treatment facilities, such certificate to show a cost of $1,213,771 with 80% or more allocated to pollution control.

H. L. Sawyer
ak

Appl. T-557

Date 6-13-74

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

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1. Applicant

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

The applicant owns and operates a pulp mill located 2-1/2 miles north of the City of North Bend in Coos County.

2. Description of Claimed Facility

The applicant is seeking certification of additional costs expended for the Deep Ocean Outfall which was certified in Certificate No. 354 (Application No. T-404) on March 2, 1973 based on costs incurred to the date of application.

Claimed additional cost: $249,284.17

($1,579,670 accountant's certified final cost minus $1,330,421.83 previously certified cost.)

The claimed additional costs were incurred after Application T-404 was filed. The outfall was placed in operation in January 1973 and is considered fully completed as of February 1974.

3. Evaluation

The previous Certificate, No. 354, was issued based on documented costs to the date of application. Final costs have now been determined and fully certified. This application therefore requests a certificate for the final increment of cost.

4. Recommendation

It is recommended that a Pollution Control Facility Certificate be issued to Menasha Corporation for the additional cost of the Ocean Outfall, such certificate to show a cost of $249,284.17 with 80% or more allocated to pollution control.

H. L. Sawyer
ak

DEPARTMENT OF ENVIRONMENTAL QUALITY

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

TOM McCALL
GOVERNOR

KESS CANNON
Director

MEMORANDUM

To : Environmental Quality Commission

From : Director

Subject: Agenda Item D, June 21, 1974 EQC Meeting

Oregon CUP Award Nomination, Willamina Lumber Company

Background

DEQ's initial contact with this company was in May of 1972 when a neighbor complained about log handling practices, dumping of residue into the creek and changing the stream flow. The company was contacted and took some steps to remedy the situation. A full field evaluation by DEQ staff was made late in 1972. The company was notified by letter in January 1973 of the following problems:

1. The log conveyor system between the two log ponds was allowing large amounts of bark to accumulate in the main channel of the creek.

2. Cold decking of logs between the pond and creek was causing large accumulations of bark on the creek banks, which is subject to wintertime flows. This also has allowed logs to enter the creek.

3. The land disposal of sawdust has created two huge piles in the area with no immediate or future plans for complete utilization.

4. The bark mulch storage pile has been located too close to the creek, which could allow the processed bark to enter the stream during loading and unloading operations.

Immediate agreement was reached on a program for abatement as follows:

Prior to September 1, 1973

1. Replacement of the log conveyor system between the two log ponds with the installation of a concrete bridge.

2. Conversion of the west log pond to a dry deck storage area. The pond will be drained, and prior to filling with rock, the adjacent sawdust pile will be spread in a thin layer on the floor of the log pond.

3. Relocation of the log dump area away from Willamina Creek by the filling of the north half of the east log pond with rock.

4. Construction of a new restroom and lunch room facility on the east side of the railroad tracks, thus eliminating the inadequate restroom facilities adjacent to Willamina Creek.

Prior to September 1, 1974 (extension to 1975, if needed):

1. Complete the filling of the east log pond for a dry deck storage area, thus completing the conversion of the lumber mill to dry handling of logs.

As soon as the compliance program had been set forth, the company took prompt action. Present status of company actions is as follows:

1. Removal of the bark from the banks of Willamina Creek was deleted due to the loss of existing vegetative matter thus causing more environmental quality problems than what exists.

2. 10-ft. buffer strip provided; log deck moved back and bark dust pile moved back from creek bank.

3. Educational program established by the firm.

4. Except for the south half of the east log pond, all log ponds have been filled in and converted to dry deck storage. Remaining pond to be filled this summer. Additional operation equipment had to be purchased at considerable expense for this operation.

5. Surface drainage around dry decks has been completed.

6. New restroom and lunch room facility has been provided and old one removed.

7. Log dump area has been relocated away from Willamina Creek.

8. Log conveyor system in Willamina Creek between the two log ponds (dry deck areas now) has been removed. Due to problems of land acquisition, concrete bridge has not been built to date.

9. Collection and storage tank for boiler blowdown has been installed thus eliminating a small daily discharge to Willamina Creek. This was main concern of Willamina residents.

10. Sawdust piles (west and east) have been sold rather than buried in log deck areas. West one just about removed (within next 2 weeks), east one to be removed next (within next 8 weeks).

11. Old brick plant and quarry across the road from the company has been purchased by them in order to use the old quarry for landfilling of dry deck cleanup material and other non-recyclable or non-reusable material generated by a lumber company. Engineering plans have been submitted to the Department and a letter approving them is about to be sent. Operation to commence this summer.

Records of Mid-Willamette Valley Air Pollution Authority indicate a similar pattern. Their first contact with the company was in 1969 with regard to a burning complaint. That contact resulted in an immediate compliance schedule which was fully met by the company. Its wigwam burner was closed down and the company is currently in compliance with all permit conditions.

Analysis

This company has spent over $400,000 on changing their log handling practices from water to dry deck.

Since starting this project in May, 1973, a number of changes have been necessary with the net result being an increase in cost. The major changes and results are as follows:

1. Inability to obtain a bridge right-of-way

   It will now be necessary to truck logs from the dry pond area. This made it necessary to buy a truck crane to be used for loading logs in the dry pond as well as building high decks on home pond area so as to maximize log storage.

2. Delays, due to DEQ restrictions, in pond drainage resulted in use of more rock and less dirt for fill, thus increasing costs.

3. Necessity for filling remaining pond with 100% rock instead of part rock and part dirt. This hopefully will avoid a mill shut-down to complete the project.

ESTIMATED COST TO COMPLETE PROJECT

Rock for fill and topping	$115,000.00
Used dump truck for clean-up	7,500.00
Log sorting bunks and trailer	7,500.00
Mill feed decks	60,000.00
Stationary mount truck crane	40,000.00
Miscellaneous	10,000.00
Total	$240,000.00
TOTAL SPENT TO DATE	$415,000.00
TO COMPLETE PROJECT	$240,000.00
TOTAL	$655,000.00

The expenditures listed exceeded original estimates by more than $80,000, but the company has consistently been willing to comply with all requirements and to make a particular effort to find the method of compliance that would be most satisfactory. For example, an entirely new rest room and lunch room facility was built rather than trying to adapt existing facilities to meet requirements; sawdust piles were sold rather than landfilled; additional property was purchased so that space would be available for landfilling material which could not be recycled or reused.

Staff Evaluation

In summary, the experience of both DEQ and the Regional Air Pollution Authority has been that this is a company which responds promptly to complaints and deals with them in depth. The district engineer states all environmental problems, no matter what size, have been taken on by the company as their responsibility. Comments from other regions, requested by the Screening Committee, indicate no other company is doing as well.

Director's Recommendation

Based on the company's extremely cooperative attitude and its willingness not only to meet requirements but to do the best job possible in abating pollution problems, the Oregon CUP Awards Screening Committee unanimously voted to recommend to the Commission that the Oregon CUP be awarded to Willamina Lumber Company. The Director concurs in this recommendation.

Director

BJS:kok
6/10/74

State of Oregon

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

To: Environmental Quality Commission

Date: June 17, 1974

From:

Subject: Agenda Item No. E: Development of Coal Deposits in Coos Bay Area and Environmental Impact

This will be an oral presentation by the Director.

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. F, June 21, 1974 EQC Meeting

Log Handling in Public Waters--
Status Report and Proposed Program

Attached is a status report and proposed program regarding Log Handling in Public Waters.

Director's Recommendation

It is recommended that the proposed program be adopted as policy of the Commission.

Kessler R. Cannon
Director

HLS:ak

Attachment

June 12, 1974

No. F

STATEMENT OF BAY AREA COUNCIL ON ENVIRONMENT AND TRADE

ON

DEPARTMENT OF ENVIRONMENTAL QUALITY STATUS REPORT ON LOG HANDLING

TO ENVIRONMENTAL QUALITY COMMISSION HEARING

COOS BAY, OREGON

JUNE 20, 1974

MY NAME IS CLIFF SHAW. I LIVE IN COOS BAY, OREGON. I AM PRESENTING THE FOLLOWING STATEMENT ON BEHALF OF THE BAY AREA COUNCIL ON ENVIRONMENT AND TRADE AN AFFILIATE OF WESTERN ENVIRONMENTAL TRADE ASSOCIATION. I AM CHAIRMAN OF BACET WHICH IS A GROUP OF CITIZENS FROM THE COOS BAY AREA WHO ARE CONCERNED WITH CONFLICTS BETWEEN THE ENVIRONMENT AND ECONOMY AND HAVE TAKEN CONSTRUCTIVE STEPS TOWARD MAINTAINING A PROPER BALANCE.

FIRST, I WOULD LIKE TO CLEAR UP AN APPARENT MISUNDERSTANDING ON THE PART OF THE DEPARTMENT OF ENVIRONMENTAL QUALITY STAFF MEMBER WHO WROTE THE STATUS REPORT ON LOG STORAGE. ON PAGE 11, IT IS STATED THAT THE PORT OF COOS BAY AND THE LOCAL TIMBER INDUSTRIES HAD OBTAINED AN ECONOMIC DEVELOPMENT ADMINISTRATION GRANT IN EARLY 1973 TO CONDUCT A LOG STORAGE STUDY OF COOS BAY WITHOUT THE DEQ'S KNOWLEDGE. QUITE TO THE CONTRARY, A DELEGATION FROM COOS BAY CONSISTING OF REPRESENTATIVES OF BACET, THE PORT OF COOS BAY, COOS-CURRY-DOUGLAS ECONOMIC IMPROVEMENT ASSOCIATION AND MYSELF MET WITH L. B. DAY AND HIS STAFF ON SEPTEMBER 27TH, 1972 TO REVIEW AND COORDINATE OUR ENTIRE PROPOSED PROGRAM WITH THE DEPARTMENT OF ENFIRONMENTAL QUALITY. WE SUBSEQUENTLY RECEIVED A LETTER FROM MR. DAY, DATED OCTOBER 5, 1972 WHICH STATED, "WE WILL BE GLAD TO ASSIST IN ANY WAY WE CAN."

FURTHERMORE, THE MATCHING FUNDS TO QUALIFY FOR THE FEDERAL GRANT DID NOT COME FROM THE PORT OF COOOS BAY AND LOCAL TIMBER INDUSTRIES ALONE. THE FUNDS WERE CONTRIBUTED BY 73 SEPARATE BUSINESSES AND INDIVIDUALS WHO GAVE FROM FIVE DOLLARS TO ONE HUNDRED DOLLARS WITH AN AVERAGE CONTRIBUTION OF $ 40.92 TOTALING $ 2,987.00. THESE LOCAL CONTRIBUTIONS WERE SUPPLEMENTED BY $ 2,000.00 FROM THE COOS COUNTY COMMISSIONERS ON BEHALF OF 51,000 PEOPLE IN COOS COUNTY.

GOVERNOR TOM MC CALL WAS ALSO INFORMED OF THE BACET PROPOSAL BY CORRESPONDENCE ABOUT THE SAME TIME THAT WE CONFERRED WITH DEQ IN PORTLAND.

BEFORE COMMENTING ON THE PROPOSED PROGRAM I WOULD LIKE TO PROTEST THE MANNER IN WHICH REFERENCE WAS MADE TO CONCLUSIONS REACHED BY DR. FRANK SCHAUMBURG. THIS CITATION IS ON PAGE ONE OF THE INTRODUCTION AND WAS USED TO SET THE TONE OF THE DEQ REPORT. APPARENTLY, THE INTENTION OF THE STAFF WAS TO "ACCENTUATE THE NEGATIVE", RATHER THAN TO PLACE THE MATTER OF LOG STORAGE, HANDLING AND TRANSPORTATION IN OBJECTIVE PERSPECTIVE.

CONCLUSIONS QUOTED STRESSED ONLY THE ADVERSE ASPECTS OF LOGS STORED IN THE WATER. COMPLETELY LEFT OUT AND IGNORED WERE THE CONCLUSIONS CONTAINED IN DR. SCHAUMBURG'S FINAL REPORT, PUBLISHED BY EPA IN 1973. LET ME QUOTE THREE:

1. LEACHATES FROM LOGS HELD IN WATER STORAGE CONTRIBUTE ORGANIC SUBSTANCES WHICH EXERT A BOD AND COD. IN MOST SITUATIONS THE QUANTITY OF THESE SUBSTANCES WHICH ENTER THE HOLDING WATER DO NOT REPRESENT A SIGNIFICANT WATER QUALITY PROBLEM.

2. BARK DEPOSITS EXERT A SMALL, BUT MEASURABLE, DEMAND FOR OXYGEN FROM OVERLYING WATERS.

3. SHOULD THE LOSS OF BARK TO HOLDING WATER BE MINIMIZED BY IMPROVED HANDLING PRACTICES BY THE TIMBER INDUSTRY, THE WATER STORAGE OF LOGS WOULD NOT CONSTITUTE A MAJOR WATER QUALITY PROBLEM.

I THINK YOU WILL AGREE THAT INCLUSION OF THE ABOVE-MENTIONED COMMENTS WOULD HAVE BEEN APPROPRIATE TO ASSIST THE COMMISSIONERS IN CONSIDERATION OF THE PROGRAM PROPOSED BY STAFF.

IN REGARD TO THE PROPOSED PROGRAM WE APPLAUD THE STATEMENT IN THE PROGRAM INTRODUCTION ON PAGE 16 WHICH SAYS THAT LOG DUMPING, RAFTING AND STORAGE SITUATIONS MUST BE EVALUATED ON A CASE BY CASE BASIS.

OUR APPLAUSE IS TEMPERED, HOWEVER, WHEN THE GUIDELINES WHICH FOLLOW CONTAIN SPECIFIC PROHIBITIONS. HOW IS IT POSSIBLE TO EVALUATE EACH SITUATION INDEPENDENTLY WHEN MANY POSSIBLE ALTERNATIVES HAVE BEEN PREEMPTED BY THESE UNQUALIFIED PROHIBITIONS.

WE HEARTILY AGREE WITH THE WISDOM OF INDIVIDUAL EVALUATIONS AND ALLOWING MAXIMUM FLEXIBILITY IN WORKING OUT SOLUTIONS AND SUGGEST THAT THE PROHIBITIONS RUN COUNTER TO THIS PHILOSOPHY.

QUOTING DR. FRANK SCHAUMBURG, "THE MAGNITUDE OF THE PROBLEM MUST BE EVALUATED IN EACH FIELD SITUATION."

* * * * * *

NOW I WOULD LIKE TO OFFER BACETS'S REACTION TO THE PROPOSED PROGRAM:

ITEM NO. 3 THIS ITEM PROHIBITS LOG STORAGE AT ANY PUBLIC WATER SITE WHERE LOGS GO AGROUND. WE ARE NOT AWARE OF ANY RESEARCH THAT CONCLUSIVELY SHOWS ACTUAL OR POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS OF GROUNDING THAT ARE SUFFICIENT TO OUTWEIGH ENVIRONMENTAL AND ECONOMIC IMPACTS OF ALTERNATIVE MEASURES. I AM SPEAKING OF THE ENVIRONMENTAL TRADEOFFS OF GROUNDING VERSUS DREDGING, LAND STORAGE OR MOVING TO AREAS OF THE BAY NOT PRESENTLY USED FOR LOG STORAGE. IN FACT THE ONLY REFERENCE TO GROUNDING THAT WE COULD FIND IS ON PAGE 13 OF THE GREENACRES REPORT ENTITLED, "THE ENVIRONMENTAL AND ECONOMIC IMPACT OF ALTERNATE METHODS OF LOG TRANSPORTATION, STORAGE AND HANDLING IN THE COOS BAY ESTUARY," DATED MAY, 1974.

IN THIS REPORT IT IS STATED, "ECOLOGICAL CONSIDERATIONS APPEAR TO DICTATE AGAINST STORING LOGS IN SHALLOW WATERS." LET ME MAKE IT CLEAR THAT OUR POSITION IS NOT IN FLAT OPPOSITION TO THE PROHIBITION. WE ARE CONCERNED THAT A MEASURE IS

BEING SUGGESTED THAT WOULD PROHIBIT THE USE OF AN ESTIMATED 75% OF EXISTING RAFT STORAGE AREAS WITHOUT A DOCUMENTED REASON OR NEED THAT MAKES SENSE.

WE WOULD ENCOURAGE THE COMMISSION TO PUBLICIZE WHATEVER EVIDENCE ITS STAFF HAS TO SUBSTANTIATE THEIR POSITION OR IF NONE IS AVAILABLE TO CONDUCT FIELD RESEARCH TO RESOLVE THIS ISSUE TO THE SATISFACTION OF ALL PARTIES. BACET MEMEBERS PLEDGE THEIR SUPPORT AND COOPERATION IN SUCH A STUDY AND AGREE TO SEEK OPERATIONAL CHANGES IF RESULTS OF SCIENTIFIC INVESTIGATION SHOWS THIS TO BE NECESSARY AND IN THE BEST INTERESTS OF OUR COMMUNITY.

ITEM #5

WE ARE IN AGREEMENT THAT THE EASY LET-DOWN OF LOGS GENERALLY RESOLVES THE BARK DISLODGEMENT PROBLEM. BEFORE PROCEEDING WITH THE REPLACEMENT OF ALL FREE-FALL LOG DUMP FACILITIES, HOWEVER, OPERATORS WOULD APPRECIATE RECEIVING A STANDARD DESIGN OR SET OF PERFORMANCE SPECIFICATIONS REGARDING LOG LET-DOWN FROM DEQ TO PROTECT THEIR INVESTMENTS IN TIME, EFFORT AND MONEY.

AGAIN, BACET MEMBERS OFFER THEIR COOPERATION IN WHATEVER MANNER WOULD BE HELPFUL TO DEQ STAFF.

ITEM #6

THIS ITEM AND ITEM "C" OF THE SPECIAL PROGRAM FOR COOS BAY SHOULD BE CONSIDERED TOGETHER. THEY BOTH REFER TO COLLECTION AND DISPOSAL OF DEBRIS AND THEY BOTH LEAD FROM A WATER CLEAN-UP SOLUTION TO A SOLID WASTE OR AIR QUALITY PROBLEM. MR. CHAIRMAN, "WHAT DO YOU DO WITH THE DEBRIS ONCE IT'S REMOVED FROM THE WATER?

FOR THE COMMISSION'S INFORMATION, THE FOREST INDUSTRY HAS BEEN INVOLVED IN A COOPERATIVE PROGRAM WITH THE PORT OF COOS BAY FOR SEVERAL YEARS TO REMOVE DEBRIS FROM THE WATERS OF COOS BAY AND DISPOSAL OF THAT DEBRIS BY INCINERATION. THIS EFFORT WAS STOPPED BY DEQ RESTRICTIONS AGAINST OPEN BURNING.

WE SUGGEST THAT IF DEQ WISHES TO IMPLEMENT DEBRIS REMOVAL THAT THEY WORK WITH LOCAL INTEREST TO COME UP WITH A SUITABLE SOLUTION TO THE PROBLEM OF DISPOSING OF THE DEBRIS FROM THE WATER OF COOS BAY.

* * * * * * *

IN CONCLUSION, WE WOULD CAUTION YOU TO SLOW DOWN IMPLEMENTING THESE THREE POLICY ITEMS UNTIL ALL THE FACTS ARE IN TO AVOID UNNECESSARY FALSE STARTS. WE ALL ARE INTERESTED IN ACHIEVING A BETTER ENVIRONMENT AND HOPE THAT THIS CAN BE DONE IN A SPIRIT OF REASON.

LOG HANDLING IN OREGON'S PUBLIC WATERS

A Status Report and Proposed Program
June, 1974

Department of Environmental Quality

INTRODUCTION

During the mid 1960 years the Department of Environmental Quality (nee Sanitary Authority) made a decision that poor water quality and stream conditions resulting from logs and log debris must be given priority attention for abatement. While some of the poor conditions were obviously apparent, little research data existed to verify detailed causes and effects. As a beginning step out of this weak regulatory position, the Department joined with the U. S. Environmental Protection Agency and Oregon State University's Department of Civil Engineering to institute basic research that would provide needed information.

The product of that research was a report entitled The Influence of Log Handling on Water Quality by Frank D. Schaumburg, Ph.D., Oregon State University, March, 1970.

Dr. Schaumburg's study results show -

". . . . that measurable pollution is associated with the water storage of logs, but the magnitude of problem must be evaluated in each field situation. Factors to consider include: number, specie and age of logs stored, and the character and flow of log holding water.

"Two general types of pollutants are associated with these storage practices, soluble leachates and bark debris.

"Soluble organic matter and color-producing, lignin-like substances which are extracted from logs floating in water can lead to a gradual deterioration of holding water quality. The organics, measured in this study by COD, TOC, and volatile solids tests, can create a dissolved oxygen demand on the holding water and could lead to foaming problems. Color-producing substances measured by the PBI test affect the aesthetic quality of the water and, thereby reduce its value for recreational use and as a water supply source.

"Vertical dumping of Douglas fir logs can result in a bark loss of up to 17 percent whereas 5 percent can be lost

during the log raft transport. Vertical dumping and raft transport of ponderosa pine logs can result in a 6 percent loss of bark.

"Bark debris from ponderosa pine and Douglas fir logs can be expected to sink at the rate of 10 percent the first day and up to 75 percent in two months. Considerable bark deposits are common in log dumping and storage areas."

During the time that Dr. Schaumburg's research was in progress the DEQ staff also searched out other available pieces of related information. Limited data were found from sources in Alaska, Canada, and Washington.

Since the related problem of logs and water quality was common to the Pacific Northwest, the DEQ next joined with Pacific Northwest Pollution Control Council to evaluate the matter throughout the membership areas of Oregon, Washington, Idaho, Montana, Alaska and British Columbia. Both the Environmental Protection Agency and the Canadian Department of National Health and Welfare also had members in the Council.

By a news release dated December 18, 1970, the Pacific Northwest Pollution Control Council announced the appointment of a special Task Force from its membership to evaluate the environmental impacts of dumping and handling logs in public waters, and to make recommendations for the abatement of associated ill effects (Glen Carter was Oregon's assignee to the Task Force). The assignment to the Task Force carried five categories for inclusion in a final report:

1. Summarize the available research findings, including an evaluation of pollution effects.

2. Inventory log dumping, handling, rafting, and storage sites.

3. Establish guidelines for recommended practices which would reduce pollution effects.

4. Determine the impacts of revised log dumping and handling practices on both the industry and the total environment.

5. Establish a plan of implementation to identify where revised operations are required, with schedules for compliance.

In carrying out its assignment, the Task Force first met with personnel from the agencies who are members of the Pacific Northwest

Pollution Control Council to gain a better understanding of log handling activities and log-related water quality problems throughout the various zones of the region. Thereafter, they met with key research personnel in the Pacific Northwest who have specifically studied the effects of logs and associated activities on water quality. This was followed by two meetings with a broad array of timber industry and tugboat representatives who aided in an assessment of the impacts to industry and the total environment that would result from revised log dumping and handling practices.

The Task Force produced a final report entitled Log Storage and Rafting in Public Waters, Pacific Northwest Pollution Control Council, August, 1971. They learned from available research findings that,

> ". . . . log debris, bark, and wood leachates resulting from log handling in public waters can adversely affect water quality. The range of effects varies from mild to gross depending upon the specific characteristics of both the involved water body and log handling practices. In most instances where logs depreciate water quality, there are a number of practicable changes that can be made to improve conditions.

This report sets forth a number of recommendations for implementing improved log handling practices that will benefit water quality:

1. Log storage and handling should be restricted in or eliminated from public waters where water quality standards cannot be met at all times or where these activities are a hindrance to other beneficial water uses such as small craft navigation.

2. The free-fall, violent dumping of logs into water should be prohibited since this is the major cause and point source of loose bark and other log debris.

3. Easy let-down devices should be employed for placing logs in the water, thereby reducing bark separation and the generation of other wood debris.

4. Positive bark and wood debris controls, collection, and disposal methods should be employed at log dumps, raft building areas, and mill-side handling zones. This would be required for both floating and sinking particles.

5. Log dumps should not be located in rapidly flowing waters or other water zones where positive bark and debris controls cannot be made effective.

6. Accumulations of bark and other debris on the land and docks around dump sites should be kept out of the water.

7. Whenever possible, logs should not be dumped, stored, or rafted where grounding will occur.

8. Where water depths will permit the floating of bundled logs, they should be secured in bundles on land before being placed in the water. Bundles should not be broken again except on land or at millside.

9. The inventory of logs in public waters for any purpose should be kept to the lowest possible number for the shortest possible time.

10. Industry should provide and periodically update an accurate quantification of its use of public waters for log handling activities.

"After a thorough review of the problem, the Task Force concluded that the establishment of a specific implementation plan must be the responsibility of the individual state agencies. The diversity of conditions and the possible adverse effects of alternatives dictate that the ultimate decisions must be made on a case by case basis. The Task Force did feel, however, that the recommendations set forth in their report are applicable to all operations and that the regulatory agencies should establish aggressive programs to implement the recommendations."

The Task Force cautioned,

"In those instances where it may be feasible to change from water-oriented log activities to land based, a full consideration and evaluation must be given to the new set of potential environmental impacts. There are the hazards of placing larger volumes of logs in transit on highways and often through residential areas. Additional noise, dust, and night-time lights in yarding areas could be a disadvantage. Certain logs in "cold deck" storage require sprinkling to retard decay. Resulting effluents are malodorous and could constitute an added source of pollutant to neighboring waterways. Massive stacks of logs on land are not always aesthetically pleasing, particularly where they may be close to city or residential areas. Thus, any such shift of logs from water to land should be made with extreme care and a certain amount of caution to consider the "tradeoffs" in environmental impacts.

In summary, the impacts of alternatives to water storage and handling of logs influence the total environmental sphere: land use patterns and planning, air and solid waste problems, transportation systems, etc. The ultimate decision as to method must include consideration of all these factors. A total ban on the use of water for log handling without taking into account these other factors is inconsistent with the broad environmental responsibilities faced by regulatory agencies."

In August, 1972, Governor McCall announced a proposed log storage policy for Oregon, based essentially on the findings and recommendations from the Pacific Northwest Pollution Control Report.

"The policy statement was drafted by a natural resources agency committee headed by Dr. Thomas Kruse, Administrator of the Oregon Fish Commission. McCall created the committee in March, 1972, to recommend to him how to reduce conflicts between log storage and rafting, and other water uses in the state.

The statement signed by McCall says in part: "The waters of the State of Oregon will be managed to recognize all beneficial uses, including industrial, log storage and transportation, domestic, recreation, navigation, aquaculture, fisheries and wildlife."

Other key points of the policy statement include:

1. Log storage and handling will be permitted in those public waters where these activities are compatible with maintenance of water quality standards and where demonstrated incompatabilities with other beneficial uses of the waters do not exist or can be controlled.

2. Bark and wood debris controls must be employed at log dumps, raft building areas and mill-side handling zones. Bundling of logs for transportation will be required, as practical. Free-rolling of unbarked logs into state waters shall be prohibited.

3. The inventory of logs in state waters will be reduced to the lowest practical level and storage will be for the shortest practical time.

4. The objectives of this policy must be met by July 1, 1975.

McCall said an implementation plan to meet the objectives will be developed immediately by state agencies. He said the plan will include identification of areas of conflict and time schedules for meeting agency requirements.

The Division of State Lands, which issues leases for log storage, and the Department of Environmental Quality, which regulates water quality in relation to log storage, will be responsible for implementing the policy, McCall said. (The DEQ is currently working with the DSL to determine the environmental acceptability of long-term log storage sites).

McCall said the implementation plan will be based on the most recent research available. However, he said, sufficient research already has been conducted to convince him that environmental problems exist in some areas as a result of log storage in waterways.

The governor said that in some instances present lumber mill requirements and operating procedures will have to be modified in the interest of other water users.

AREA PROBLEM REVIEW

The major areas of log handling in public waters around the state have been evaluated to various extents by the staff, and a brief review of current information about each area is presented herewith.

Klamath River

The DEQ actually began to aggressively press for the reduction of logs in Oregon's troubled water areas during 1968 when a water quality improvement plan was implemented for the Klamath River. Four companies (Weyerhaeuser, Columbia Plywood, Klamath Lumber, and Modoc Lumber) collectively had upwards of 50,000,000 board feet of logs stored in the river during peak seasons. A serious water quality and debris problem resulted.

Floating bark and broken logs from these operations littered the river surface from Klamath Falls to Keno. Irrigation diversion ditches and pumping stations were continuously choked with the waste materials. In the vicinity of each mill, and for several miles downstream, the river bottom was covered with sunken logs and log debris ranging up to 6 or 8 feet deep. Effervescing gases and other decomposition products from the submerged wood masses exerted tremendous demands on the available dissolved oxygen supplies in overlying waters. Massive fish mortalities frequently resulted from a lack of free oxygen during the heat of summer.

Consequently, each company was given a five-year period to either remove logs from the stream or provide debris control equivalent to dryland storage, i.e. no debris in the water. At the end of the five-year period Klamath Lumber Company had all logs and operations out of the river. Modoc Lumber Company reduced their log storage and handling in the water from 12 million board feet annually to a maximum of 4 million board feet during winter and no water storage in summer. In addition, they built a log debris collection and removal system to accommodate the winter log storage and handling in the river. The combination of reduced log storage and debris collection program has substantially lessened Modoc Lumber Company's river problem. However, preliminary evaluation of the lake conditions next to the mill in 1973 indicated that considerable sunken bark was still being laid down on the bottom away from the collection facilities.

Modoc Lumber Company has adequate land next to the mill for total dry-land handling and storage of logs, but to date insists on water storage for a portion of their logs during the winter season.

Weyerhaeuser Company has transferred all log storage and sorting to land, but they continue to utilize a water corridor (300' x 1500') at the Klamath River's edge to transport logs into the sawmill. (The mill was designed and built for water delivery of logs only; thus, that delivery route cannot be changed without rebuilding the mill). Weyerhaeuser Company moves approximately one million board feet of logs through the corridor each day. The resulting debris generation and accumulation are monumental, and unacceptable by DEQ standards.

At its June, 1972 meeting in Lakeview, the Environmental Quality Commission adopted the following program for Weyerhaeuser Company:

> "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 hired a consulting engineering firm to study the possible alternatives to their present wet delivery of logs into the mill.* Preliminary schemes were prepared by the firm in November, 1972, and eight revised schemes were finally presented in July, 1973.

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* R. J. Hill Engineering Company, Log Handling Systems Study on Ways to Feed Mills 1 and 2 at Weyerhaeuser Company, Klamath Falls, Oregon. Revised July 7, 1973.

Schemes (1), (2) and (3) are variations of handling logs from a large landfill in the river in front of the mill (245,000 cubic yards or about 9 acres). Projected cost: (1) $1,320,514, (2) $1,470,776, and (3) $1,369,162.

Scheme (4) consists of leaving the log handling as is and improving floating bark removal ($294,336).

Scheme (5) consists of enclosing existing log handling areas with a double row of sheet pile filled with rock ($2,276,789).

Scheme (6) consists of enclosing existing log handling area with a single row of sheet pile ($901,461).

Scheme (7) consists of enclosing existing log handling area with an earth dike ($594,710).

Scheme (8) consists of extending 1" mesh nylon nets from the existing log booms to the river bottom ($341,462).

Two schemes which have not been addressed are: (1) use of a minimum fill in the river for construction of a conveyor to the log slips; and (2) relocating the barkers and feeding barked logs to the mill.

In total effect, the 8 schemes offer two basic alternatives: (1) a land fill in the river to make a fully land based operation, or (2) modifications of the present wet log delivery system with various bark and log debris control devices. The Departmental staff has rejected possible modifications of the present wet log delivery system for several reasons:

1. The velocity and rate of forcing over one million board feet of logs per day through a narrow water corridor generates large quantities of bark and other log debris.

2. It is extremely difficult to effectively control and remove such large volumes of bark and debris in the water.

3. Bark collection screens or fences in the water soon plug, and have little or no efficiency for containing fine, submerged particles.

4. The heavy buildup of ice behind screens or other enclosures nullify both waste control programs and the company's capability to move logs into the mill.

From a water quality management point of view, a fill in the river for Weyerhaeuser Company would provide the highest and best practicable method for controlling bark and debris. The Department Staff has endorsed this method. It can be accomplished without impairing the river's hydrological carrying capacity, and it would have minimal impact on aquatic life and waterfowl. The fill would provide public benefit in the form of a cleaner river for recreational and aesthetic enjoyment. Also, there would be further public benefit in the removal of adverse impact of log debris from downstream irrigation and hydroelectric facilities.

Weyerhaeuser Company cannot make a fill in the river without a permit from the Oregon Division of State Lands, as approved by the state natural resources agencies and this Department. They will soon begin negotiating this matter with the Division of State Lands, and they have agreed to have the fill made and operational within nine months after receiving the fill permit. That date is quite indefinite.

It now appears unlikely that the company will be able to meet the Commission's established date of October 1, 1974, for getting the wet log feed operation out of the river. The Commission should authorize the Department to amend the time schedule to accommodate this situation.

Columbia Plywood Corporation, Klamath Division, came to the end of the five-year period with no reduction in river storage and handling of logs. Their plant is closely bound on each side by the highway, river, and other private property. They have no land available for log storage at the mill site, and their neighbors will not sell or lease acreage for log usage.

Consequently the company has appealed to the DEQ for permission to "stay in the river." They have installed an easy let-down sling for unloading trucks. They bundle logs to reduce water surface area requirements for storage, and they have installed a floating debris collection unit. Even though river quality improvements have resulted from the better housekeeping practices, the controls do not effectively keep the river surface free of floating debris nor do they satisfactorily reduce sinking debris. Neither do they lessen the leachate releases from floating logs.

Columbia Plywood Corporation retained Dr. Frank Schaumburg of Oregon State University as a consultant to analyze and compare alternative approaches for the handling and storage of logs. His report, "An Analysis of the Log Storage Situation at Columbia Plywood Corp." was received by the Department on August 15, 1973.

Dr. Schaumburg presented a limited comparison of two alternatives: (1) continuation of present methods and (2) land storage. The comparison stressed energy consumption, largely ignored the primary problem of log debris and its effects on water quality and presented no comparative information on capital or operating costs. The comparison further assumed that bark collected from land storage areas would be contaminated, unuseable for fuel and disposed of by landfilling. No apparent consideration was given to a properly designed, surfaced storage area which would facilitate clean up and use of debris, control of log deck sprinkling water and dust control.

Dr. Schaumburg concludes that continued log storage in the river will not significantly degrade water quality and would have less negative environmental impact than land storage.

Dr. Schaumburg recommended construction of ". . . . a wire mesh screen to extend from the floating baffles to the river bottom in the vicinity of the log hoisting and bundle breaking activities and at the lower end of the storage zone."

The Department staff finds several technical difficulties with such screening. No mesh size was specified. No cleaning mechanism was proposed. Screening would not be effective against small particles that travel as submerged, suspended solids. A screen fine enough to trap small particles would soon plug. Further, all wood wastes retained in the water would still exert an adverse impact on water quality.

Columbia Plywood Corporation still has not submitted sufficiently detailed information on capital costs, operating costs, or environmental impacts of specific possible alternatives to their present log handling situation. In effect, the Department still has no sound basis for changing their original decision to require total log removal.

Columbia Plywood Corporation now claims that their only remaining alternative, if pressed, would be to close down the mill. This matter will eventually have to be resolved by the EQC.

Deschutes River

In the upper Deschutes River two lumber companies utilize the waterway for log handling. Brooks Scanlon Lumber Company at Bend has log dumping, storing, and mill feed operations in the river. They are currently under order from the DEQ to move all logs out of the stream. Two alternatives are open to the company: (1) relocate the river channel or (2) bridge the stream with a log conveyor. The company desires to pursue the channel relocation.

Below the Brooks Scanlon operation, the river bottom is filled with many years' accumulation of bark and log debris. These materials have also carried downstream to fill large areas in Bend's Mirror Pond and spread on the riverbed toward Tumalo. Bark and debris also cause plugging problems on downstream irrigation diversion screens.

Gilchrist Lumber Company, at Gilchrist, recently abandoned a flow through log storage pond on the Little Deschutes River. They now store logs on land and feed only debarked logs through the water to the mill. Some log debris and colored water still result from this operation.

Coos Bay

Six companies bordering Coos Bay annually dump and handle approximately 532 million board feet of logs in the water (Weyerhaeuser Company, 300 MBF; Coos Head Timber Co., 69 MBF; Knutson Towboat Co., 50 MBF; Georgia Pacific, 50 MPF; Al Peirce Lumber Co., 38 MPF; and Cape Argo Co., 15 MBF). Most of their collective activities are in the upper bay sloughs and river channels, where resulting log debris and substandard water quality are closely associated.

The DEQ set out in early 1973 to place each of the six timber industries on Coos Bay under an implementation plan for reducing in-water log dumping, handling, and storage to the lowest possible level. Unknown to the DEQ, the Port of Coos Bay and local timber industries had simultaneously applied for and received monies from the U. S. Economic Development Administration (EDA) for "A Study of Economic and Environmental Impacts of Alternate Methods of Log Storage in the Coos Bay Estuary."

Consequently, the Port Commission and industry representatives asked the DEQ to hold the state's implementation plan in abeyance for seven months (until February 1, 1974) to allow completion of the local study. The DEQ agreed to that delay.

Mr. Alec Jackson of Greenacres Consulting Corporation, Bellevue, Washington, conducted the study and submitted his final report in May, 1974. It is interesting to note that Mr. Jackson's final recommendations are very much the same as those of both the Departmental staff and the Pacific N. W. Pollution Control Council task force on log storage and rafting in public waters.

Mr. Jackson's final letter of transmittal to the Port of Coos Bay Commissioners carries his summary and recommendations:

"As a result of our investigations we have concluded that log transportation, storage and handling activities, as now practiced in Coos Bay Estuary, do detract from water quality and thus detract from environmental quality. Most alternatives to current practices will also detract from environmental quality and in addition will have an adverse impact on the economics of the forest products industry and thus the economy of the region.

For the guidance of the Commission we wish at this point to summarize our recommendations into two categories as follows:

1. Short-term Recommendations (less than five years).

   (a) That the forest products industry be allowed to continue its present log transportation, handling and storage practices in the waters of Coos Bay Estuary provided:

      (i) gentle let down systems are installed at all log dumps on the estuary;

      (ii) that the present clean-up practices used in the Coos River drainage are adopted for the entire estuary;

      (iii) that the peak inventory of logs stored in the water be reduced by improved logistics where improved logistics are possible;

   (b) That the construction of new wood processing plants which must receive logs from the waters of the estuary be prohibited.

   (c) That existing wood processing plants now located on the estuary not be required to relocate.

2. Long-term Recommendations (five to ten years).

   (a) That dry land storage of all logs at the Eastside Site be encouraged provided:

      (i) the current shortage of fuel eases;

      (ii) that dredge spoils are available for development of the site;

      (iii) that in the interim no higher value and better use be demonstrated for the site;

   (b) That the continued use of the waters of Coos Bay Estuary for transportation purposes be allowed."

Aside from the obvious environmental benefits to be gained from these recommendations, Mr. Jackson shows conclusively that shorter storage periods for fewer logs in the water and dry land sorting and storage are economically desirable.

For Coos Bay, and other waters subject to tidal influence, the staff would also recommend that logs not be stored where they go aground during low tides. Logs pounding on the bottom are both harmful to aquatic life and the cause of unnecessary turbidity.

Yaquina Bay

Three timber companies handle logs in Yaquina Bay, the most significant one being the Georgia Pacific Corporation which annually dumps and stores some twelve million board feet.

As yet, the DEQ has not fully evaluated the effect of the logs on Yaquina Bay water quality, i.e some of the local debris is from land sources and some of the up-bay water stagnation results from natural conditions. In any event, a reduction in logs would have some beneficial effect. Unfortunately, almost no land is conveniently available for cold decking.

Scappoose Slough

Scappoose Slough is utilized by the Multnomah Plywood Corporation for log dumping, rafting, and mill-side handling. The slough is shallow and receives little summer inflow. Consequently, the logs and related activities keep the slough muddy, debris laden, and deficient in dissolved oxygen during summer and early fall. Multnomah Plywood Corporation has agreed to a five-year program to phase out their log dump and pond saw operation - by January, 1975.

Skipanon River

In the Skipanon River, near Warrenton, there are two companies handling logs - Warrenton Lumber Company and Nygaard Brothers Logging Co. The Nygaard operation has been publically condemned because their logs usurp the whole channel surface, in addition to releasing debris.

Warrenton Lumber Company rafts logs only to their facilities. Their log storage is on land.

The DEQ has not developed an abatement plan for the Skipanon River problem, but Nygaard's operations must be reduced to meet water quality standards.

Lewis and Clark River

Also, near Warrenton and Astoria is the Lewis and Clark River where the Crown Zellerbach Company makes up rafts with logs out of land storage. A detailed environmental evaluation of the working area and river have not yet been made. A cursory survey indicates that there is not a serious problem, but some "housekeeping" improvements are needed.

Umpqua Bay

Umpqua Bay supports a minor amount of log rafting and millside handling. The magnitude and effect of the operations are not fully known. Three operators are involved: International Paper Co., Reedsport Lumber Co., and the U. S. Bureau of Land Management.

Siuslaw Bay

There are three lumber industries on Siuslaw Bay: U. S. Plywood Corporation, Davidson Lumber Company and Murphy Veneer Company. The first stores all logs on land and feeds only debarked "blocks" through the water to the plywood plant. This operation is acceptably clean.

Both Davidson and Murphy dump, raft, store, and handle logs in the estuary. Here, as in Yaquina Bay, it is difficult to separate natural debris and reduced water conditions from those caused by the logs. Further study of the estuary and company activities is needed. One thing for sure, there is almost no available land for "cold deck" log storage in the narrow canyon near these two mills. They must utilize the water to survive on present locations.

Columbia River

There are an unknown number of log raft storage areas and scattered sawmills along the Columbia River that have not been either enumerated or evaluated by the DEQ. We have no record of reported problems with log debris or log related impairment of water quality in the Columbia River.

Willamette River

On the Willamette River above the falls, there remains a single log dump at Canby, operated by the Crown Zellerbach Company. Log rafting and storage are still common throughout the Portland Harbor and Multnomah Channel. Here again these log related activities have not been finitely analyzed for compliance with environmental programs. No serious problems of water quality or log debris are apparent.

Siletz River

Boise Cascade Corporation maintains a flow-through log pond on the upper Siletz River at Valsetz. Log debris and leachates definitely depreciate the water quality. The Corporation has been instructed by the DEQ to abate the problem. Final plans for a change have not yet been submitted.

Coquille River

In the Coquille River estuary, at Coquille, the Georgia Pacific Corporation stores a small quantity of logs. However, their main storage site is on land and only debarked logs are fed from there through the water to the mill. Here again, the DEQ has not yet closely evaluated the water conditions related to the logs.

Moore-Mill and Lumber Company on the Coquille River estuary at Bandon operates a sawmill with some of the logs stored in the water. Little is known about the log effects on water quality here. Further evaluation is needed.

SUMMARY

1. There is ample and conclusive evidence that the dumping, rafting, storage, and mill-side handling of logs in public waters has an adverse effect on water quality.

2. Bark and log debris are the major waste products resulting from logs in water. These range in size from microscopic particles to whole logs. Some float, but most all will sink in a short time. Numerous particles may travel submerged a considerable distance before dropping to the bottom. Bottom deposits of these substances blanket the benthic aquatic life and fish spawning areas. During submerged decomposition stages the rotting wood products rob overlying waters of dissolved oxygen, and often give off toxic decay products.

   Leachates from logs in water are a source of biochemical oxygen demand and dark color. These generally have a minimal impact in larger, flowing streams, but their ill effect may be compounded in quiet waters.

3. The DEQ has initiated programs to reduce water pollution problems resulting from log dumping, rafting, storage, and mill-side handling in selected public waters. These programs are consistent with the Pacific Northwest Pollution Control Council recommendations and Governor McCall's Log Storage Policy.

4. The DEQ must begin to write waste discharge permits which include programs for the control of water quality problems resulting from log handling and storage activities.

5. Significant improvements are needed and can be accomplished on a short-term basis by improved "housekeeping" practices.

6. Alternatives to the storage and handling of logs in waterways can create undesirable environmental trade offs. Thus, each operation must be carefully evaluated on its own merits.

PROPOSED PROGRAM

Considering the aforestated background information and history of numerous problems, the staff recommends that the EQC adopt the following program for control of log dumping, rafting, and storage in Oregon's public waters as policy to guide the case by case evaluation of such operations:

1. The construction of new wood processing plants which must receive logs from public waters shall be prohibited.

2. Log dumping, storage, and handling shall be restricted or eliminated from waters where water quality standards are not met at all times.

3. Log storage shall be prohibited at any public water site where logs go aground.

4. Free-fall log dumps shall be prohibited.

5. Easy let-down devices as approved by the Department shall be employed at all log dumps into public waters as soon as practicable.

6. Positive bark and wood debris controls, collection, and disposal methods, as approved by the Department shall be employed at log dumps, raft building areas, and mill-side handling sites.

7. The inventory of logs in public waters for any purpose shall be kept to the lowest possible number for the shortest possible time. In those waters where logs can be rafted and handled without major impact on water quality or cause other adverse conditions, the maximum residency of any log shall be limited to one year.

8. The industry shall provide and periodically update an accurate quantification of its sites and use of public waters for all log handling activities.

9. All dry land log storage, wood chip and hog fuel handling and storage facilities shall be set back sufficiently and properly shielded and operated to prevent the loss of wood products into the public waters.

10. Each industry shall be responsible for clean up and restoration of log handling and storage areas when use thereof is terminated.

Special Program for Specific Waters of the State (in addition to the General Program)

For the following waters, application of the above policy leads to the following specific programs:

A. Klamath Basin

All log dumping, storage, and mill-side handling in public waters should be prohibited.

1. The Department should support a limited fill or other facilities that may be needed to accomplish log removal by Weyerhaeuser Company. The Department should further establish a new deadline for completion contingent on issuance of a fill permit.

2. Columbia Plywood Company should be required to submit a report setting forth comparative capital and operating costs for specific alternatives to river log handling and storage.

B. Deschutes Basin

All log dumping, storage, and mill-side handling in public waters should be prohibited.

1. The Department should support the Brooks Scanlon proposal for relocating the river channel away from their mill.

2. Gilchrist Timber Company should be placed on a long-term program to phase the remainder of the log handling operations out of the river.

C. Coos Bay

1. Short-term program (immediately)

   a. Easy let-down devices, as approved by the Department, shall be employed at all log dumps.

   b. Log dumps should be limited to a minimum number and in locations where maximum bark and debris controls can be made effective. (log dumps and raft building sites in cul-de-sacs off the main water body would afford best conditions for debris control).

   c. An industry sponsored log debris clean-up program should be instituted on the estuary - similar to that employed by Weyerhaeuser Company in the Coos and Millicoma River channels.

2. Long-term Programs (5 years)

   a. Dry-land storage of all logs should be encouraged at the Eastside site or other acceptable locations.

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. G, June 21, 1974 EQC Meeting

Weyerhaeuser Company, Springfield: Status Report on NPDES Permit Application

Background

Weyerhaeuser Company has applied for a National Pollutant Discharge Elimination System (NPDES) permit for their existing wood products complex at Springfield. The complex consists of a kraft pulp and paperboard operation, plywood plant, particleboard plant and sawmill. This complex has been under a waste discharge permit from the Department of Environmental Quality since December 28, 1967, and the proposed NPDES permit is essentially a renewal of Weyerhaeuser's previous permits although it is much more detailed than the previous permits.

All of Weyerhaeuser's existing wastewater control facilities have been reviewed and approved by the Department of Environmental Quality. The process wastewaters are presently settled in a series of two primary settling ponds and then are treated in an extended aeration lagoon system prior to discharge to the McKenzie River. Weyerhaeuser is in the process of designing a mechanical primary clarifier which should help improve their effluent quality. Log pond overflow is aerated to reduce the Biochemical Oxygen Demand (BOD) prior to being pumped to the main effluent line. Evaporator condensate is spray irrigated on land near the mill during the low flow summer months in order to reduce the waste load to the aeration facilities and the resulting discharge to the river. This source is treated in the aerated lagoon during the winter months. Once-through condenser cooling water is discharged to a secondary channel of the McKenzie River.

In the early 1960's, and prior to the production expansion which was approved in 1964, satisfactory water quality had been maintained during summer months with BOD discharges less than 4,000 lbs/day. Comparable levels were to be maintained after the expansion. In

order to reduce BOD discharge levels to less than 4,000 lbs/day, after the expansion the company proceeded to design and install the present treatment facilities. The aerated lagoon which was completed in 1966 was the first of its kind and has been a proving ground for new technology.

In December 1967, when the first waste discharge permit was issued, a BOD limit of 3,000 lbs/day summer and 4,000 lbs/day winter was established based on limited available data. The permit required the company to monitor and report on the operation of facilities and magnitude of discharges.

During the period between 1967 and the present, significant information has been obtained regarding the operation as a result of company monitoring.

1. Nutrients must be fed to the aerated lagoon to obtain optimum BOD removal.

2. Biological cells produced in the process of removing BOD settle and accumulate in the pond, thus reducing detention time and pond efficiency and necessitating dredging.

3. BOD removal efficiency decreases in winter with colder temperatures.

The company has dredged the pond twice since 1972. They have also conducted substantial studies to determine nutrient balance. They have continued to work toward improved efficiency by installation of additional aerators and recycling of some pond effluent.

The company has reported spills, malfunctions and discharges in excess of limits to the Department since the first permit was issued. The Department has observed sampling procedures and has on occasion split samples with the company. The Department has worked with the company to secure correction of operational problems and reduction of discharges when limits are exceeded.

It became apparent in 1972 with better data that the 4,000 lbs/day winter discharge limit was not achievable and that adjustment of the limitation may be necessary when the permit was renewed.

NPDES Proceedings

The Department drafted its first proposed NPDES permit for Weyerhaeuser in early 1973. The company did not agree to this permit, hence it was not issued during the interim authority period (March 1973). A major problem centered around specification of analytical procedures. The procedures used by the company, while relatively standard for the industry, were different from those specified. They expected the revised procedures to yield greater numerical values for the same discharge levels and thus requested an increase in discharge limitation numbers. The Department would not increase the summer limit but did concur that increase of the winter limit from 4,000 to 5,700 lbs/day would be reasonable based on this and other factors previously mentioned.

Suspended solids limits were incorporated into the permit. Such limits were not in the previous permit.

Recently revised water quality standards require the Department to define an allowable mixing zone in each permit. The purpose of the definition is to facilitate determination of water quality standards compliance. The Department thus proposed a definition and in addition required a special study to develop data to serve as a basis for later revision if necessary. The Department does not have all the desired data available and cannot delay permit issuance until it is obtained. Therefore, we are proceeding based on best available information and expect to improve it in the next cycle of issuance.

On February 19, 1974, public notice of intent to issue a permit was given. As a result of this notice, a hearing was requested by several interested persons.

Public Hearing

On April 9, 1974, notice was given for a hearing on May 13, 1974. This hearing was held before Hearings Officer Thomas Guilbert. His report, as filed with the Director, is attached.

The staff of the Department has reviewed this report and concurs with the summary of testimony. The staff does not concur, however, with the conclusions drawn from the testimony. The hearing was not a contested case hearing. There was no cross-examination of witnesses or rebuttal testimony. The record of the hearing does not contain all of the facts which must be considered in the issuance of a permit. The purpose of the hearing was to seek additional information and public views regarding the Department's proposal prior to making a final determination to issue a permit.

The staff has evaluated the testimony with this purpose in mind, and comments as follows on major points:

1. Opposition to 5,700 lbs BOD/day winter discharge: This has already been discussed and is considered to be an adjustment in an earlier number based on inadequate information rather than an increase in the discharge.

2. Alleged inadequacy of self-monitoring and requests for automatic monitoring: DEQ is required to include self-monitoring and reporting requirements in permits. Most automatic monitoring equipment has not proven to be effective, reliable or accurate in such installations. The Department would like to expand its program for verification monitoring of dischargers but cannot do so without legislative approval of additional manpower. It is interesting to note that Weyerhaeuser has not been hesitant to report violations based on self-monitoring data to DEQ.

3. Objection to mixing zone size and study details: This has already been discussed. The Department recognizes the need for more data and thus has required the study. In the interim, a mixing zone has been defined based on the best information available to the Department.

4. Deteriorating water quality and "slugging": The Department has chemically and biologically sampled the river above and below the discharge at various times of the year. This monitoring does not indicate any significant deterioration in water quality over that observed in the last few years. Biological monitoring, which can detect the after-effects of slug discharges does not indicate the presence of this problem.

5. Request for Zero Discharge: The 1985 zero discharge goal in the Federal Act is an idealistic goal rather than a requirement. Weyerhaeuser currently provides summer control which is better than the EPA-defined best available technology which must be achieved by 1983.

6. Request for limits stricter than EPA limits to protect McKenzie River: The proposed limits are more stringent than EPA limits and are based on meeting Oregon's Special Water Quality Standards for the McKenzie, established after full public hearings.

7. Temperature and effects of heated discharges: This item will be further evaluated in the mixing zone study.

8. Suggestions to issue a one-year permit: Present procedures require four to six months for issuance of a permit. A four-year permit was proposed to even-out work loads for future renewals. The Department can institute modification of any permit at any time based on a demonstrated need.

Summary

After careful evaluation of the information available to the Department, it is concluded that issuance of the proposed permit to place Weyerhaeuser Company under the enforceable provisions of this more detailed permit is the best course of action. Accordingly, the Director intends to issue the permit and proceed as necessary to secure compliance with its provisions.

KESSLER R. CANNON
Director

HLS:ss
6/12/74
attachment

Expiration Date: 3-31-78
Page 1 of 9

PRELIMINARY DRAFT

FOR A

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

TO BE ISSUED BY

OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

Pursuant to ORS 449.083 and P.L. 92-500

ISSUED TO: Weyerhaeuser Company Post Office Box 275 Springfield, Oregon 97477 PLANT SITE: Springfield Operations ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY Diarmuid F. O'Scannlain, Director — Date	REFERENCE INFORMATION File Number: 96244 Appl. No.: 1763 Received 11-16-72 071-OYA-2-000148 Major Basin: Willamette Minor Basin: McKenzie Receiving Stream: McKenzie River River Mile: 14.7 County: Lane

PERMITTED ACTIVITIES

Until such time as this permit expires or is modified or revoked, Weyerhaeuser Company, Springfield Operations, is herewith permitted to:

a. Operate waste treatment and control facilities.
b. Discharge adequately treated waste waters to the McKenzie River.
c. Construct and operate inplant waste water reduction/control facilities.
d. Discharge uncontaminated cooling water to the McKenzie River via the slough.

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

All other waste discharges are prohibited.

SPECIAL CONDITIONS

S1. The permittee shall reduce the Settleable Solids discharged to the McKenzie River to levels specified in the discharge limitations of condition S8 of this permit in accordance with the following time schedule:

a. Submit a program and time schedule by October 1, 1974.

b. Report on progress - July 1, 1975.

c. Report on progress - January 1, 1976.

d. Meet required limitations by June 1, 1976.

S2. The permittee shall survey and evaluate the temperature plume below each outfall in sufficient detail to ascertain plume boundaries during the next low stream flow period. It is also suggested that additional background temperature data be gathered during the next regular plant shutdown which occurs during low stream flow periods. The surveys shall provide both a horizontal and vertical temperature profile and shall indicate, where practicable, the location of the boundary of the area where the plant discharges increase the background temperature of the river by 0.5° F. The conclusions of the study shall be submitted to the Department by November 1, 1974. After evaluating the study the Department may find it necessary to either redefine the allowable mixing zones or require additional thermal control or both.

S3. As soon as practicable, but not later than April 1, 1974, the permittee shall submit for review and approval an operational plan for the irrigation area outlining procedures for efficiently utilizing all available areas in a manner which will preclude runoff and odor nuisances. The plan shall include detailed plans and specifications for control facilities which may be necessary to prevent contaminated runoff. The approved plan shall be implemented by June 1, 1974.

S4. The permittee is expected to meet the compliance schedules and interim dates which have been established in conditions S1, S2 and S3 of this permit. Either prior to or no later than 14 days following any lapsed compliance date the permittee shall submit to the Department a notice of compliance or non-compliance with the established schedule.

S5. Prior to constructing or modifying any waste water control facilities, detailed plans and specifications shall be approved in writing by the Department.

S6. The quantity and quality of uncontaminated cooling water discharged directly or indirectly to the McKenzie River from outfall 002 shall be limited as follows:

Parameter	Monthly Average	Daily Maximum
Flow	15 MGD	25 MGD
Temperature	97° F.	115° F.
pH	Within the range 6.0 - 9.0	

S7. Beginning on the date of issuance of this permit and ending May 31, 1976, the quantity and quality of effluent discharged directly or indirectly to the McKenzie River from outfall 001 shall be limited as follows:

June 1 to October 31

Parameter	Weekly Average	Daily Maximum
BOD (5-day)	3,000 lbs/day	4,500 lbs
Suspended Solids (above background)	10,000 lbs/day	20,000 lbs
pH	Within the range 6.0 - 8.5	

November 1 to May 31

Parameter	Monthly Average	Daily Maximum
BOD (5-day)	5,700 lbs/day	10,000 lbs
Suspended Solids (above background)	11,960 lbs/day	28,000 lbs
pH	Within the range 6.0 - 8.5	

S8. After May 31, 1976 the quality and quantity of effluent discharged directly or indirectly to the McKenzie River from outfall 001 shall be limited as follows:

June 1 to October 31

Parameter	Weekly Average	Daily Maximum
BOD (5-day)	3,000 lbs/day	4,500 lbs
Suspended Solids (above background)	10,000 lbs/day	20,000 lbs
pH	Within the range 6.0 - 8.5	
Settleable Solids	Not to exceed 0.1 ml/l	

November 1 to May 31

Parameter	Monthly Average	Daily Maximum
BOD (5-day)	5,700 lbs/day	10,000 lbs
Suspended Solids (above background)	11,960 lbs/day	28,000 lbs
pH	Within the range 6.0 - 8.5	
Settleable Solids	Not to exceed 0.1 ml/l	

S9. The total discharge shall be controlled to maintain a reasonably constant flow rate throughout each 24-hour operating period.

S10. Notwithstanding the effluent limitations established by this permit, no wastes shall be discharged and no activities shall be conducted which will violate Water Quality Standards as adopted in OAR 340-41-100 except in the following defined mixing zones:

The allowable mixing zone for the process water discharge (001) shall not exceed a segment of the McKenzie River 100 feet wide as measured from the water line along the south bank and extending from 5 feet upstream of the point of discharge to 5,000 feet downstream of the point of discharge.

The allowable mixing zone for the uncontaminated cooling water (002) shall not extend beyond the secondary river channel receiving the discharge plus one-half the width of the main river channel from the point of confluence to the Hayden Bridge.

S11. No petroleum-base products (or other substances) which might cause the Water Quality Standards of the State of Oregon to be violated shall be discharged or otherwise allowed to reach any of the waters of the state.

S12. Sanitary wastes shall be disposed of to the City of Springfield municipal sewerage system.

S13. Filter backwash, solids, sludges, dirt, sand, silt or other pollutants separated from or resulting from the treatment of intake or supply water shall not be discharged to state waters without first receiving adequate treatment (which has been approved by the Department) for removal of the pollutants.

S14. Unless approved otherwise in writing by the Department the permittee shall observe and inspect all waste handling, treatment and disposal facilities and the receiving stream above and below each point of discharge at least daily to insure compliance with the conditions of this permit. A written record of all such observations shall be maintained at the plant and shall be made available to the Department of Environmental Quality staff for inspection and review upon request.

S15. The permittee shall monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the wastes discharged. A record of all such data shall be maintained and submitted to the Department of Environmental Quality at the end of each calendar month during the period November 1 to May 31. Reports shall be submitted at weekly intervals during the period June 1 to October 31. Unless otherwise agreed to in writing by the Department of Environmental Quality, data collected and submitted shall include but not necessarily be limited to the following parameters and minimum frequencies:

Parameter	Minimum Frequency
Discharge to River	
Flow (001 and 002)	Daily - continuous
BOD (5-day) (001)	3 24-hr composite samples/week
Suspended Solids (001)	3 24-hr composite samples/week
Settleable Solids (001)	3 grab samples/week
pH (001 and 002)	Continuous or daily grab samples
Color (001)	3 grab samples/week
Turbidity (001)	3 grab samples/week
Temperature (001 and 002)	3 grab samples/week

Parameter	Minimum Frequency
Discharge to Irrigation	
Flow	Daily - continuous
BOD (5-day)	3 grab samples/week
Land Application (gallons/acre)	Each rotation or setting
Other	
Mixing zone visual observations for color, foam, floating solids, slime accumulations, odors and anything unusual at each discharge	Daily
Production	
Pulp	Average tons/day for reporting period
paper	Average tons/day for reporting period

Monitoring procedures:

a. Monitoring shall begin on the first day of the month following issuance of this permit.

b. Monitoring reports shall be submitted by the 15th day of each following month during the monthly reporting period and within 10 days of the end of the reporting period during the weekly reporting period.

c. Monitoring data shall also be submitted on approved NPDES report forms monthly.

d. All records of monitoring activities and results required pursuant to this permit, including all original strip chart recordings for continuous monitoring instrumentation and calibration and maintenance records, shall be retained by the permittee for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the permittee or when requested by the Director.

e. The permittee shall record for each measurement or sample taken pursuant to the requirements of this permit the following information: (1) the date, exact place and time of sampling; (2) the dates the analyses were performed; (3) who performed the analyses; (4) the analytical techniques or methods used and (5) the results of all required analyses.

f. Samples and measurements taken to meet the requirements of this condition shall be representative of the volume and nature of the monitored discharge.

g. All sampling and analytical methods used to meet the monitoring requirements specified in this permit shall, unless approved otherwise in writing by the Department, conform to the latest edition of the following references:

1) American Public Health Association, Standard Methods for the Examination of Water and Wastewaters (13th ed. 1971).

2) American Society for Testing and Materials, A.S.T.M. Standards, Part 23, Water, Atmospheric Analysis (1970).

3) Environmental Protection Agency, Water Quality Office, Analytical Control Laboratory, Methods for Chemical Analysis of Water and Wastes (April, 1971).

S16. Within 30 days of the issuance of this permit the permittee shall submit a detailed description of the sampling procedures used, sample analysis techniques and exact location of sampling stations.

S17. Unless otherwise agreed to in writing by the Department all hydraulic barker water shall be screened and discharged to the aeration basin.

S18. Unless otherwise agreed to in writing by the Department, evaporator condensate shall be irrigated on land between June 1 and October 31 as much as it is practicable. Discharge of evaporator condensate to the aerated lagoon shall be kept to a minimum.

S19. All waste solids, including dredgings and sludges, shall be utilized or disposed of in a manner which will prevent their entry, or the entry of contaminated drainage or leachate therefrom, into the waters of the state and such that health hazards and nuisance conditions are not created.

S20. Prior to July 1, 1974 the permittee shall provide an alternative power source sufficient to operate all facilities utilized by the permittee to maintain compliance with the terms and conditions of this permit. In lieu of this requirement the permittee may certify in writing to the Department within 30 days of the issuance of the permit that in the event of a reduction, loss, or failure of a power source the permittee shall halt, reduce or otherwise control production and/or all discharges in order to maintain compliance with the terms and conditions of this permit.

S21. The permittee shall prepare, submit to the Department and implement a suggested spill prevention and contingency plan for the facility covered by this permit within 90 days of the date of its issuance. Such plan shall include at least the following information and procedures relative to the prevention and handling of spills and unplanned discharges of oil, chemicals and other hazardous substances:

a. A description of the reporting system which will be used to alert responsible facility management and appropriate legal authorities;

b. A description of the facilities which prevent, contain or treat spills and unplanned discharges;

c. A list of all oil and hazardous materials used, processed or stored at the facility which may be spilled and could conceivably be discharged to state waters;

d. A brief description of recent spills and changes made to prevent their occurrence; and

e. An implementation schedule for additional facilities which may be required to prevent the spillage of oil, chemicals and other hazardous materials and subsequent discharge to state waters.

S22. Waste waters discharged to biological secondary treatment facilities shall contain adequate nutrients at all times. An automatic flow-regulated mechanical nutrient feeding facility is recommended for maintenance of an adequate influent balance at all times.

S23. An environmental supervisor shall be provided to coordinate and carry out all necessary functions related to maintenance and operation of waste collection, treatment and disposal facilities. This person must have access to all information pertaining to the generation of wastes in the various processing areas.

S24. A continuing program shall be initiated to reduce total fresh water consumption by increased utilization of soiled water.

S25. No waste streams subject to contamination with fiber, process chemicals, cleaning compounds, oils, leachates etc. shall be permitted to enter the discharge stream without passage through adequate waste treatment facilities.

S26. All surface drainage channels subject to contamination in the mill area shall be adequately controlled and monitored to insure that the spilled or accumulated fiber, process chemicals, cleaning compounds, oils, leachates etc. are not carried away from the plant site. Data collected from such monitoring shall be kept on file and made available to Department of Environmental Quality staff for review upon request.

S27. The diversion or bypass of any discharge from facilities utilized by the permittee to maintain compliance with the terms and conditions of this permit is prohibited, except (a) where unavoidable to prevent loss of life or severe property damage or (b) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the terms and conditions of this permit. The permittee shall immediately notify the Department in writing of each such diversion or bypass in accordance with the procedure specified in Condition G9.

S28. The log pond and aeration basin shall not be drained or dredged without prior written approval from the Department.

S29. All glue waste water shall be recirculated or otherwise controlled so that it does not enter public waters.

GENERAL CONDITIONS

G1. All discharges and activities authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant more frequently than or at a level in excess of that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit.

G2. The 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. Whenever a facility expansion, production increase or process modification is anticipated which will result in a change in the character of pollutants to be discharged or which will result in a new or increased discharge that will exceed the conditions of this permit, a new application must be submitted together with the necessary reports, plans and specifications for the proposed changes. No change shall be made until plans have been approved and a new permit or permit modification has been issued.

G4. After notice and opportunity for a hearing this permit may be modified, suspended or revoked in whole or in part during its term for cause including but not limited to the following:

a. Violation of any terms or conditions of this permit or any applicable rule, standard, or order of the Commission;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;

c. A change in the condition of the receiving waters or any other condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

G5. If a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Federal Act for a toxic pollutant which is present in the discharge authorized herein and such standard or prohibition is more stringent than any limitation upon such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee shall be so notified.

G6. The permittee shall, at all reasonable times, allow authorized representatives of the Department of Environmental Quality:

a. To enter upon the permittee's premises where an effluent source or disposal system is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy any records required to be kept under the terms and conditions of this permit;

c. To inspect any monitoring equipment or monitoring method required by this permit; or

d. To sample any discharge of pollutants.

G7. The permittee shall maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

G8. The Department of Environmental Quality, its officers, agents and employees shall not sustain any liability on account of the issuance of this permit or on account of the construction or maintenance of facilities because of this permit.

G9. In the event the permittee is unable to comply with all of the conditions of this permit because of a breakdown of equipment or facilities, an accident caused by human error or negligence, or any other cause such as an act of nature, the permittee shall:

a. Immediately take action to stop, contain and clean up the unauthorized discharges and correct the problem.

b. Immediately notify the Department of Environmental Quality so that an investigation can be made to evaluate the impact and the corrective actions taken and determine additional action that must be taken.

c. Submit a detailed written report describing the breakdown, the actual quantity and quality of resulting waste discharges, corrective action taken, steps taken to prevent a recurrence and any other pertinent information.

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

DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 6296

TOM McCALL
GOVERNOR

KESS CANNON
Director

MEMORANDUM TO: Director

FROM: Hearings Officer

SUBJECT: Weyerhaeuser Company, Springfield: Application for NPDES Permit

Background

Weyerhaeuser Company has applied for a National Pollutant Discharge Elimination System (NPDES) permit for its existing wood products complex at Springfield. This complex has been under a waste discharge permit from the DEQ since 28 December 1967, and the proposed permit is essentially a much more detailed renewal of the company's previous permits, with a few significant changes which will be detailed below. It is a matter of public record that Weyerhaeuser Company has repeatedly exceeded winter discharge levels for biochemical oxygen demand (BOD) established by the existing permit.

A public hearing was held on Monday, May 13, in Harris Hall, Eugene, Oregon, to take public testomony on the proposed permit. In addition to the hearings officer, representatives of governmental agencies present included Craig Starr of the Midwest Region of DEQ, Verner Adkison, Regional Administrator of the Midwest Region of DEQ, Glenn Carter of the DEQ Water Quality Division, and James Sweeney of the United States Environmental Protection Agency (EPA).

Applicable Statutes and Rules

In determining whether an NPDES permit should be granted to Weyerhaeuser Company, and what the terms of the permit should be, several statutory provisions and rules must be reviewed. Because the precise language is significant, several sections are herewith excerpted at length.

Section 316 (c) of the Federal Water Pollution Control Amendments of 1972, (FWPCA), 33 U.S.C. Section 1326 (c), is particularly important for a determination of whether this permit should be granted. It reads in part:

> "Notwithstanding any other provision of this chapter, any point source of a discharge having a thermal component, the modification of which is commenced after October 18, 1972, and which, as modified, meets

> effluent limitations established under section 1311 [section 301] of this title or, if more stringent, effluent limitations established under section 1313 [section 303] of this title and which effluent limitations will assure protection and propagation of a balanced, indigenous population of shellfish, fish, and wildlife in or on the water into which the discharge is made, shall not be subject to any more stringent effluent limitation with respect to the thermal component of its discharge during a ten-year period beginning on the date of completion of such modification..." (emphasis added).

Sections 301 and 303 of the FWPCA, referred to in the passage above, are quoted in relevant part, following:

Section 301(b) of the FWPCA, 33 U.S.C. Section 1311 (b) reads in part:

> "...[T]here shall be achieved...not later than July 1, 1977, effluent limitations for point sources...which shall require the application of the best practicable control technology currently available...or...any more stringent limitation, including those necessary to meet water quality standards, treatment standards, or schedules of compliance, established pursuant to any state law or regulations."

Section 303 of the FWPCA, 33 U.S.C. Section 1313, is a long and complex section dealing with water quality standards and implementation plans. Subsection (d) thereof reads, in part:

> "Each State shall identify those waters within its boundaries for which the effluent limitations required by section 1311 (b) [section 301(b)]...of this title are not stringent enough to implement any water quality standard applicable to such waters... and for which controls on thermal discharges under section 1311 [section 301] of this title are not stringent enough to assure protection and propagation of a balanced indigenous population of shellfish, fish, and wildlife. Each state shall establish for the waters so identified... the total maximum daily load for those pollutants... and the total maximum daily thermal load required to assure protection and propagation of a balanced, indigenous population of shellfish, fish, and wildlife. Such load shall be established at a level necessary to implement the applicable water quality standards with seasonal variations and a margin of safety which takes into account any lack of knowledge concerning the relationship between effluent limitations and water quality and shall take into account the normal water temperatures, flow rates,... existing sources of heat input, and the dissipative capacity of the identified waters or parts thereof. Such estimates...shall include a margin of safety which takes into account any lack of knowledge concerning the development of thermal water quality criteria for such protection and propagation in the identified waters or parts thereof."

Two other sections of the FWPCA are relevant to this case. First, section 101(a), 33 U.S.C. Section 1251 (a), states, in part:

> "The objective of this chapter is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters...[I]t is the national goal that the discharge of pollutants into the navigable be eliminated by 1985..."

Section 308 of the FWPCA, 33 U.S.C. Section 1318, reads, in part:

> "Whenever required to carry out the objective of this chapter,... the Administrator shall require the operator of any point source to...install, use, and maintain such monitoring equipment or methods [and] sample such effluents (in accordance with such methods, at such locations, at such intervals, and in such manner as the Administrator shall prescribe)... If the Administrator finds that the procedures and the law of any State relating to...monitoring...are applicable to at least the same extent as those required by this section, such State is authorized to apply and enforce its procedures for...monitoring...with respect to point sources located in such State..."

Oregon Administrative Rules (OAR) chapter 340, Division 4, applies to water pollution. The most significant provision thereof for the present determination is 41-023:

> "MIXING ZONES. (1) The Department may suspend the applicability of all or part of the water quality standards set forth in this subdivision, except those standards relating to aesthetic conditions, within a defined immediate mixing zone of very limited size adjacent to or surrounding the point of waste water discharge.
>
> (2) The sole method of establishing such a mixing zone shall be by the Department defining same in a waste discharge permit.
>
> (3) In establishing a mixing zone in a waste discharge permit the Department:
>
> (a) may define the limits of the mixing zone in terms of distance from the point of the waste water discharge or the area or volume of the receiving water or any combination thereof;
> (b) may set other less restrictive water quality standards to be applicable in the mixing zone in lieu of the suspended standards; and
> (c) shall limit the mixing zone to that which in all probability will
>
> (A) not interfere with any biological community or population of any important species to a degree which is damaging to the ecosystem; and
> (B) not adversely affect any other beneficial use disproportionately.

Other provisions of OAR chapter 340 of immediate relevance are 41-022, 41-025, and 41-100, selected portions of which are set out following:

41-022: "In developing treatment requirements and implementation schedules for existing installations or activities, consideration shall be given to the impact upon the overall environmental quality including air, water, land use, and aesthetics."

41-025: "No wastes shall be discharged...which...will cause: ...[t]he development of fungi or other growths... the formation of appreciable bottom or sludge deposits, or the formation of any organic or inorganic deposits deleterious to fish or other aquatic life or injurious to public health, recreation or industry."

41-100: "No wastes shall be discharged and no activities shall be conducted which...will cause in the waters of the McKenzie River Basin...any measurable increases [in temperature] when stream temperatures are 58° F. or greater; or more than 0.5° F. increase due to a single-source discharge when receiving water temperatures are 57.5° F. or less..."

Summary of Testimony

Craig Starr presented the DEQ's report on the proposed permit. He noted that Weyerhaeuser is in the process of designing a mechanical primary clarifier which should help to improve the quality of its effluent. The new permit requires Weyerhaeuser to survey and evaluate the thermal plume from the process waste water discharge and the cooling water discharge and submit a report to the Department by the first of November, 1974. Mr. Starr stated that the Department may find it necessary, after evaluating the report, to modify the permit to redefine the mixing zones or require thermal controls.

Mr. Starr testified that the new permit will require Weyerhaeuser to reduce the quantity of settleable solids being discharged into the McKenzie River to below 0.1 ml/l by 1 June 1976. The winter BOD discharge level is set at 5,700 pounds per day compared to the existing permit's level of 4,000 pounds per day. Upon examination by the hearings officer, Mr. Starr testified that this increase in allowable discharge will not allow Weyerhaeuser to discharge more pollutants into the river than it does in fact now discharge: the previous permit limitation was established by estimating the probable performance of the highest and best practicable treatment, which estimate has proven to be over-optimistic. Whereas the Weyerhaeuser system met the 1967 permit requirements for a period after the permit was issued, the long-term effectiveness of the system was subject to deterioration.

Mr. Starr explained that the mixing zones described in the permit were established on the large side because the Department presently lacks sufficient data to adequately describe the actual area within which the thermal requirements for the McKenzie River are not met during various river stages. However, no certain detrimental effects of Weyerhaeuser's thermal discharges have yet been documented.

Jerry L. Harper presented Weyerhaeuser Company's testimony. He testified that his company desires that the permit be issued for the full five years allowed under the NPDES program, rather than the less than four years of the proposed permit. He requested permission to conduct a demonstration of thermal effects under section 316 (a) of the FWPCA [33 U.S.C. Section 1326 (a)] (not reproduced above) for purposes of showing that compliance with OAR Chapter 340, section 41-100 (2) (e), reproduced above, is unnecessary. Mr. Harper repeatedly emphasized the adverse air pollution or land use effects which would be a probable concomitant of more stringent effluent or thermal limitations. Cf. OAR Chapter 340, section 41-022, reproduced above.

Mr. Harper stated that his company objects in principle to several of the conditions of the permit which restrict how Weyerhaeuser manages its internal waste flow and disposal systems. Several of the objected to conditions, however, appear to fall squarely within section 308 of the FWPCA, reproduced above.

With regard to suspended solids, Mr. Harper requested that the summertime limitation be increased to that of the 1977 EPA interim effluent guidelines: that is, from 10,000 pounds to 11,960 pounds per day, and modified to reflect final EPA guidelines if those guidelines prove to differ from the interim guidelines. He noted that compliance with the permit conditions will be met by modification of the plant. He defended the shape and size of the proposed mixing zones.

Mr. Harper objected to the vagueness of term "S22" of the permit which requires that "adequate" nutrients be added to biological treatment facilities, since overabundant nutrients would themselves be a source of harm to the river.

Statement of Proponent

Only one statement was offered in support of the proposed permit. Edward L. Ramsay, president of the Springfield Area Chamber of Commerce, strongly supported the extension of the waste discharge permit on behalf of his organization. The prime basis for the support was stated to be the jobs, payroll, and taxes Weyerhaeuser provides.

Statements of Opponents

Many witnesses directed their testimony primarily or exclusively to the increase in allowable winter BOD discharge to 5,700 pounds per day, as opposed to 4,000 pounds per day of the existing permit. This was the primary thrust of the statement of the League of Women Voters of Central Lane County ("We oppose any degradation of standards for present high quality rivers.") presented by Mary Sherriffs. Robin Jaqua also opposed an increase, stating that present standards could be met with stronger controls. Glen A. Love, Willard B. Bohrer, and Bayard H. McConnaughey all opposed an increase. John C. Sihler of McKenzie Fly Fishers suggested that the company's performance will deteriorate according to the relaxed demands being made upon them. In written testimony, Louise Smith, Mr. and Mrs. Walter H. Hebert, and Robert G. Bumstead objected to any increase in Weyerhaeuser's discharge.

The question of monitoring to assure compliance with the terms of the permit drew much testimony. Robin Jaqua, a long-time resident of the area, alleged 25 years of Weyerhaeuser concealment, and requested a meeting with DEQ officials to document this statement under oath, if desired. She asserted the company would do a better job if monitored from outside, and suggested DEQ hire a person to check thrice daily. Her son, Jon Jaqua, also questioned if self-monitoring would lead to compliance. Bayard H. McConnaughey questioned the efficacy of self-monitoring, as did William Wilson. Ronald L. Cole, Oregon State Director of Northwest Steelheaders, repeated Prof. McConnaughey's suggestion that an automatic electronic monitoring system be required to be installed as a condition of the permit. Mr. Cole recommended that Weyerhaeuser buy the devices, then give them to the DEQ. Lloyd Dolby testified that automated monitoring equipment could measure COD (chemical oxygen demand) more readily than BOD (biochemical oxygen demand), and suggested rewriting the permit in COD terms, comparing BOD and COD levels over a period of time, if necessary, to assure comparability of permit requirements. He also noted that there can be variations in data taken from monitoring stations relative to the size of suspended particles. John C. Sihler also called for independent monitoring. John L. Pilafian called for automatic monitoring devices. In written testimony, Malcolm Burke questioned the efficacy of self-monitoring.

The size and shape of the mixing zones, i.e., the area within which the permittee will be exempt from all ambient water quality standards, was the subject of a great deal of well-thought-out testimony. Christopher Kittell, representing the Northwest Environmental Defense Center, testified that he believed that the Department is violating its own conditions for the definition and restriction of mixing zones to a "very limited size," as contained in OAR, Chapter 340, section 41-023, reproduced above. He recommended that, as part of the study required by condition S2 of the proposed permit, Weyerhaeuser should be required to perform a cost-benefit analysis of measures to reduce the size of the mixing zone to various sizes, ranging from the size in the proposed permit to no mixing zone (i.e., zero discharge). Thomas Pogson testified that the language of 41-023 (3) (c) (A) refers to "the ecosystem" which a mixing zone is required "in all probability" not to interfere with to a damaging degree. He suggests that this ecosystem should be specified in the permit condition which defines the mixing zone so that the question(of whether the mixing zone so defined satisfies 41-023) becomes an ascertainable question of fact. John B. Overton testified that he believes the DEQ had an inadequate data base with which to define a mixing zone in accordance with the criteria of 41-023, and his views were echoed in written testimony submitted by Robert G. Bumstead. John Neilson, representing the Oregon Environmental Council, also testified that the DEQ lacks sufficient information upon which to define a mixing zone as large as that defined in the permit.

Closely related to the data base needed to establish a mixing zone is the testimony of several witnesses who have been observing and monitoring the river the last several years. Robin Jaqua testified that, following an improvement when Weyerhaeuser installed its present controls, the winter algal growth and presence of slime and sludge in the river has deteriorated noticeably in the last two years. Jon Jaqua testified as to slime in his cattle-watering sloughs 2½ miles below the outfall. Don Dugdale, who owns property downstream from the outfall, testified that the river water quality has deteriorated in recent months, and he can see what appear to be paper fibers trailing from gravel bars. He testified that Weyerhaeuser apparently practices night

"slugging," and cuts back during the hours DEQ employees might inspect and monitor. Willard B. Bohrer, who owns land 400 yards downstream from the outfall, testified as to foam coming down the river. Bayard H. McConnaughey, a professor of biology at the University of Oregon, testified that the altered character of the algal-diatom growths on the rocks below the outfall compared to above shows that the discharge seriously affects the river. He also noted a decline in various aquatic insects and other benthic invertebrates in the affected stretches of the river. Ronald L. Cole asked that the DEQ give prime consideration to the impact on fisheries. Michael Starr noted that Mr. Harper had attributed the decline in the effectiveness in Weyerhaeuser's control system to sludge buildup in its lagoons. Mr. Starr asked if the lagoons get plugged, would not the river, too? He asked that the DEQ consider the cumulative effect of pollution continuing for several years. Leon Earl Henderson testified that conditions below outlets are much poorer than those above. Tom R. Bowerman read a letter from his ecologist brother, Jay, which stated that in two studies between 1965 and 1969 populations of stone fly larvae, a chief food of trout, were significantly lower below the outfall. Thomas Pogson testified at length on the biological implications of data within the DEQ files. In written testimony Robert G. Bumstead testified that there is an algae mat extending downstream from the outfall which does not exist upstream from the outfall. This mat extends, he writes, to the mouth of the McKenzie. John C. Sihler testified as to large chunks of material coming out of the outfall.

Whether alluding to section 101 (a) of the FWPCA, reproduced above, or not, several witnesses protested against any pollution of the McKenzie River. Robin Jaqua wants all discharges eliminated. Quoting from ORS 468.710 (not reproduced above), the policy section of Oregon's water pollution statute, William Wilson, a licensed river guide, argued for zero discharge. He particularly objects to the proposed permit's allowance of 28,000 pounds per day of suspended solids during winter months. Terry Esvelt of the University of Oregon Survival Center noted that the FWPCA sets a goal of zero discharge by 1985, and this permit fails to move in the direction of that goal. Ronald L. Cole noted the thrust of the law is to improve water quality, not merely maintain it at its present degraded level. He suggests comparing the quality of water at Weyerhaeuser's intake with that at the outfall.

Some witnesses noted that the Environmental Quality Commission has, by its rules (cf. 41-100, reproduced above), recognized a higher level of purity for the McKenzie River than for some other waters of the state. Robin Jaqua testified that she believed that the permit should recognize the higher standards applicable to the McKenzie. Bayard H. McConnaughey and John Overton jointly submitted a chart, noting the coldness of McKenzie River waters, the levels set in 41-100 for allowable temperature increases, and the heat of Weyerhaeuser's two discharges. Terry Esvelt noted that Oregon need not follow EPA if it wishes to impose stricter limitations, and that the special ecological system within the McKenzie River is peculiarly subject to damage from discharges such as Weyerhaeuser's. John Neilson also noted the importance of the McKenzie as a salmon fishery and its uniqueness for recreational activities, and felt the permit was inadequate to protect these values.

The temperature of the effluent was a source of particular concern. Terry Esvelt noted that the proposed permit restricted the temperature of only the cooling water, and not the process water. Moreover, quoting from

the Public Notice and Fact Sheet, he noted that the cooling water is hotter in the summer than in the winter, so that the river receives more thermal load when the water level is at its lowest, and when the receiving water is already warmer than in winter. John Neilson requested evaluation of the effect of the thermal discharges before issuance of a permit. He suggested that an interim permit be issued until Weyerhaeuser has completed the study required in the proposed permit. He asked how often the 115-degree maximum discharge occurs, and is that type of discharge coincident with migratory fish runs or hot weather?

The procedures and timetable for granting of a permit were the subject of several witnesses' testimony. Concern about the data base underlying the proposed mixing zone has already been mentioned. Bayard H. McConnaughey suggested that a cost-benefit analysis of the costs of cleanup versus allowing degradation of the river be done prior to granting a permit. Ronald L. Cole requested that the findings of Weyerhaeuser's study (required by the proposed permit) of thermal effects of the cooling water plume be made public. Michael Starr requested a deferral of the granting of the permit until after the public could read and respond to this hearings officer's report. Christopher Kittell requested that a public hearing follow an evaluation of alternate methods of reducing the size of the mixing zone. Patricia Anderson requested public participation in the permit-issuing process. John C. Sihler testified that the proposed effective length of the permit is too long, and proposed periodic hearings to call Weyerhaeuser into account. He, too, requested a delay before granting the permit. Tom R. Bowerman requested that the DEQ run a controlled environmental impact study before granting the permit. He and John L. Pilafian felt that DEQ acted as an apologist for Weyerhaeuser in defending the permittee's right to dump.

Leon Earl Henderson and Tom R. Bowerman questioned why DEQ's enforcement powers have not been brought against Weyerhaeuser for past violations, with Mr. Bowerman noting that compliance followed the only letter of reprimand sent in June 1973. Frank Barry noted that statutes prescribe heavy penalties for violation of water quality standards and suggested that DEQ impose some fines to stimulate invention on Weyerhaeuser's part.

Both Christopher Kittell and William D. Mitchell emphasized that the permit should take into account river flow levels in a more detailed manner than the proposed permit does. Mr. Kittell suggested that a larger mixing zone in summer than in winter is justified in light of the smaller quantity of receiving water to dilute the discharge. Mr. Mitchell noted that the higher allowable BOD discharge from November to June may not reflect the actual low winter water levels which sometimes prevail.

Several points were mentioned by only one witness. Robin Jaqua suggested that Weyerhaeuser was not using "highest and best practicable" technology in light of the performance of American Can Company's Halsey plant's efficient sludge removal and internal recycling. Jon Jaqua proposed that Weyerhaeuser operate below capacity to reduce its discharges until it can prove no health hazard to downstream cattle. Bayard H. McConnaughey testified that he supported regulation by the DEQ of Weyerhaeuser's internal processes. Michael Starr testified that the public should not have to choose between water quality and air and land quality. Lloyd Dolby advocated activated carbon technology for treating the process water. Patricia Anderson thought settleable solids should be regulated before the proposed permit's 1976 date. John C. Sihler raised the possibility of tax credits being given to Weyerhaeuser for buying

automatic monitoring equipment. John L. Pilafian noted Weyerhaeuser's net worth and recent profits and suggested the permittee could pay for any level of treatment DEQ required of it. Finally, Malcolm Burke suggested that if the DEQ and public ceased polluting the blood vessels which bring life to our brains by the food we eat, we will be able to think and see clearly the answers to Weyerhaeuser's pollution of the river which brings life to the earth.

Evaluation of Testimony and Recommendations

Pursuant to section 303 of the FWPCA, reproduced in part above, the State of Oregon has identified the McKenzie River as among "those waters within its boundaries...for which controls on thermal discharges under [section 301 of the FWPCA] are not stringent enough to assure protection and propagation of a balanced indigenous population of shellfish, fish, and wildlife." Again, pursuant to that section, the Environmental Quality Commission has enacted OAR Chapter 340, section 41-100, reproduced in part above. In special condition S2 of the permit, the Department has required Weyerhaeuser Company to survey and evaluate the temperature plume below the two outfalls from the Springfield plant. Uncontroverted testimony received at the hearing established a prima facie case that the temperature from the discharges, by itself or in combination with the pollutants in the process water discharge, has altered the ecology of the river below the outfalls.

Weyerhaeuser Company, in its testimony, indicated that it intends to modify its point source of discharge by addition of a primary clarifier to reduce settleable solids as required by the proposed permit. Your hearings officer has consulted with Ray Underwood, counsel for the Department, who has advised me that there is a possibility that this modification may bring Weyerhaeuser Company within section 316 (c) of the FWPCA, reproduced above. If this is the case (Mr. Underwood's conclusion when I addressed the question to him was merely preliminary), the DEQ would be precluded from imposing any more stringent effluent limitation on the thermal component of the discharge for more than ten years hence.

Section 316 (c) of the FWPCA applies only if the point source of discharge meets "effluent limitations [which] will assure protection and propagation of a balanced, indigenous population of shellfish, fish, and wildlife." While, presumptively, a permittee meeting all conditions of his permit and the EQC rules will meet effluent limitations which will so assure, the hearings officer recommends that the Director ask counsel what effect OAR Chapter 340, section 41-023, creating mixing zones, has upon this section of the FWPCA. Since that part of the river within a mixing zone is exempt from all water quality standards established by EQC rules, the applicability of "effluent limitations which will assure, etc." within mixing zones is problematical.

Aside from 41-023's interaction with the FWPCA, testimony received tended to cast doubt upon whether the Department possessed a sufficient data base prior to drafting the proposed permit to make the determinations impliedly required by the EQC's rule 41-023. Your hearings officer recommends that the permit not be issued until the Director is fully satisfied that condition S10 of the proposed permit has been drafted in accord with both the letter and the apparent intent of 41-023.

Your hearings officer found little merit in the testimony opposing the change of allowable wintertime BOD discharge (from 4,000 pounds in the present permit to 5,700 pounds in the proposed permit) on the basis that the DEQ is allowing an "increase" in pollution. The preponderance of the evidence is that the 5,700 pound limit reflects a realistic estimate of the long-term capability of this control technology at Weyerhaeuser's present operating levels. However, those witnesses who opposed this part of the proposed permit on the basis that it represents no progress toward the national goal of zero discharge by 1985 raised a telling point, in your hearings officer's opinion. If the present set of controls represented the highest and best practicable control technology in 1967, is it not reasonable to ask if this particular form of pollution can be more effectively controlled in 1974, particularly for purposes of a permit not due to expire until 1978?

Several detailed and well-thought-out suggestions were received for detailing the permittee's work program under the survey required by condition S2. Your hearings officer recommends that the Director ask his staff to review these suggestions with a view to making condition S2 more specific as to what is required from the permittee.

Past bad faith on the part of the permittee was alleged by enough witnesses to reopen the issue of whether monitoring of the permittee's performance by independent means is desirable. While several witnesses testified as to the capability of new automatic recording devices which could evaluate each aspect of permit compliance, your hearings officer lacks the requisite technical expertise to weigh this testimony.

However, the nature of the bad faith alleged tended to center around "slugging" when DEQ personnel were likely to be off-duty. Since this type of violation involves less a change of chemical nature of the effluent than an unevenness of quantity of flow, it would seem that a very simple electronic monitor which records merely quantity of flow or downstream water temperature could provide the Department with sufficient independent data to corroborate the data the Department requires the permittee to furnish. Your hearings officer recommends that the Director ask his staff for recommendations regarding such a requirement.

In light of the nature and quantity of unresolved questions regarding this discharge and its effects, your hearings officer finally recommends that a permit issued now be effective for only one year. After the permittee has completed studies such as those required under condition S2 of the proposed permit, I recommend that a new permit be proposed, with opportunity, as required by the FWPCA, for another public hearing if it appears necessary.

Submitted this fifth day of June, 1974.

Thomas G. P. Guilbert
Hearings Officer

TG:bm

McKENZIE FLYFISHERS

P. O. BOX 1832 • EUGENE, OREGON 97401

TO ENCOURAGE FLYFISHING
AS A METHOD OF ANGLING

June 17, 1974

Environmental Quality Commission
c/o Department of Environmental Quality
1234 Southwest Morrison Street
Portland, Oregon 97205

RE: National Pollution Discharge Elimination System (NEPDS) Permit to be issued to Weyerhaeuser Company, P.O. Box 1645, Tacoma, Washington 98401, for operation of its Springfield, Oregon plant.

Gentlemen:

A representative of our club testified before Mr. Thomas Gilbert, Hearings Officer, at the public hearing in regard to the above matter held at 7:30 p.m., at Harris Hall in Eugene on Monday, May 13, 1974. Our club, the parent club of the National Federation of Flyfishers, is made up of a homogenous mixture of native Oregonians and people who came to Oregon in large part, due to its reputation for a willingness to do everything humanly possible to preserve and protect irreplaceable natural resources. It was due to our concern for one such natural resource, the McKenzie River, that we appeared at the May 13th public hearing. It is our understanding that based on the testimony there taken by Mr. Gilbert, in the report he prepared following the hearing, that the EQC plans to issue an NEPDS Permit to Weyerhaeuser Company for the waterborne discharges associated with or stemming from the operation of its Springfield, Oregon plant. Our representatives have read Mr. Gilbert's report, and this letter is intended to state the club's position in response thereto.

First, we oppose any increase in the permissible BOD, suspended solids and discharge water temperature limits for the plant, regardless of the time of the year in which the discharges may occur. We firmly believe that federal and state law require the continuous improvement of water quality, not the permitted increase of the discharge of pollutants and necessarily related decrease in water quality. It should be Weyerhaeuser's obligation, not the public's, to do whatever is necessary to continually decrease the pollution load it contributes to the McKenzie River.

Second, regardless of the permissible limits of discharge established in the NEPDS Permit, the permit should be for one year, as recommended by Mr. Gilbert, not

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TO ENCOURAGE FLYFISHING
AS A METHOD OF ANGLING

for four years as originally proposed by the DEQ or five years as requested by the Weyerhaeuser Company representative (Mr. Jerry Harper) at the May 13th public hearing. This time limitation is absolutely crucial, in light of a complete lack of reliable, objective evidence on which to base so many things that should be answered before, not after the proposed permit is issued. For example, as regards the permitted temperature of discharged cooling water, it was admitted at the May 13th hearing by Mr. Craig Starr, the DEQ Representative, that the size picked for the mixing zones was largely a matter of guess, since there was no reliable information available on which to base the size of the zone. Similarly, as regards BOD and suspended solids, there was no reliable information presented at the hearing on the effect on animal and plant life in the river from the proposed increase in permitted discharge. Finally, the only statistics as to the history of the quantity and content of water-borne waste discharges from the plant have come from readings taken by Weyerhaeuser itself. To remedy these and similarly related problems, we recommend, (a) the issuance of an NEPDS Permit for a period of time not to exceed one year, and (b) during this one year period that the DEQ set up independent monitoring facilities, accessible only to DEQ representatives, to provide reliable, objective information on the BOD, suspended solids and temperature levels in the plant's discharge.

Finally, we request, and in fact respectfully demand, that the DEQ enforce the standards that are set by the new, proposed NEPDS Permit, by the use of fines and injunctive relief. All the evidence suggests that non-compliance in the past, especially in the area of permitted BOD levels, has gone on substantially without the use of remedies that effectively and immediately prevent reoccurrence. Conference, conciliation, and the absence of short-term, enforced compliance schedules simply can no longer be tolerated. It was specifically and publicly stated by a DEQ representative at the May 13th hearing, as well as earlier, in response to a reporter's questions, (see article on Page 8A of Eugene Register Guard for Monday, May 6, 1974, and the last column of an article on Page 11A of the Register Guard for May 9, 1974), that the DEQ will expect Weyerhaeuser to abide by the new permit levels, and that failure to do so "would be prosecuted". We expect this promise to be honored.

McKENZIE FLYFISHERS

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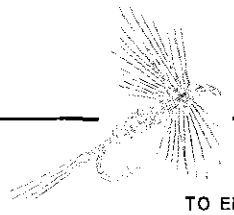

TO ENCOURAGE FLYFISHING
AS A METHOD OF ANGLING

We appreciate your attention to this letter, and recognize the importance and difficulty of your job. We also recognize the need for you to be an unhesitating watchdog of the public interest. We believe the recommendations contained in this letter will help to insure such a goal.

Very truly yours,

Jeffrey Lake
President

cc: Mr. Thomas Gilbert
Director, DEQ

Natural Resources Defense Council, Inc.

664 Hamilton Avenue
Palo Alto, Calif. 94301
415 327–1080

Washington Office
1710 N. Street, N.W.
Washington, D.C. 20036
202 783–5710

New York Office
15 West 44th Street
New York, N.Y. 10036
212 869–0150

June 18, 1974

Mr. B. A. McPhillips, Chairman
Members of the Commission
Environmental Quality Commission
1234 Southwest Morrison Street
Portland, Oregon 97205

Subject: Weyerhaeuser Company, Springfield
Application for NPDES Permit

Dear Chairman McPhillips and Members of the Commission:

At the request of the Oregon Environmental Council, we have reviewed the Memorandum of the Director, the Memorandum of the Hearings Officer and the Draft Permit Regarding the Weyerhaeuser Springfield NPDES permit application. This letter is to express our concern and opposition to the Director's Memorandum and the proposed permit.

The Natural Resources Defense Council is a national environmental law organization, with a membership of 20,000 persons which, through its Project on Clean Water, has monitored, commented on, and where necessary, litigated key elements of the implementation of the FWPCA amendments.

First, we object to the disregard for and dismissal of the public hearing and the hearings officer's recommendations evidenced in the Director's Memorandum. Contrary to the strong policy expressed in the FWPCA in favor of allowing and encouraging citizen participation in decision-making, the Director's Memorandum (page three) treats the public hearing as a formality of no substance. The public should not be lured into a false sense of participation when, as the memorandum states, the record of the hearing

does not contain all of the facts which must be considered in the issuance of the permit, and when the staff and the Director of the Commission feel no obligation to present all significant facts or to answer in detail responsible dissenting views presented by the public or, at a minimum, objections reached on the basis of the public hearing by the hearings officer. The public hearing and careful public-minded citizen participation it led to were, in fact, a sham -- at least to the staff and Director of the Department. The Commission should reverse that policy.

Second, the Commission should not endorse the cavalier rejection of the 1985 zero discharge requirement of the FWPCA expressed in the Director's Memorandum (page four, point five). After lengthy deliberation, including endorsement of zero discharge by the Senate by an 81 to 0 vote, Congress established that standard. If states fail to make every reasonable effort to meet the standard, the responsibility will, by default, necessarily be assumed by the federal government.

Third, the mixing zone established by the permit appears to exceed substantially the "very limited size" allowed by Oregon Administrative Rule Chapter 340, Div. 4, 41-023. In view of the staff's stated inability to determine at this time the proper mixing zone, a permit for one year, or other shorter interim permit, would be appropriate. The statement in the Memorandum that the department "cannot delay issuance" until desired data is obtained is both an incorrect view of the Department's authority and insufficient justification for the four-year open authority to pollute authorized in the proposed permit.

As the first major permit to be granted under the National Pollutant Discharge Elimination System in Oregon, this decision and the stated reasons in support of it will have considerable precedential importance. We urge the Commission to approach the permit with a greater effort to satisfy the purposes and requirements of the Federal Water Pollution Control Amendments than is reflected in the Director's Memorandum, and to reject the Memorandum as to each of the three points specified in this letter.

Respectfully yours,

John Bryson

John E. Bryson
Attorney for the
Natural Resources Defense Council

JEB:gg

TESTIMONY OF THE OREGON ENVIRONMENTAL COUNCIL BEFORE THE ENVIRONMENTAL QUALITY COMMISSION REGARDING THE NPDES PERMIT FOR WEYERHAEUSER COMPANY, SPRINGFIELD OPERATIONS, HELD IN COOS BAY, OREGON - JUNE 21, 1974

I am John R. Neilson representing the Oregon Environmental Council, 2637 S. W. Water Avenue, Portland, Oregon 97201. We are pleased to be able to present for your consideration, our concerns regarding the NPDES permit for the Weyerhaeuser Springfield operation. The Council has followed this permit from the time it was released in March in draft form. We discussed proposed modifications of the permit with the Department of Environmental Quality at that time. When a number of citizen and conservation groups expressed similar concerns and the Department did not choose to modify the draft permit on the basis of this informal input, the OEC joined with other members of the public in presenting their case through the public hearing process.

Over 100 citizens turned out for that hearing on May 22 in Eugene. Of 25 witnesses appearing at the four hour hearing, about 23 were opposed to the terms of the draft permit for the Weyerhaeuser plant. The Weyerhaeuser spokesman and one letter read into the record represented the only testimony against tighter restrictions for the plant than contained in the draft permit. The Hearings Officer then submitted a report with a number of very specific modifications recommended for the draft permit. Unfortunately, DEQ has chosen to reject, point by point, each of these recommendations.

In spite of hundreds of man hours spent by the public sitting in the Eugene hearing- researching the problem and talking with representatives of DEQ, the DEQ staff has not responded favorably to any of the recommended modifications. On the one hand, you have the changes recommended by the Hearings Officer and the concerns of the public. On the other hand, you have the DEQ staff in direct opposition, recommending that a permit be issued exactly as they drafted it in the spring. The public participation process appears to have broken down.

We strongly support the findings of your Hearings Officer, Mr. Tom Guilbert, and feel that he has accurately represented the facts of the case. The DEQ, in rejecting each and every recommendation by the Hearings Officer and the public, attempted to refute Mr. Guilbert's findings in the DEQ memorandum to the EQC. On pages 3 and 4 of this memorandum, DEQ advances 8 points in arguing against modification of the permit. I would like to comment briefly on the most important of those 8 points, in the order they appear.

1. 5,700 pounds BOD/day winter discharge: The question here whether the present 4,000 pounds BOD/day winter discharge limit should be loosened to 5,700 pounds BOD/day in light of the finding that Weyerhaeuser has not been consistently meeting this winter limit. The fact is, however, that Weyerhaeuser was able to meet this 4,000 pound winter limit when its treatment pond first came into operation. Before a four year permit is issued incorporating this less strict standard, we would like to see Weyerhaeuser and the Department

investigate the feasibility of different alternatives for meeting the present 4,000 pound standard. The DEQ and the public could make use of this information on alternatives if a one-year permit were issued as recommended by the Hearings Officer. The basic question raised by Mr. Guilbert is a good one. Should the set of controls which represented the highest and best practicable control technology in 1967 be relied upon to control pollution until 1978?

2. Requests for automatic monitoring: The DEQ memorandum states that "most automatic monitoring equipment has not proven to be effective, reliable, or accurate in such installations." While we realize that DEQ would be very hard pressed to expand its monitoring programs, our best information is that certain important parameters such as temperature or dissolved oxygen, can be accurately monitored automatically at relatively small expense.

3. Mixing zone size: The OAR adopted in 1973 places specific legal requirements on the creation of mixing zones. These requirements have, we feel, been compromised or overlooked in the drafting of this permit. First, OAR CH. 340 Sec 41-023(1), sited in the hearings Officer report, permits the DEQ to suspend water quality standards "...within a defined immediate mixing zone of very limited size." Taken in context, this definition, most logically means small. The 2-1/2 miles of mixing zone contained as a term of this permit is not small. Relative to other mixing zones already approved by DEQ, this 2-1/2 miles is of another scale of magnitude.

Secondly, Oregon Administrative Rules require that the DEQ "(c) Shall limit the mixing zone to that which in all probability will (A) not interfere with any biological community or population of any important species to a degree which is damaging to the ecosystem; and (B) not adversely affect any other beneficial use disproportionately."

Testimony at the Eugene hearing brought into focus the commercial and recreational significance of protecting salmon, trout, and steelhead populations and the acquatic insects and water quality necessary to sustain these fish populations. Speakers at the hearing also raised serious questions about the actual or potential damage of the Weyerhaeuser discharges distributed over 2-1/2 on fish and acquatic habitat. Testimony and evidence in DEQ files points out gross changes to the river bottom and acquatic insect populations were observed when Weyerhaeuser was operating in violation of this permit in 1972.

As noted in the summary of testimony, DEQ has stated that it may be necessary, after evaluating the report Weyerhaeuser would be required to make on thermal discharges, to modify the permit to redefine mixing zones or require thermal controls. The mixing zones described in the permit were large because, as stated in the Hearing Officer's report, DEQ "lacked sufficient data to adequately describe the actual area within which the thermal requirements for the McKenzie River are not met during various river stages." (p. 4). Mr. Guilbert concluded "...testimony received tended to cast doubt upon whether the Department possessed a sufficient data base to make the determinations impliedly required in the EQC's rule 41-023."(1.9) "The Department does not have all the desired data available and cannot delay permit issuance until it is obtained."

It is clear that the data necessary to meet the legal requirements of OAR has not been developed.

4. Deteriorating water quality: The Department's biological and chemical monitoring of the River has not been as systematic as is desirable and data available in DEQ files does not make a convincing case that fish population and acquatic insects are not impacted by the discharges. Further, fishermen, recreationists, and people living along the River have been complaining about the Weyerhaeuser discharge for years, not just a deterioration in the recent period.

5., 6., and 7. - These points are covered in a general manner by other comments in our statement.

8. One year permit: This is one of the most important recommendations made in the Hearings Officer report. The report states, "In light of the nature and quantity of unresolved questions regarding this discharge and its effects, your hearings officer finally recommends that a permit issued now be effective for only one year." Statements made by DEQ, by the Hearings Officer, and in hearing testimony all indicate, we feel, that the DEQ lacks a sufficient data base to make the determinations required by OARs.

Before a four year permit is issued, plume boundaries must be defined and evaluated. A systematic assessment of fish and insect populations and other important biological indices needs to be conducted at both high and low river flows. Weyerhaeuser should be required to submit a report on the engineering alternatives available for reducing the size of the mixing zone, both by reducing the amount of effluent discharged and by alteration of the method of discharge. This information should be available, both to DEQ and the public, before a long term permit is issued to Weyerhaeuser.

There are special circumstances in this case which recommend issuing the NPDES permit on a short term basis. First, as Mr. Guilbert emphasizes, it is quite possible that if Weyerhaeuser were to install a primary clarifyer as planned, DEQ would be precluded from imposing more stringent thermal discharge limitations for more than ten years.

Secondly, the Weyerhaeuser discharge into the McKenzie is unique in many respects. The McKenzie is truly exceptional from both a recreational and fishery standpoint and basic information on the discharge and the impact of this comparatively very large mixing zone is not available as required by Oregon Administrative Rules.

And thirdly, the public, which has already expended a great deal of effort to voice its concerns, will lose much of the leverage it has to influence the final form of a permit by being able to call for a public hearing on permit conditions. It is true that DEQ can institute modification of any permit at any time if it determines a demonstrated need.

With DEQ staff already overworked and with a four year permit negotiated with Weyerhaeuser, chances of initiating a modification are much more remote than if a permit comes up for renewal. Under existing State and Federal water quality law, the public is no longer saddled with the difficult burden of proving damage to a public resource. If there is a history of resource damage and a lack of available information, supplied by the polluter to the DEQ, as is the case with this Weyerhaeuser permit, the public must retain its option of calling for a public hearing on the terms of a discharge permit.

To issue a 4-year permit to Weyerhaeuser at this point could stiffle the opportunity for meaningful public input into this important water quality decision. This is the kind of input that is required by the Federal Water Pollution Control Act and that is in the best tradition of open operation by Oregon's Environmental Quality Commission.

Thank you.

OREGON ENVIRONMENTAL COUNCIL
2637 S. W. Water Avenue
Portland, Oregon 97201

Phone: 222-1963

ENVIRONMENTAL QUALITY COMMISSION

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

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GOVERNOR

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RONALD M. SOMERS
The Dalles

KESSLER R. CANNON
Director

MEMORANDUM

To : Environmental Quality Commission

From : Director

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

Fiscal Year 1975 Annual Water Strategy including Fiscal Year 1975 Sewage Works Construction Grant Priority List

Background

Section 106 of the Federal Water Pollution Control Act calls for submission of an Annual State Water Strategy statement to the Environmental Protection Agency as a part of the grant application for federal assistance to support the water pollution control program of the Department.

The first such strategy statement was completed a year ago for FY 1974, presented to the Commission in public meeting as a part of federal public participation requirements and submitted to EPA.

This, the second Annual State Water Strategy for FY 1975 is essentially an update and minor revision of the FY 1974 strategy.

Strategy Contents

The strategy document contains a brief assessment of water quality problems, a statement of general program strategy, a description of major program modules or functions, projected accomplishments and available resources for the next year and a series of inventory and priority listings.

There are two elements of the strategy which are worthy of special note.

First, the general program strategy lists the four most visible priorities as follows:

1. Permit Issuance. The goal of the Department is the issuance of all major NPDES permits and the drafting of all minor permits by December 31, 1974, and the completion of issuance of all NPDES permits before the end of FY 1975. Until after December 31, 1974, all available resources will be devoted to the permit issuance function. Other program efforts will be slighted in order to issue as many permits as possible prior to the December 1974 deadline.

2. Construction of Waste Treatment Facilities. A major emphasis in the early months of FY 1975 will be on the awarding of federal construction grants for eligible municipal treatment works. The availability of federal funds will be the principal constraint upon the rate of sewage treatment works construction in Oregon. Needed industrial facilities are generally being constructed in a timely manner as needs are identified through the planning and permit issuance process.

3. Planning. The current planning effort will continue with the goal being to adopt water quality management plans for 20 designated basins prior to the end of FY 1975.

4. Compliance Monitoring. After December 1974, the Department's compliance monitoring program will be accelerated by diversion of staff from issuance of permits to monitoring work.

Second, in conjunction with the municipal inventory contained in Attachment C, the updated sewage works construction grant priority list for FY 1975 is included. The Needs Priority Ranking Criteria as adopted last year are shown on page C-9. Pages C-10 through C-14 indicate the assignment of priority points and the resultant ranking of identified needs. Pages C-15 through C-17 indicate the scheduling of projects and the scheduled fiscal year of funds for grant awards.

Projects scheduled to receive FY 1975 funds down through priority number 77 are expected to be funded from presently available allocations. Unfortunately, monies do not stretch far enough to fund all of the projects which are ready to proceed during FY 1975. Many of those scheduled for FY 1976 funds could also be ready for grant award if additional funds were available.

In order to get as many projects started this year before costs go up further, the Department has not been approving grant increases for any project where the community has sufficient funds to cover cash flow needs. In essence, we are programming the increases to come from FY 1976 or later funds. The increases involved are the difference between the estimates which serve as a basis for grant award and the actual construction bids.

Director's Recommendation

Following receipt and consideration of public comments, it is recommended that the Commission approve the FY 1975 Annual State Water Strategy and adopt the revised FY 1975 priority list and project list for construction grants.

KESSLER R. CANNON
Director

HLS:ss

6/12/74

attachments

ENVIRONMENTAL QUALITY COMMISSION

see inside

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

MEMORANDUM

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From : Director

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KESSLER R. CANNON
Director

HLS:ss

6/12/74

attachments

How + when will public be permitted to comment?

STATE OF OREGON

SECOND ANNUAL STATE WATER STRATEGY

FY 1975

Pursuant to Sections of 106 and 303(e)
of the
Water Pollution Control Amendments of 1972

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

TABLE OF CONTENTS

INTRODUCTION

Section 106 of the Federal Water Pollution Control Act calls for submission of an annual State Water Strategy to the Environmental Protection Agency by June 15 as part of the grant application for federal assistance to support the water pollution control program of the Department of Environmental Quality.

This State Water Strategy statement concentrates on the priorities and activities of the forthcoming fiscal year: FY 1975. It includes a statewide assessment of water quality problems; listing of municipal and industrial dischargers; a listing of the priorities for construction grants and the anticipated outputs to be achieved and the expected resources - both federal and non-federal - to be expended.

Persons using this strategy statement are reminded that, while based on law, it is not the law, nor is it a regulation mandated by the law. It is a management tool that the Director of DEQ uses to establish annual program objectives and accomplishments, allocate resources, and assess progress.

At the same time, it will ensure that program activities, by conforming to a single strategy, are consistent among each other. It will further serve as a means of promoting awareness and encouraging public participation.

Comments on the Strategy are welcome. They should be addressed to:

Mr. Kessler R. Cannon
Director
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

ASSESSMENT OF WATER QUALITY PROBLEMS AND CAUSES

Summary

The Federal Water Pollution Control Amendments of 1972 call for the achievement of a general level of water quality, everywhere in the Nation, that will support fishing and swimming by 1983. In terms of existing water quality, Oregon has in most waters already achieved this goal - a decade or more ahead of the rest of the country.

Point-source discharges in the State are reasonably controlled, with the treatment of such wastes being equal to or higher than EPA requirements in practically all areas. There still remains, however, substantial and widespread factors that significantly affect water quality. These include:

1. Point sources - improved controls are needed in many areas to correct localized problems or prevent deterioration of water quality.

2. Non-point sources - the extent of pollution from diffuse sources, such as silviculture, agriculture, construction, mining, and hydrologic modifications need to be defined.

3. Flow augmentation and requlation - the flows of many State streams are either severely depleted or completely dried up annually through over-appropriations, diversions, or impoundments.

Essentially all the remaining serious water quality problems in Oregon are associated with the inadequate streamflows. Such problems are not susceptible to being solved by more stringent treatment requirements, but require flow augmentation to serve a broad array of beneficial uses.

Basin Assessments

A planning framework of 20 river basins has been established in the State using hydrologic boundaries (Attachment A). For purposes of this assessment, these basins have been grouped into five geographic areas. Specific water quality problems and causes are discussed below in general order of priority.

Willamette Basin (Including Sandy Basin)

In 1938 when the State Sanitary Authority (predecessor to the Department of Environmental Quality) was created, the Willamette River was one of the most polluted waterways in the country. Today, as a result of years of effort and the expenditure of millions of dollars for pollution control, the Willamette River has been restored to a level of quality which supports fish life and intensive recreation.

Approximately 1.4 million people, or 2/3 of the State's population live, work and play in the Willamette Basin. The waste assimilative capacity of the Willamette River is totally utilized at present. Dissolved oxygen (DO) standards were exceeded on a few days during the Summer of 1973, therefore, maintenance of water quality at present levels will require reductions of present waste loads in order to stay within DO standards and future growth and development. The Willamette Basin thus remains as the highest priority area for water quality control purposes.

High water temperatures during low flow periods, along with high coliform counts, are the other serious water quality problems in the Willamette Basin. Temperature violations - resulting from both natural conditions and depleted streamflows - occur on the main stem Willamette River, the Calapooia, Molalla, and Pudding Rivers and all tributary streams which drain east from the Coast Range.

High coliform counts due to point source discharges are occurring in Scappoose and Columbia Sloughs, the Tualatin Rivers and tributaries, main stem Santiam River and the lower reaches of the South Santiam River. Land runoff is primarily responsible for coliform levels above standard on the lower reaches of the Clackamas, Coast Fork Willamette, Calapooia and McKenzie Rivers; as well as the Pudding, Molalla, Long Tom, Mary's, Luckimute, Rickreal, and the Yamhill Rivers and their tributaries.

Dissolved oxygen levels still fall below standards on the Tualatin River and tributary streams. Although turbidities are generally in compliance with standards, seasonal high turbidities from land runoff are common in most basin streams.

Coastal Basins (North Coast, Mid Coast, South Coast, Rogue and Umpqua Basins)

Water quality in the coastal basins is generally good. Water quality problems can be characterized as being somewhat local in nature and resulting primarily from land runoff, log handling, inadequately controlled point source discharges and low stream flows.

Principal problem areas include:

Neacoxie Creek - Water temperature and dissolved oxygen do not meet accepted standards or criteria during low flow periods. This condition prevails throughout the length of the stream.

Nehalem Bay - Coliform levels exceed estuarine standards in Nehalem Bay. This condition may be attributable in part to waste discharges at Wheeler and Nehalem.

Tillamook River - Coliform levels are not acceptable in the lower reaches of Tillamook River.

Nestucca River - Coliform counts exceed acceptable levels from the town of Beaver on downstream to and including Nestucca Bay. Dissolved oxygen falls below the standard immediately below Cloverdale but is satisfactory in the estuary.

South Umpqua - Low dissolved oxygen and high coliform counts exist in the lower reach from Winston to mouth.

Cow Creek, Elk Creek, and Calapooya Creek - Dissolved oxygen and coliform levels are not meeting water quality standards during low stream flow periods.

Coos Bay - Substandard water quality exists in dead-end Isthmus Slough. High temperatures result from low stream flows. Low DO levels occur as a result of log handling and storage.

Eastern Oregon Basins (Hood River, Deschutes, John Day, Umatilla, Walla Walla, Grande Ronde, Powder, Malheur and Owyhee Basins)

The water quality in river basins east of the Cascades is generally high, experiencing problems more from irrigation practices, agricultural activities and low stream flows than the more populated and industrialized Western Oregon Basins. Present efforts are directed toward preserving existing high quality waters. Principal problem areas include:

Deschutes River - Elevated stream temperatures and excessive aquatic growths during low flow periods.

Crooked River - Temperature, turbidity, and low flow problems occur throughout its reaches.

Trout Creek - This small tributary of the Deschutes suffers from high temperature, high coliform levels, and low flows.

Upper John Day River - Present water quality suffers from high temperatures and low flows due to natural conditions and heavy irrigation withdrawals. High coliform and phosphorous levels are occurring due to municipal waste discharges, land runoff, and irrigation return water.

Umatilla - High levels of coliform and turbidity occur from land runoff. This stream is dried up each summer due to irrigation uses.

Grande Ronde - Turbidity and coliform levels are high from land runoff. The summer flow is drastically rdcuced by irrigation uses resulting in sluggish, warm, algae laden waters.

Malheur - High summer temperatures result from low flows. Turbidity and coliform levels are high from land runoff and irrigation waste water. High nutrient levels contribute to poor water quality in the Snake River reservoirs.

Lower Columbia Basin (Including Lower Columbia River)

Principal problems in the Lower Columbia River are related to temperature, dissolved gas, and coliform bacteria below Portland. Temperature problems are largely natural. Thermal sources such as power plants are being subjected to stringent controls. Potential dissolved gas problem solutions are being evaluated by the Corps of Engineers. Completion of secondary treatment for sources of sewage discharged to the Columbia will result in a significant improvement in bacterial quality. Those streams in the Basin with water quality problems include:

Lewis and Clark River - Coliform levels do not meet standards in the area of Peterson Slough.

Skipanon River - Temperature and dissolved oxygen levels do not meet water quality standards during low flow periods and in the lower reaches of the stream.

South Central Basins (Malheur Lake, Goose and Summer Lakes, and Klamath Basin)

The desert areas of south Central Oregon are generally

characterized by a shortage of water. The Malheur Lake and Goose and Summer Lake Basins are relatively sparsely populated, therefore, water quality is minimally influenced by man's activities. The Klamath Basin is highly developed for irrigation agriculture. Irrigation return waters significantly affect water quality. Log handling which has extensively affected water quality of the Klamath River is still not adequately controlled. In general, most of the poor water quality is a natural phenomenon little subject to man's control. Major problem areas include:

Sprague River - Turbidity and coliform are seasonally high from land runoff. Low flows contribute to high temperatures during the summer.

Klamath River - Water manipulation for irrigation and hydroelectric power, plus decaying algae and wood debris from log handling operations results in a depletion of dissolved oxygen.

General Program Strategy

In important respects, the FY 1975 Strategy constitutes a continuation of the Strategy for FY 1974. The commitments made in FY 74 are retained, as they provide the basic objectives toward which the water quality program is directed. The theme of water pollution control in FY 75, therefore, is a continued dedication of effort to the basic permit grant, and planning outputs needed to maintain and preserve Oregon's high levels of water quality. The four most visible priorities in the water program will be:

1. Permit Issuance. The goal of the Department is the issuance of all major NPDES permits and the drafting of all minor permits by December 31, 1974, and the completion of issuance of all NPDES permits before the end FY 75. Until after December 31, 1974, all available resources will be devoted to the permit issuance function. Other program efforts will be slighted in order to issue as many permits as possible prior to the December 1974 deadline.

2. Construction of Waste Treatment Facilities. A major emphasis in the early months of FY 75 will be on the awarding of federal construction grants for eligible municipal treatment works. The availability of federal funds will be the principal constraint upon the rate of sewage treatment works construction in Oregon. Needed industrial facilities are generally being constructed in a timely manner as needs are identified through the planning and permit issuance process.

3. Planning. The current planning effort will continue with the goal being to adopt water quality management plans for 20 designated basins prior to the end of FY 75.

4. Compliance Monitoring. After December 1974, the Department's compliance monitoring program will be accelerated by diversion of staff from issuance of permits to monitoring work.

Program Module Description

During FY 74 the Department was reorganized and decentralized by shifting substantial manpower to five regional offices. The process of adapting and adjusting to this new organizational structure will continue through FY 75. As a result, the program modules described below are somewhat different than those described in the FY 74 strategy.

Permits. Oregon has had a statewide permit program in operation since January 1968. All major sources and most minor sources are presently covered by valid state permits. On September 26, 1973, EPA authorized DEQ to issue National Pollutant Discharge Elimination System (NPDES) permits pursuant to Section 402 of the Federal Water Pollution Control Act Amendments of 1972 (the "Act"). Under NPDES, permits are issued to all point-source dischargers, stating the limits of allowable discharge consistent with regulations adopted pursuant to the Act.

The Department's strategy is the issuance of all major NPDES permits and the drafting of all minor permits by December 31, 1974, and the completion of issuance of all NPDES permits before the end of FY 75. This objective will require substantial assistance from the Department's newly formed regional offices for review of applications, drafting of permits, fact sheets and notices and completing numerous procedural requirements.

Municipal Facilities Construction, Operation, Maintenance, and Training. A major objective in the early months of FY 75 will be the awarding of construction grants to priority projects. Every effort will be made to gear up and effect review and processing procedures so that a maximum number of priority projects can be readied for grant awards and the construction of needed facilities can be initiated with minimum delay.

A second objective is to secure adequate operation and maintenance of facilities constructed. The operation and maintenance program will be used to determine which plants currently operating are not in compliance with standards and to ascertain what is required to bring them into compliance. This effort will focus on priority basins and on plants where the required degree of improvement can be achieved without additional capital investment. Manpower training programs will be conducted periodically to support the operation and maintenance program.

Planning and Water Quality Standards. The interagency review of 20 preliminary basin plans, plus public hearings, will be completed by mid-fiscal year, and the submittal and approval of all 303 plans will be completed by the end of FY 75. The major thrust of this planning effort is to establish the framework for implementation of activities in the areas of permitting, construction grants, planning, monitoring, and water quality standards during FY 76-83.

The initial basin plans focus primarily on point source controls. Knowledge of the formation, extent, and effects of non point source (NPS) pollution in Oregon is limited, therefore, the Department will begin to correct the informational deficiencies surrounding NPS pollution during FY 75.

Subject to approval of federal funding, areawide planning efforts (under Section 208 PL 92-500) will be initiated in three areas: The Portland Urbanizing Area, the Salem Urbanizing Area, and the Eugene-Springfield Urbanizing Area.

Facilities Plans (Step 1 or 201 Plans) will receive emphasis during FY 75, so that construction of treatment works can proceed expeditiously in the future. Planning for the cost effectiveness and technical effectiveness of municipal waste treatment facilities will be encouraged.

Monitoring. The fundamental objectives of the monitoring program are to provide an understanding of the water quality conditions within the state, to support the pollution control activities of the Department, and to assess the effectiveness of those activities in terms of maintenance and improvement of water quality.

Based upon the monitoring needs identified in the 20 basin plans and available resources, a statewide monitoring strategy has been developed, which addresses the following monitoring functions: A primary fixed-station monitoring network, intensive surveys, compliance monitoring, laboratory support and quality assurance, toxic pollutant monitoring, annual data analysis and report, and groundwater monitoring.

Priority will also be given to compliance monitoring to provide the operational information necessary to detect unknown waste sources, assess compliance with permit conditions, assess the water quality effects of discharges, develop data for enforcement actions, and validate self-monitoring reports.

Enforcement. Enforcement of permit conditions will be strengthened during FY 75. As permit conditions and implementation schedules come into effect, enforcement activities will emphasize:

1. Identification of violations of discharge conditions or schedules of compliance; and initiation of proceedings to correct and/or penalize these violations.

2. A statistically significant review of discharger monitoring reports.

3. Selected audit, through effluent sampling, of discharger monitoring reports.

Other Program Efforts. A number of activities are conducted by Department staff which support the Department's Water Quality Control Program. These include technical assistance, review of waste control facility plans, and complaint investigations.

Department of Environmental Quality

WATER QUALITY PROGRAM

Output Estimates

Program Element	Start Level	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Total
Permits						
Industrial Permits Issued/Certified:						
Major	26	5	-	-	-	31
Minor	73	123	122	122	-	440
Municipal Permits Issued/Certified:						
Major	14	29	1	-	-	44
Minor	54	65	65	-	-	184
Agricultural Permits Issued/Certified:	2	13	15	15	15	60
Federal Permits Certified:						
Major	2	-	1	-	1	4
Minor	17	11	-	-	-	28

Department of Environmental Quality

WATER QUALITY PROGRAM

Output Estimates

Program Element	Start Level	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Total
Municipal Facilities						
Construction Grants:						
FY 75 Dollars		16,180,000	12,033,000	4,011,000	1,912,700	34,136,700
FY 75 No. of Grants		19	9	6	1	35
FY 76 Dollars		-	-	8,600,000	8,600,000	17,200,000
FY 76 No. of Grants		-	-	15	15	30
Operation and Maintenance Surveys		20	20	20	20	80
No. of Operators Trained						
Entry Level				100		100
Upgrade				50	50	100
Operators Certified (Voluntary)						
Entry Level					75	75
Upgrade					145	145

Department of Environmental Quality

WATER QUALITY PROGRAM

Output Estimates

Program Element	Start Level	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Total	
Planning and Standards							
303(e) Basin Plans submitted for EPA approval	0 (No.)	0	0	0	20	20	(All)
Monitoring							
No. of Permit Compliance Monitoring Surveys/Inspections							
Major		21	21	16	17	75	
Minor		156	156	156	156	624	
WQL segments where load allocations will be established (by name)					1	1	(Willamette)
No. of segments to be studied in more detail relative to point or non-point sources (intensive surveys) (specify name or attach list)						3	(Marys R., Bear Creek, Crooked R.)
Primary Monitoring Network:							
No. Chemical/Physical Stations Sampled		30	30	30	30	120	
No. Biological Stations Sampled		10	10	10	10	40	
Enforcement							
No. of Civil Penalties		3	3	3	3	12	
No. of Administrative Orders Issued						1	
No. of Court Suits Initiated						1	
No. of Court Suits Resolved						0	

Allocation of Projected
Water Quality Resources by Program Module
Fy 75

Module	FTE Positions		Projected Expenditures
Permits	27		$ 449,276
Municipal Facilities	9		162,439
Planning & Standards	5		97,745
Monitoring	21		312,158
Enforcement	4.4		96,182
Other Program Efforts	3		48,300
Sub Total	69.4		$1,166,100
Projected Fund Sources			
Federal		$492,900	
State		673,200	
Indirect Costs 38%			443,118
Total			$1,609,218
Projected Fund Sources			
Federal Funds		$680,200	
State Funds		929,018	

Projected Needs for Additional Resources

At present, permit, monitoring and surveillance activities are being impaired by lack of funding for acquisition of motor vehicles for field personnel and needed sampling and laboratory equipment as follows:

1.	Fifteen vehicles 3 Plymouth Satellite Station Wagons @ $2,961 7 Chevrolet Vega Station Wagons @ $2,750 5 Dart Sedans @ $2,531	$ 40,788
2.	Infra-Red Spectrophometer	26,140
3.	GC/MS System, Model 1015C	28,800
4.	Cameras - 4 @ $250	1,000
5.	Isco Sewage Sampler, Model 1391 X - 4 @ $1300	5,200
6.	Microscope Accessories	300
7.	Bottle, round wide-mouth with screw top 15 doz. @ $7.08/doz.	106
8.	Gunwale Winch - Wildoo Instruments	96
9.	Foerst Electric Centrifuge Implement, 1959 Model	297
10.	Core Sampler for use on mudflats	90
11.	Wildco Core Squeezer, Model #2212	96
12.	Scanning X-Ray Fluoresence Spectrometer	51,195
13.	Graphic Preparation Equipment	321
14.	Office Furniture	8,060
	GRAND TOTAL	$162,489

INVENTORY OF LAKES

TOTAL NUMBER OF PUBLICLY OWNED FRESH WATER LAKES	Unknown
TOTAL NUMBER OF SIGNIFICANT LAKES	130
NUMBER OF SIGNIFICANT LAKES EXHIBITING HEAVY NATURAL ENRICHMENT	2
NUMBER OF SIGNIFICANT LAKES EXHIBITING MODERATE NATURAL ENRICHMENT	54
NUMBER OF SIGNIFICANT LAKES EXHIBITING NO NOTICEABLE ENRICHMENT	25
NUMBER OF SIGNIFICANT LAKES FOR WHICH EUTROPHICATION STATUS IS NOT KNOWN	49
TOTAL AREA OF PUBLICLY OWNED FRESH WATER LAKES	est. 250,000 acres
TOTAL AREA OF SIGNIFICANT LAKES	est. 230,000 acres
AREA OF SIGNIFICANT LAKES EXHIBITING HEAVY & MODERATE NATURAL ENRICHMENT	est. 170,000 acres
AREA OF SIGNIFICANT LAKES EXHIBITING NO NOTICEABLE EUTROPHY	est. 60,000 acres
AREA OF SIGNIFICANT LAKES FOR WHICH EUTROPHICATION STATUS IS NOT KNOWN	est. 20,000 acres

PRIORITY AND CONTROL ACTION LISTINGS

The required lists - stream segment ranking, municipal discharge inventory, and industrial discharge inventory - are described below. The specific listings follow.

Basin and Stream Segment Ranking (Attachment B)

To indicate the statewide geographical priorities, 20 river basins and 77 stream segments are ranked in priority order, taking into account presently available information relative to the severity of pollution problems, population affected, need for preservation of high-quality waters, and state and national priorities. These rankings generally govern the development of plans, construction of publicly-owned treatment works, issuance of permits, monitoring and surveillance, and other program activities.

Municipal Discharge Inventory (Attachment C)

The significant municipal dischargers in the state are ranked in priority order according to the need for a specific control action - construction grant award or permit issuance - and the seriousness of the water quality problem caused by the discharger. The updated sewage works construction grants priority list for FY 75 is also included.

Industrial Discharge Inventory (Attachment D)

The known industrial dischargers in the state have been ranked in a priority order for issuance of NPDES permits. Dischargers are generally ranked with largest or most significant discharges affecting water quality first and the discharges of least known significance last.

Miscellaneous Discharge Inventory (Attachment E)

DEQ records indicate a number of sources which do not presently discharge wastes to public waters but which may be required to obtain and maintain state permits. Further investigation of these sources may reveal the need for NPDES permits in some cases.

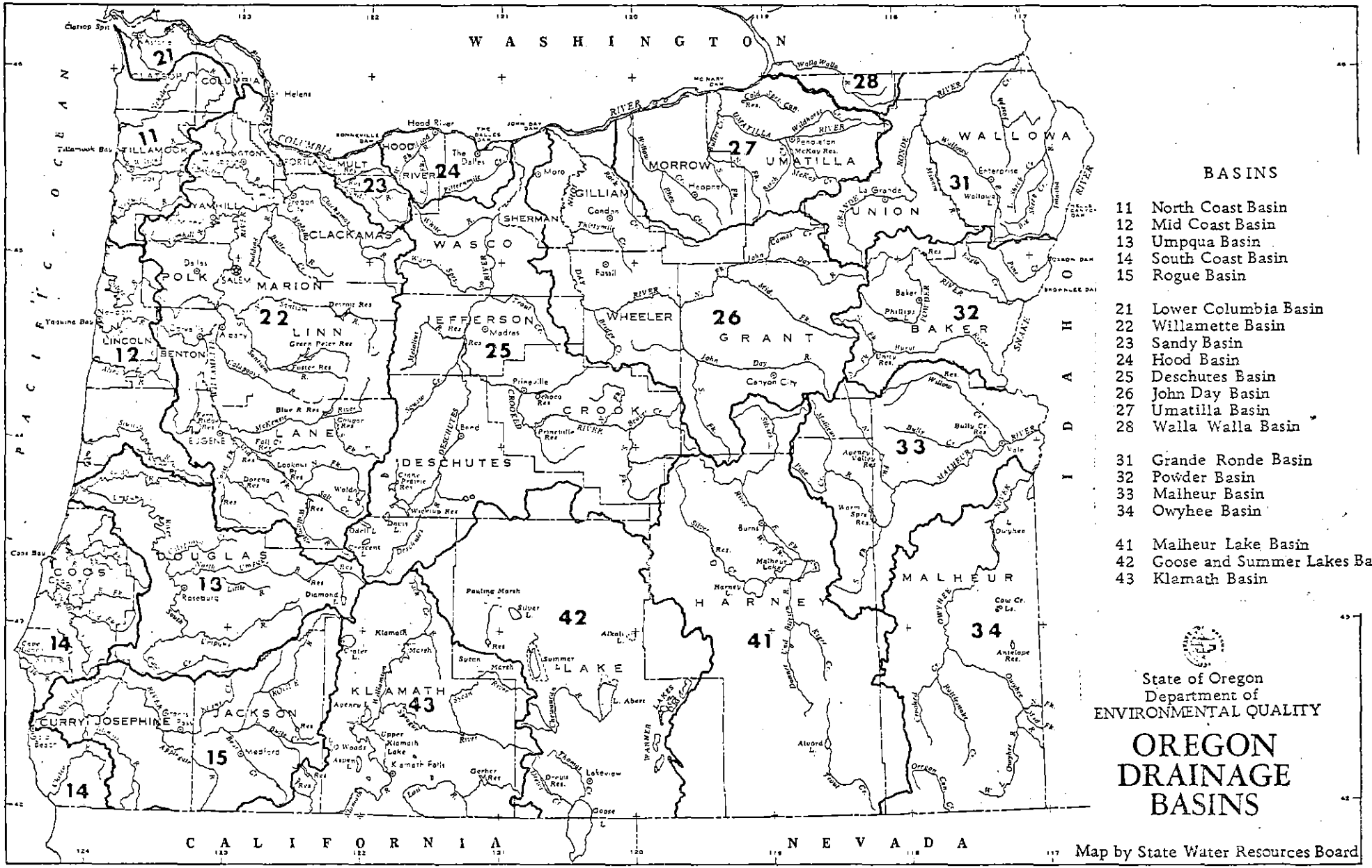
Work Plan for NPDES permit Drafting (Attachment F)

The table indicates the workload for each DEQ Regional Office and the scheduling (monthly) of municipal and industrial permits to be drafted. This is an in-house management tool only and not a priority list for the issuance of permits.

OREGON'S CONTINUING PLANNING PROCESS

Oregon's Continuing Planning Process was submitted to EPA on February 15, 1973 and approved by EPA on July 17, 1973. No revisions to the state's Continuing Planning Process are being proposed at this time. The basin plans are currently in draft stage and being reviewed by DEQ. Adoption is expected prior to the end of FY 75.

Revisions to the Continuing Planning Process will be submitted with the initial State Water Strategy by April 15, 1975, and will reflect adopted changes in planning methodology non-point source control, flow augmentation, and possible revision of water quality standards.



Attachment A

RIVER BASIN PRIORITIES

1. Willamette Basin
2. South Coast Basin
3. Mid Coast Basin
4. Deschutes Basin
5. John Day Basin
6. Umpqua Basin
7. Rogue Basin
8. Hood Basin
9. Umatilla Basin
10. Grande Ronde Basin
11. North Coast Basin
12. Walla Walla Basin
13. Malheur Basin
14. Powder Basin
15. Sandy Basin
16. Lower Columbia Basin
17. Klamath Basin
18. Malheur Lake Basin
19. Goose and Summer Lakes Basin
20. Owyhee Basin

STREAM SEGMENT RANKING

Number	Name of Segment(*)
1	Tualatin River
2	Willamette River
3	Coos Bay
4	Deschutes River
5	South Umpqua River
6	Umpqua and North Umpqua River
7	Rogue River
8	Bear Creek
9	Columbia River
10	John Day River
11	Grande Ronde River
12	Sandy River
13	Skipanon River
14	Necanicum River
15	Neacoxie Creek
16	Nehalem River
17	Nehalem Bay
18	Wilson River
19	Trask River
20	Tillamook River
21	Tillamook Bay
22	Nestucca River

(*) Named segment includes tributaries thereto unless such tributaries are otherwise listed.

Number	Name of Segment
23	Netarts Bay
24	Siuslaw River
25	Chetco River and Chetco Cove
26	Coquille River
27	South Coquille River
28	Yaquina River
29	South Yamhill River
30	Mill Creek
31	North Yamhill River
32	Yamhill River
33	Pudding River
34	Molalla River
35	South Santiam River
36	Santiam and North Santiam River
37	Pacific Ocean
38	Coast Fork Willamette River
39	Middle Fork Willamette River
40	Clackamas River
41	McKenzie River
42	Rickreall Creek
43	Luckiamute River
44	Marys River
45	Calapooia River
46	Long Tom River
47	Columbia Slough

Number	Name of Segment
48	Hood River
49	Umatilla River
50	Klamath River
51	Sprague River
52	Lost River
53	Williamson River
54	Snake River
55	Silvies River
56	Salmon River
57	Alsea River
58	Lower Umpqua River
59	Lewis and Clark River
60	Klaskanine River
61	White River
62	Warm Springs River
63	Crooked River
64	Metolius River
65	Spring River
66	Fall River
67	Little Deschutes River
68	North Fork John Day River
69	South Fork John Day River
70	Walla Walla River
71	Powder River
72	Wallowa River

Number	Name of Segment
73	Owyhee River
74	Silver River
75	Donner and Blitzen River
76	Chewaucan River
77	Thomas Creek

OREGON DISCHARGE INVENTORY
MUNICIPAL
FY '75

NAME	LOCATION	STREAM
Foster-Midway	Foster-Midway	
Corvallis	Corvallis	Willamette
Salem-Willow Lake	Salem	Willamette
Cottage Grove	Cottage Grove	Willamette
Maupin	Maupin	Deschutes
Winston	Winston	S. Umpqua R.
Riddle	Riddle	Cow Creek
Glendale	Glendale	Cow Creek
Glide-Idelyld Area	Idelyld Park	
Sutherlin	Sutherlin	
Butte Falls	Butte Falls	
Gold Hill	Gold Hill	Rogue R.
Rufus	Rufus	
Clatskanie	Clatskanie	Clatskanie
Wauna-Westport	Clatsop County	
John DAy	John Day	John Day R.
Mt. Vernon	Mt. Vernon	
Union	Union	
Government Camp	Government Camp	Camp Creek
Charleston S.D.	Coos County	
Fruitdale-Harbeck	Fruitdale-Harbeck	
The Dalles-Eastside	The Dalles	Columbia R.
Portland	Portland	Columbia R.
Port of Astoria	Astoria	
Cloverdale S.D.	Cloverdale	Nestucca R.
Pacific City	Pacific City	
Netarts-Oceanside S.D.	Tillamook County	
Jordan Valley	Jordan Valley	Subsurface
Mapleton	Mapleton	
Lafayette	Lafayette	Yamhill R.
Turner	Turner	Mill Cr.
Molalla	Molalla	Bear Creek
Donald	Donald	
Harbor S.D.	Brookings	
Lebanon	Lebanon	S.Santiam R.
Mill City	Mill City	
Rockaway	Rockaway	Clear Lake
Toledo	Toledo	Yaquina R.
Sublimity-Stayton	Stayton	Santiam R.
Aurora	Aurora	
Fall City	Fall City	
Gleneden	Gleneden	
Lincoln City	Lincoln City	Schooner Cr.
Twin Rocks S.D.		Watesco Cr.
Monmouth-Independence	Monmouth	Ash Creek
Bonanza	Bonanza	Lost R.

OREGON DISCHARGE INVENTORY
MUNICIPAL
FY '75

NAME	LOCATION	STREAM
Eugene-Springfield		Willamette
Chiloquin	Chiloquin	Williamson
Huntington	Huntington	Burnt R.
Unity	Unity	Job Cr.
Hines	Hines	Land Disposal
Cave Junction	Cave Junction	Sucker Cr.
Shady Cove	Shady Cove	Rogue R.
Merlin-Col. Valley	Grants Pass	
BCVSA-White City	White City	
Mosier	Mosier	
Boardman	Boardman	Columbia R.
Long Creek	Long Creek	
Corvallis Airport	Corvallis	Willamette
Corvallis Mobile Ct.	Corvallis	Oak Creek
Albany	Albany	Willamette
West Linn-Willam.	West Linn	Willamette
Clackamas Co. S.D.		
Culver	Culver	
Terrebonne	Terrebonne	
Metolius	Metolius	
Bend	Bend	Lava Holes
Umatilla-McNary	Umatilla	Columbia R.
Gresham	Gresham	Columbia R.
Multnomah Co. - Inverness	Portland	Columbia R.
Columbia City	Columbia City	
Aumsville	Aumsville	Beaver Creek
Port of Tillamook Bay	Tillamook	Trask R.
Yamhill	Yamhill	Yamhill Cr.
Silverton	Silverton	Silver Cr.
Scotts Mill	Silverton	
Brownsville	Brownsville	Calapooya
Veneta	Veneta	Long Tom R.
Modoc Point	Modoc Point	
Portland	Tryon Creek	Willamette
Coburg	Coburg	
Tangent	Tangent	
Eagle Point	Eagle Point	Little Butte
Elgin	Elgin	Grande Ronde
Dufur	Dufur	15-Mile Creek
Eugene-East Side	Eugene	Willamette
La Grande	La Grande	Mill Creek
Dayton	Dayton	Yamhill R.
Gervais	Gervais	Pudding R.
Detroit	Detroit	
Barlow	Barlow	
Juntura	Juntura	
Baker	Baker	Powder R.

OREGON DISCHARGE INVENTORY
MUNICIPAL
FY '75

NAME	LOCATION	STREAM
Portland-Gertz Schmeer	Portland	
Florence	Florence	
Redwood S.D.	Grants Pass	
Gold Hill	Gold Hill	
Portland-Col. Blvd.	Portland	Columbia R.
Pendleton	Pendleton	Umatilla R.
Arlington	Arlington	Columbia R.
Gold Beach	Gold Beach	Riley Cr.
Coos Bay-No.1	Coos Bay	Coos Bay
Coos Bay-No. 2	Coos Bay	Coos Bay
North Tillamook S.A.	Nehalem	
Bly	Bly	
Rogue River	Rogue River	
Yachats	Yachats	
Seneca	Seneca	
Newport	Newport	Pacific
Bunker Hill S.D.	Coos Bay	Coos Bay
Eastside	Eastside	Coos Bay
Winchester Bay S.D.	Reedsport	
McMinnville	McMinnville	Yamhill R.
Prineville	Prineville	Crooked R.
Milwaukie	Milwaukie	Willamette
Hillsboro-Rock Cr.	Hillsboro	Rock Creek
USA Sunset	Beaverton	Cedar Mill
USA Sherwood	Sherwood	Cedar Cr.
Sweet Home	Sweet Home	S. Santiam
USA Fanno Creek	Beaverton	Fanno Cr.
USA Forest Grove	Forest Grove	Tualatin R.
USA Cornelius	Cornelius	Tualatin R.
Wood Village		Cr. 2 Col.
Ashland	Ashland	Ashland Cr.
Depoe Bay S.D.	Depoe Bay	
USA Durham	Durham	Tualatin R.
Wasco	Wasco	Dry Creek
Madras	Madras	
Hammond	Hammond	
Orient School	Gresham	Johnson Creek
Medford	Medford	Rogue R.
Dundee	Dundee	Willamette
Jacksonville	Jacksonville	Daisy Creek
Port of Portland	Portland	Columbia R.
Klamath Falls	Klamath Falls	L Ewauna
Hillsboro-West Side	Hillsboro	Tualatin R.
USA Aloha	Aloha	Beaverton
Oak Lodge S.D.	Milwaukie	Willamette
West Linn - Bolton	West Linn	Willamette
Cedar Hills	Portland	Beaverton Cr.

OREGON DISCHARGE INVENTORY
MUNICIPAL
FY '75

NAME	LOCATION	STREAM
Roseburg	Roseburg	S. Umpqua R.
Hood River	Hood River	Columbia R.
Grants Pass	Grants Pass	Rogue R.
Junction City	Junction City	Flat Cr.
Oregon City	Oregon City	Willamette
Hermiston	Hermiston	Umatilla R.
Canby	Canby	Willamette
USA Metzger	Metzger	Fanno Cr.
S. Suburban S.D.	Klamath Falls	L Ewauna
St. Helens	St.Helens	Columbia R.
Ontario	Ontario	Malheur R.
Beaverton	Beaverton	
North Bend	North Bend	Coos Bay
Dallas	Dallas	Rickreall
Astoria	Astoria	Columbia R.
USA Tigard	Tigard	Fanno Cr.
Warrenton	Warrenton	Columbia E.
Burns	Burns	
Tillamook	Tillamook	Trask R.
Philomath	Philomath	Marys R.
Tri City S.D.	Myrtle Creek	S. Umpqua R.
Seaside	Seaside	Necanicum
North Roseburg S.D.	Roseburg	S. Umpqua R.
Newberg	Newberg	Willamette
Coquille	Coquille	Coquille R.
Woodburn	Woodburn	Pudding R.
Reedsport	Reedsport	Umpqua R.
Lakeview	Lakeview	Deadman Cr.
Powers	Powers	S. Coquille
Carlton	Carlton	N. Yamhill
Canyonville	Canyonville	S. Umpqua
Pilot Rock	Pilot Rock	Birch Cr.
Heppner	Heppner	Willow Cr.
Brookings	Brookings	Chetco Cov.
Enterprise	Enterprise	Wallowa R.
Milton-Freewater	Milton-Freewater	
Nyssa	Nyssa	Snake R.
Vernonia	Vernonia	Nehalem R.
Joseph	Joseph	Prairie Cr.
Prairie City	Prairie City	John Day R.
Vale	Vale	Malheur R.
Sheridan	Sheridan	S. Yamhill
Klamath Falls Air	Klamath Falls	Lost R.
Wilsonville	Wilsonville	Willamette
Troutdale	Troutdale	Sandy R.
Sandy	Sandy	Tickle Cr.

OREGON DISCHARGE INVENTORY
MUNICIPAL
FY '75

NAME	LOCATION	STREAM
Cascade Locks	Cascade Locks	Columbia R.
Cannon Beach	Cannon Beach	Elk Creek
Bandon	Bandon	Coquille R.
Oakridge	Oakridge	Willamette
Salem-West	Salem	Willamette
Valsetz	Valsetz	Valsetz
Estacada	Estacada	Clackamas
Inn at Otter Crest	Otter Rock	Pacific
Myrtle Point	Myrtle Point	S. Coquille
Mt. Angel	Mt. Angel	Pudding R.
Somerset West	Portland	Rock Cr.
Jefferson	Jefferson	Santiam R.
Hayden Island No. 2	Portland	Oregon Slough
Rainier	Rainier	Columbia R.
Parkdale S.D.	Parkdale	Trout Cr.
Myrtle Creek	Myrtle Creek	Myrtle Cr.
Drain	Drain	Elk Cr.
Dammasch State Hosp.	Wilsonville	Corral Cr.
Tualatin	Tualatin	Tualatin R.
Tektronix - Dom.	Beaverton	Beaverton
Lowell	Lowell	Willamette
Timberline Rim	Brightwood	Sandy R.
Harrisburg	Harrisburg	Willamette
Central Linn School	Halsey	Spoon Cr.
Stanfield	Stanfield	Umatilla R.
Bay City	Bay City	Tillamook
Willamina	Willamina	Willamina
Tongue Point	Astoria	Columbia R.
Oak Hills	Beaverton	Willow Cr.
King City	King City	Tualatin R.
Green S.D.	Roseburg	S. Umpqua R.
Garibaldi	Garibaldi	Tillamook
Adair Air Force Base	Corvallis	Slo. 2 Will.
Heintz Const. Co.	Newport	Thiel Cr.
Portland Mob. Hm. Ct.	Portland	Columbia S.
Odell S.D.	Odell	Odell Cr.
Illahe Hills	Salem	Willamette
Creswell	Creswell	Camas Slough
Emigrant Lake Park	Ashland	
Wallowa	Wallowa	Wallowa R.
Fossil	Fossil	Butte Cr.
Chemawa Indian School	Chemawa	L Labish
Athena	Athena	Wildhorse
Yoncalla	Yoncalla	Yoncalla Cr.
USA Banks	Banks	Dairy Cr.
Malin	Malin	Ditch
Lane Comm. College	Eugene	Willamette

OREGON DISCHARGE INVENTORY
MUNICIPAL
FY '75

NAME	LOCATION	STREAM
Port Orford	Port Orford	Garrison L.
Merrill	Merrill	Lost R.
Echo	Echo	Umatilla R.
Oakland	Oakland	Calapooya
Halfway	Halfway	Pine Cr.
Salishan Prop.	Gleneden Beach	Siletz Bay
Marylhurst	Marylhurst	Willamette
Weyerhaeuser Co.-Dom.	Klamath Falls	Klamath R.
Weston	Weston	Pine Cr.
Southwood Park S.D.	Portland	Fanno Cr.
Reynolds Metals Co.	Troutdale	Cr. 1 Colum.
Pixieland Corp.	Otis	Salmon R.
Halsey	Halsey	Muddy Cr.
Fishhawk Lake Rec.	Clat. & Colum. Co.	Rock Cr.
Amity	Amity	Ash Swale
Wedderburn S.D.	Wedderburn	Pacific
Pier Point Inn	Florence	Siuslaw R.
Hines Lumber - Dom.	Westfir	N. Fork Wil.
Knoll Terrace Pk.	Corvallis	Frazier Cr.
Siletz	Siletz	Siletz R.
Eola Village	McMinnville	S. Yamhill
Country Squire Motel	Eugene	Lttl Muddy
Condon	Condon	Condon Can.
USA Gaston	Gaston	Tualatin R.
Timberline Lodge	Mt. Hood	Salmon R.
Scio	Scio	Thomas Cr.
Primate Center	Beaverton	
Gilchrist Timber-Dom.	Gilchrist	
Crown Zellerbach	Wauna	Columbia R.
Camp Angell	Lincoln Co.	Big Cr.
Timberlake Job Corps	Clackamas Co.	Clackamas
Shoreline S.D.	Portland	Skipanon R.
Riverview Mob. Hm.	Carver	Clackamas
Riverview Heights	Albany	Willamette
River Bend Mob. Hm.	Carver	Clackamas
North Powder	North Powder	North Powder
Mountain S. Air Pk.	Portland	Col. Slough
Moro	Moro	Dry Cr.
Monroe	Monroe	Long Tom R.
Wolf Creek Job Corps	Douglas Co.	Little R.
Rice Hill	Yoncalla	Yoncalla Cr.
Propco	Portland	Col. Slough
Mt. Hood Meadows	Mt. Hood	E. Hood R.
Kah-Nee-Ta	Warm Springs	Warm Springs
Chatnicka Heights	Salem	Glenn Cr.
Century Meadows Subd.	Aurora	Willamette
Brownsville-No. 1	Brownsville	Calapooya

OREGON DISCHARGE INVENTORY
MUNICIPAL
FY '75

NAME	LOCATION	STREAM
Union Cr. Campground	Baker Co.	Mason Dam
Pleasant Valley School	Portland	Kelly Cr.
Panavista Subd.	Portland	Cedar Mill
Mt. Hood Golf Course	Wemme	Salmon R.
Mt. Hebo Air Force	Hebo	Pollard Cr.
Milo Academy	Milo	S. Umpqua R.
Fleming Jr. High School	Grants Pass	Harris Cr.
Driftwood Shores Inc.	Florence	Siuslaw R.
Camp Lane	Lane Co.	Siuslaw R.
American Can	Halsey	Willamette
Tiller Ranger Station	Douglas Co.	S. Umpqua R.
Willamette Lutheran	Salem	Clear Lake
Sunset Bay State Pk.	Coos Bay	Pacific
Stayton Canning Co.	Brooks	Fitzpatric
South Umpqua Hi School	Myrtle Cr.	S. Umpqua R.
Skyline West S.D.	Corvallis	Oak Cr.
Siletz Keys S.D.	Lincoln Co.	Siletz Bay
River Haven Mob. Est.	Grants Pass	Rogue R.
Ramada Inn	Tualatin	Tualatin R.
Pioneer Villa	Halsey	Courtney Cr.
Pineway Apartments	Lebanon	S. Santiam
Mt. Hood Golf Club Tr.	Clackamas Co.	Salmon R.
Laurelwood Academy	Gaston	Tualatin R.
Henley High School	Klamath Falls	Lost R.
Jubitz Truck Station	Portland	Col. Slough
Fir Cove Sanitation	Eugene	Willamette
Eugene Airport	Eugene	Clear Lake
Douglas High School	Winston	S. Umpqua R.
Dikeside Moorage	Scappoose	Columbia R.
Columbia Way Court	Portland	Col. Slough
Lafayette Trappist	Lafayette	Cr.-Yamhill
Knoxtown S.D.	Wedderburn	Cr. to Paci.
Twin Oaks School	Eugene	Spencer Cr.
Tangent Elem. School	Tangent	L. Creek
Stuckey Pecan Shop	Halsey	Courtney Cr.
Stephenson School	Portland	Tryon Cr.
Shady Vista Mob. Pk.	Shady Cove	Cusey Cr.
Sauvie Isl. Moorage	Sauvie Island	Mult. Chan.
Royal Highlands Subd.	Portland	Creek
River Vill. Mob. Hm.	Wilsonville	Willamette
Ranch Motel	Yoncalla	Yoncalla Cr.
Pacific High School	Port Orford	Cr.-Pacific
Olney School	Astoria	Clatskanie
Neskowin Lodge	Neskowin	Trask R.
Millersburg School	Albany	Crooks Cr.
Lowell Park	Lane Co.	Willamette
Goshen Elem. School	Springfield	Wild Hog Cr.

OREGON DISCHARGE INVENTORY
MUNICIPAL
FY '75

NAME	LOCATION	STREAM
Diamond Hill	Eugene	Ltl Muddy
Burright Subdivision	Portland	Mitchell Cr.
Bullards Beach	Coos Co.	Coquille R.
Bonanza School	Bonanza	Lost R.
A P Industries	Portland	Col. Slough
Wheeler	Wheeler	Nehalem R.
Hiatt Apartments	Bend	Drill Hole
Lincoln Co. School	Newport	Olalla Cr.
Sportsmans Park 3	Wasco Co.	
McKenzie Laundromat	Depoe Bay	Pacific Oc.
Manzanita School	Josephine Co.	
Central Linn School	Halsey	Spoon Cr.
Diamond Lake	Diamond Lake	
Eddys Motel	The Dalles	
Central Oregon College	Bend	Drain Hole
Zig Zag Cond.	Clackamas Co.	
Willow Is. Mob. Est.	Lake Oswego	
Western Modular Home	Salem	Mill Cr.
Surfpoint Inn	Depoe Bay	Pacific
Steamboat Ranger Sta.	Douglas Co.	
Siletz River Estates	Lincoln Co.	
Royal Motor Inn	Depoe Bay	Pacific
Rogue River Mob. Hm.	Grants Pass	
Rancho Klamath Falls	Klamath Falls	
Portland Meadows Apt.	Portland	
Peerless Truck & Tr.	Tualatin	Tualatin R.
Klamath Agency	Klamath Agency	Klamath L.
Exposition Center	Portland	Col. Slough
Elkton	Elkton	
Crestellyn Acres	Corvallis	
Camelot Mobile Res.	Corvallis	
B K Builders	Dexter	
Auckland Moorage	Portland	
Adrian	Adrian	

NEEDS PRIORITY RANKING CRITERIA

Sewerage Works Construction Grants and Loans

Point Assignment	Point Categories
	1. Need
300	A. Health Hazard I - documented and certified existing emergency health hazard.
250	B. Required by EQC or EPA order.
	C. Required by permit - compliance schedule.
	D. Required by standard changes.
	E. Health hazard II - documented but not certified under ORS 224; existing hazard to recreation, fishing, shellfish or water supplies.
200	F. Elimination of interim facility.
	G. Improvement of performance.
150	H. Potential health hazard.
	I. Expansion for future.
77 max.	2. Stream segment - ranked in reverse order to that shown in "Annual State Strategy Program, FY 75".
	3. Project type.
50	A. Sewage treatment plant including sewer system rehabilitation as shown by evaluation and analysis.
40	B. Interceptor sewers, pumping stations, pressure sewers.

NEEDS PRIORITY RANKING

Applicant	Environmental Points (A)	River Segment Points (B)	Project Type Points (D)	Total Points	Priority Ranking
Portland	300	69	40	409	1
Florence N. Int.	300	54	40	394	2
Foster-Midway	300	43	40	383	3
Corvallis - STP	250	76	50	376	4
Salem - STP	250	76	50	376	5
Cottage Grove	250	76	50	376	6
Maupin	250	74	50	374	7
Redmond	250	74	50	374	8
Winston-Dillard	250	73	50	373	9
Riddle	250	73	50	373	10
Glendale	250	73	50	373	11
Glide-Idelyld	250	72	50	372	12
Sutherlin	250	72	50	372	13
Redwood S. D.	250	71	50	371	14
Butte Falls	250	71	50	371	15
Gold Hill	250	71	50	371	16
Rufus	250	69	50	369	17
Clatskanie	250	69	50	369	18
Wauna-Westport	250	69	50	369	19
John Day	250	68	50	368	20
Mt. Vernon	250	68	50	368	21
Union	250	67	50	367	22
Lake Oswego (Willamette-Marylhurst)	250	76	40	366	23

Applicant	Environmental Points (A)	River Segment Points (B)	Project Type Points (D)	Total Points	Priority Ranking
Government Camp S. D.	250	66	50	366	24
Charleston S. D.	250	75	40	365	25
Bear Creek Valley Sanitary Authority (South Medford)	250	71	40	361	26
Fruitdale-Harbeck	250	71	40	361	27
The Dalles-Eastside	250	69	40	359	28
Portland-S.E. Relieving	250	69	40	359	29
Port of Astoria	250	69	40	359	30
Cloverdale S. D.	250	56	50	356	31
Pacific City	250	56	50	356	32
Netarts-Oceanside S.D.	250	55	50	355	33
Jordan Valley	300	5	50	355	34
Mapleton	250	54	50	354	35
Lafayette	250	49	50	349	36
Turner	250	48	50	348	37
Mollala	250	45	50	345	38
Donald	250	45	50	345	39
Harbor S. D.	250	53	40	343	40
Lebanon	250	43	50	343	41
Mill City	250	42	50	342	42
Rockaway	250	41	50	341	43
Toledo	250	50	40	340	44
Sublimity-Stayton	250	48	40	338	45
Aurora	250	45	40	335	46
Fall City	250	35	50	335	47
Gleneden S. D.	250	41	40	331	48

Applicant	Environmental Points (A)	River Segment Points (B)	Project Type Points (D)	Total Points	Priority Ranking
Lincoln City	250	41	40	331	49
Twin Rocks S. D.	250	41	40	331	50
Monmouth-Independence	200	76	50	326	51
Bonanza	250	26	50	326	52
Eugene-Springfield - STP	200	76	50	326	53
Chiloquin	250	25	50	325	54
Huntington	250	24	50	324	55
Unity	250	24	50	324	56
Hines	250	23	50	323	57
Cave Junction	200	71	50	321	58
Shady Cove	200	71	50	321	59
Merlin-Col. Valley	200	71	50	321	60
Bear Creek Valley Sanitary Authority (White City)	200	71	50	321	61
Mosier	200	69	50	319	62
Boardman	200	69	50	319	63
Long Creek	200	68	50	318	64
U.S.A. (Willow Creek)	200	77	40	317	65
Corvallis (Airport)	200	76	40	316	66
Corvallis (Mobile Court)	200	76	40	316	67
Albany - N.E. Int.	200	76	40	316	68
West Linn - Lower Tualatin	200	76	40	316	69
Clackamas Co. S. D. # 1	200	76	40	316	70
Lake Oswego (Lakeview)	200	76	40	316	71
Lake Oswego (Evergreen)	200	76	40	315	72
Culver	250	15	50	315	73

Applicant	Environmental Points (A)	River Segment Points (B)	Project Type Points (D)	Total Points	Priority Ranking
Terrebonne	250	15	50	315	74
Metolius	250	15	50	315	75
Bend - E. Pilot Butte	200	74	40	314	76
Umatilla - McNary	200	69	40	309	77
Gresham - Ruby Junction	200	69	40	309	78
Multnomah County	200	69	40	309	79
Columbia City	200	69	40	309	80
Aumsville	200	48	50	298	81
Port of Tillamook Bay	200	57	40	297	82
Yamhill	200	47	50	297	83
Silverton	200	45	50	295	84
Scotts Mills	200	45	50	295	85
Brownsville	200	33	50	283	86
Veneta	200	32	50	282	87
Modoc Point	200	28	50	278	88
Portland - Tryon S.T.P.	150	76	50	276	89
Coburg	150	76	50	276	90
Tangent	150	76	50	276	91
Eagle Point	150	71	50	271	92
Elgin	150	67	50	267	93
Dufur	150	66	50	266	94
Eugene - E. Side	150	76	40	266	95
LaGrande-Island City	150	67	40	257	96
Dayton	150	46	50	246	97
Gervais	150	45	50	245	98

Applicant	Environmental Points (A)	River Segment Points (B)	Project Type Points (D)	Total Points	Priority Ranking
Detroit	150	42	50	242	99
Barlow	150	44	44	234	100
Juntura	150	23	50	223	101
Baker	150	7	50	207	102

PROJECT LIST - CONSTRUCTION GRANTS

Priority Ranking	Municipality	Project	Project Cost	Preliminary Step I, EPA Start	Complete	Cost	Grant	FY	P & S Step II, EPA Start	Complete	Cost	Grant	FY	Construction Step III, EPA Start	Complete	Cost	EPA Grant	FY	Cumulative Grant Amt.
1	Portland (Gertz-Schmeer)	INT	3,110,000	11-71	5-71	93,300	0		6-72	5-74	342,100	0		6-74	9-75	2,674,600	2,332,500	74	pending
2	Florence	INT	109,000	3-73	7-73	3,300	0		8-73	11-73	12,000	0		6-74	11-74	93,700	81,750	75	81,750
3	Foster-Midway	INT	915,000	8-73	11-74	27,500	0		3-75	12-75	100,600	0		3-76	3-77	786,900	686,250	76	768,000
4	Corvallis	STP exp	10,180,000	7-73	11-73	305,000	0		6-74	2-75	1,119,800	1,119,800	75	4-75	4-77	8,754,800	7,635,000	75	8,403,000
5	Salem	STP exp	16,000,000	12-70	10-73	480,000	0		7-73	1-74	1,760,000	0		6-74	2-76	13,760,000	12,000,000	75	20,403,000
6	Cottage Grove	STP exp	500,000	7-74	3-75	15,000	0		5-75	2-76	55,000	0		5-75	8-77	430,000	325,000	76	20,778,000
7	Maupin	STP exp	235,000	5-71	6-74	7,000	0		8-74	3-75	25,800	0		5-75	11-75	202,100	176,250	75	20,954,250
8	Redmond	STP&INT	2,000,000	1-70	1-75	60,000	0		7-75	1-76	220,000	220,000	76	7-76	9-78	1,720,000	1,500,000	76	22,454,250
9	Winston-Dillard	STP&INT	3,000,000	11-73	7-74	90,000	0		8-74	3-75	330,000	0		5-75	5-76	2,580,000	2,250,000	75	24,704,250
10	Riddle	STP exp	480,000	5-72	6-74	14,400	0		8-74	3-75	52,800	0		5-75	5-76	412,800	360,000	75	25,064,250
11	Glendale	STP exp	684,000	10-73	12-74	20,500	0		2-75	7-75	75,200	0		9-75	9-76	588,300	513,000	76	25,577,250
12	Glide-Idelyld	STP&INT	1,200,000	5-70	10-74	36,000	0		12-74	8-75	132,000	0		10-75	1-77	1,032,000	900,000	75	26,477,250
13	Sutherlin	STP exp	1,768,000	5-73	12-74	53,000	0		1-75	6-75	194,500	0		8-75	8-76	1,520,500	1,326,000	76	27,803,250
14	Redwood S. D.	STP&INT	900,000	5-70	3-74	27,000	0		5-74	11-74	99,000	0		12-74	2-76	774,000	675,000	75	28,478,250
15	Butte Falls	STP&INT	500,000	4-74	7-74	15,000	0		9-74	2-75	55,000	0		4-75	4-76	430,000	375,000	75	28,853,250
16	Gold Hill	STP exp	375,000	8-73	6-74	11,000	0		7-74	1-75	41,200	0		3-75	3-76	322,500	281,250	75	29,134,500
17	Rufus	STP&INT	200,000	4-72	6-74	6,000	0		9-74	3-75	22,000	0		5-75	1-76	172,000	150,000	75	29,284,500
18	Clatskanie	STP exp	300,000	6-73	8-74	9,000	0		9-74	3-75	33,000	0		5-75	5-76	258,000	225,000	75	29,509,500
19	Wasma-Westport	STP&INT	1,000,000	10-72	10-74	30,000	0		12-74	6-75	110,000	0		8-75	8-76	860,000	750,000	75	30,259,500
20	John Day-Canyon City	STP&INT	1,600,000	6-70	12-74	48,000	0		2-75	8-75	176,000	0		10-75	10-76	1,376,000	1,200,000	76	31,459,500
21	Mt. Vernon	STP&INT	300,000	6-70	12-74	9,000	0		2-75	8-75	33,000	0		10-75	10-76	258,000	225,000	76	31,684,500
22	Union	STP	200,000	5-70	3-74	6,000	0		6-74	1-75	22,000	0		3-75	3-76	172,000	150,000	75	31,834,500
23	Lake Oswego (Willamette-Marylhurst)	INT	390,000	5-71	6-74	11,700	0		8-74	5-75	42,900	0		7-75	7-76	335,400	292,500	76	32,127,000
24	Government Camp S.D.	STP imp	519,000	2-74	8-74	15,500	0		10-74	8-75	57,100	0		10-75	10-76	446,400	389,250	76	32,516,250
25	Charleston S.D.	INT	1,100,000	5-64	5-74	33,000	0		6-74	9-74	121,000	0		11-74	11-75	946,000	825,000	75	33,341,250
26	LCWSA (South Medford)	INT	796,000	5-73	9-73	23,900	0		10-73	5-74	87,500	0		8-74	8-75	684,600	597,000	75	33,938,250
27	Fruitdale-Hambeck	INT	110,000	12-68	2-74	3,300	0		5-74	10-74	12,100	0		1-75	7-75	94,600	82,500	75	34,020,750
28	The Dalles (E. Side)	INT	520,000	5-72	12-72	15,600	0		1-73	5-74	57,200	0		7-74	7-75	447,200	390,000	75	34,410,750
29	Portland (S.E. Relieving)	INT	750,000	1-70	3-74	22,500	0		3-73	8-74	82,500	0		10-74	7-75	645,000	562,500	75	34,973,250
30	Port of Astoria	INT	559,000	11-73	2-74	16,700	0		2-74	4-74	61,500	0		7-74	4-75	480,800	419,250	75	35,392,500
31	Cloverdale S.D.	STP&INT	330,000	6-67	7-74	9,900	0		9-74	2-75	36,300	0		4-75	4-76	283,800	247,500	75	35,640,000
32	Pacific City	STP&INT	230,000	6-71	7-74	6,900	0		9-74	3-75	25,300	0		5-75	5-76	197,800	172,500	75	35,812,500
33	Netarts-Oceanside	STP&INT	600,000	5-70	6-74	18,000	0		8-74	1-75	66,000	0		3-75	3-76	516,000	450,000	75	36,262,500
34	Jordan Valley	STP&INT	310,000	6-71	8-71	9,300	0		9-73	1-74	34,100	0		7-74	7-75	266,600	232,500	75	36,495,000
35	Mapleton	STP&INT	430,000	6-74	5-75	12,900	0		6-75	12-75	47,300	0		3-76	3-77	369,800	322,500	76	36,817,500
36	Lafayette	STP exp	160,000	2-73	4-74	4,800	0		8-73	5-74	17,600	0		7-74	3-75	137,600	120,000	75	36,937,500
37	Turner	STP&INT	700,000	3-74	8-74	21,000	0		10-74	6-75	77,000	0		8-75	8-76	602,000	525,000	76	37,462,500
38	Nollala	STP exp	300,000	7-74	3-75	9,000	0		5-74	11-74	33,000	0		7-75	1-76	258,000	225,000	76	37,687,500
39	Donald	STP&INT	240,000	12-73	3-74	7,200	0		9-74	6-75	26,400	0		8-75	8-76	206,400	180,000	76	37,867,500
40	Harbor S.D.	INT	381,000	12-71	6-74	11,400	0		7-74	11-74	41,900	0		2-75	2-76	327,700	285,750	75	38,153,250
41	Lebanon	STP exp	1,500,000	6-74	11-74	45,000	0		2-75	8-75	165,000	0		10-75	10-76	1,290,000	1,125,000	75	39,278,250
42	Mill City	STP&INT	1,000,000	2-74	5-74	30,000	0		8-74	6-75	110,000	0		8-75	8-76	860,000	750,000	75	40,028,250

Priority Ranking	Municipality	Project	Project Cost	* Preliminary Step I, EPA Start	Complete	Cost	Grant	FY	* P & S Step II, EPA Start	Complete	Cost	Grant	FY	* Construction Step III, EPA Start	Complete	Cost	EPA Grant	FY	Cumulative Grant Amoun
43	Rockaway	STP imp	170,000	6-69	9-74	5,100	0		10-74	3-75	18,700	0		5-75	6-75	146,200	127,500	75	40,185,750
44	Toledo	INT	109,000	6-72	12-73	3,300	0		1-74	6-74	12,000	0		8-74	2-75	93,700	81,750	75	40,267,500
45	Sublimity-Stayton	INT	462,000	5-71	5-74	13,900	0		6-74	3-75	50,800	0		5-75	5-76	397,300	346,500	75	40,614,000
46	Aurora	INT	200,000	5-74	11-74	6,000	0		2-75	12-75	22,000	0		3-76	12-77	172,000	150,000	76	40,764,000
47	Fall City	STP&INT	235,000	4-74	10-74	7,000	0		1-75	7-75	25,900	0		10-75	10-76	202,100	176,250	76	40,940,250
48	Gilchecen S. D.	INT	300,000	4-72	5-73	9,000	0		1-74	7-74	33,000	0		10-74	1-76	258,000	225,000	75	41,165,250
49	LaMcoln City	INT	250,000	1-74	9-74	7,500	0		11-74	6-75	27,500	0		8-75	8-76	215,000	187,500	76	41,352,750
50	Twin Rocks S. D.	STP imp	200,000	6-74	12-74	6,000	0		2-75	8-75	22,000	0		10-75	10-76	172,000	150,000	76	41,502,750
51	Monmouth-Independence	STP	400,000	11-73	8-74	12,000	0		10-74	7-75	44,000	0		9-75	9-76	344,000	300,000	76	41,802,750
52	Bonanza	STP&INT	600,000	7-74	12-74	18,000	0		2-75	8-75	66,000	0		10-75	7-76	516,000	450,000	76	42,252,750
53	Eugene-Springfield	STP	15,000,000	7-74	7-75	450,000	0		9-75	9-76	1,650,000	0		10-76	10-78	12,900,000	11,250,000	77	53,502,750
54	Chiloquin	STP exp	258,000	5-72	7-74	7,700	0		10-74	3-75	28,400	0		5-75	5-76	221,900	193,500	75	53,696,250
55	Huntington	Cl_2	22,000	6-71	7-71	700	0		3-72	4-72	2,400	0		7-74	11-74	18,900	16,500	75	53,712,750
56	Unity	STP&INT	124,000	6-71	2-74	3,700	0		3-74	6-74	13,600	0		8-74	8-75	106,700	93,000	75	53,805,750
57	Hines	Cl_2	22,000	6-74	8-74	700	0		9-74	11-74	2,400	0		1-75	3-75	18,900	16,500	75	53,822,250
58	Cave Junction	STP exp	150,000	1-73	8-74	4,500	0		10-74	12-74	16,500	0		2-75	11-75	128,000	112,500	75	53,934,750
59	Shady Cove	STP&INT	700,000	2-74	12-74	21,000	0		1-75	5-75	77,000	0		7-75	7-76	602,000	525,000	76	54,459,750
60	Merlin-Col. Valley	STP&INT	1,000,000	6-74	12-74	30,000	0		1-75	5-75	110,000	0		7-75	7-76	860,000	750,000	76	55,209,750
61	EC/SA-White City	STP imp	230,000	6-74	2-75	6,900	0		3-75	6-75	25,300	0		7-75	7-76	197,800	172,500	76	55,382,250
62	Mosier	STP&INT	197,000	11-72	4-73	6,000	0		11-73	5-74	21,600	0		7-74	4-75	169,400	147,750	75	55,530,000
63	Boardman	STP imp	150,000	10-73	1-74	4,500	0		4-74	7-74	16,500	0		8-74	6-75	129,000	112,500	75	55,642,500
64	Long Creek	STP	123,000	10-72	6-73	3,700	0		11-73	6-74	13,500	0		8-74	2-75	105,800	92,250	75	55,734,750
65	USA-Willow Creek	INT	200,000	4-74	7-74	6,000	0		8-74	12-74	22,000	0		4-75	4-76	172,000	150,000	75	55,884,750
66	Corvallis-Airport	INT	500,000	2-74	6-74	15,000	0		6-75	8-75	55,000	0		10-75	6-76	430,000	375,000	76	56,259,750
67	Corvallis-Mobile Court	INT	90,000	2-74	6-74	2,700	0		6-75	8-75	9,900	0		10-75	6-76	77,400	67,500	75	56,327,250
68	Albany-N.E.	INT	2,000,000	3-72	7-74	6,000	0		9-74	5-75	22,000	0		7-75	7-76	172,000	150,000	75	57,717,250
69	West Linn-Lower Tualatin	INT	480,000	12-71	8-74	14,400	0		10-75	3-76	52,800	0		5-76	11-76	412,800	360,000	76	58,197,250
70	Clackamas Co. S.D. #1	INT	700,000	5-70	12-73	21,000	0		6-74	5-75	77,000	0		7-75	7-76	602,000	525,000	76	58,803,250
71	Lake Oswego (Lakeview)	INT	150,000	1-74	6-74	4,500	0		8-74	3-75	16,500	0		7-75	7-76	128,000	112,500	76	58,784,750
72	Lake Oswego (Evergreen)	INT	200,000	1-74	6-74	6,000	0		8-74	3-75	22,000	0		7-75	7-76	172,000	150,000	76	58,934,750
73	Culver	STP&INT	343,000	5-72	12-73	10,300	0		3-74	6-74	37,700	0		7-74	2-75	295,000	257,250	75	59,192,000
74	Terrebonne	STP	450,000	3-74	9-74	13,500	0		12-74	8-75	49,500	0		10-75	10-76	387,000	337,500	75	59,529,500
75	Metolius	STP&INT	343,000	7-71	12-73	10,300	0		1-74	5-74	37,700	0		7-74	7-75	295,000	257,250	75	59,786,750
76	Bend-E. Pilot Butte	INT	197,000	5-73	8-73	5,900	0		1-74	5-74	21,700	0		7-74	7-75	169,400	147,750	75	59,934,500
77	Umatilla-McNary	INT	171,000	12-72	1-74	5,100	0		1-74	5-74	18,800	0		7-74	7-75	147,100	128,250	75	60,062,750
78	Gresham-Ruby Jct.	INT	1,500,000	2-74	8-74	45,000	0		10-74	6-75	165,000	0		8-75	6-76	1,290,000	1,125,000	75	61,187,750
79	Multnomah County	INT	400,000	6-71	2-74	12,000	0		6-74	8-74	44,000	0		10-74	7-75	344,000	300,000	75	61,487,750
80	Columbia City	INT	190,000	5-70	2-74	5,700	0		6-74	8-74	20,900	0		10-74	7-75	163,400	142,500	75	61,630,250
81	Aumsville	STP imp	80,000	12-73	6-74	2,400	0		8-74	1-75	8,800	0		5-75	11-75	68,800	60,000	75	61,790,250
82	Port of Tillamook Bay	INT	600,000	3-74	3-75	18,000	0		5-75	12-75	66,000	0		3-76	3-77	516,000	450,000	76	62,240,250
83	Yamhill	STP imp	134,000	11-72	3-74	4,000	0		6-74	9-74	14,700	0		10-74	4-75	115,300	100,500	75	62,340,750
84	Silverton	STP imp	250,000	1-74	8-74	7,500	0		10-74	4-75	27,500	0		7-75	5-76	215,000	187,500	76	62,528,250
85	Scotts Mill	STP&INT	400,000	3-74	8-74	12,000	0		10-74	7-75	44,000	0		9-75	9-76	344,000	300,000	76	62,828,250
86	Brownsville	STP imp	230,000	2-74	7-74	6,900	0		9-74	3-75	25,300	0		5-75	5-75	197,800	172,500	75	62,990,750
87	Veneta	STP EXP	502,000	4-73	7-74	15,100	0		8-74	2-75	55,200	0		5-75	1-76	431,700	376,500	76	63,367,250
88	Modoc Point	STP	230,000	1-74	7-75	6,900	0		9-74	4-75	25,300	0		7-75	2-76	197,800	172,500	76	63,539,750
89	Portland (Tryon)	STP Exp	4,500,000	1-71	5-74	135,000	0		5-73	3-74	495,000	0		6-74	10-75	3,870,000	3,375,000	75	66,914,750
90	Coburg	STP&INT	600,000	1-74	7-74	18,000	0		9-74	5-75	66,000	0		7-75	7-76	516,000	450,000	76	67,364,750

Priority Ranking	Municipality	Project	Project Cost	Preliminary Step I, EPA Start	Complete	Cost	Grant	FY	P & S Step II, EPA Start	Complete	Cost	Grant	FY	Construction Step III, EPA Start	Complete	Cost	EPA Grant	FY	Cumulative Grant Amt.
91	Tangent	STP&INT	480,000	2-74	7-74	14,400	0		10-74	6-75	52,800	0		8-75	8-76	412,800	360,000	76	67,644,750
92	Eagle Point	STP imp	100,000	11-73	7-74	3,000	0		9-74	2-75	11,000	0		4-75	1-76	86,000	75,000	76	67,719,750
93	Elgin	STP imp	85,000	2-74	8-74	2,500	0		10-74	3-75	9,400	0		7-75	1-76	73,100	63,750	76	67,783,500
94	Dufur	STP imp	75,000	3-74	1-75	2,200	0		3-75	12-75	8,300	0		3-76	12-76	64,500	56,250	76	67,839,750
95	Eugene-E. Side	INT	4,500,000	12-71	9-74	135,000	0		11-74	6-75	495,000	0		8-75	8-76	3,870,000	3,375,000	76	71,214,750
96	LaGrande-Island City	INT	300,000	6-71	10-74	9,000	0		12-74	6-75	33,000	0		6-75	4-76	258,000	225,000	76	71,439,750
97	Dayton	STP imp	290,000	2-74	7-74	8,700	0		9-74	3-75	31,900	0		5-75	1-76	249,400	217,500	76	71,657,250
98	Gervais	STP imp	80,000	2-74	10-74	2,400	0		1-75	1-76	8,800	0		3-76	3-77	68,800	60,000	76	71,717,250
99	Detroit	STP&INT	700,000	1-74	10-74	21,000	0		1-75	1-76	77,000	0		3-76	3-77	602,000	525,000	76	72,242,250
100	Barlow	INT	110,000	7-74	1-75	3,300	0		3-75	1-76	12,100	0		3-76	12-76	94,600	82,500	76	72,324,750
101	Juntura	STP	150,000	1-74	9-74	4,500	0		11-74	1-76	16,500	0		3-76	12-76	129,000	112,500	76	72,437,250
102	Baker	STP imp	150,000	6-71	1-74	4,500	0		3-74	1-75	16,500	0		3-75	9-75	129,000	112,500	75	72,549,750

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Boise Cascade	Salem	Willamette
Crown Zellerbach	West Linn	Willamette
Publishers Paper Co.	Newberg	Willamette
Publishers Paper Co.	Oregon City	Willamette
Western Kraft	Albany	Willamette
Boise Cascade	LaGrande-Part	Grande Ronde
Martin Marietta Alum	The Dalles	Columbia River
Oregon Metallurgical	Albany	Oak Creek
Reichhold Chemical	St. Helens	Columbia River
Borden Chemical	LaGrande	Grande Ronde
Simpson Timber Co.	Albany	
Texaco Inc.	Coos Bay	Coos Bay
General Foods Corp.	Woodburn	Pudding River
Rogers Walla Walla	Milton-Freewater	Milton Ditch
Tillamook Co. Creamery	Tillamook	Wilson River
Georgia Pacific	Toledo Plywood	Yaquina River
Agnew Plywood	Brookings	
Hines Lumber Industry	Westfir	N. Fork Willamette
Ochoco Lumber Co.	Prineville	Ochoco Creek
Boise Cascade	Elgin	Phillips
Boise Cascade	Medford	Mingus Creek
Lane Plywood Inc.	Eugene	Amazon Creek
Roseburg Lumber	Coquille	Coquille River
Pope & Talbot	Oakridge	Salmon Creek
Oregon Steel Mills	Portland -River	Willamette
Oregon Steel Mills	Portland -Freight	Willamette
McGraw Edison Co.	Corvallis	Willamette
Borden Chemical	Springfield	Willamette
Agnew Plywood	Grants Pass	Skunk Creek
Weyerhaeuser Co.	Cottage Grove	Willamette River
Bauman Lumber	Lebanon	Tributary of South Santiam
Boise Cascade	St. Helens	Columbia River
Ash Grove Cement	Portland	Willamette River
Amalgamated Sugar	Nyssa	Snake River
Northwestern Ice & Cold Storage	Portland	Willamette River
Cascade Fiber Co.	Eugene	Amazon Creek
Georgia Pacific	Albany	Murder Creek
3-G Lumber	Wren	Spout Creek
U.S. Plywood	Willamina	S. Yamhill
Evans Products	Corvallis	Willamette River
Brand-S Corp.	Corvallis Airport	Willamette River

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Reichhold Chemical	White City	Whetstone
Stimson Lumber	Forest Grove	Scoggins Creek
Union Carbide	Portland	Columbia Slough
Diamond Fruit Growers	Odell	Odell Creek
Diamond Fruit Growers	Hood River	Neal Creek
Diamond Fruit Growers	Parkdale	Hood River
Diamond Fruit Growers	Van Horn	Neal Creek
Pennwalt Corp.	Portland	Willamette River
Georgia Pacific	Toledo	Yaquina River
North Santiam Plywood	Mill City	N. Santiam
Cabax Mills Plywood Div.	Eugene	Amazon Creek
Publishers Paper	Tillamook	
Northside Lumber	Philomath	Marys River
Columbia Steel Casting	Portland	Columbia Slough
Rhodia Inc.	Portland	Willamette River
American Can Co.	Halsey	Willamette River
International Paper	Gardiner	Pacific
Weyerhaeuser	Springfield	McKenzie River
Zip-O-Log Veneer	Eugene	Amazon Creek
Kaiser Gypsum	St. Helens	Scappoose Bay
Kenton Packing	Portland	Columbia Slough
Arrowhead Timber	Culver	Clackamas River
Weyerhaeuser	Klamath Falls	Klamath River
Menasha Corp.	North Bend	Coos Bay
Oregon Portland Cement	Lake Oswego	Willamette River
Western Pulp Products	Corvallis	
Rosboro Lumber	Springfield	
Camac Veneer	Eugene	Amazon Creek
Duckwall-Pooley Fruit	Hood River	Neal Creek
Champion International	Dee	E. Fork Hood River
Oregon Fish Commission	Salmon River Fish Hatchery	Salmon River
Davidson Lumber Co.	Mapleton	Siuslaw River
Wah Chang	Albany	Truax Creek
Reynolds Metals Co.	Troutdale	Columbia River
Burlington Northern	Portland	Tanner Creek
Union Pacific R.R.	Hinkle	Umatilla River
Silver Falls Packing	Portland	Columbia Slough
Pacific Meat Co.	Portland	Columbia Slough
Herbert Malarkey Roofing	Portland	Columbia Slough
Flavorland Foods	Forest Grove	
Willamette Industries	Foster	Wiley Creek
Willamette Industries	Sweet Home	South Santiam
American Can	Brownsville	Ditch

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Oregon Fruit Products	Salem	Willamette River
Crown Zellerbach	Wauna	Columbia River
Cascade Steel Rolling Mills	McMinnville	Tributary South Yamhill River
Delmonte Corp.	Salem	Shelton Ditch
Forrest Industries	Brownsville	Courtney Creek
Union Oil	Coos Bay	Coos Bay
International Paper	Veneta	Hardy Creek
Union Oil Co.	Portland	Willamette River
Frank Lumber Co.	Mill City	
Oregon Portland Cement	Huntington	Burnt River
Armour & Company	Portland	Columbia Slough
Crown Zellerbach	Lebanon	South Santiam
Georgia Pacific	Toledo -Pulp	Yaquina River-Pacific
Crown Zellerbach	Portland	Columbia River
Georgia Pacific	Coos Bay -Part	Isthmus Slough
PGE Trojan Nuclear	Rainier	Columbia River
Pacific Carbide	Portland	Columbia Slough
Omark Industries	Milwaukie	
Teledyne Wah Chang	Albany	Truax Creek
Hanna Nickel	Riddle	Crawford Creek
General Chain Bar Co.	Tigard	Fanno Creek
Anodizing Inc.	Portland	Columbia Slough
Tektronix Industries	Beaverton	N. Beaverton
Brod & McClung	Milwaukie	
Portland Willamette	Portland	Columbia Slough
Stauffer Chemical Co.	Portland	Columbia Slough
Dant & Russell	Portland	McKay Creek
Simpson Timber	Eugene	
McFarland Co.	Eugene	
McCormich & Baxter	Portland	Willamette
Sheridan Pr Tr Lbr	Sheridan	
Atlantic Richfield	Linnton	Willamette
Union Pacific	Portland	Willamette
Shell Oil Co.	Portland	Willamette
Phillips Petroleum	Portland	Willamette
Standard Oil	Portland-Willbr	Willamette
Texaco Inc.	Portland	Willamette
Standard Oil	Coos Bay	Coos Bay
Ager & Davis Refinery	Portland	Multnomah Drainage
Burlington Northern	Albany	
Burlington Northern	Klamath Falls	
Union Oil	Astoria	

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Mobil Oil Corp.	Portland	Willamette
Time Oil Co.	Portland	
Union Oil Asphalt	Portland	Columbia River
Zidell	Portland	Willamette
Union Oil Co.	Coos Bay	
Union Pacific	The Dalles	
Nu Way Oil Co.	Portland	Columbia Slough
Union Oil	Coos Bay	Coos Bay
United Flav R Pac	Salem	Pringle Creek
Ore-Ida Foods Inc.	Ontario	Snake River
Stadelman Fruit	The Dalles	Columbia River
Harry & David	Medford	Bear Creek
American Fine Foods	Nyssa	Snake River
Stayton Canning Co.	Stayton	Ditch
Dole Co.	Salem	
Agripac Inc.	Salem	
Carnation Co.	Portland	
Libby McNeill & Libb	Portland	
Thos. Iseri Produce	Ontario	
Hudson House	Cottrell	Council Creek
Westnut Inc.	Dundee	Hess Creek
Gourmet Food Prod	Metolius	Drill Hole
Klamath Potato Dist	Merrill	Lost River
Norpac Growers Inc.	Dundee	
Oak Springs Inc.	The Dalles	
Norpac Growers Inc.	Newberg	
Newbry Orchards	Ashland	
Moore Orchards	Hood River	Neal Creek
Stadelman Fruit	Hood River	
Levy & Zentner Co.	Merrill	Toule L
Diamond Fruit	Hood River	Columbia River
The Dalles Cherry Gr	The Dalles	Columbia River
Lage Orchards	Hood River	Unnamed Creek
Diamond Fruit	Pine Grove	Neal Creek
Erdman Packing Co.	Bandon	Spring Creek
Hervin Co.	Tualatin	Tualatin River
Coast Packing	Ontario	Snake River
Kummer Meat Co.	Hillsboro	Dairy Creek
Van Dine Meat Co.	Myrtle Creek	
Coos Bay Packing Co.	Coos Bay	Shinglehouse
Northwest Fur Breed	Astoria	Columbia River
Crown Rendering Co.	Hillsboro	Tualatin River
Kovach Hog Farm	LaGrande	McAllister
Willamette Egg Farms	Canby	
Logan Egg Farm	Oregon City	Foster Creek
Dayton Livestock Co.	Dayton	
Portland Un Stk Yd	Portland	

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Ocean Foods	Astoria	Columbia River
New England Fish Co.	Newport	Yaquina Bay
Yaquina Bay Fish	Newport	Yaquina Bay
Meredith Fish Co.	Brookings	Chetco River
Astoria Fish Factors	Astoria	
New England Fish Co.	Warrenton	
Qualman Oyster	Coos Bay	
Hayes Oyster Co.	Bay City	Tillamook
Hoy Fish & Crab	Garibaldi	Tillamook Bay
Union Fisherman	Charleston	S. Slough
Pacific Shrimp Inc.	Warrenton	Columbia River
Union Fisherman	Astoria	Columbia River
Warrenton Seafood	Brookings	Chetco River
Peterson Sea Foods	Coos Bay	South Slough
Point Adams Packing	Newport	Yaquina Bay
Point Adams Packing	Hammond	Columbia River
Bandon Fisheries	Bandon	Coquille Bay
Bell Buoy Crab	Seaside	Necanicum
Fishermens Co-Op	Charleston	South Slough
Northwest Fur Breed	Newport	
Blanco Fisheries	Port Orford	Pacific
Depoe Bay Fish Co.	Depoe Bay	Depoe Bay
Eureka Fisheries	Coos Bay	Coos Bay
Hallmark Fisheries	Charleston	South Slough
Bumble Bee Canneries	Newport	Yaquina Bay
Barbey Packing Corp.	Astoria	Columbia River
Astoria Seafood	Astoria	Columbia River
Bioproducts Inc.	Warrenton	Columbia River
Bumble Bee Cannery	Astoria	Columbia River
Bumble Bee Storage	Astoria	Columbia River
Smiths Pacific Shrimp	Garibaldi	Tillamook
Winchester Bay Sea	Winchester Bay	Winchester
Tillamook Oyster Co.	Tillamook	Tillamook
Smiths Pacific Shrimp	Newport	Yaquina Bay
Rogue River Cannery	Wedderburn	Rogue River
Lazio Fish Co.	Harbor	Chetco Bay
Olson Oyster Co.	Bay City	Tillamook
Edmunds Fish & Crab	Garibaldi	
International Paper	Veneta	Noti Creek
International Paper	Gardiner -Plywood	Umpqua River
Klamath Plywood	Klamath Falls	Klamath River
Georgia Pacific	Coquille -Plywood	Coquille River
Multnomah Plywood	Scappoose	

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Oregon Washington Plywood	Garibaldi	
Boise Cascade	Albany	Willamette
Willamette Industries	Springfield	
U.S. Plywood	Roseburg -Ven	S. Umpqua River
Georgia Pacific	Coos Bay -Ply	Isthmus Slough
Columbia Plywood	Cascade Locks	Columbia River
Kogap MCF	Medford	Hansen Creek
Crown Zellerbach	Estacada	
Willamette Industries	Albany	
Cone Lumber Co.	Goshen	Seavy Loop
Brand S Corp.	Eugene	
Brand S Corp.	Alsea	
Brand S Lumber	Portland	
Brand S Corp.	Portland	
Georgia Pacific	Portland	
Guistina Bros	Eugene	
U.S. Plywood	Hood River	Neal Creek
U.S. Plywood	Idanha	
Glendale Plywood	Glendale	Cow Creek
Weyerhaeuser Co.	Coos Bay	Coos Bay
Coos Head Timber Co.	Coos Bay	Isthmus Slough
Burrill Lumber	White City	Military Slough
Forrest Industries	Dillard	S. Umpqua River
Georgia Pacific	Corvallis	Willamette
Linnton Plywood	Portland	Willamette
Louisiana Pacific	Pilot Rock	Birch Creek
Hines Lumber	Bates	John Day River
Crater Plywood	Grants Pass	
Davidson Lumber	Mapleton	Siuslaw River
Modoc Lumber Co.	Klamath Falls	Klamath River
Southern Oregon Plywood	Grants Pass	Shunk Creek
Brooks Scanlon	Bend	Deschutes
Gilchrist Timber Ind.	Gilchrist	L. Deschutes
Georgia Pacific	Springfield	Willamette
U.S. Plywood	Lebanon	South Santiam
Bohemia Lumber	Culp Creek	Row River
Boise Cascade	Valsetz	Valsetz L.
U.S. Plywood	Gold Beach	Rogue River
Boise Cascade	Joseph	Wallowa River
U.S. Plywood	Glide	Little River
U.S. Plywood	Roseburg -Ply	Deer Creek
Olson Lawyer Lumber	White City	Rogue River
Georgia Pacific	Sutherlin	Sutherlin

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Green Veneer Inc.	Idanha	N. Santiam
Boise Cascade	Independence	Ash Creek
Georgia Pacific	Eugene -Prairie	Ditch
Astoria Plywood	Astoria	Columbia River
Keller Lumber Co.	Roseburg	N. Umpqua River
Koch Lumber Co.	Sandy	Tickle Creek
Sun Studs Inc.	Roseburg	Umpqua River
Pierce Al Lumber Co.	Coos Bay	Ishmus Slough
Medford Corp.	Medford	Bear Creek
Hills Creek Lumber	Jasper	Willamette
Herbert Lumber Co.	Riddle	Juddcreek
Georgia Pacific	Cottage Grove	Mosby Creek
Georgia Pacific	Coquille -Log	Coquille River
Fort Hill Lumber Co.	Grand Ronde	Klees Creek
Eugene Stud & Veneer	Eugene	Amazon Creek
Ellingson Timber Co.	Baker	Powder River
Ellingson Lumber Co.	Burnt River	Powder River
Diamond Lumber Co.	Tillamook	Anderson Creek
C & L Lumber Co.	Eagle Creek	Goose Creek
Burkland Lumber	Turner	Coos Bay
Brookings Plywood	Brookings	MacKlyn Creek
Boise Cascade	LaGrande -Saw	Ditch
Bohemia Lumber	Saginaw	Willamette
Bohemia Lumber	Dorena	Row River
Bate Plywood	Merlin	Louse Creek
Olympic Forest Products	Mist	Nehalem River
Erskine Lumber Co.	Sweethome	Siuslaw River
Fir Ply Inc.	White City	Rogue River
Superior Lumber	Glendale	
Steve Wilson	Trail	
Steve Wilson	Medford -Centra	
San Juan Lumber Co.	John Day	
Round Prairie Lumber	Dillard	
Roseburg Lumber	Green	
Roseburg Lumber	Dixonville	
Roseburg Lumber	Dillard -Ply	
Moser Lumber	Kings Valley	
Mountain Fir Lumber	Grants Pass	
Nordic Veneers Inc.	Roseburg	Deer Creek
Nordic Plywood Inc.	Sutherlin	Sutherlin
Harris Pine Mills	Pendleton	Umatilla River
Forest Grove Lumber	Forest Grove	Gales Creek
Barker Willamette	Eugene	Amazon Creek
Mountain Fir Lumber	Independence	

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Publishers Paper Co.	Molalla	
Willamette Industry	Lebanon	
Willamette Industry	Dallas	
Vancouver Plywood	Springfield	
Publishers Paper Co.	Portland	Johnson Creek
Ross Island -Hardtac	Portland	Willamette
Rogers Asphalt Paving	LaGrande	
Rogue River Paving	Medford	Bear Creek
Ross Island -Vanport	Portland	Oregon Slough
Davidson Paving	Beaverton	Beaverton
Estacada Rock Products	Estacada	Clackamas
Hall Placer Mine	Gold Hill	
Hall Placer Mine	Medford	Forest Creek
M P Materials Turner	Salem	Shelton Ditch
McFarland Placer Mine	Baker	Wash-Gulch
Molalla S & G	Milwaukie	
Northwest S & G	Milwaukie	
Oakridge S & G	Oakridge	
Polk Placer Mine	Cave Junction	
Quick Service S & G	Oregon City	
R & R Placer Mining	Josephine County	
R D Mac Inc.	Island City	
River Island S & G	Barton Park	
Rivergate Rock Products	Portland	Willamette
Rock Creek S & G	Carver	
Rogers Construction	Pendleton	
Steward Placer Mine	Wolf Creek	
Troutdale S & G	Troutdale	
Tygh Valley S & G	Tygh Valley	
Umpqua River Navigation	Reedsport	Umpqua Creek
Wildish S & G	Eugene	Willamette
Idaho Concrete Pipe	Nyssa	
Cobb Rock Products	Beaverton	
Dayton Sand & Gravel	McMinnville	Yamhill River
Flynn Sand & Gravel	Ontario	Snake River
Lininger & Sons	Medford	Bear-Rogue
Klineline S & G	Oregon City	
Bernert Towing Co.	Wilsonville	Willamette
C & H Enterprises	Umatilla	
Bassett Placer Mine	Josephine County	Steves Fork
M P Materials River	Salem	Claggett Creek
Road & Driveway Co.	Newport	
Readymix S & G	Milton-Freewater	
Pacific Building Mat.	Portland	Willamette

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Ross Island -Tait	Portland	Willamette
Ross Island -Boise	Portland	Willamette
Ross Island -Albina	Portland	Willamette
Cascade Construction Co.	Portland	Willamette
Willamette Western	Portland -Ivon	Willamette
Eugene Sand & Gravel	Eugene	Willamette
Lininger & Sons	Ashland	Ashland Creek
Corvallis S & G	Corvallis	Willamette
Concrete Steel Corp.	Medford	Bear Creek
Willamette Western	Portland - River	Willamette
Benham Concrete	Coquille	S. Fork Coquille
Oregon Ready-Mix	Oregon City	
Pacific Building Mat	Scappoose	Santosh
Klamath Ready Mix	Klamath Falls	Williamson
Johnson Rock Products	Reedsport	
Toye & Co.	Roseburg	
Johnson Dredging	Cave Junction	Sucker Creek
Johnson Cement	North Bend	Kentuck Creek
Huchendorf Placer	Gold Hill	Sardine Creek
Empire Lite Rock	Timber	Castor Creek
Cornucopia Minerals	Carson	Pine Creek
Steves Redi Mix	Cave Junction	Illinois River
Bush & Renfro Mine	Roseburg	City Creek
Bristol Silica	Rogue River	Rogue River
Brandenthaler Mine	Baker County	Burnt R N
Coos Bay Timber Op	Coos County	Kentuck Creek
Coos Bay Timber Op	North Bend	Kentuck Creek
Pacific Power	Portland	Willamette
M P Materials Lancas	Salem	Mill Creek
Georgia Pacific	Albany	
EPA Fish Lab	Corvallis	Willamette
Pacific Power	Albany -Water	Calapooia
Owens Illinois Inc.	Portland	Johnson Lake
Pacific Power	Lebanon	Santiam Ca
Parkrose Water Dist	Portland	Columbia
Kaiser Gypsum	Portland	Willamette
Columbia Cement Co.	Portland	Willamette
Bureau of Sport Fish	Eagle Creek Hatchery	
Gardiner Enterprises	Canyon City	
Oregon Aqua Food	Newport	
Oregon Fish Commission	Bonneville	
Cargill Inc.	Portland	
Milton-Freewater -Wa	Milton-Freewater	
Ontario - Water	Ontario	

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Sweet Home -Water	Sweet Home	
Newberg -Water Plant	Newberg	Willamette
Mears Controls	Beaverton	
Murphy Co.	Florence	
Oregon Army National Guard	Portland	
Oregon Air National Guard	Portland	
Medford Water Plant	Medford	
Magma Energy	Malheur County	
Beverly Beach St. Pk.	Lincoln County	Spencer Creek
Bethel Danebo S & G	Eugene	Amazon Creek
Beall Pipe & Tank	Portland	Willamette
McNary Dam	Umatilla County	Columbia River
John Day Dam	Sherman County	Columbia
Hells Canyon Dam	Wallowa County	Snake River
Bonneville Dam	Multnomah County	Columbia River
Brownlee Dam	Baker County	Snake River
Pacific Power	Mill City	N. Santiam
Oregon Water Corp.	Roseburg	
Rasmussen & Co.	Beaverton	Beaverton
Pacific Power	Albany -Vine	
Park Place Water Dist	Oregon City	
The Dalles Dam	The Dalles	Columbia River
Seal Rock Water Dist	Seal Rock	
Oxbow Dam	Baker County	
Hayden Bridge Filt	Eugene	McKenzie River
Bird & Son Inc.	Portland	Willamette
AMF Voit Rubber Corp.	Portland	Columbia Slough
Hercules Inc.	Portland	Willamette
Crown Zellerbach	Columbia City	Columbia River
Pacific Resins	Portland	Columbia Slough
Agripac Inc.	Eugene	Willamette
Cascade Resins Inc.	Eugene	Amazon Creek
U.S. Plywood	Mapleton	Siuslaw River
Northwest Natrual Gas	Portland	Willamette
Georgia Pacific	Eugene -Irving	Ditch
Bohemia Lumber	Lakeside	Ten Mile Lake
Pacific Resins	Eugene	Low Amazon
Medford Veneer & Plywood	White City	Ditch
Georgia Pacific	Junction City	Ditch
Bagley Canning Co.	Ashland	Ashland Creek
Klamath Lumber	Klamath Falls	Klamath River

OREGON DISCHARGE INVENTORY

INDUSTRIAL

NAME	LOCATION	STREAM
Eugene Water & Electric	Leaburg	
Eugene Water & Electric	Carmen-Smith	
American Can	Eugene	
McKenzie-Will. Hospital	Springfield	
Joslyn Mfg. & Supply	Portland	Columbia Slough
Ireco Industries	Eugene	Amazon Creek
Huntington Rubber	Portland	Willamette
GAF Inc.	Portland	Fanno Creek
Forrest Industries	White City	Rogue River
Carolina Pacific	White City	Rogue River
Associated Meat	Portland	Columbia Slough
Alpenrose Dairy	Portland	Fanno Creek
Eugene Water & Electric	Walterville	McKenzie River
Pacific Power	Keno	Klamath River
Pacific Power	Klamath Falls W	Klamath River
Pacific Power	Klamath Falls E	Klamath River
Portland Rendering	Portland	Columbia Slough
Eugene Water & Electric	Eugene	Willamette
Monsanto Co.	Eugene	Storm Drainage
Roseburg Lumber	Dillard -Flake	
Royal Oak Charcoal	Whiteacity	Rogue River
Spalding & Son, Inc.	Grants Pass	
Specialty Polymers	Salem	Ditch
White City Plywood	White City	
Southern Oregon Sales	Medford	
Pacific Power	Roseburg -Toket	
Pacific Power	Roseburg -Soda	
Pacific Power	Roseburg -SL Cr	
Pacific Power	Roseburg -LEM 2	
Pacific Power	Roseburg -LEM 1	
Pacific Power	Roseburg -Fish	
Pacific Power	Roseburg Clr 2	
Pacific Power	Roseburg Clr 1	
Pacific Power	Prospect -No 4	
Pacific Power	Roseburg -Clr 1	
Pacific Power	Prospect -No 3	
Pacific Power	Prospect -No 2	
Pacific Power	Prospect -No 1	
Pacific Power	Hood River	
Pacific Power	Eagle Point	

OREGON DISCHARGE INVENTORY

MISCELLANEOUS

NAME	LOCATION
Northwest Organic Prod.	Aurora
Boardman Ind. Park	Boardman
Fibre Mold Inc.	Portland
Mt. Angel Meat Co.	Mt. Angel
Muirhead Canning Co.	The Dalles
Nebergall Meat Co.	Albany
N. Santiam S & G	Stayton
Kinzua Corp.	Kinzua
Miller Lumber	Monroe
Morse Brothers	Corvallis
Greenleaf Dairy	Greenleaf
OJA Lumber Co.	Sandy
Paradise Cove TP	Wheeler
Paris Woolen Mills	Stayton
Pedee Lumber Co.	Dallas
PGE Tryon Creek	Clackamas County
Port of Coos Bay	Coos Bay
Rogue River Hardboard	Grants Pass
Seneca Sawmill Co.	Eugene
Stout Creek Lumber	Lyons
Sunset Packing	Forest Grove
T P Packing Co.	Klamath Falls
Tillamook Asphalt Paving	Tillamook
Coast Wide Redi-Mix	Tillamook
Tillamook Plywood Co.	Tillamook
U. S. Plywood	Lyons
Valley Concrete	Independence
Vann Barrel Co.	Portland
West Foods	Salem
Westport Heights	Clatsop County
Whitneys Canning	Portland
Willamette Indust.	Foster
Stayton Canning Co.	Dayton
Stayton Canning Co.	Silverton
Ward Construction	Bend
Cabell City Mines	Baker
Georgia Pacific	Rogue River
Koppers Co., Inc.	Portland
Hubbard	Hubbard
Barlow High School	Gresham
Beaver Lake Development	Clackamas County
Boring	Boring
Sun River	Bend
Central Point	Central Point

OREGON DISCHARGE INVENTORY
MISCELLANEOUS

NAME	LOCATION
Columbia City	Columbia City
Coos Head Naval Base	Coos-Head
Culver	Culver
Daniels Moorage	Portland
Dillard	Dillard
Dorena	Dorena
Duyn Brothers	Carlton
Harbor S.D.	Brookings
Inn of the Seventh Mt.	Bend
Mapleton Grade School	Mapleton
Mosier	Mosier
Mt. Bachelor Lodge	Bend
Muir & McDonald Co.	Dallas
Nehalem	Nehalem
Oxbow Village	Oxbow
Round Lake Estates	Klamath Falls
Santa Clara S.D.	Santa Clara
Scappoose	Scappoose
St. Paul	St. Paul
Sublimity	Sublimity
Union Oil Truck Stop	Salem
Westport School	Westport
Wyne Poultry Farm	Brownsville
Lake of the Cottonwood	Lake County
Baker Bay Park	Lane County
Bonanza	Bonanza
Bonneville	Bonneville
Brawand Custom Meat	Scappoose
Falls City	Falls City
Lynnbrook Subdivision	Eugene
Manzanita Rest Area	Josephine County
Mill City	Mill City
Neighbors of Woodcraft	The Dalles
Ochoco West S.D.	Prineville
PGE Promontory Park	Portland
Richland	Richland
Foster	Foster
Manhattan Beach S.D.	Rockaway
Bremner Hills Trailer Park	Winston
Crane High School	Crane
Green Peter Dam	S. Santiam
Sheridan Novitiate	Sheridan
Oak Acres TP	Clackamas
West Tualatin View S.D.	Beaverton
Howard Prairie Park	Jackson County

OREGON DISCHARGE INVENTORY
MISCELLANEOUS

NAME	LOCATION
Hyatt Lake	Jackson County
Sunriver Properties	Bend
Black Butte Ranch	Sisters
Paisley	Paisley
Warm Springs Indian	Warm Springs
Roseburg Lumber	Riddle
Roseburg Lumber	Coos Bay
Gresham Berry Growers	Gresham
Merrill Meat Co.	Merrill
Springfield Slaughtering Plt	Springfield
Valley View Egg Farm	Woodburn
Willamette Poultry	Creswell
Stutzman Slaughter House	Sheridan
Hansell Bros. Hog Farm	Hermiston
Interstate Meats	Clackamas
Johnston Family Meat	Stanfield
Lane Feedlots	Eugene
Mallories Dairy	Silverton
McKillip Bros. Meat	St. Paul
Southern Oregon Tallow	Eagle Point
Union Mills Lib. Plt.	Canby
Albany Frozen Foods	Albany
Rogue Valley Plywood	White City
Atlantic Richfield	Albany I-5
Fiber Tech Corp.	Hood River
Simpson Timber Co.	Portland
Hub City Concrete	Albany
Abiqua Rock Products	Silverton
Central Cement	Pendleton
Frontier Leather Co.	Sherwood
Pendleton Ready Mix	Pendleton
Standard Oil	Malheur County
Timber Products Co.	Grants Pass
U. S. Gypsum	Pilot Rock
Widing Transportation Co.	Portland
Willamette Western	Progress
Waterway Terminal	Portland
Berndt Water Plant	Vernonia
Cascade Eggs	Salem
Dessert Seed Co.	Salem
Jefferson Woolen Mill	Jefferson
Lamb Weston Inc.	Hermiston
Klamath Tallow	Klamath Falls
B & D	Hood River
B & D Paving	Hood River

OREGON DISCHARGE INVENTORY
MISCELLANEOUS

NAME	LOCATION
Centennial Mills	Portland
Hakanson S & G	Oakland
Oregon Portland Cement	Huntington
Eldridge Packing Co.	La Grande
Eugene Chemical Works	Eugene
Gerber Blades	Tigard
Idaho & Oregon Rend.	Nyssa
Lake Owyhee Resort	Nyssa
Lakeview Uranium Co.	Lakeview
Lamb Canning Co.	Milton-Freewater
Multnomah Falls	Multnomah County
Oregon Fruit Products	Salem
Smith Cannery	Pendleton
Smucker Co.	Woodburn
Sunset Packing	Salem
Sweet Home Tannery	Sweet Home
Terminal Ice	Salem
The Dalles Ind.	The Dalles
Grande Ronde	Grande Ronde
Waverly Heights	Portland
West Slope	Portland
Wilsonville Mobile Park	Portland
Edgefield Center	Multnomah County
Lake Oswego	Lake Oswego
Lakeview Sub. S.D.	Lakeview
North Umpqua S.D.	Winchester
Table Rock S.D.	Medford
Umatilla Indian Res.	Pendleton
Tri City Elem. School	
Willow Lake	Medford
Wells and Sons	Hood River

NORTHWEST REGIONAL OFFICE, DEQ, PORTLAND
Work Plan for NPDES Permit Drafting

Attachment F

Feb.	Draft	March	Draft	April	Draft	May	Draft	June	Draft	July	Draft	Aug.	Draft	Sept.	Draft	Oct.	Draft
USA, Fanno Cr. USA, Beaverton Hillsboro, Rock Cr. Portland, Tryon Cr. Damascn St. Hospital Willow Island Mob. Est. Port.-Col. Blvd. STP Vernonia Clatskanie Dikeside Moorage Metropolitan Parks Found. STP Molalla Pleasant Valley Sch. Dist. Construction Aggregate, Ore. City Morris P. Kirk & Son, Inc. Herbert Malarkey Pacific Meat Silver Falls Packing Co. Pacific Carbide & Alloy Co. Armour & Co. Mult. Plywood Reynolds Alum. Pac. Trojan Union Mills Poultry Burlington Northern Ager & Davis Forest Grove Lumber Flavorland Foods, For. Grove Cal. Lbr. Co. Eagle Creek		USA, Aloha USA, Banks USA, Cornelius Canby Estacada Wood Village T&W Equip Co., A.P. Ind. Pk. Mears Controls, Beaverton Will. Hi-Grade Conc., Ptld. Will. Hi-Grade Concrete Co., Newberg Will. Hi-Grade Concrete Co., Readymix Plant Crown Zellerbach, Estacada Carnation Co., Ore. City Bird & Son Crown Zellerbach, N. Ptld. Mt. States Inv. Builders Mervin Co., Tualatin Anodizing, Inc. Beall Pipe & Tank Stauffer Chemical, N. Portland Pacific Resources Bonneville Dam, Salmon Hatchery Crown Zellerbach Columbia City		USA, Gaston Hillsboro, W. Side Gladstone Wilsonville Parkrose Water Dist. Tektronix, Inc., Beaverton Kummer Meat Co., Hillsboro Publishers Paper Co., Molalla Joe Bernert Towing, Wilsonville Brod & McClung Pace Co. Koppers Hercules Col. Cement Simpson Tbr. Owens-Ill.		USA, Metzger USA, Tigard Terra Invest., Riverbend Mobile Home Park PGE, Promontory Park GAF Corp., Progress Wash. Square Pacific Power & Light, Lincoln Samuels Lbr. N.W. Natural Gas Brand S - Portland Coast Ven'r Cargill, Inc. United Med. Lab.		Forest Grove Water Treat. Plant Ore. Regional Primate Research Center USA, Forest Grove West Linn-Bolton West Linn-Will. Berndt Subdiv., Water Coop., Vernonia Empire Lite-Rock Inc., Timber Estacada Rock Products Molalla Sand & Gravel Linnton Plywood ACF Industries Atlantic-Richfield, Linnton Term. Phillips Petrol. American Pipe Products AMF Voit Huntington Rubber Alpenrose Dairy		USA, Sunset USA, Sherwood N.W. Sand & Gravel, Milwaukie Mobil Oil Shell Oil Texaco Union Oil Co. of Calif. Time Oil Co. Union Pacific R.R., Albina Yard Rock Creek Sand & Gravel, Clackamas		Interstate Meats, Inc., Clackamas Quick Service Sand & Grav. Carver Port of Ptld. Ship Repair Yard Ptld. Union Stockyards Kaiser Cement & Gypsum Pacific Resins & Chem. Oregon Air Natl. Guard			

NORTHWEST REGIONAL OFFICE, DEQ, SALEM
Work Plan for NPDES Permit Drafting

Feb.	Draft	March	Draft	April	Draft	May	Draft	June	Draft	July	Draft	Aug.	Draft	Sept.	Draft	Oct.	Draft
Lafayette		Netarts-Oceanside		Willamina		Pacific Shrimp Company, Warrenton		City of Tillamook		Amity		Cloverdale S.D., Cloverdale		Western Modular Homes, Hubbard			
Taho Development Co., Neskowin Lodge		Rockaway		Woodburn		Point Adams Packing Co., Hammond		San Juan Fishing & Packing Company, Warrenton		Century Meadows Butteville		Sheridan		Sheridan Novitiate, Sheridan			
Nehalem		Twin Rocks S.D.				Smith's Pac. Shrimp Co., Garibaldi		Tillamook Oyster Co., Tillamook		Wauna-Westport, Westport		Carlton		Chatnicka Heights, Salem			
Wheeler		Port of Tillamook Bay		Astoria Plywood Astoria		Green Veneer, Idanha		New England Fish Company, Warrenton		Aumsville		Dallas		Eola Village McMinnville			
Yamhill		Hammond		Ore. Wash. Ply. Garibaldi		Union Oil Co. Astoria		Bell Buoy Crab Co., Seaside				Hubbard		Gervais			
Pacific City		Cannon Beach		Tillamook Asphalt Paving, Tillamook		Pedee Lbr. Co Pedee		Warrenton Crab Inc., Warrenton		Dole Company, Salem		Independence		Jefferson			
Salem, Willow Lake		City of Tillamook		Tillamook Plywood, Tillamook		Texaco Bulk Plant, Astoria		Willamette Industries, Dallas		Stayton Canning Co., Stayton		Monmouth		McMinnville			
Otter Crest		Astoria Seafood Co., Astoria		Hayes Oyster Company, Bay City		Bioproducts, Inc., Warrenton		Burkland Lbr. Co., Turner		Norpac Growers, Dundee		Silverton		Mt. Angel			
Mallorie's Dairy, Silverton		Barbey Packing Co., Astoria		Hoy Bros. Fish & Crab Co., Garibaldi		Boise Cascade, Independence		Franklin Sweed, Independence		Stayton Canning Co., Brooks		West Salem (Wallace Rd.)		West Foods, Salem			
Mt. Angel Meat Co., Mt. Angel		Bumble Bee Seafoods (cold storage), Astoria		Olson Oyster Co., Bay City		Boise Cascade, Valsetz		Stout Creek Lbr. Co., Mehama		Carlton Packing Co., Carlton		United Flav-R-Pac, Salem		Pac. Power & Light Company, Mill City			
Cascade Steel Rolling Mill, McMinnville		Bumble Bee Seafoods (Elmore Cannery), Astoria		Union Fisherman's Coop. Packing Co., Astoria				Tillamook Co. Creamery, Tillamook		Stayton Canning Company, Silverton							
Del Monte, Salem		NW Fur Breeders Corp., Astoria															
Mountain Fir Lbr. Co., Independence		Astoria Fish Factors, Astoria															
Crown Zellerbach, Wauna		Ocean Foods of Astoria, Astoria															

MIDWEST REGIONAL OFFICE, DEQ, EUGENE

Work Plan for NPDES Permit Drafting

Feb.	Draft	March	Draft	April	Draft	May	Draft	June	Draft	July	Draft	Aug.	Draft	Sept.	Draft	Oct.	Draft
Eugene Goshen Elementary School Springfield Lane County Parks, Camp Lane Crown Zellerbach, Lebanon Teledyne Wah Chang Albany Cone Lbr. Co. Goshen Internat'l Paper, Vaughn Monsanto Corp. Eugene U.S. Plywood, Mapleton Davidson Industries, Mapleton Murphy Co., Florence American Can Company, Brownsville Forrest Ind. (Permaneer) Brownsville Wyne Poultry Farm, Brownsville		Pioneer Villa Oakridge Toledo Willamette Industries, Griggs U.S. Plywood, Lebanon Willamette Industries, Philomath Boise Cascade, Adair Cladwood, Sweet Home SWF Plywood, Springfield Agripac, Eugene Barker Willamette Lumber Co., Eugene Chembond Corp., Springfield		Brownsville - north lagoon Brownsville - south lagoon West Hills San District Crestellyn Acres Country Squire Coburg Hines Lbr. Co. (Hemlock Subdiv.) Oakridge Sand & Gravel, Oakridge J.H. Baxter, Eugene Bohemia, Inc., Culp Creek Bohemia, Inc., Saginaw Bohemia, Inc., Jct. City Bohemia, Inc., Coburg Bohemia, Inc., Eugene Bohemia, Inc., Prairie Road Mika Lumber, Philomath Hull-Oakes Lbr. Dawson I.P. Miller Lbr., Monroe (Dawson)		Albany Albany (Adair Plant) PP&L, Vine St. Plant, Albany PP&L, Albany PP&L, Lebanon Willamette Industries, Albany Bio-Dry, Inc., Newport EWEB, Hilyard Steam Plant, Eugene EWEB, Hayden Bridge Filtration Plant, Eugene Georgia-Pac. Corp., Irving Rd. Plant Georgia-Pac. Corp., Jct. City Ply. Plant Georgia-Pac. Corp., Mosby Creek Pond Georgia-Pac. Corp., Prairie Rd. Plant Georgia-Pac. Corp., Springfield Pacific Resins & Chemicals, Eugene		Philomath Corvallis Airport Tangent Elemen. School Lowell Lowell Park Eugene Stud & Veneer, Eugene Brand S Corp., Cascade Resins, Eugene Sports Harbor Guistina Bros. Lbr., Eugene Natl. Metallurgical Corporation Widing Transportation Company Moser Lumber, Kings Valley System Mfg., Harrisburg N.W. Fur Breeders, Newport		Diamond Hill (Triple H Investments) Lebanon Pineway Apts., Lebanon U of O Power Plant, Eugene Southern Pac. Yards Springfield Quarry Rock Products Sea Lions Caves Kimbal Bros., Pleasant Hill Brand S Corp., Five Rivers Bumble Bee Seafoods, Newport Depoe Bay Fish Company, Depoe Bay Point Adams Packing Co., Newport Smith's Pac. Shrimp Co., Newport Yaquina Bay Fish Co., Newport New England Fish Co., Newport		Halsey Harrisburg Lincoln City Siletz Alsea Lbr. Co., Alsea Tomco, Cascadia Lester Shingle, Sweet Home Brand S Corp., Alsea Brand S Corp., Corvallis Rock Creek Water Plant, Corvallis Brand S Corp., Albany Burlington-Northern, Albany Bethel-Danebo Sand & Gravel Co., Eugene Brand S Corp., Springfield Wildish Sand & Gravel Co., Eugene		Millersburg School Dist. #32, Albany Monroe Riverview Service Corp., Albany (Riverview Heights) Salishan Leaseholders, Inc., Gleneden Beach Willamette Poultry, Creswell L.D. McFarland Eugene Hills Creek Co., Jasper Seneca Sawmill Co., Eugene Shell Oil Co. Eugene Willamette Industries, Springfield Boise Cascade Albany Ryals Trucking Albany Sweet Home Water Trt. Plant Eugene Chem. Works Road & Drive-Way Co., Newport		Fir Cove Sanitation Company Twin Oaks Elem. Sch Scio Stuckeys, Halsey Bush & Renfro, Lane Co. Springfield Slaughterhouse Brand S Corp. Natron Div. United Chrome, Albany REM Metals, Albany Hub City Concrete, Albany Depoe Bay Laundry, Depoe Bay Texaco Bulk Sales Plant, Albany Hudson House, Inc. Harrisburg	

SOUTHWEST REGIONAL OFFICE, DEQ, ROSEBURG
Work Plan for NPDES Permit Drafting

Feb.	Draft	March	Draft	April	Draft	May	Draft	June	Draft	July	Draft	Aug.	Draft	Sept.	Draft	Oct.	Draft
Medford		Riddle		Gold Hill		Bremner Hills Co-op, Winston		Eagle Point		Butte Falls		Roseburg		River Haven Mobile Pk.		Fleming Jr. High and Manzanita Grade Sch.	
Tri City S.D.		Grants Pass		Cave Junction		Green S.D		Milo Academy		Shady Vista Mobile Park		N. Roseburg S.D.		Canyonville		Myrtle Cr.	
Ashland		Redwood S.D.		Jacksonville		Bunker Hill S.D.		Brookings		Winston		Yoncalla		Douglas H.S.		Reedsport	
North Bend		Coquille		Sutherlin		Pacific H.S.		Harbor S.D.		Glide-Idleyld		Eastside		Bullards Beach St. Park		Wedderburn S.D.	
Port Orford		Oakland		Bandon						Daniel Webb, Rice Hill		Knoxtown S.D.				Ranch Motel Rice Hill	
Myrtle Point		Powers		Winchester Bay S.D.		PP&L, Toketee Plant, Idleyld Park		PP&L, Fish Cr. Station				Talent Water Trt. Plant		Sunset Bay St. Park			
PP&L, Clearwater #1, Idleyld Pk.		PP&L, Lemola #1 Idleyld Park		PP&L, Eagle Point Plant		PP&L, Prospect #1		Coos Bay-North Bend Water Board				Yoncalla Water Trt. Plant				Winchester Filter Pl.	
PP&L, Clearwater #2, Idleyld Pk.		PP&L, Lemola #2		PP&L, Prospect #2		PP&L, Prospect #3		Coquille Water Treatment Pl.		Grants Pass Filter Plant		Lakeside Water District		Roberts Cr. Water Dist.		Winston-Dillard W.D.	
PP&L, Slide Creek Point Idleyld Pk.		PP&L, Soda Springs Plant, Idleyld Park		Bates Plywood Division, Fibreboard Corp., Merlin		PP&L, Prospect #4		Superior Lbr. Co., Glendale		Riddle Filter Plant		Ore. Water Corp Roseburg		Tri-City W.D. Myrtle Cr.		Medford Water Com.	
M.C. Lininger & Son, Medford		Southern Oregon Plywood, Grants Pass		Crater Plywood Grants Pass		Steve Wilson Co., Central Point		Roseburg Lbr., Dillard		Sutherlin Filter Plant		Forrest Ind.Ltd. (Permaneer) White City		Umpqua Basin Water Assn.		Rogue Val. Plywood	
Olson-Lawyer Lbr., Medford		Concrete Steel Corp., Medford		Medford Corp.		Steve Wilson Co., Trail Creek		Douglas County Lumber, Roseburg		Sun Studs, Inc. Roseburg		Rogue River Paving Co., Medford		Bristol Silica Co., Gold Hill Operation		Carolina Pacific, Grants Pass	
Burrill Lbr., White City		Tru-Mix Const., Medford		Newbry Orchards, Ashland		Kogap Mfg., Medford		Royal Oak Charcoal Co. White City		Hanna Mining & Nickel, Riddle		White City Plywood Corp., White City		Southern Ore. Sales, Medford		Agnew Ply. Grants Pass	
Harry & David Medford		Robert Dollar Co. Glendale		South Oregon Tallow Co., Eagle Point		Georgia-Pac. Rogue River		Ross McFarland Wash. Gulch Creek Mine		Georgia-Pac., Sutherlin		Round Prairie Lbr., Fibre-Board Corp., Dillard		M.C. Lininger & Sons, Ashland		Mountain Fir Lbr. Co., Grants Pass	
Medford Veneer & Ply., White City		Glendale Plywood, Glendale		Ralf Nakanson, Oakland		Roseburg Lbr. Dixonville		Fir Ply, Inc., White City		Timber Products Co., Grants Pass		Roseburg Lbr. Co., Riddle		Double Dee Lumber, Central Pt.		Modoc Orchard Co. Medford	
Western States Ply., Port Orford		Coos Head Timber, McKenna Oper's, Coos Bay		Johnson Rock Products, Reedsport		Keller Lumber, Roseburg		Meredith Fish Co., Brookings		Vern M. Johnson, Gold Bar Placer, Cave Jct.		D.C. Toye & Co. Roseburg		Herbert Lbr. Riddle		Roseburg Lbr. Flake Bd., Dillard	
Brookings Ply Brookings		Weyerhaeuser, Coos Bay		Wooley Enterprises, Smith River, Drain		Coos Bay Packing Co., Coos Bay		Tom Lazio Fish Company, Brookings		Qualman Oyster Co., Coos Bay		Wooley Enterprises, Mt. Baldy Div.		Coos Bay Tbr. Kenrock Op.		U.S. Ply. Gold Beach	
Nordic Veneer Sutherlin		Union Oil, Coos Bay		Wooley Enterprises, Drain		Blanco Fisheries, Port Orford		Peterson Seafood, Inc., Charleston		Georgia-Pac., Coos Bay		Yoncalla		Coos Bay Tbr. Kenston Rock Prod.		Erdman Packing Co. Bandon	
U.S. Plywood Reedsport		U.S. Plywood, Glide		Wooley Enterprises, Drain Plywood		Bandon Fisheries, Bandon		Rogue River Cannery Wedderburn		Umpqua River Navigation, Reedsport		Std. Oil Coos Bay		Coos Bay Tbr. Oper., Koos-Rock, N. Bend		Bohemia Lbr. Company, Lakeside	
U.S. Plywood Roseburg		U.S. Plywood, Roseburg				Eureka Fisheries, Coos Bay		Union Fisherman's Co-op Packing Co., Charleston		Al Pierce Lbr. Co., Coos Bay		Georgia-Pac. Coquille		Roseburg Lbr. Green Dist.		Mayflower Farms, Coos Bay	
						Fisherman Co-op Assn. Charleston				Al Pierce Lumber Co. Bayshore Drive, Coos Bay		Permaneer Corp Dillard		Van Dine Meat Co., Myrtle Cr.		Nordic Ply, Roseburg	
						Hallmark Fisheries, Charleston				Al Pierce Lumber Co. Company, Mullin St. Bunker Hill							

CENTRAL REGIONAL OFFICE, DEQ, BEND
Work Plan for NPDES Permit Drafting

Feb.	Draft	March	Draft	April	Draft	May	Draft	June	Draft	July	Draft	Aug.	Draft	Sept.	Draft	Oct.	Draft
Maupin Henley High Sch., Klamath Falls		Klamath Falls, Kingsley Field The Dalles		Merrill Moro Hood River		Mt. Hood Meadows Paisley		Central Oregon Comm. College Bend Klamath Falls		Eddy's Motel		Dufur		Modoc Point Brooks Resources Corp., Black Butte Ranch South Suburban S.D. Malin		Lakeview Stadelman Fruit, Lenz & Whitney Plants, Hood Riv. PP&L, Conduit Plant, Hood Riv. PP&L, Powerdale Plant Cascade Locks, Water Treatment	
Duckwall-Pooley Fruit, Odell Klamath Ply., Klamath Falls				PP&L, Eastside Klamath Falls PP&L, Westside Klamath Falls PP&L, Keno		Klamath Ready Mix, Klamath Falls U.S. Plywood-Champion Papers, Neal Creek		Klamath Potato Dist., Malin J. Arlie Bryant, Hood River T. P. Packing, Klamath Falls		Stadelman Fruit, Inc., The Dalles Std. Oil Co. of Calif., Blue Mountain, Unit #1 The Dalles Cherry Growers, Inc. The Dalles		Lage Orchards, Hood River Moore Orchards, Hood River Walter Wells & Sons, Hood River		Brooks-Scanlon, Inc., Bend Klamath Lbr. Company, Klamath Falls Gilchrist Timber Co., Gilchrist			

EASTERN REGIONAL OFFICE, DEQ, PENDLETON
Work Plan for NPDES Permit Drafting

Feb.	Draft	March	Draft	April	Draft	May	Draft	June	Draft	July	Draft	Aug.	Draft	Sept.	Draft	Oct.	Draft
Umatilla/ McNary Wallowa Athena Cattle Feeders, Athena Top Cut Feedlots, Inc., Hermiston C&B Livestock, Inc. Hermiston Hansell Bros. Hermiston		LaGrande Baker North Powder John Day		Huntington Cabell City Mines, Granite Cornucopia Minerals, Cornucopia Munn and Schulthies, Adrian So. Board of Control, Owyhee Project J.A. Albertson, Nyssa Geo. B. Russell, Vale Munn Feedlots, Nyssa Skyline Farms, Ontario		B-C Particleboard, Island City B-C Sawmill, LaGrande B-C Sawmill, Elgin B-C Sawmill, Joseph		Heppner Boardman Stanfield		Rogers Walla Walla, Inc., Milton-Freewater Union Pacific Railroad, Hinkle Louisiana Pacific, Pilct Rock		Edward Hines Lbr. Co., Bates Kinzua Corp., Kinzua Harris Pine Mills, Pendleton San Juan Lbr. Co., John Day		Enterprise Water Trt. Plant, Milton-Freewater Ore. Concrete Products, Nyssa Water Trt. Plant, Ontario Thos. Iseri, Ontario		Fossil Condon Gardiner Enterprises	

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.

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

DEPARTMENT OF
ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 6242

TOM McCALL
GOVERNOR

KESSLER R. CANNON
Director

Gentlemen:

On the 24th of January 1972, the Environmental Quality Commission adopted rules pertaining to the sulfur content in fuel oils, specifically the following rule pertaining to residuals. 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 oil containing more than 1.75 percent sulfur by weight."

Due to an anticipated oil shortage, the Department wrote on the 15th of January, 1974 to the suppliers of residual fuel oil and requested specific information that was believed necessary to evaluate the environmental effect and to develop a workable program to provide for

maintaining adequate fuel supplies consistent with environmental needs. Although a response has not been received from all companies contacted, information has been received from some oil suppliers, distributors and major users that indicates there may be difficulty in complying with the 1.75 percent sulfur limitation for residual fuel effective July 1, 1974.

At this time the Department does not have sufficient information to justify a specific recommendation to the Commission nor to project a long range plan. Therefore, unless specific written applications with supporting information justifying a variance are received and granted by the Commission, we will have no alternative but to strictly enforce the regulation.

Since the regulations require compliance by each supplier, distributor and user, applications and supporting information must be submitted by each party. Information considered basic with each applicant is the quantities, average and maximum sulfur content of fuels to be sold, distributed or used and details of plans including dates of implementation to achieve compliance with the regulation.

Oil suppliers are expected to provide information relative to the reasons why compliance cannot be achieved. Additionally, information is needed concerning the sulfur content of residual oil being provided to neighboring states and projected short and long range plans for supplying lower sulfur fuel to users in the State of Oregon.

Applications for a variance received by the Department before June 10, 1974 will be considered by the Environmental Quality Commission at their June 21, 1974 meeting in Coos Bay, Oregon.

Each applicant is expected to appear before the Commission and respond to any questions they may have concerning your request and supply additional information as needed.

Cordially,

KESSLER R. CANNON
Director

WH:vt

SHELL OIL COMPANY
TWO SHELL PLAZA
P. O. BOX 2105
HOUSTON, TEXAS 77001

June 7, 1974

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

Gentlemen:

This is in response to your letter of May 17, 1974 concerning the announced adoption of a new limitation relating to the sulfur content of residual fuel oil which is to become effective in the State of Oregon after July 1, 1974. After a thorough review of the numerous and complex aspects involved in the production of residual fuel at our refinery facilities, we believe that Shell Oil can for the short term, comply with the provisions of paragraph (2) of Section 22-010 of the Environmental Quality Commission rules which limit the sulfur content of residual fuel.

On the basis of our own projected crude oil availabilities, however, it is recognized that it will be difficult, if not impossible, to maintain any continuing supply of residual fuel that will be in full compliance with the maximum 1.75% sulfur content requirement for any extended period into the future. Becuase of uncertainties relating to the availabilities of imported crudes, it appears that no firm commitment could be made to any specific maximum sulfur content for residual fuel beyond 60 days. Consequently, it is anticipated that occasionally situations might develop wherein fuel oil sulfur contents would exceed the maximum limit and the only recourse would be to seek relief through an emergency application for variance when that occurs.

As noted in our previous letter of April 18, 1974 relating to the sulfur problem, our primary supply of residual fuel for the Oregon area originates in the Martinez Refinery near San Francisco, California. Sulfur contents of fuels produced at this location are strongly dependent on the sulfur contents of the crude oils from which they are manufactured since we have no facilities to desulfurize residual fuel. Martinez Refinery, as a consequence, has little control over the sulfur content of the No. 6 Fuel Oil produced. In reality, the sulfur levels that are representative of prepared quantities of fuel are more directly the result of the combined effect of sulfur contents of the processed crudes and the crude oil delivery schedules. In addition, the refinery handling facilities offer little opportunity to segregate certain selected crudes that might make lower sulfur product.

Within these production constraints, the recorded sulfur levels for the first five months of 1974 at Martinez (see Figure 1 attached) are centered around a median value of 1.57% sulfur, but individual values for the inclusive period range from a low of 0.88% (in January) to a high of 2.23% (in May).

The self-evident feature in the pattern of sulfur contents in Figure 1 is the lack of any consistent, sustained value. The points scatter around a central trend value reflecting process variation but there are variances between high's and low's. These are of little consequence when variances are sufficiently lower than product quality guidelines such as the 2.5% value of the existing specification. Considerably greater significance is achieved however, when the spread of values is marginally closer to a limit value such as the 1.75% of the new regulation. Here, chance variations can exceed the limit.

Careful reexamination of the graph shows that sulfur contents in excess of 1.75% were produced in isolated examples at Martinez in January, February, April and May and there were occasions in March when the limit was approached or equalled.

An additional interpretation of the 1974 Martinez sulfur data is obtained from the cululative distribution curve of Figure 2. Derived from the same data as Figure 1, the frequency curve indicates that 83.5% of the Martinez production during January to May 1974 had sulfur contents less than, or equal to the new 1.75% sulfur limitation. (Approximately 99% had contents less than 2.0%). Thus, although it is accurate to state that the median sulfur content (at 1.57%) was within the new limit, it is equally compelling to observe that 16.5% of the production had sulfur contents surpassing the 1.75% requirement.

Any considered appraisal of the significance of these results should be made against the background of the times when it is remembered that the five-month period represented was a particularly turbulent interlude in the oil industry and was dominated by the overpowering presence of the Arab oil embargo. Neither crude rates nor crude quality could be fairly judged as representative of normal operations. Only in limited scope to they portray any semblence to situations or problems. Despite this failing, the information presented offers the only basis for support of our previous contention that "With the present crude diet, residual fuel occasionally exceeds 1.75% but does not exceed 2.0%."

Within Oregon itself, residual fuel is distributed directly from our Willbridge Plant in Portland. Supplied by tanker out of Martinez, the Willbridge terminal has recorded sulfur contents on incoming cargoes of fuel that are presented in Figure 3 for the reference period in 1974. The trends in sulfur content and the average value of 1.51% at Willbridge bear resemblence to the Martinez pattern, but the abrupt variations in sulfur values are smoothed out somewhat in the delivery process. Only one value at 1.80% (in January) exceeds the 1.75% limitation, while two others (in February and May) approach, but remain within the new restriction. It is striking that sulfur contents for late May shipments are generally lower than average and support the conclusion that present stocks on hand are in compliance with the new regulation.

Residual fuel oil is also produced at our Anacortes Refinery near Seattle, Washington. Relatively small quantities of the Anacortes fuel are available for commercial supply and these are not directly involved in additions to the Willbridge storage. Most are dispensed to satisfy local demand. Representative data on sulfur contents of residual fuel at Anacortes in Figure 4 are presented for reference only because they have no relevance to Oregon supply. The Anacortes figures, however, present a slightly altered pattern from the others. During January, February and March, typical sulfur contents are in the range of 1.3 to 1.4%. Late in March the production trend shifts to one in which the representative values are in a range of 1.8 to 1.9% and all sulfur contents in May are in excess of the 1.75% limit.

In summary, we find that there is a certain inherent process variation that is reflected in the production of residual fuel at our refineries and the most important element in the pattern of fuel oil sulfur values is the sulfur content of the crude from which the fuel oil is prepared. With the present crude diet we anticipate that there will be occasional sulfur contents that will exceed the new 1.75% limit; but on the whole, it is believed that material meeting this requirement can be provided for the near future. On this basis, there appears to be no immediate need for an application for variance. We will continue surveillance and monitoring of our residual fuel sulfur contents, but may find it necessary to seek a variance possibly on an emergency basis at a leter date should the need arise.

Present projections for the supply of crude oil in the future are still indefinite and the types of imported crude with respect to sulfur level are not known with any certainty at this time beyond 60 days. There are anticipations, however, that the Martinez Refinery might process amounts up to 50% of imported crude in the near future. Based on the expected quality of imported crudes scheduled for delivery during the next 60 days, it is probable that the average industrial fuel oil production will be less than 2.0% and could possibly meet the 1.75% maximum Oregon specification if imported crudes are received as planned.

We hope that the foregoing information will prove of value. Although this does not represent an application for variance, we plan to be represented at your June 21, 1974 meeting at Coos Bay and will be available to answer questions.

Yours very truly,

Leo Barnes, Manager
Technical Services
Commercial Sales

Attachments

cc: Regional Administrator, Region X
Federal Energy Administration
Federal Office Building
909 First Avenue
Seattle, Washington 98104

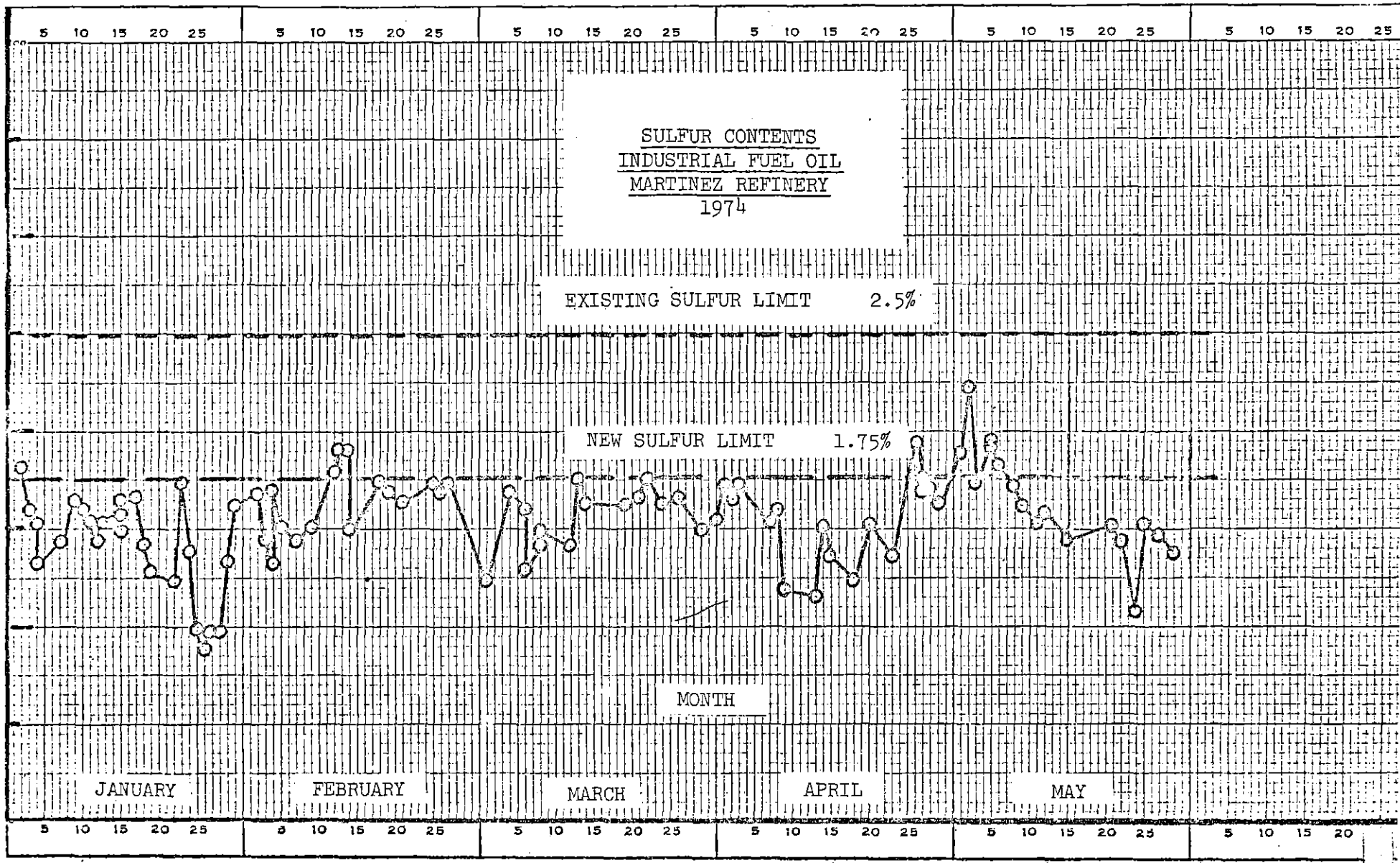
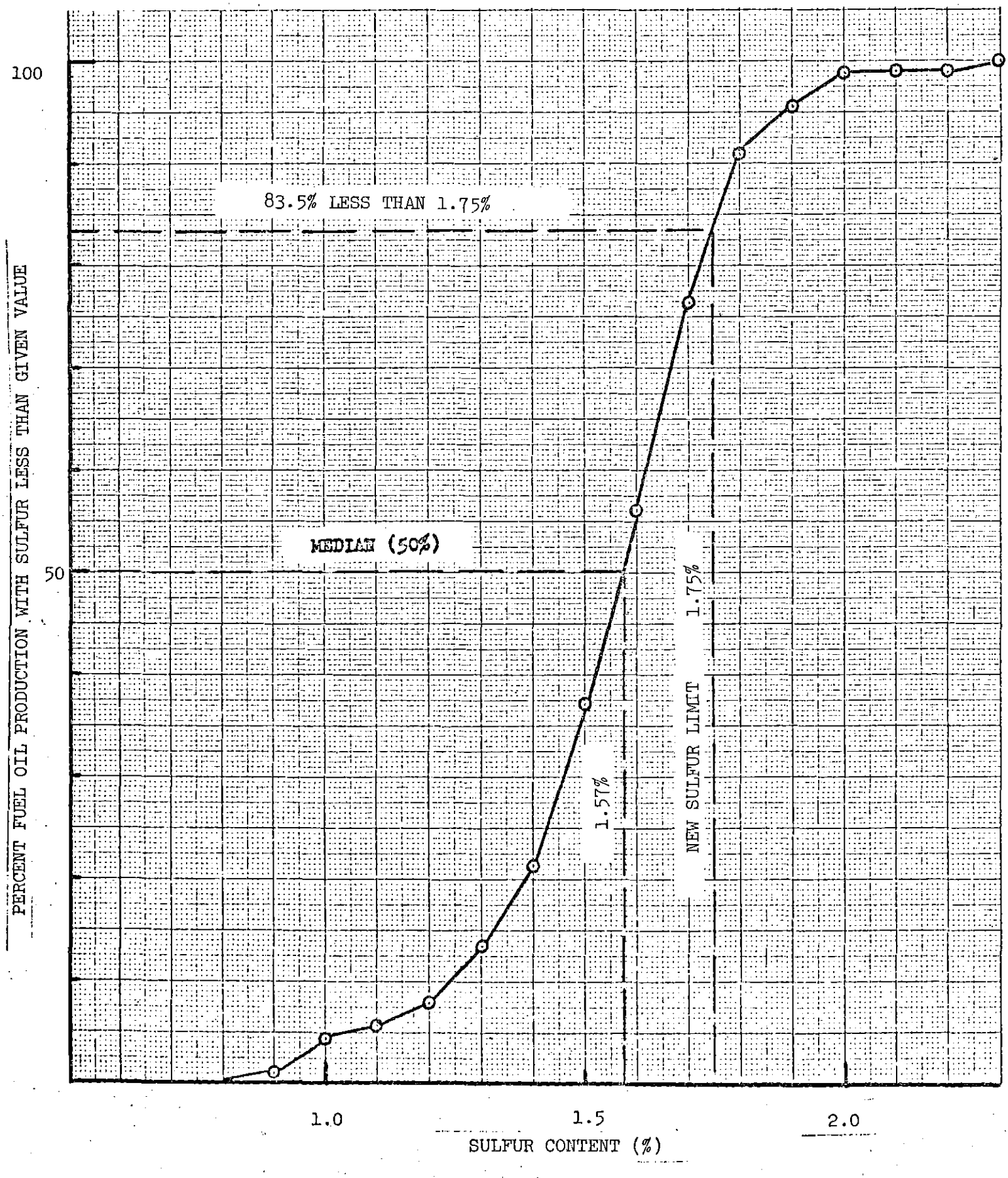

SULFUR CONTENTS
INDUSTRIAL FUEL OIL
MARTINEZ REFINERY
1974
EXISTING SULFUR LIMIT 2.5%
NEW SULFUR LIMIT 1.75%
SULFUR CONTENT (%)
3.0
2.0
1.0
5 10 15 20 25
JANUARY
FEBRUARY
MARCH
APRIL
MAY
MONTH

FIGURE 1

FIGURE 2

SULFUR CONTENTS
CUMULATIVE FREQUENCY DISTRIBUTION
MARTINEZ REFINERY
JANUARY-MAY 1974



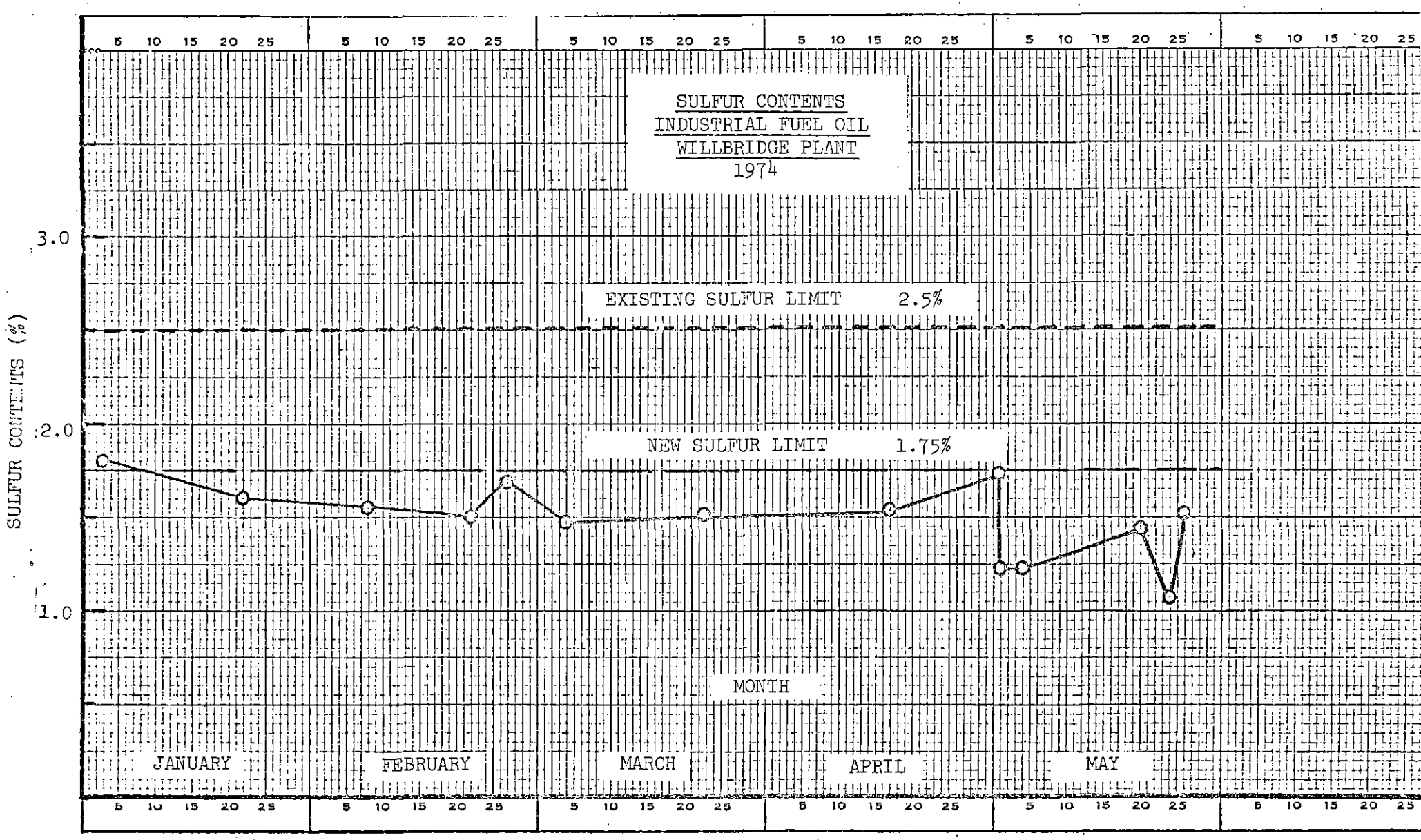

SULFUR CONTENTS
INDUSTRIAL FUEL OIL
WILLBRIDGE PLANT
1974
SULFUR CONTENTS (%)
3.0
2.0
1.0
EXISTING SULFUR LIMIT 2.5%
NEW SULFUR LIMIT 1.75%
MONTH
JANUARY
FEBRUARY
MARCH
APRIL
MAY
5 10 15 20 25

FIGURE 3

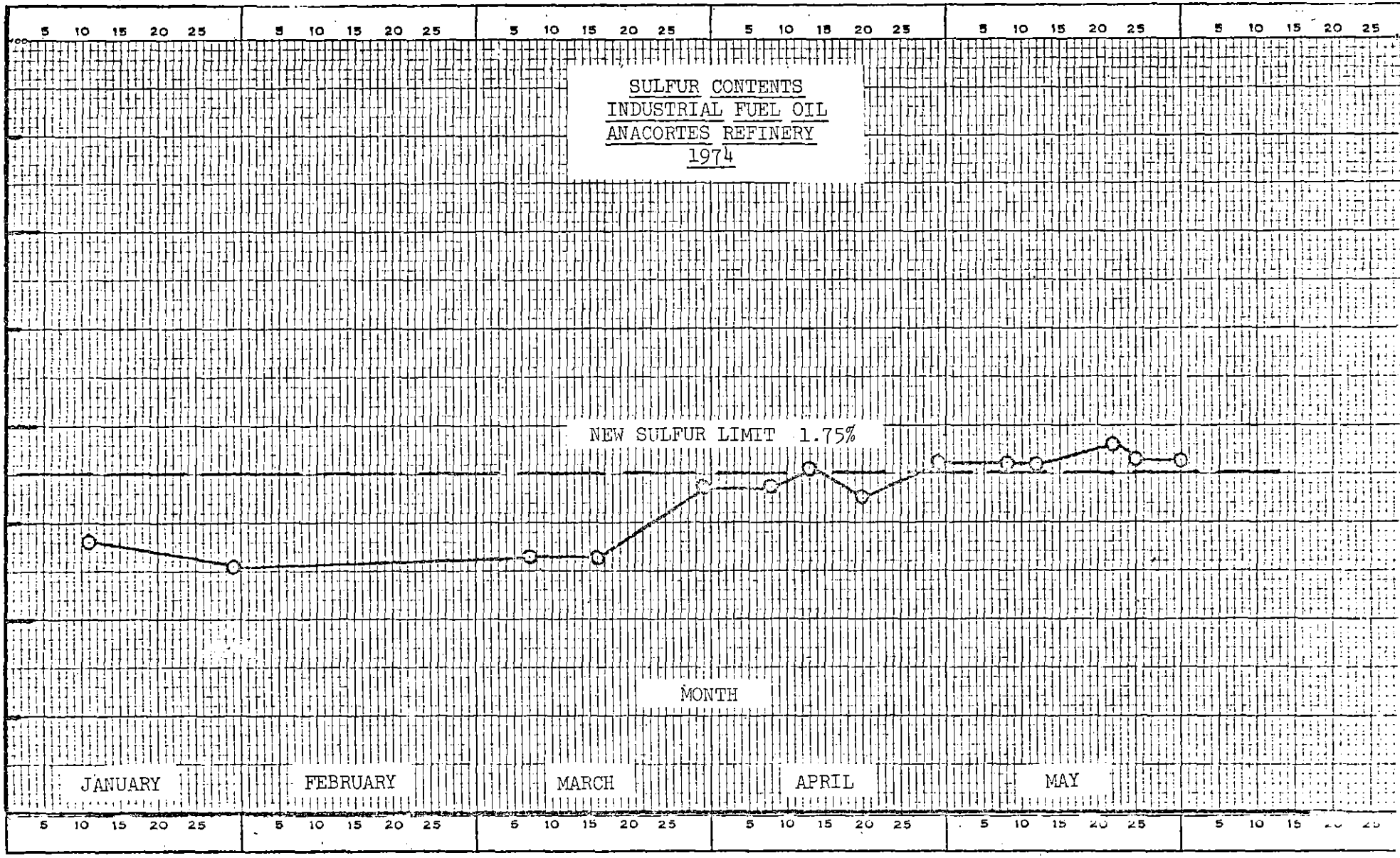

SULFUR CONTENTS
INDUSTRIAL FUEL OIL
ANACORTES REFINERY
1974
SULFUR CONTENTS (%)
3.0
2.0
1.0
NEW SULFUR LIMIT 1.75%
MONTH
JANUARY
FEBRUARY
MARCH
APRIL
MAY
5 10 15 20 25

FIGURE 4

Mobil Oil Corporation

150 EAST 42ND STREET
NEW YORK, NEW YORK 10017

June 12, 1974

Kessler R. Cannon, Director
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

Dear Mr. Cannon:

Your letter of May 17, 1974, advised us of the opportunity to apply for a variance from Oregon's statewide residual fuel sulfur content limit of 1.75 wt. % before it goes into effect on July 1, 1974.

We have looked at our situation closely and find that we will have no immediate problem meeting the new limit. However, as we stated before in our February 8, 1974 letter to your department, Mobil's availability of maximum 1.75 wt. % sulfur residual fuel will be affected by a number of factors over which we have no control. These include, for example, the continued cutback of low sulfur crude from Canada to our Ferndale, Washington refinery with consequent substitution of higher sulfur foreign crude imports.

It is quite possible, therefore, that Mobil will seek a variance in the not too distant future based on solid reasons why compliance will be difficult to achieve.

Very truly yours,

W H Broderick

DMacD/mr

W. H. Broderick, Manager
Distribution and Traffic

AtlanticRichfieldCompany
Products Division
1500 S.W. First Avenue
Mailing Address: Box 1571
Portland, Oregon 97207
Telephone 503 224 2150

June 17, 1974

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

Attention: Mr. Kessler R. Cannon, Director

Gentlemen:

Please accept our apology for the delay in responding to your letter of May 17, 1974.

At the present time, we are not certain that we can comply with Section 22-010, limiting the sulfur content of residual fuels to not more than 1.75% by weight. We, therefore, request a variance for a period of ninety days from the effective date of the regulations.

Very truly yours,

M. E. FITZPATRICK, Manager
Heating Oil Marketing

MEF:pj

cc: Mr. J. L. Keyser
Mr. R. M. McKee
Mr. J. Pendergraft
Mr. D. L. Peterson
Mr. J. W. Raffety
Mr. R. S. Webb
Mr. J. R. Williams

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

June 5, 1974

Mr. Kessler R. Cannon, Director
State of Oregon
Department of Environmental Quality
Environmental Quality Commission
1234 S. W. Morrison St.
Portland, Oregon 97205

Dear Mr. Cannon:

In accordance with the provisions of Section 449.810 dealing with variances from particular requirements of any environmental quality rule, the Union Oil Company requests a variance from the Oregon Administrative Rules, Chapter 340, Division 2, Subdivision 2, Section 22-010(2) concerning the sulfur content of residual fuel oils.

This Company relies in part on imported crude oil to operate its refineries and maintain product supply to its customers. In the normal supply environment for such crude oil, specific crude oils can be processed through the refinery in such a manner as to control sulfur in residual products to predictable limits.

In today's crude oil short environment, this supply flexibility no longer exists. Crude is purchased where and when available. Thus, although the same overall average sulfur level may be achieved, the processing operations cannot be programmed effectively to guarantee a steady availability of 1.75% sulfur residual fuel oil after July 1, 1974.

The Union Oil Company, therefore, respectfully requests a variance to allow it to supply fuel oil averaging 2.5% maximum sulfur to and through the Oregon market during the continuing period of uncertain crude oil supply. In your May 17th letter to Mr. W. M. Shreve, you indicate you will consider variance requests at your June 21 meeting in Coos Bay. We request that this application be included and we will be prepared to discuss any details at that time, or earlier at our mutual convenience.

Your May 17 letter also asks for data concerning sulfur content of residual fuels Union sends to other locations. The attachment summarizes this information.

You also requested our short and long range plan to bring our sulfur levels into compliance with your Oregon limits. The plan is wholly dependent upon our ability to acquire imported crude supplies at adequately low sulfur levels. In order to fill our refineries for the balance of this year, we anticipate processing from 0 to 65MB/D of imported crudes. The foreign crudes we are able to purchase will come predominently from Arabian and Iranian sources. For the longer term, our plan is to purchase lower sulfur foreign crudes and by 1977 we expect to be able to acquire North Slope Alaskan crude. Consistent with this plan, we request our variance request for 2.5% average sulfur level to be effective through June 30, 1975. As we approach that time, we would discuss our then projected position and modify our sulfur variance request to the lowest attainable level.

Sincerely,

C. R. WARNOCK

attch.
CRW:ed

DATA SUMMARY

Bunker Fuel Oil - Production and Sulfur Data - Union Oil Co. of California

	1972 MB/MO	1973 MB/MO	1974 MB/MO	4 Mos.
High sulfur fuel oil produced at California refineries and distributed to non-controlled areas including export and ship bunkers and to controlled areas in Washington permitting sulfur contents greater than 2½%. Sulfur content is in 2½-4½% range.	112	78	39	
Low sulfur fuel oil produced at California refineries and distributed to controlled areas such as Oregon and parts of Washington. Sulfur maximum of 2.5% for Oregon * and 2.2% for controlled parts of Washington.	448	401	330	
Very low sulfur fuel oil produced at California refineries and distributed to public utilities requiring 0.5% maximum sulfur fuel oil.	314	446	303	

* Detail on fuel oil deliveries to Portland, Oregon

Date	Quantity	Source	%S
1/6/73	41MB	LA	1.94
2/1/73	31MB	LA	1.74
2/12/73	24MB	LA	1.85
3/3/73	14MB	LA	2.01
7/11/73	14MB	LA	2.03
9/11/73	6MB	LA	2.13
10/10/73	28MB	LA	1.83
10/22/73	54MB	LA	2.01
11/15/73	55MB	LA	2.25
11/16/73	27MB	LA	2.20
11/25/73	38MB	LA	2.20
12/10/73	81MB	LA	2.40
12/24/73	63MB	LA	2.25
12/25/73	13MB	LA	2.25

Date	Quantity	Source	%S
1/4/74	67MB	LA	2.13
1/13/74	81MB	LA	1.76
2/15/74	56MB	LA	1.63
3/22/74	15MB	LA	1.62
3/25/74	22MB	LA	1.62
4/5/74	14MB	LA	1.68

OHI

THE OIL HEAT INSTITUTE OF OREGON / 1927 N.W. KEARNEY / PORTLAND, OREGON 97209 / PHONE 224-4231

June 10, 1974

Mr. Kessler R. Cannon, Director
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

Dear Mr. Cannon:

In support of our request for a variance or Special Rule covering distributors and users of residual oils, as these products are affected by the sulfer regulations, we submit the following information:

1. This request is in conformity with 468.345:

   (a) Conditions exist that are beyond the control of the persons granted such variance.

   (b) Special circumstances render strict compliance unreasonable, burdensome or impractical.

   (c) Strict compliance would result in substantial curtailment or closing down of a business, plant or operation.

   (d) No other alternative facility or method of handling is available.

(a) The distributors and users of residual oils have no control over the quantity or specifications of the product involved. Both are totally dependent upon what is provided by the Prime Supplier. Neither group can in any way change the quality of the residual oils or influence the specifications to comply with regulations.

(b) Special circumstances: Because of the world demand for crude oil and the varying composition of these oils it becomes increasingly difficult to forecast the specifications of the finished product.

The distributors and users find themselves in the position of accepting what is available. The Prime Supplier is faced with the facts of, on one hand, an unsure crude supply, and the need to increase the amount of product produced to meet the demands brought about by ever increasing Natuaral Gas interruptions.

(c) Strict compliance combined with the aforementioned gas cut-offs would result in the curtailment or shutdown of industry, with the resulting economic impact, and the danger and discomfort to many citizens because of heating system stoppage.

(d) As of this date, no alternative is readily available to answer the needs.

Continuing effort is being made by the Institute, it's members, and those served by this industry to work with the Prime Suppliers to resolve this problem within the regulations.

These Suppliers have expressed a cooperative spirit and have reiterated their desire to comply with the requirements. The principal concern is their inability to guarantee what crude source will be available in future months and the consequence in sulfer content of their finished product. Few seem to feel that at any time will the July '72 requirements be violated and most contend that presently the 1974 standards are being met.

It would seem practical that a special rule be adopted allowing that if a variance is granted to a Prime Supplier any distributor or user of that product would be covered by that variance.

Sincerely yours,

OIL HEAT INSTITUTE OF OREGON

Leonard Gassner
Executive Director

LG/sf

OHI

THE OIL HEAT INSTITUTE OF OREGON / 1927 N.W. KEARNEY / PORTLAND, OREGON 97209 / PHONE 224-4231

June 4, 1974

Mr. Kessler R. Cannon, Director
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

Dear Mr. Cannon:

In compliance with "Section 22-010" we are submitting an application for a variance in the use of residual oil not to exceed the July 1972 Sulfur Standard in the State of Oregon for a 90 day period starting July 1, 1974.

Because of the potential far reaching effects of the regulations this application would cover all the distributors and users of residual products. To the best of our knowledge there are 20 to 30 individual distributors and 3,000, or more, end-users who would be effected by this request.

We fully realize that the regulation, as written, requires individual application for variance. At the time of writing this had a reasonable connotation but in view of todays situation we feel sure that the Commission would not anticipate that all 3,000 users be required to individually present such data.

Although, at the time of this writing, little, if any, product exceeds the 1.75% standard it is impossible to guarantee, or even predict, the future composition of product.

In the market today, oil is completely contingent upon the crude supply and availability. The individual distributor and end-user has absolutely no control over the product obtainable and is indeed fortunate to maintain operations or comfort in light of natural gas cut-off for an unprecedented 180 to 210 days.

It is our understanding that each Prime Supplier of residual oils will request a variance, if needed, for the same period covered in this request.

OIL HEATS BEST

Because of the impact of the problem upon the economy, safety and health of the people of Oregon and because of the national supply situation (appendix A) we request that this conditional variance be granted at the June 21, 1974 meeting of the Commission.

Sincerely yours,

OIL HEAT INSTITUTE OF OREGON

Leonard Gassner
Executive Director

LG/sf

Table 6

RESIDUAL FUEL OIL SITUATION

	Fourth Quarter 1973 MB/D	Fourth Quarter 1973 Percent of Total Demand	First Quarter 1974 MB/D	First Quarter 1974 Percent of Total Demand
Demand				
Heating	524	17.2%	623	17.4%
Industrial	510	16.7	594	16.6
Electric Utilities	1,538	50.5	1,893	52.7
Oil Company Use	125	4.1	130	3.6
Vessels	220	7.2	210	5.9
Military	76	2.5	91	2.5
Other	54	1.8	46	1.2
TOTAL DEMAND	3,046	100.0	3,587	100.0
TOTAL SUPPLY	2,637	86.6	2,535	70.6
Deficit	409	13.4	1,052	29.4

Table 2

SHORTFALLS AND STRATEGIES, FIRST QUARTER 1974
(Quantities in thousands of barrels per day)

Product	Gross Shortage: Thous. Bbls. per Day	Gross Shortage: Percent of Unconstrained Demand	Actions Taken or Announced: Action	Fuel Saving	Shift in Refinery Output[1]	Net Shortage	Potential Actions
Jet Fuel	400	32%	25% reduction in airline schedules	220	180	-5	Conversion from kerosine-type to naphtha-type jet fuel
			General aviation restriction	5		(Surplus)	
Gasoline	700	11	15% reduction through allocation program published December 12	900	-780	572	Price increase, tax increase, coupon rationing
			General aviation restriction	8			
			50-55 m.p.h. speed limit[2]	(200)			
			Sunday gas station closings[2]	(50)			
Distillate Fuel Oils	900	17	Reduction of 6° in residential and 10° in commercial heating	490	400	-30	
			Other reductions published December 12	40		(Surplus)	
Residual Fuel Oil	860	24	Oil to coal switch in 26 power plants	200	200	--	Excessive use taxes on electricity and natural gas
			Allocation program and reduced heating, published December 12	260			
			Voluntary conservation	200			
Other Petroleum Products	400	10	Allocation program published December 12	400		--	
TOTAL	3,260[3]	16.3		2,723	--	537	

[1]Cost of Living Council regulations published December 4 encourage refinery shift; projected shifts remain to be validated.
[2]Actions taken to restrict demand, but impact is subsumed in supply restriction through allocation program.
[3]Differs slightly from total of 3,271 shown on Table 1 owing to independent rounding of various components.

IMPORTS SITUATION, FOURTH QUARTER 1973

IMPORTS OF CRUDE OIL AND REFINED PRODUCTS

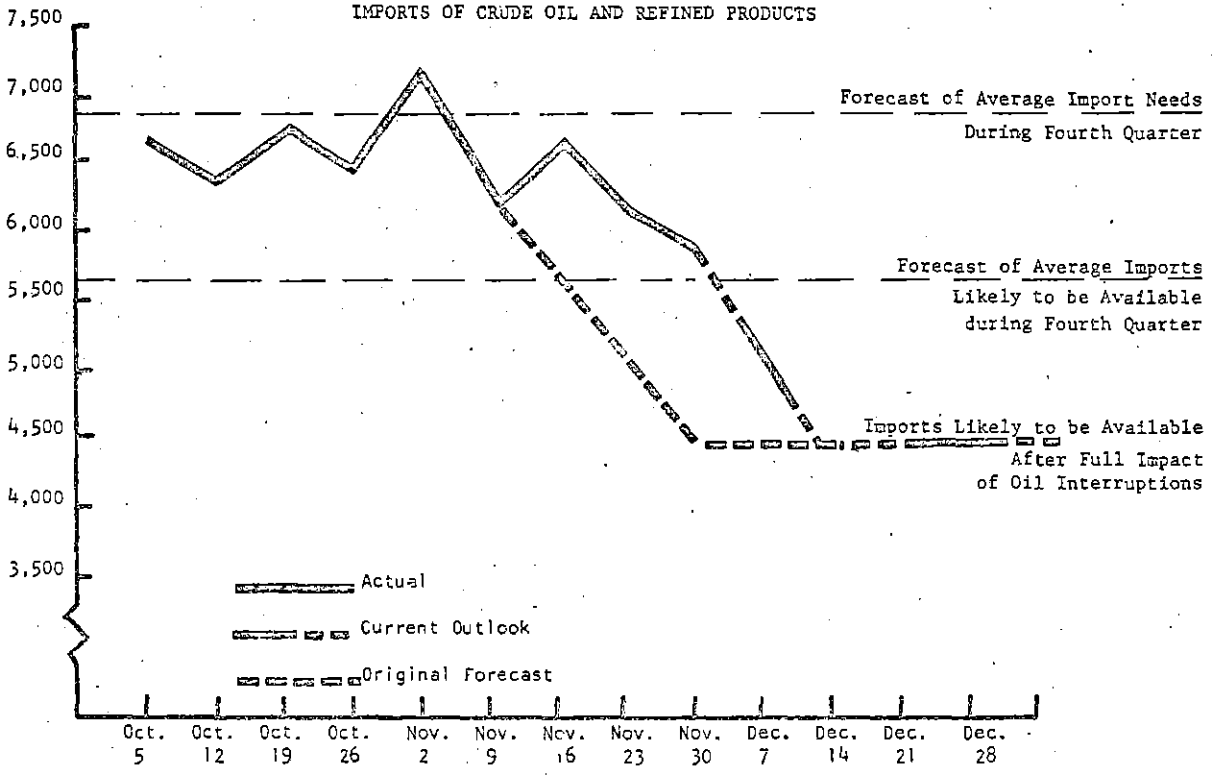
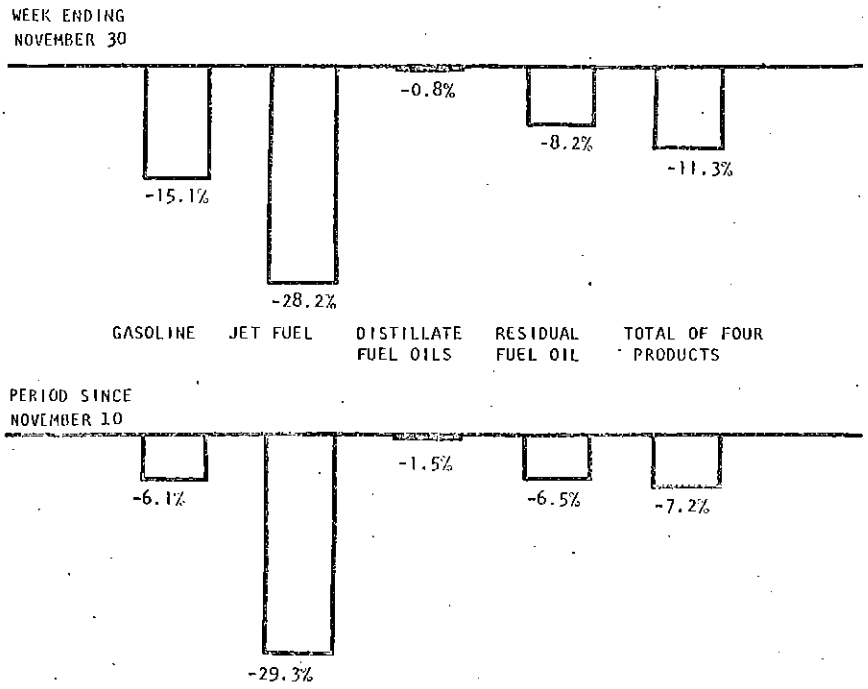


CHART 4

DEMAND SITUATION

PERCENTAGE VARIATIONS OF ACTUAL DEMAND FROM FORECAST



PETROLEUM SITUATION REPORT
WEEK ENDING NOVEMBER 30, 1973

EMPIRE FUEL
HEAT

HEATING OILS
WOOD
FURNACE SALES
FURNACE REPAIR

Telephone 267-2112
320 N. FRONT • COOS BAY, OREGON 97420

May 28, 1974

Mr. Kessler R. Cannon
Department of Evironmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

Dear Mr. Cannon,

In answer to your letter of May 17th Empire Fuel Inc. would like to request a variance in the 1.75 per cent sulfur by weight requirement for residual fuel oils.

We will be represented at your June 21st meeting in Coos Bay, Oregon.

Sincerely yours

James A. Cahill

JAC:jl

OFFICE & PLANT
TELEPHONE 362-3633

VALLEY Oil Company, Inc.

1790 16TH STREET S.E. • P. O. BOX 551
SALEM, OREGON 97302

ROBERT W. DELK
PRESIDENT

MICHAEL W. DELK
VICE-PRES.

JAMES R. WILSON
VICE-PRES.

O. R. KENNEN, JR.
SECRETARY
AND TREASURER

Asphalt Paving — General Contracting — Heating Oils

Environmental Quality Commission
5th Floor
Terminal Sales Bldg.
Portland, Ore. 97205

June 6, 1974

Attention: Kessler Cannon, Director of Department of Environmental Quality

Re: Section 22-010 Chapter 340, Oregon Administrative Rules

Gentlemen:

As a distributor of residual fuel oils, to approximately 110 customer users, we hereby request a permanent variance on behalf of our company as distributor and our customer users as a class, from the provisions of Subsection 2, Section 22-010, Chapter 340 of Oregon Administrative rules, Department of Environmental Quality, by deletion of the requirements of said subsection 2 of Section 22-010.

As grounds for said request, we rely upon ORS 468.345 Sub (a) and assert that,

> Conditions exist that are beyond the control of Valley Oil Company and its customers.

Specifically, Valley Oil Company has been advised by its supplier, ARCO, that the supplier's residual fuel oils will not meet the specifications imposed by Section 22-010, Subsection 2, and that they will no longer be able to provide residual fuel oils after June 30, 1974.

Valley Oil Company and its customers, to the best of its knowledge, do not have an alternative source of supply and without a variance will be forced out of the residual fuel oil business and its customers required to shut down.

Very truly yours,

VALLEY OIL COMPANY

J.R. Wilson

JRW/mp

GENERAL FOODS CORPORATION / *P. O. Box 568*
FOOD PRODUCTS DIVISION *Woodburn, Oregon 97071*

June 10, 1974

Mr. Kessler R. Cannon
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

Dear Mr. Cannon:

On behalf of Food Products Division of General Foods Corporation in Woodburn, Oregon, we are requesting a variance from Section 22-010, subsection 2, in complying with the July 1, 1974 requirement of the discontinuation of use of residual fuel oils containing more than 1.75 percent sulfur by weight. This variance is filed under the authority of ORS 468.345 and its duration is respectfully requested for a minimum of one year.

It is our understanding that the PS-300 fuel oil we receive from the Valley Oil Company, 1790 16th Street, S. E., Salem, Oregon has no guarantee it will not exceed 1.75 percent of sulfur by weight. (Refer to the attached letter from Atlantic Richfield Company.) Our annual usage will vary from 100,000 to 400,000 gallons depending on the availability of natural gas, which this year could be curtailed by September 1. (Refer to the attached letter from Northwest Natural Gas Company.)

Since early September is the height of our harvest and processing season, and if fuel oil is not available, plant shutdown would be necessary and result in the layoff of approximately 1,200 employees. This could place a significant economic impact on the Woodburn and surrounding areas since the lost wages would approach $2,300,000. In addition, upwards to 30,000,000 pounds of corn, cauliflower, and/or brussels sprouts could not be processed with the potential loss to area farmers of up to $4,000,000.

We feel justified in requesting such a variance for the following reasons:

1. General Foods Corporation has no control over the chemical composition of our fuel oil supplied by Arco.

BIRDSEYE

2. Our boilers are equipped to fire with only natural gas or residual fuel oil and a change is both costly and time consuming.

3. Without fuel to fire our boilers, a plant shutdown would result with a significant financial impact to the surrounding community.

4. Without natural gas or residual fuel, we have no other alternative to operate or process our perishable product.

It is our intention to have representatives at the Environmental Quality Commission meeting in Coos Bay, Oregon on June 21, 1974 to support our request for this variance.

Very truly yours,

GENERAL FOODS CORPORATION
FOOD PRODUCTS DIVISION

C. J. Kiefer
Plant Manager

CJK:pr
Attachments

NORTHWEST NATURAL GAS COMPANY

123 N.W. Flanders Portland, Oregon 97209

(503) 226-4211

April 23, 1974

Birds Eye Division
General Foods Corporation
Woodburn, Oregon 97071

Subject: Your facilities at 101 Birds Eye Avenue, Woodburn, Oregon

Gentlemen:

In view of the possibility that acquisition of alternate fuels may be difficult again this year, you may find it useful to have an indication of the probable gas supply situation for the 1974-75 winter.

While it is too early for a precise estimate, it is expected that the exposure of interruptible customers to natural gas curtailments will be substantially greater than during the past season. Preliminary appraisals indicate that service may be curtailed as much as 180 to 210 full days, depending upon weather conditions and other variables. Curtailments could begin as early as September 1974 and extend into May 1975.

The increases in curtailment are based upon the probability that the reduction in supply which was experienced last November due to water encroachment in Canadian wells supplying our system will not be corrected before 1975-76 winter period. Our pipeline supplier is making every effort to reduce the effect by obtaining gas from other sources, but this is difficult in the current energy crunch. We ourselves have purchased Alaskan gas to be brought into our area as LNG but several approvals are still required. The LNG will be used on a year-round basis and will benefit all of our customers. This additional supply has not been considered in our present forecasts, although there is a remote possibility that it could be available early in 1975.

Please complete and return the attached notification sheet in the enclosed self-addressed envelope at this time so that our records can be updated.

Yours very truly,

E C Phillips

E. C. Phillips
Manager
Gas Control Department

Enc. 2

AtlanticRichfieldCompany Products D[illegible]ion
1500 S.W. First Avenue
Mailing Address Box 1571
Portland, Oregon 97207
Telephone 503 224 2150

April 29, 1974

[illegible] Oil Co., Inc.
P. O. Box [illegible]
Salem, Oregon 9[illegible]

Attention: Mr. Robert [illegible]

Gentlemen:

On November 13, 1972, we provided you with a copy of the proposed addition to Chapter 340 of the Oregon Administrative Rules, Department of Environmental Quality, Air Quality Control Division.

In particular we called your attention to Section 2 wherein it was proposed that "after July 1, 1974, no person shall sell, distribute, use or make available for use within the state of Oregon any residual fuel oil containing more than 1.75% sulphur by weight."

On January 24, 1973, Section 22-010 covering residual fuel oils was adopted by the Department of Environmental Quality. Attached for your reference is a copy of Subdivision 2, Sulphur Content of Fuels. A complete copy of Chapter 340 may be obtained from:

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

In view of the adoption of this rule by the Department of Environmental Quality, we wish to advise that residual fuel oils supplied by Atlantic Richfield Company will not meet this specification, which requires that "no person shall sell, distribute, use or make available for use any residual fuel oil containing more than 1.75% sulphur by weight."

Unless the state of Oregon grants a variance or a delay in enacting this law, we will be unable to satisfy this demand and will, therefore, be unable to provide residual fuels after June 30, 1974.

Very truly yours,

M. E. Fitzpatrick

M. E. FITZPATRICK, Manager
Heating Oil Marketing

MEF: pj
Enclosure
cc: Mr. G. J. Dunne
Mr. L. S. Morgan
Mr. R. D. Shortt

TELEPHONE 648-2141

GENERAL FOODS CORPORATION / *Hillsboro, Oregon 97123*
BIRDS EYE DIVISION

June 10, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
JUN 10 1974
OFFICE OF THE DIRECTOR

Environmental Quality Commission
1234 Southwest Morrison Street
Portland, Oregon 97205

Attention: Mr. Kessler R. Cannon, Director

Dear Sir:

This letter is submitted as application for variance from Section 22-010, sub-section 2 of the Environmental Quality Commission Rules (Residual fuel oils) as authorized by ORS 468.345.

This facility (Food Products Division, General Foods Corporation, Hillsboro, Oregon) is engaged in the processing of fresh, highly perishable fruits and vegetables. Processing delays of only a few hours will yield spoiled product. Primary finished products are frozen strawberries, cooked squash, broccoli and combination vegetable mixes. The major operating period is June - December annually, but some fresh processing continues during the months of January - May.

The Plant utilizes three (3) boilers to generate up to 830 H.P. of steam for use in processing and facility heating. All boilers are designed to use natural gas and PS300 residual fuel oil to fire the furnaces. Due to design criteria and age of boilers, these fuels are the only available types that can be effectively utilized. Natural gas is the primary fuel with PS300 residual fuel oil being used when gas service is interrupted.

In this day of on again/off again fuel shortages we find it difficult to estimate annual PS300 consumption, but we expect to have gas service interrupted during a major portion of the period September 1 - March 15. Our best estimate is that we will use 150M-200M gallons of PS300 fuel oil during this period.

As is the case with all end users, we have no control over the chemical content of the PS300 fuel oil delivered to our facility. We are told that it generally meets the 1.75% sulfer content requirement, but cannot be assured of continued and constant compliance with this requirement.

BIRDSEYE

Our supplier (Valley Oil Company, Salem) is filing similar application for variance due to the fact that they also have no control over their supply. In turn, Valley's prime supplier (Arco) is making similar application. Attached is data effecting these applications.

Therefore this variance application is submitted under the following provisions of ORS 468.345, Section (1):

a) As an end user of PS300 residual fuel oil, we have no control over the sulfur content.

b) The physical condition of our boilers permits us to utilize only PS300 residual fuel oil as an alternate to natural gas, which is interrupted for a substantial period of time due to lack of availability.

c) Strict compliance to the afforementioned requirement will result in substantial curtailment of our operations and lead to certain closure of this facility, which will lead to a $10,922,000 loss to the economy of Oregon (see confidential attachment).

d) No alternate fuel, supplier, or method of operation is yet available.

We are requesting a standing variance which would remain in effect until major oil suppliers and our distributor are in a position to assure continued compliance with Section 22-010, sub-section 2 of the Environmental Quality Commission Rules, or for a minimum of one year beginning July 1, 1974.

We expect to appear, or have a representative appear, at the June 21 meeting of the Commission; but if unable to do so, we request your consideration of this variance application.

Sincerely,

Marlin G. Nelson
Plant Manager

cc: R. E. Cerosky
L. F. Young

MGN/cs

Enclosure

Del Monte Corporation • Northwest Division, Plant No. 156, P.O. Box 14130, Portland, OR 97214 • Telephone (503) 235-3123

June 13, 1974

Mr. Kessler R. Cannon
DEQ Director
Environmental Quality Commission
1234 S. W. Morrison Street
Portland, Oregon 97205

Dear Mr. Cannon:

This letter is a request by Del Monte Corporation for variance from Section 22-010 subsection (2) of OAR, specifically regarding the 1.75% sulfur by weight requirement.

We are filing this variance under the authority of ORS 468.345, and specifically request a variance for a minimum of one year.

We have been informed by our basic fuel supplier, Northwest Natural Gas, that as an interruptible customer, we may be curtailed on our fuel supply between September and March. Since September is one of our peak operating periods, we would be forced to turn to our standby sources of fuel which is Arco #535 residual fuel oil.

We have been informed by Arco that they cannot meet this 1.75% sulfur by weight regulation, and as a result, we would be forced to close down our plant operation.

We have one food processing plant in the State of Oregon located at Salem, and if we were to shut down this unit in the early part of September, we would still have remaining to process about 30% of our Green Bean pack, 50% of our Beet pack, and 100% of our Carrot pack. To lose this amount of raw product at the cost paid to our growers would result in a $1,580,000 loss. This, of course, would also add to the already critical shortage of canned foods on the nationwide basis.

Since I will be unable to attend the meeting in Coos Bay on the 21st, I hope the facts we have provided will be obvious enough to influence the Commission's decision in favor of the variance.

Very truly yours,

DEL MONTE CORPORATION
Northwest Division

R. B. Bornhecker
Purchasing Manager

RBD:ds

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
JUN 13 1974
OFFICE OF THE DIRECTOR

Wright W. Hanson

Del Monte Corporation • Northwest Division, Plant No. 156, P.O. Box 14130, Portland, OR 97214 • Telephone (503) 235-3123

June 13, 1974

Mr. Kessler R. Cannon
DEQ Director
Environmental Quality Commission
1234 S. W. Morrison Street
Portland, Oregon 97205

Dear Mr. Cannon:

This letter is a request by Del Monte Corporation for variance from Section 22-010 subsection (2) of OAR, specifically regarding the 1.75% sulfur by weight requirement.

We are filing this variance under the authority of ORS 468.345, and specifically request a variance for a minimum of one year.

We have been informed by our basic fuel supplier, Northwest Natural Gas, that as an interruptible customer, we may be curtailed on our fuel supply between September and March. Since September is one of our peak operating periods, we would be forced to turn to our standby sources of fuel which is Arco #535 residual fuel oil.

We have been informed by Arco that they cannot meet this 1.75% sulfur by weight regulation, and as a result, we would be forced to close down our plant operation.

We have one food processing plant in the State of Oregon located at Salem, and if we were to shut down this unit in the early part of September, we would still have remaining to process about 30% of our Green Bean pack, 50% of our Beet pack, and 100% of our Carrot pack. To lose this amount of raw product at the cost paid to our growers would result in a $1,580,000 loss. This, of course, would also add to the already critical shortage of canned foods on the nationwide basis.

Since I will be unable to attend the meeting in Coos Bay on the 21st, I hope the facts we have provided will be obvious enough to influence the Commission's decision in favor of the variance.

Very truly yours,

DEL MONTE CORPORATION
Northwest Division

R. B. Dornbecker
Purchasing Manager

RBD:ds

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
JUN 13 1974
OFFICE OF THE DIRECTOR

PHONE: AREA CODE 503, 769-2101

Stayton Canning Company Cooperative

AFFILIATED WITH NORTH PACIFIC
CANNERS AND PACKERS INCORPORATED

ALSO PLANTS AT:
SILVERTON, DAYTON, SALEM AND BROOKS OREGON

PACKERS OF
BERRIES • PURPLE PLUMS • CHERRIES
BLUE LAKE BEANS • CORN • CARROTS

P. O. BOX 458
STAYTON, OREGON 97383

June 4, 1974

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

ATTENTION: Mr. Kessler R. Cannon, Director

Dear Sir:

It is respectfully requested that Stayton Canning Co., Cooperative (Plant No. 1) located in Stayton, Oregon, be granted a variance from the requirement of Oregon Administrative Rules Section 22-010 (2), and be allowed to use residual fuels with a sulfur content not exceeding 2.5% by weight, during the 1974-1975 processing and heating season.

This request is based on the following: *ORS 468.345 (1) (a)&(c)*

A. Conditions exist that are beyond the control of Stayton Canning Co., Cooperative.
   1. Northwest Natural Gas Company has predicted that natural gas curtailment could begin as early as September 1974.
   2. The residual boiler fuels are purchased from a distributor for Mobil Oil Co., Capital City Transfer Co., Salem, Oregon. No control over the sulfur content of the fuel oil used can be exercised.
   3. The Federal Energy Office allocations program and the limited fuel oil supplies prevent the user from changing his source of supply.

C. Strict compliance would result in closing down of the plant. During the peak processing months, fuel oil deliveries from the distributor are required on a daily basis. If the deliveries are interrupted, the plant must shut down.

Yours truly,

Tom Villman

Tom Villman, Project Engineer

PHONE: AREA CODE 503, 769-2101

Stayton Canning Company Cooperative

AFFILIATED WITH NORTH PACIFIC
CANNERS AND PACKERS INCORPORATED

ALSO PLANTS AT:
SILVERTON, DAYTON, SALEM AND BROOKS OREGON

PACKERS OF
BERRIES • PURPLE PLUMS • CHERRIES
BLUE LAKE BEANS • CORN • CARROTS

P. O. BOX 458
STAYTON, OREGON 97383

June 4, 1974

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

Attention: Mr. Kessler R. Cannon, Director

Dear Sir:

It is respectfully requested that Stayton Canning Co., Co-operative (Plant No. 2) located in Silverton, Oregon, be granted a variance from the requirement of Oregon Administrative Rules Section 22-010 (2), and be allowed to use residual fuels with a sulfur content not exceeding 2.5% by weight, during the 1974-1975 processing and heating season.

This request is based on the following: ORS 468.345 (1) (a)&(c)

A. Conditions exist that are beyond the control of Stayton Canning Co., Cooperative.

1. Northwest Natural Gas Company has predicted that natural gas curtailment could begin as early as September 1974, we are still processing product during this month.

2. The residual boiler fuels are purchased from a distributor for Shell Oil Co., Ross Oil Co., Silverton, Oregon. No control, over the sulfur content, of the fuel oil used can be exercised.

3. The Federal Energy Office allocations program and the limited fuel oil supplies prevent the user from changing his source of supply.

C. Strict compliance would result in closing down of the plant. During peak processing months, fuel deliveries are required about every five days. If fuel is not available, the plant must shut down.

Yours truly,

Tom Villman

Tom Villman, Project Engineer

MEMBER OF ASSOCIATED BLUE LAKE GREEN BEAN CANNERS, INC • NATIONAL CANNERS ASS'N [illegible] NATIONAL ASS'N FROZEN FOOD PACKERS • NORTHWEST CANNERS AND FREEZERS ASS

PHONE: AREA CODE 503, 769-2101

Stayton Canning Company Cooperative

AFFILIATED WITH NORTH PACIFIC
CANNERS AND PACKERS INCORPORATED

ALSO PLANTS AT:
SILVERTON, DAYTON, SALEM AND BROOKS OREGON

PACKERS OF
BERRIES • PURPLE PLUMS • CHERRIES
BLUE LAKE BEANS • CORN • CARROTS

P. O. BOX 458
STAYTON, OREGON 97383

June 4, 1974

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

Attention: Mr. Kessler R. Cannon, Director

Dear Sir:

It is respectfully requested that Stayton Canning Co., Co-operative (Plant No, 3) located near Dayton, Oregon, be granted a variance from the requirement of Oregon Administrative Rules Section 22-010 (2), and be allowed to use residual fuels with a sulfur content not exceeding 2.5% by weight, during the 1974-1975 processing and heating season.

This request is based on the following: ORS 468.345 (1) (a)&(c)

A. Conditions exist that are beyond the control of Stayton Canning Co., Cooperative.

   1. The residual boiler fuels are purchased from an ARCO distributor, Carson Oil Company, Portland, Oregon. No control over the sulfur content of the fuel oil used can be exercised.

   2. The Federal Energy Office allocations program and the limited fuel oil supplies prevent the user from changing his source of supply.

C. Strict compliance would result in closing down of the plant. This plant is entirelly dependent on residual fuel oil to fire its boilers. Deliveries during the peak processing months are required about every seven days. If fuel is not available the plant must be shut down.

Yours truly,

Tom Villman

Tom Villman, Project Engineer

MEMBER OF ASSOCIATED BLUE LAKE GREEN BEAN CANNERS, INC • NATIONAL CANNERS ASS'N • NATIONAL ASS'N FROZEN FOOD PACKERS • NORTHWEST CANNERS AND FREEZERS ASS

PHONE: AREA CODE 503, 769-2101

Stayton Canning Company Cooperative

AFFILIATED WITH NORTH PACIFIC
CANNERS AND PACKERS INCORPORATED

ALSO PLANTS AT:
SILVERTON, DAYTON, SALEM AND BROOKS OREGON

PACKERS OF
BERRIES • PURPLE PLUMS • CHERRIES
BLUE LAKE BEANS • CORN • CARROTS

P. O. BOX 458
STAYTON, OREGON 97383

June 4, 1974

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

Attention: Mr. Kessler R. Cannon, Director

Dear Sir:

It is respectfully requested that Stayton Canning Co.,Co-operative (Plant No. 4) located in Salem, Oregon, be granted a variance from the requirement of Oregon Administrative Rules, Section 22-010 (2) and be allowed to use residual fuels with a sulfur content not exceeding 2.5% by weight, during the 1974-1975 processing and heating season.

This request is based on the following: ORS 468.345 (1) (a)&(c)

A. Conditions exist that are beyond the control of Stayton Canning Co., Cooperative.

1. Northwest Natural Gas Company has predicted that natural gas curtailment could begin as early as September 1974, the peak processing month.

2. The residual boiler fuels are purchased from an ARCO distributor, Home Fuel Oil Co., Salem, Oregon. No control over the sulfur content of the fuel oil can be exercised.

3. The Federal Energy Office allocations program and the limited fuel oil supplies prevent the user from changing his source of supply.

C. Strict compliance would result in closing down of the plant. During the peak processing months fuel oil deliveries from the distributor are required on a daily basis. If the deliveries are interrupted, the plant must be shut down.

Yours truly,

Tom Villman

Tom Villman, Project Engineer

MEMBER OF ASSOCIATED BLUE LAKE GREEN BEAN CANNERS, INC • NATIONAL CANNERS ASS'N • NATIONAL ASS'N FROZEN FOOD PACKERS • NORTHWEST CANNERS AND FREEZERS ASS'

PHONE: AREA CODE 503, 769-2101

Stayton Canning Company Cooperative

AFFILIATED WITH NORTH PACIFIC
CANNERS AND PACKERS INCORPORATED

ALSO PLANTS AT:
SILVERTON, DAYTON, SALEM AND BROOKS OREGON

PACKERS OF
BERRIES • PURPLE PLUMS • CHERRIES
BLUE LAKE BEANS • CORN • CARROTS

P. O. BOX 458
STAYTON, OREGON 97383

June 4, 1974

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

ATTENTION: Mr. Kessler R. Cannon, Director

Dear Sir:

It is respectfully requested that Stayton Canning Co., Cooperative (Plant No. 5) located near Brooks, Oregon, be granted a variance from the requirement of Oregon Administrative Rules Section 22-010 (2), and be allowed to use residual fuels with a sulfur content not exceeding 2.5% by weight, during the 1974-1975 processing and heating season.

This request is based on the following: *ORS 468.345 (1) (a)&(c)*

A. Conditions exist that are beyond the control of Stayton Canning Co., Cooperative.
   1. Northwest Natural Gas Company has predicted that natural gas curtailment could begin as early as September 1974, the peak processing month.
   2. The residual boiler fuels are purchased from an ARCO distributor, Valley Oil Co., Salem, Oregon. No control over the sulfur content of the fuel oil used can be exercised.
   3. The Federal Energy Office allocations program and the limited fuel oil supplies prevent the user from changing his source of supply.

C. Strict compliance would result in closing down of the plant. During the peak processing months, fuel oil deliveries from the distributor are required about every three days. If deliveries are interrupted, the plant must shut down.

Yours truly,

Tom Villman

Tom Villman, Project Engineer

Kelley, Farquhar & Co.

Northwest Products . . . FROZEN FRUITS AND VEGETABLES ☆ CHERRIES IN BRINE

P. O. BOX 7106, SALEM, OREGON 97303

June 10,1974

Enviromental Quality Commission.
Kessler R.Cannon D.E.Q.Director.
1234 S.W.Morrison Street.
Portland,Oregon 97205.

Dear Mr.Kessler:

Kelley,Farquhar & Co. would like to apply for a (1) year variance from Section 22 - 010 Subsection (2). This is the 1.75% Sulfur by Weight Requirement.

I am sorry that I will be unable to attend your meeting at Coos Bay on June 21,1974, and I hope this letter for application is self-explanatory.

The filing of this variance is under the authority of O.R.S. 468.385.

The amount of sulfur content in Residual Fuel is beyond our control. I have discussed this problem with our supplier (Home Fuel) and they feel they will be unable to supply fuel with such a low sulfur content at this time.

Kelley,Farquhar & Co., is a Food Processing plant. We process strawberries, Peas, Beans and Corn.

We process over 5,000 acres of Sweet Corn during the months of September and October and the first week of November. You can see what a disaster this would be in the loss of Revenue to the Crower, Processor and a loss of Food Supply to the nation.

We do use Natural Gas most of the processing season, but mostly depend on oil the last part of the season.

Kelley,Farquhar & Co., need a variance to absolutely assure a supply of fuel during the processing season.

Yours very truly,
KELLEY, FARQUHAR & CO.

George J. Hayward

George J.Hayward
Oregon Manager.

GJH:dc

WESTERN KRAFT CORPORATION

3700 First National Bank Tower
Portland, Oregon 97201

Phone (503) 224-3221

June 10, 1974

Mr. Kessler R. Cannon, Director
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, OR 97205

Dear Mr. Cannon:

Under the provisions of ORS 468.345, Western Kraft requests a variance from Oregon Administrative Rule, Chapter 340, Section 22-010, Subsection (2) - "After July 1, 1974, no person shall sell, distribute, use, or make available for use, any distillate fuel oil containing more than 1.75 percent sulfur by weight."

This variance is requested for a period of one year from July 1, 1974 to June 30, 1975.

This variance is requested for the following reasons:

1. Conditions exist that are beyond the control of the person requesting the variance. Enclosed is a letter from Atlantic Richfield Company to Cummings Transfer and Fuel (Attachment 1). Cummings Transfer and Fuel has a contract to supply Western Kraft with residual fuel. Atlantic Richfield has advised Cummings that they will not be able to meet OAR Section 22-010, Subsection (2). Further, Western Kraft has not been able to secure alternate sources of supply that will guarantee compliance with OAR Section 22-010, Subsection (2).

2. Strict compliance could result in substantial curtailment or closing down. Western Kraft has been notified by the Northwest Natural Gas Company (Attachment 2) that during the next heating season, the 1974-75 winter, preliminary appraisals indicate that service may be curtailed as much as 180 to 210 full days. The operation of the Albany Mill of Western Kraft is dependent on residual fuel for fuel supply during natural gas curtailment. Substantial curtailment or closing down of the Albany Mill would result if there were not a continuing supply of residual fuel available. To assure a continuing supply of residual fuel, it is necessary to have a variance from OAR Section 22-010, Subsection (2).

Usage of residual oil is approximately 1350 barrels per day during periods of natural gas curtailment. Sulfur content of residual oil from Atlantic

Richfield through Cummings during the heating season of 1973-74 was up to 2.12 percent. During the months of December, 1973 and January, 1974, the sulfur content averaged approximately 2 percent.

We respectfully submit this request for variance from Section 22-010, Subsection (2). We will be present at the Environmental Quality Commission meeting on June 21, 1974 in Coos Bay, Oregon to respond to any questions.

Sincerely,

K. F. Halladin

K. F. Halladin
Director of Environmental Quality

KFH/cw
Attachments (2)

cc: C. R. Duffie
D. E. Nicholson

Receipt acknowledged
10 June 1974

1500 S.W. F.. . Avenue
Mailing Address: Box 1571
Portland, Oregon 97207
Telephone 503 224 2150

ATTACHMENT 1

April 29, 1974

Cummings Transfer & Fuel
P. O. Box 826
Albany, Oregon 97321

Attention: Mr. Richard Mikesell

Gentlemen:

On November 13, 1972, we provided you with a copy of the proposed addition to Chapter 340 of the Oregon Administrative Rules, Department of Environmental Quality, Air Quality Control Division.

In particular we called your attention to Section 2 wherein it was proposed that "after July 1, 1974, no person shall sell, distribute, use or make available for use within the state of Oregon any residual fuel oil containing more than 1.75% sulphur by weight."

On January 24, 1973, Section 22-010 covering residual fuel oils was adopted by the Department of Environmental Quality. Attached for your reference is a copy of Subdivision 2, Sulphur Content of Fuels. A complete copy of Chapter 340 may be obtained from:

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

In view of the adoption of this rule by the Department of Environmental Quality, we wish to advise that residual fuel oils supplied by Atlantic Richfield Company will not meet this specification, which requires that "no person shall sell, distribute, use or make available for use any residual fuel oil containing more than 1.75% sulphur by weight."

Unless the state of Oregon grants a variance or a delay in enacting this law, we will be unable to satisfy this demand and will, therefore, be unable to provide residual fuels after June 30, 1974.

Very truly yours,

M. E. Fitzpatrick

M. E. FITZPATRICK, Manager
Heating Oil Marketing

MEF: pj
Enclosure
cc: Mr. G. J. Dunne
Mr. L. S. Morken
Mr. H. D. Shorkk

ATTACHMENT 2

NORTHWEST NATURAL GAS COMPANY
123 N.W. Flanders Portland, Oregon 97209
(503) 226-4211

April 23, 1974

Western Kraft Corporation
P. O. Box 339
Albany, Oregon 97321

Subject: Your facilities at Old Pacific Highway, Albany, Oregon

Gentlemen:

In view of the possibility that acquisition of alternate fuels may be difficult again this year, you may find it useful to have an indication of the probable gas supply situation for the 1974-75 winter.

While it is too early for a precise estimate, it is expected that the exposure of interruptible customers to natural gas curtailments will be substantially greater than during the past season. Preliminary appraisals indicate that service may be curtailed as much as 180 to 210 full days, depending upon weather conditions and other variables. Curtailments could begin as early as September 1974 and extend into May 1975.

The increases in curtailment are based upon the probability that the reduction in supply which was experienced last November due to water encroachment in Canadian wells supplying our system will not be corrected before 1975-76 winter period. Our pipeline supplier is making every effort to reduce the effect by obtaining gas from other sources, but this is difficult in the current energy crunch. We ourselves have purchased Alaskan gas to be brought into our area as LNG but several approvals are still required. The LNG will be used on a year-round basis and will benefit all of our customers. This additional supply has not been considered in our present forecasts, although there is a remote possibility that it could be available early in 1975.

Please complete and return the attached notification sheet in the enclosed self-addressed envelope at this time so that our records can be updated.

Yours very truly,

E. C. Phillips

E. C. Phillips
Manager
Gas Control Department

Enc. 2

PUBLISHERS PAPER TIMES MIRROR

June 10, 1974

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

Attention: Kessler R. Cannon

Gentlemen:

The problem of securing supplies of Bunker C residual fuel oil in either adequate quantity or quality to operate our paper mills at Oregon City and Newberg during the winter months has become one of considerable concern to our company. I am certain that your agency is aware of the fact that this is the fuel we rely on as standby during periods of curtailment of natural gas, our mills' primary source of heat energy.

In September 1973 we were advised by Northwest Natural Gas Company that curtailments equivalent to from 140 to 170 full days might be experienced during the period September 1973 through April 1974. Although we experienced a relatively mild winter, temperature-wise, we actually incurred the equivalent of 135 full days' curtailment.

On April 23, 1974, the natural gas supplier informed us that depending on weather conditions, service may be curtailed as much as 180 to 210 full days during the period September 1974 through May 1975 (copies of their notices are attached). Each day of this curtailment could require consumption of nearly 1,000 barrels of Bunker C oil to keep our two mills operating at present levels.

To further complicate the supply picture strictly from the "quantity available" aspect, we have been advised that F. E. O. has removed paper manufacturing from the agricultural classification. Our allocation will be on a month-to-month basis as compared to the previous year, rather than on the basis of actual requirement. This means that virtually all flexibility of supply or supplier will be denied us.

Mr. Phil Moran, Northwest Representative for Texaco Oil Co., our major supplier, has informed us that his company cannot guarantee us a supply for the entire curtailment period which will be less than 1.75% sulphur by weight.

On April 29, 1974, Atlantic Richfield Company informed Economy Oil Company, our secondary supplier, that they will be unable to provide residual fuels after June 30, 1974, if the 1.75% sulphur by weight rule is imposed without variance. Economy Oil Company has subsequently, by letter of May 24, 1974, informed us of its inability to supply us if Arco no longer delivers to the Oregon market. Copies of both the above mentioned letters are attached.

We would at this time not consider, recommend, nor support any loosening of environmental or health protection standards. However, since ambient SO_2 levels are now neither exceeding, nor threatening to exceed, secondary standards, we feel that the Environmental Quality Commission should amend Rule 22-010 of its' air quality regulations, to a more reasonable sulphur limitation. A simple and realistic solution would be repeal of Rule 22-010 (2).

In the event the Environmental Quality Commission does not amend its' rule to realistically accomodate available supplies of Bunker C which could be burned without threatening violation of ambient standards, please consider this letter to be our request for a variance from rule 22-010 (2), for all our company's residual fuel requirements in the State of Oregon.

We have no data on oil to be purchased in the future, other than that quoted above. In the past year our supply of fuel has ranged from 0.8% to 2.0% in sulphur by weight content. Our only operation outside Oregon using Bunker C is located at Anacortes, Washington, where the standard is now, and is expected to remain, at 2%. Their supplier (Arco) has been supplying oil in the range of 1.68% to 1.80% during the past two years.

Our usage, in barrels, for each of the past three winter seasons was as follows:

	1971-72	1972-73	1973-74
Oregon City	47,146	46,858	65,297
Newberg	47,351	30,564	56,459
Total	94,497	77,422	121,756

If you require additional information, please contact me.

Yours very truly,

Peter Schnell

PS:nh

attmts.

NORTHWEST NATURAL GAS COMPANY

123 N.W. Flanders Portland, Oregon 97209

(503) 226-4211

April 23, 1974

Publishers Paper Co.
Spaulding Division
P. O. Box 551
Oregon City, Oregon 97045

Subject: Your Plant at 1400 Wynooski St., Newberg, Oregon

Gentlemen:

In view of the possibility that acquisition of alternate fuels may be difficult again this year, you may find it useful to have an indication of the probable gas supply situation for the 1974-75 winter.

While it is too early for a precise estimate, it is expected that the exposure of interruptible customers to natural gas curtailments will be substantially greater than during the past season. Preliminary appraisals indicate that service may be curtailed as much as 180 to 210 full days, depending upon weather conditions and other variables. Curtailments could begin as early as September 1974 and extend into May 1975.

The increases in curtailment are based upon the probability that the reduction in supply which was experienced last November due to water encroachment in Canadian wells supplying our system will not be corrected before 1975-76 winter period. Our pipeline supplier is making every effort to reduce the effect by obtaining gas from other sources, but this is difficult in the current energy crunch. We ourselves have purchased Alaskan gas to be brought into our area as LNG but several approvals are still required. The LNG will be used on a year-round basis and will benefit all of our customers. This additional supply has not been considered in our present forecasts, although there is a remote possibility that it could be available early in 1975.

Please complete and return the attached notification sheet in the enclosed self-addressed envelope at this time so that our records can be updated.

Yours very truly,

E. C. Phillips

E. C. Phillips
Manager
Gas Control Department

Enc. 2

NORTHWEST NATURAL GAS COMPANY

123 N.W. Flanders Portland, Oregon 97209

(503) 226-4211

April 23, 1974

Publishers Paper Company
Oregon City
Oregon 97045

Subject: Your facilities at South Main Street, Oregon City, Oregon

Gentlemen:

In view of the possibility that acquisition of alternate fuels may be difficult again this year, you may find it useful to have an indication of the probable gas supply situation for the 1974-75 winter.

While it is too early for a precise estimate, it is expected that the exposure of interruptible customers to natural gas curtailments will be substantially greater than during the past season. Preliminary appraisals indicate that service may be curtailed as much as 180 to 210 full days, depending upon weather conditions and other variables. Curtailments could begin as early as September 1974 and extend into May 1975.

The increases in curtailment are based upon the probability that the reduction in supply which was experienced last November due to water encroachment in Canadian wells supplying our system will not be corrected before 1975-76 winter period. Our pipeline supplier is making every effort to reduce the effect by obtaining gas from other sources, but this is difficult in the current energy crunch. We ourselves have purchased Alaskan gas to be brought into our area as LNG but several approvals are still required. The LNG will be used on a year-round basis and will benefit all of our customers. This additional supply has not been considered in our present forecasts, although there is a remote possibility that it could be available early in 1975.

Please complete and return the attached notification sheet in the enclosed self-addressed envelope at this time so that our records can be updated.

Yours very truly,

E. C. Phillips

E. C. Phillips
Manager
Gas Control Department

Enc. 2

Economy Oil Company

DISTRIBUTORS OF ARCO HEATING OILS
HEATING EQUIPMENT AND COMPLETE BURNER SERVICE

287-1104
4225 N. E. CULLY BOULEVARD
PORTLAND, OREGON 97218

May 24, 1974

Publishers Paper Company
419 Main Street
Oregon City, Oregon

Attention Mr. Pete Schnell
Director of Public Relations

Dear Mr. Schnell:

In my conversation with your Mr. Spicer today, he mentioned that you have a copy of the letter directed to us by Atlantic-Richfield Company pertaining to residual fuel oils and sulphur content.

As one of your suppliers of residual fuels, we feel obligated to advise you that if ARCO enforces their statement in the last paragraph, which states that they will be unable to satisfy our allocation if the State of Oregon does not grant a variance in sulphur restrictions, we will be without product to deliver to you.

Although we have a contract and a healthy allocation from Arco, it is of no value to us if they are unable to provide residual fuels in the State of Oregon because of Environmental Quality Controls after June 30.

One of the clauses in our contract with Arco exempts them from performance and delivery to us under certain "strikes, labor disputes, governmental regulations or restrictions, etc."

The purpose of this letter is to point out to you now, rather than to refuse your order in September when you are urgently in need of fuel.

Sincerely yours,

ECONOMY OIL COMPANY

By R. L. Lindsay
President

RGL/rw

RECEIVED
MAY 28 1974
PUBLISHERS PAPER CO.

Mailing Address: Box 1971
Portland, Oregon 97207
Telephone 503 224 2150

April 29, 1974

Economy Oil Company
4225 N. E. Cully Blvd.
Portland, Oregon 97225

Attention: Mr. R. G. Lindsay

Gentlemen:

On November 13, 1972, we provided you with a copy of the proposed addition to Chapter 340 of the Oregon Administrative Rules, Department of Environmental Quality, Air Quality Control Division.

In particular we called your attention to Section 2 wherein it was proposed that "after July 1, 1974, no person shall sell, distribute, use or make available for use within the state of Oregon any residual fuel oil containing more than 1.75% sulphur by weight."

On January 24, 1973, Section 22-010 covering residual fuel oils was adopted by the Department of Environmental Quality. Attached for your reference is a copy of Subdivision 2, Sulphur Content of Fuels. A complete copy of Chapter 340 may be obtained from:

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

In view of the adoption of this rule by the Department of Environmental Quality, we wish to advise that residual fuel oils supplied by Atlantic Richfield Company will not meet this specification, which requires that "no person shall sell, distribute, use or make available for use any residual fuel oil containing more than 1.75% sulphur by weight."

Unless the state of Oregon grants a variance or a delay in enacting this law, we will be unable to satisfy this demand and will, therefore, be unable to provide residual fuels after June 30, 1974.

Very truly yours,

M. E. Fitzpatrick

M. E. FITZPATRICK, Manager
Heating Oil Marketing

MEF: pj
Enclosure
cc: Mr. G. J. Dunne
Mr. L. S. Morken
Mr. H. D. Shortt

Georgia-Pacific Corporation

900 S.W. Fifth Avenue Portland, Oregon 97204 503/222 5561

June 7, 1974

Mr. Barney A. McPhillips
Chairman
Environmental Quality Commission
1234 S. W. Morrison
Portland, OR 97204

Dear Mr. McPhillips:

Georgia-Pacific's major residual fuel supplier in Oregon is Standard Oil of California. We understand that Standard Oil will be sending you a letter stating their position no later than June 7, 1974.

Our primary use of residual fuel is at our plants in Toledo and the Eugene/Springfield area. At the present time the sulfur content of the oil that we purchase from them is in a range of 1.1 to 1.4 percent. We have requested a confirming letter from Standard Oil advising their ability to continue supplying us with residual to meet the Oregon State requirement of 1.75 sulfur or less through the 1974/75 winter period. They have previously stated that they will be able to meet the new specification at this time; however, they are not in a position to guarantee that they will continue to be able to do this through the forthcoming fall and winter.

We anticipate having at least seven days notice if Standard is forced to supply us with oil that is not within sulfur specifications. We suggest that the Environmental Quality Commission delegate interim authority to issue variances to the Director of the DEQ to allow continued operation of plants should the 1.75 percent oil become unavailable before the EQC could act on such a variance request. The absence of such a mechanism would lead to plant shutdown and consequent economic hardship to the corporation and to its employees.

Sincerely,

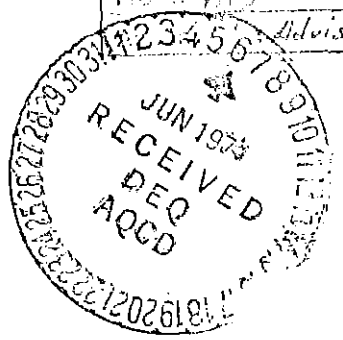
Matthew Gould
Corporate Director
Environmental Control

cc: Mr. Tom Donaca, Associated Oregon Industries
Mr. W. J. Moshofsky, G-P, Portland

ROUTING	
To	Noted by
HMP	
EV/H	
File No.	10-0025
From: HB	Advise

ROSEBURG LUMBER CO.

P.O. BOX 1088 · ROSEBURG, OREGON 97470 PHONE (503) 679-8741



June 4, 1974

Mr. Hal Burkitt
Dept. of Environmental Quality
Air Quality Control Division
1234 S. W. Morrison St.
Portland, Oregon 97205

Dear Hal:

Recently we were notified by our volume supplier, Texaco Co., of the difficulty involving Bunker C Oil (PS 600).

We use Bunker C oil for generating steam in our boiler and turbine operations at Dillard, Oregon. We were notified that due to the world supply situation of oil that Texaco may not necessarily be able to deliver to us oil with a sulphur content meeting the 1.75% regulation which is to come into effect on July 1, 1974.

In order that we may continue operation, I am asking for a temporary variance until Texaco is able to supply oil with the proper sulphur content. In that this supply is critical to our operation, your prompt attention would be appreciated.

If you have any questions regarding the above, please contact me immediately.

Very truly yours,

A llyn C. Ford

ACF/drw
CC: R. Amos, Powerhouse Supt.

CrownZellerbach

Vice President

June 6, 1974
64.10

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
JUN 10 1974
OFFICE OF THE DIRECTOR

Mr. Kessler R. Cannon, Director
Department of Environmental Quality
1234 S.W. Morrison Street
Portland, Oregon 97205

Dear Mr. Cannon:

By this letter, Crown Zellerbach is formally requesting a variance from the application of Oregon Administrative Rules Chapter 340, Subdivision 2, Rule 22-010. We are making this request under the provisions of Oregon Revised Statue 468.345.

We have no control over the sulphur content of fuel oil available to us. We have not been successful in obtaining a firm commitment for fuel oil with guaranteed maximum 1.75% sulphur content for use after July 1, 1974.

Circumstances render strict compliance unreasonable as, due to the difficulty in predicting winter weather, the amount of fuel oil required cannot be accurately determined in advance. The forecasted gas curtailment indicated in the attached letter from Northwest Natural Gas Company dated April 23, 1974 (applicable to interruptible gas customers in Oregon and Washington) varies by 30 days under average conditions. Should the winter be abnormally cold, this forecast could be exceeded by an unknown amount.

Even without that difficulty in determining requirements, sources for our total oil requirement cannot be determined at this time. The attached letter dated May 7, 1974 from District X, of the Federal Energy Office, indicates that a decision on our request for assignment of additional suppliers to supply oil needs exceeding our base period allocation will not be made until some time prior to September 1, 1974.

Strict compliance would result in substantial curtailment or closure of our plants at Wauna, West Linn, and Lebanon. We have attempted to obtain an assured supply of 1.75% maximum sulphur fuel, however, suppliers have indicated they cannot guarantee delivery of oil meeting this specification. Our major supplier, Union Oil Company, has indicated they can only guarantee fuel oil averaging 2.5% maximum sulphur. Without a variance, we would either be in violation of the law, or have to shut down operations after gas curtailment commences in September, 1974. Please refer to Union Oil Company letter of May 31, 1974 submitted to your attention as evidence of their current capability.

1870-1970
Foundation for the Future
Crown Zellerbach Centennial

One Bush Street, San Francisco, California 94119

Natural gas is the primary fuel used at these locations, and oil is only used during the winter months when the natural gas supply is interrupted.

In accordance with the above conditions, we respectfully request a variance be issued to Crown Zellerbach allowing the use of fuel oil having an average 2.5% maximum sulphur content through June 30, 1975.

Very truly yours,

Vice President - Purchases

H. H. Becker:lm

Attachments

NORTHWEST NATURAL GAS COMPANY

123 N.W. Flanders Portland, Oregon 97209

(503) 226-4211

April 23, 1974

Crown Zellerbach Corporation
West Linn
Oregon 97068

Gentlemen:

In view of the possibility that acquisition of alternate fuels may be difficult again this year, you may find it useful to have an indication of the probable gas supply situation for the 1974-75 winter.

While it is too early for a precise estimate, it is expected that the exposure of interruptible customers to natural gas curtailments will be substantially greater than during the past season. Preliminary appraisals indicate that service may be curtailed as much as 180 to 210 full days, depending upon weather conditions and other variables. Curtailments could begin as early as September 1974 and extend into May 1975.

The increases in curtailment are based upon the probability that the reduction in supply which was experienced last November due to water encroachment in Canadian wells supplying our system will not be corrected before 1975-76 winter period. Our pipeline supplier is making every effort to reduce the effect by obtaining gas from other sources, but this is difficult in the current energy crunch. We ourselves have purchased Alaskan gas to be brought into our area as LNG but several approvals are still required. The LNG will be used on a year-round basis and will benefit all of our customers. This additional supply has not been considered in our present forecasts, although there is a remote possibility that it could be available early in 1975.

Please complete and return the attached notification sheet in the enclosed self-addressed envelope at this time so that our records can be updated.

Yours very truly,

E. C. Phillips

E. C. Phillips
Manager
Gas Control Department

Enc. 2

Crown Zellerbach, SF

F.E.O.

MAY 9 1974

FEDERAL ENERGY OFFICE
REGION X
1151 FEDERAL OFFICE BUILDING
909 1ST AVENUE
SEATTLE, WASHINGTON 98174

May 7, 1974

Mr. F. H. Bolton
Crown Zellerbach Corporation
One Bush Street
San Francisco, California 94119

Dear Mr. Bolton:

This refers to your letter of April 25, 1974 concerning allocation of No. 6 fuel oil to be used at four locations in Oregon and Washington as a substitute energy source for interruptable natural gas.

This use of fuel by Crown Zellerbach and other major interruptable natural gas customers represents a significant portion of the middle distillate and residual fuel consumption in the Pacific Northwest. Because of this impact, a way must be found to minimize storage of the fuels and reduce usage wherever possible while at the same time assuring that critical industry operations are not jeopardized.

Recognizing the importance of timely and definitive decisions by the Federal Energy Office , a Special Industry Task Group was set up in this office to establish a policy for allocating fuel to these interruptable customers. Members of the Task Group will be in contact with Industry user groups, natural gas companies, State utility commissions and suppliers to assure that the policy decided upon is workable and equitable to all concerned.

I assure you that allocation orders will be issued in sufficient time for suppliers to begin distributing the products by September 1, 1974. If you need additional information or further clarification, please call Bill Hughes, Chairman of the Task Group, at (206) 442-7929.

Sincerely,

Robert B. Mackman
Chief, Case Resolution Branch

Hanna Nickel Smelting Company
Riddle, Oregon, 97469

June 6, 1974

Mr. B. A. McPhillips, Chairman
Environmental Quality Commission
Oregon Department of Environmental Quality
1234 S. W. Morrison Street
Portland, OR 97205

Dear Mr. McPhillips:

The purpose of this letter is to request a variance to O.A.R. Chapter 340, Subdivision 2, Rule 22-010, to exceed the 1.75% sulfur content of residual fuel oils used after July 1, 1974, at Hanna Nickel Smelting Company plant at Riddle, Oregon. This request is made in accordance with the authority granted in ORS 468.345.

The granting of this variance is extremely important because no other alternative exists and without it the plant will shut down.

The use of the residual fuel oil at the plant is confined to burning in the two calciners that discharge gases through a common stack. This fuel is only used as an auxiliary fuel to replace natural gas during periods of curtailment. After conferring with California-Pacific Utilities, our supplier of natural gas, the predicted curtailment for 1974 would require the burning of an estimated 33,600 barrels of residual fuel oil to replace the loss of natural gas as a source of heat. The actual amount of gas curtailment is related to the severity of the winter and gas availability.

The supplier of residual fuel oil to the plant as designated by the Federal Energy Office is Union Oil Company of California. Union Oil Company has stated they cannot meet the 1.75% sulfur limitation effective July 1, 1974. Union Oil Company has also indicated this by stating at the EQC hearing of May 24, 1974, that they would apply for a variance to exceed the sulfur limitation. To state what degree future deliveries of residual fuel oils will exceed the 1.75% limitation cannot be done, since control of the sulfur content lies with the residual fuel oil supplier. The present residual fuel oil contract with Union Oil Company expires on July 1 of this year. At this time, Hanna has not been able to negotiate a new contract for residual fuel oil with Union Oil because of the uncertainty that exists in granting a variance in the limit of sulfur in residual fuel oils.

To B. A. McPhillips - DEQ June 6, 1974

On May 1 of this year, the Federal Energy Office adopted in Part 215 of their rules and regulations an edict prohibiting the use of petroleum products having a lower sulfur content than the average sulfur content of such products in use during November, 1973. Our usage during that time averaged 1.89% sulfur by weight. To comply with the FEO ruling will place Hanna in direct violation without receiving a variance to exceed the 1.75% sulfur limitation.

We respectfully request the commission to grant this variance for Hanna Nickel Smelting Company.

Sincerely,

E. J. Maney
General Manager

EJM/bas
cc: K. R. Cannon (DEQ)
H. M. Patterson (DEQ)
RDC
FJC
MJD

EWR

Hanna Nickel Smelting Company

Riddle, Oregon, 97469

June 6, 1974

Mr. B. A. McPhillips, Chairman
Environmental Quality Commission
Oregon Department of Environmental Quality
1234 S. W. Morrison Street
Portland, OR 97205

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We respectfully request the commission to grant this variance for Hanna Nickel Smelting Company.

Sincerely,

E. J. Maney
General Manager

EJM/bas
cc: K. R. Cannon (DEQ)
H. M. Patterson (DEQ)
RDC
FJC
MJD

No. 1

SULFUR CONTENT OF FUELS

PRESENTATION TO THE DEPARTMENT OF ENVIRONMENTAL

QUALITY

STATE OF OREGON

TOM MC CALL
GOVERNOR

PRESENTED BY:

J. W. HUGHES
CONSULTANT TO JACK B. ROBERTSON
REGIONAL ADMINISTRATOR
REGION X
FEDERAL ENERGY ADMINISTRATION

COOS BAY, OREGON

JUNE 21, 1974

THE ROLE OF THE FEDERAL ENERGY OFFICE
IN REGULATING THE SULFUR CONTENT OF FUELS

I believe that it is important to clarify, at the outset, what role the Federal Energy Office plays in the areas we are discussing today. The Federal Energy Office was given authority by Congress in the Emergency Petroleum Allocation Act of 1973 to provide for the equitable allocation and pricing of petroleum products. The Federal Energy Office exercised this authority by issuing regulations which, as most of you are aware, deal with the quantities of fuel suppliers are to deliver, and with the prices which may be charged for the fuel. With one minor exception, our regulations do not deal with the quality of the fuel that is to be delivered or used. This area is within the general purview of the Environmental Protection Agency and the various State Departments of Environmental Quality. The Federal Energy Office, as a general policy, will try not to intercede in any activities carried out by these agencies.

Now, I am obviously oversimplifying the respective roles of these administrative agencies, and I am sure the future will present many opportunities for us to work with these agencies and elements of the petroleum industry in resolving problems which affect all of us. Let me pledge the Federal Energy Office's willingness to do whatever is within its power to help in these situations. However, let me reiterate the fact that Congress has tried to design a system wherein the Federal Energy Office and the Environmental Protection Agency have

distinct and independent functions and that the Administration has tried to preserve this distinction by minimizing the areas of overlapping regulatory authority.

The one Federal Energy Office regulation which does deal with sulfur content is Part 215, which is a carryover of an earlier regulation published by the old Energy Policy Office under Governor Love. This regulation establishes restrictions on the sulfur content of fuels used by large power generators. Automatic exception to this regulation is given if the State Air Quality Agency certifies that the exception is needed to meet primary air quality standards. Part 215 applies only to power generators which burned more than 50 million B.T.U. per hour prior to December 7, 1973. The regulation does not effect any other users of petroleum products. Part 215 is specifically designed to avoid any conflict with the Clean Air Act or any rule published pursuant thereto.

Under the present Federal Energy Office regulations, a supplier's allocation requirement is not affected by quality characteristics such as sulfur content. Therefore, a supplier's supply obligation is not diminished by the implementation of air quality standards. Any reduction in supply, whether or not attendant to new sulfur restrictions, would result in a violation of the Federal Energy Office's Allocation Regulations.

As a summary, let me highlight the major functions of Part 215 as they impact upon the Clean Air standards.

1. The regulations prohibits a power generator from switching to petroleum fuel unless the power generator is converting from natural gas in the absence of alternative fuels. See Section 215.3.

2. The regulation limits both the sulfur content and the quantity of petroleum products burned to specific base periods. See Section 215.4.

3. The blending and use of middle distillate residual fuel oil mixes is limited to the relative proportions of those fuels blended or used during base periods. See Section 215.4(4).

4. Automatic exception to this regulation is granted for power generators converting from natural gas when alternative non-petroleum fuels cannot practically be utilized. See Section 215.4(5).

5. Any new petroleum-fired power generating firm may not use any petroleum product with a sulfur content lower than that required to meet primary air quality standards. See Section 215.5.

6. There is an exception section to this regulation wherein:
   (a) Automatic exception is to be granted upon certification of the State Air Pollution Control Agency. See Section 215.6.

(b) The Federal Energy Office has discretion to grant exceptions if compliance would cause an economic hardship or the requisite fuels are unavailable.

¶ 3471 Part 215—Low Sulfur Petroleum Products Regulation

Sec.
215.1 Purpose and intent.
215.2 Definitions.
215.3 Power generators not currently burning petroleum products.
215.4 Power generators currently burning petroleum products.
215.5 New power generators.
215.6 Exceptions to meet primary ambient air quality standards.
215.7 Other exceptions.

AUTHORITY: Emergency Petroleum Allocation Act of 1973, Pub. L. 93-159; E.O. 11748, 38 FR 33575; FEO Order 3 (Feb. 5, 1974).

[SOURCE: The provisions of Part 215 appear at 39 Federal Register 15137, May 1, 1974, unless otherwise noted.]

[¶ 3472]

§ 215.1 Purpose and intent.

The purpose of this part is to assure the optimum use of the limited supplies of low sulfur petroleum products in a manner consistent with the provisions of the Clean Air Act, as amended, and the Clean Fuels Policy of the Environmental Protection Agency. This Part is not intended to affect or preempt the development of individual source compliance schedules or other actions associated with implementation of the Clean Air Act, except with regard to the timing of actual shifts to burning lower sulfur oil during the period this Part is in effect.

[¶ 3473]

§ 215.2 Definitions.

"Power generator" means any boiler, burner, or other combustor of fuel or any combination of boilers at a single site in any electric power generating plant or industrial or commercial plant having a total firing rate of 50 million B.T.U./hour or greater in commercial operation on or prior to December 7, 1973 and includes combustion turbines used in the generation of electrical energy.

"Petroleum product" means crude oil, residual fuel oil, and refined petroleum products as defined in Part 211 of this Title.

"Primary ambient air quality standards" means the national primary ambient air quality standards provided for in the Clean Air Act, as amended. (42 U.S.C. 1857 et seq.)

[¶ 3474]

§ 215.3 Power generators not currently burning petroleum products.

No petroleum product shall be sold or otherwise provided to or accepted by any firm for burning under power generators that were not using the petroleum product on December 7, 1973. Automatic exception is granted for power generators converting from natural gas, provided that alternative fuels, such as coal, cannot practically be utilized.

[¶ 3475]

§ 215.4 Power generators currently burning petroleum products.

Petroleum products may continue to be purchased and utilized by firms using them in power generators burning petroleum products on December 7, 1973 except that:

(1) No petroleum product having a lower specified sulfur content, by weight, than the average content of the petroleum products in use in such a power generator during November, 1973 or during the last month in which the power generator consumed such products, shall be sold or otherwise provided or accepted by any firm for use in such power generator;

(2) The aggregate quantity of petroleum products utilized by such firm in any month subsequent to April, 1974 in any such power generator capable of burning coal and petroleum products shall not exceed the larger of the aggregate quantity of petroleum products consumed in the corresponding month of 1972 or in July 1973, except that the quantity of petroleum products burned may be increased in proportion to the increased output of energy or increased need for startups.

(3) The quantity of middle distillate fuel oil utilized by such firm in any month subsequent to April, 1974 in any such power generator shall not exceed the larger of the quantity of middle distillate fuel oil consumed in the corresponding month of 1972 or in July 1973, except that the quantity of middle distillate fuel oil burned may be increased in proportion to the increased output of energy, or increased need for startups.

(4) In order to discourage further increase in the indirect use of middle distillate and residual fuel oils:

(i) No firm shall blend more middle distillate fuel oils into residual fuel oil than the greater of the quantities blended in the corresponding month of 1972, or in July 1973, except where essential to meeting Primary Ambient Air Quality Standards.

(ii) No firm shall use under a power generator a blended fuel containing a greater proportion of middle distillate fuels from the larger of:

(A) The proportion included in the corresponding month of 1972, or

(B) The proportion included in July 1973, except where essential to meeting Primary Ambient Air Quality Standards.

(iii) Those quantities of fuels containing middle distillates that constitute plant or firm inventories as of the effective date of this Part may be consumed by or sold for use in power generators until those quantities are depleted.

(5) Automatic exception is granted for power generators converting from natural gas, provided that alternative non-petroleum product fuels, such as coal, cannot practically be utilized.

[¶ 3476]

§ 215.5 New power generators.

(a) Any firm with power generators which commenced commercial operations after December 7, 1973 shall not utilize any petroleum products with sulfur content by weight lower than that needed to meet Primary Ambient Air Quality Standards or to comply with EPO new source performance standards or for startup.

(b) This part is not intended to preempt the new source performance standards of the Clean Air Act, as amended. In the event this Part conflicts with such standards, the provisions of the Clean Air Act prevail and the provisions of this Part do not apply.

[¶ 3477]

§ 215.6 Exceptions to meet primary ambient air quality standards.

(a) The FEO shall automatically grant exceptions to the provisions of this Part as provided in Subpart C of Part 205 when the use of petroleum products is properly certified by the appropriate State air pollution control agency to be essential to meeting the Primary Ambient Air Quality Standard of the air quality region in which the plant is located.

(b) With respect to § 215.3, FEO shall grant exceptions pursuant to this paragraph only when suitable alternative non-petroleum product fuels are not available.

[¶ 3478]

§ 215.7 Other exceptions.

The FEO may also grant exceptions from the provisions of this Part as provided in Subpart C of Part 205 if:

(a) Any firm subject to this Part can demonstrate that compliance would cause an undue economic hardship; or

(b) Fuels necessary for compliance with this Part are not available.

[FEO Rulings begin on page 3301.]

from Shell

MANUFACTURING LOW SULFUR RESIDUAL FUEL OILS

Block diagrams of typical refineries are shown in Figures A and B. The simplified refinery is primarily a fuel refinery from foreign or smaller domestic origins. The refinery with cracking capacity is primarily a gasoline refinery typical of most larger domestic sources.

In both cases, high sulfur crude is distilled and the sulfur compounds normally tend to concentrate in the heavier fractions. A 2% sulfur crude might give a long residue fraction of 2.5%w, sulfur. In the simplified refinery, residual fuels of the proper viscosity are made by blending cutter stock (normally straight run gas oil) into the long residue fraction.

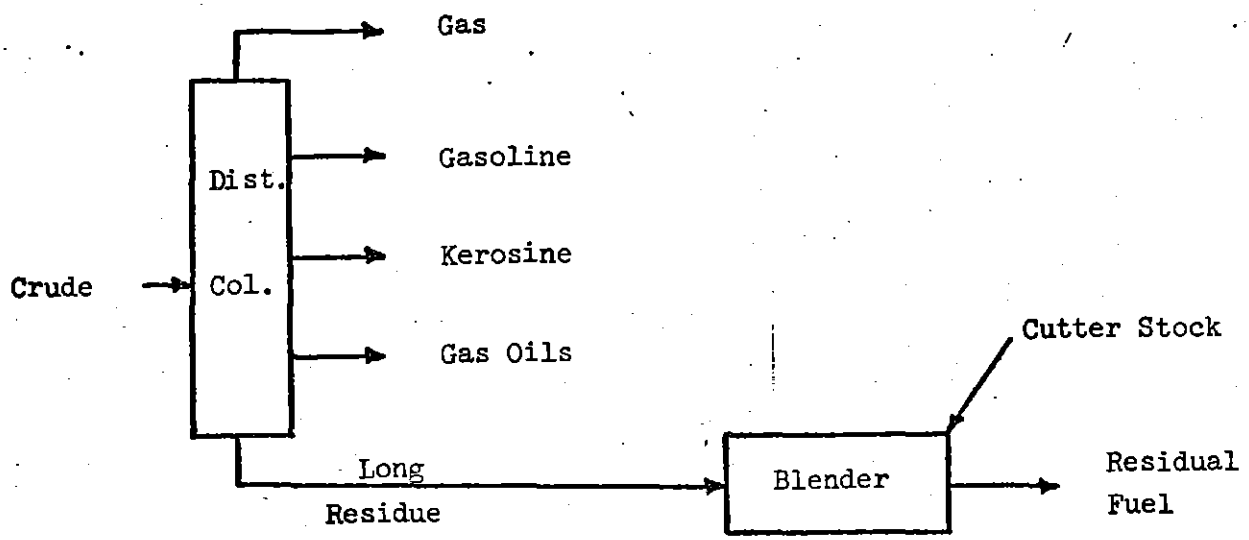
In the more integrated refinery the long residue is further distilled in a vacuum flasher and the heavy gas oil is fed to the cracker (catalytic or thermal). A short residue is produced from the vacuum flasher and a cracked residue (slurry or decanted oil) is produced from the cracker using the 2% w sulfur crude. These residues may have sulfur contents of up to 3.0% w. Residual fuels are made by blending cutter stock (mixtures of straight-run and cracked gas oils) with both the short residue and cracked residue. The finished residual fuel generally will differ from those of the simplified refinery by having lower API gravities (i.e. 8-12), higher sulfur content (2.7% w), and slightly lower pour points.

The simplest and cheapest way of making low sulfur fuel oils is to start with a low sulfur crude. Fuel oil manufacture then proceeds exactly as discussed for high sulfur fuels. Unfortunately low sulfur crudes are not plentiful and the lower the sulfur content, the rarer the crude. Fuel viscosity can be equal to those of high sulfur fuels but are normally lower because of efforts to maximize volume.

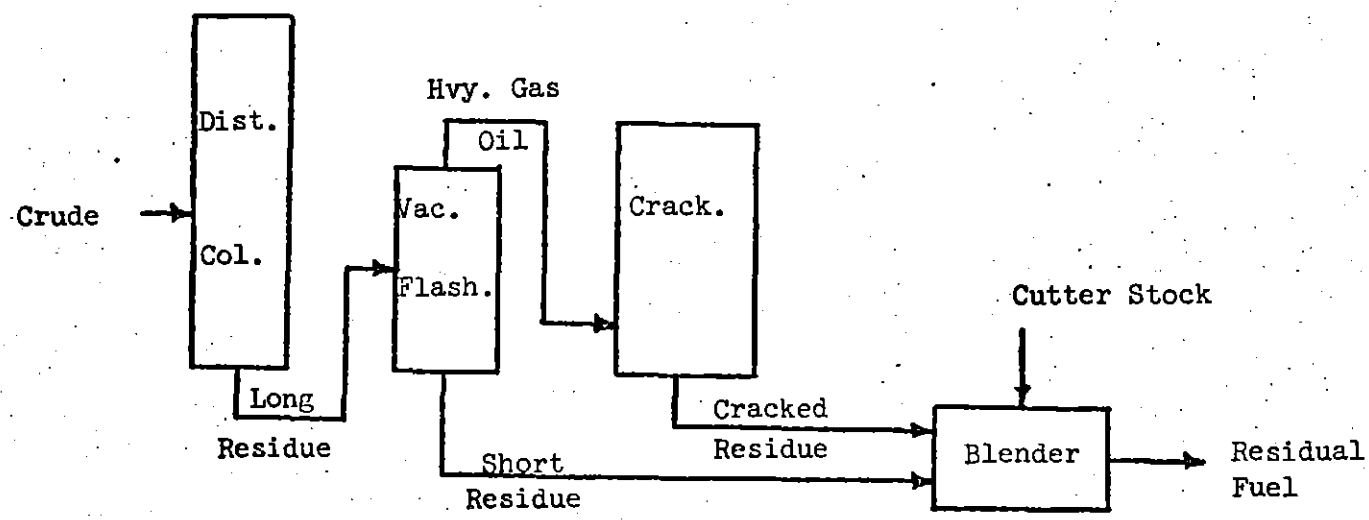
Hydrotreated fuel oils can be made, as shown in Figure C, by either hydrotreating the long residue directly or by hydrotreating the heavy gas oil from the vacuum flasher. The latter method is preferred because longer catalyst lives are obtained. Residue fractions contain metal contaminates (vanadium, nickel, etc.) which poison the catalyst. The lower sulfur fuel oils are made by blending sufficient hydrotreated heavy gas oil and low sulfur cutter stock back into high sulfur residue to meet the sulfur specifications. Other residues from low sulfur crudes can be used to supplement the hydrotreated stocks. On an overall basis less residue is used and fuel viscosity is significantly lower than conventional residual fuels. This is true of the low sulfur Venezuelan fuels imported on the East Coast.

MANUFACTURE OF RESIDUAL FUEL OILS

A. SIMPLIFIED REFINERY

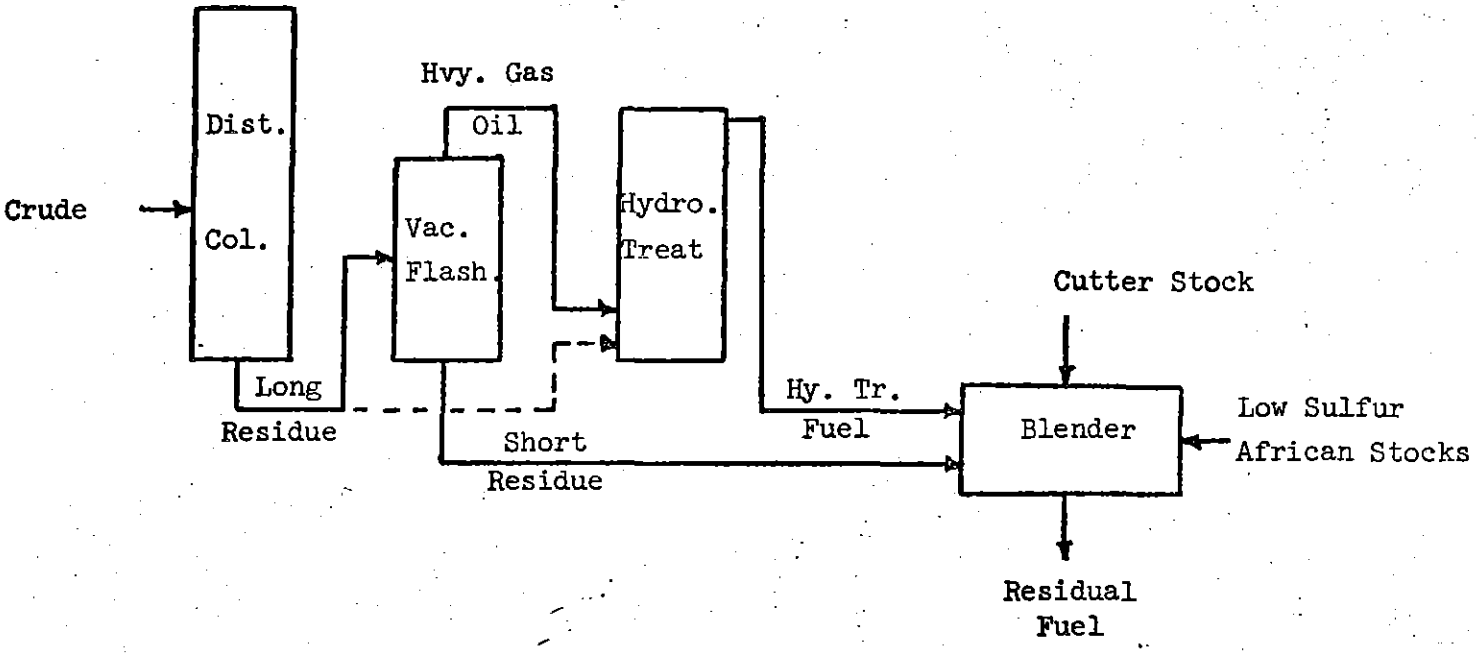


B. REFINERY WITH CRACKING



MANUFACTURE OF RESIDUAL FUEL OILS

C. REFINERY WITH RESIDUAL FUEL HYDROTREATING



No. 1

PERMANEER CORPORATION

P. O. BOX 178
DILLARD, OREGON 97432
(503) 679-8781

June 19, 1974

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

ATTENTION MR. KESSLER R. CANNON, DIRECTOR

Dear Sir:

SUBJECT: REDUCED SULFUR CONTENT IN RESIDUAL FUELS

Permaneer Corporation requests that the following statement be entered for record at the June 21, 1974 meeting of the Oregon Environmental Quality Commission.

Permaneer Corporation operates a particleboard plant at Dillard, Oregon. Residual fuel oil is used as an alternate to natural gas in drying wood wastes for board production. Residual fuel was used approximately 110 days during the winter of 1973-74. Northwest Natural Gas Company estimates approximately 150 days curtailment during the winter of 1974-75.

Union Oil Company, the current supplier for our Dillard plant, has stated that they cannot guarantee any supplies of residual fuel oil which will comply with the revised 1.75% sulfur requirement to become effective July 1, 1974. Permaneer Corporation's Dillard Particleboard Plant, employing 76 people, requires approximately 3,000 gallons per day of residual oil during periods of natural gas curtailment. An additional 68 jobs at Dillard Laminating Plant are dependent on the output of the Dillard Particleboard Plant.

Shutting down the Dillard Particleboard Plant due to lack of authorized fuel would have a very negative impact on the Winston-Dillard-Roseburg area and a more serious effect on the stability of Permaneer Corporations Dillard Plants. The difficulty of obtaining fuels forced several temporary plant closures in Southern Oregon last winter. The economic impact of the lower sulfur requirement for residual fuels must be reconsidered in view of the current fuel shortage.

Permaneer respectfully requests that the requirement for lower sulfur content in fuels be deferred until July 1, 1975 to allow a thorough study and determination of:

1. The availability and cost of lower sulfur fuels during the critical winter heating season.
2. The economic impact of a requirement for lower sulfur fuels.
3. The actual environmental impact, on a regional basis, of continued use of available fuels.

Permaneer Corporation recognizes that studies in these areas were conducted before the low sulfur requirement was proposed. However, we feel that the following changes warrant a re-examination of the requirement:

1. Availability of all fuels is poor and prices are high.
2. The economic impact of the lower sulfur requirement will be severe unless adequate supplies of complying fuels are available during the winter heating season. The availability of adequate supplies has not been demonstrated.
3. The environmental impact, on a regional basis, of continued use of available fuels must be re-evaluated in view of the new FEO requirements on sulfur content. Under rules printed in the Federal Register, May 1, 1974, many users of residual fuels are required to use fuels with a minimum sulfur content higher than the new maximum. This conflict should be resolved before the new rules are placed in effect.

In the event that a deferral cannot be granted, Permaneer Corporation requests a variance to allow the use of available fuels at our Oregon plants until July 1, 1975. We further request that this variance be renewable for periods of one year until adequate supplies of conforming fuels are available or the rule has been vacated.

Very sincerely yours,

PERMANEER CORPORATION

Hank Longton
General Manager

John Myers, C.E.
Project Engineer

JTM:gls

cc Lew Kirkwood
Orv Lervold
Oregon Environmental Quality Commission Meeting, Coos Bay, OR
Department of Environmental Quality, Roseburg, OR